

Fort McCoy Pamphlet 200-8

Public Works

Installation Environmental Management System

Department of the Army
Headquarters Fort McCoy
Fort McCoy, WI
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SUMMARY of CHANGE

Pamphlet 200-8
Installation Environmental Management System

- This is the first publication of the Installation Environmental Management System pamphlet.

Installation Environmental Management System

HISTORY. This is the first publication of this pamphlet.

SUMMARY. This pamphlet establishes responsibilities and procedures for implementation and sustainment of a fully conforming environmental management system and is used together with EO 13693, AR 200-1, and the international standard ISO 14001:2004.

APPLICABILITY. This pamphlet is applicable to all activities on Fort McCoy. Military, garrison, civilian, contractor, and tenant personnel are required to comply with this pamphlet. No activity is exempt from this pamphlet.

PROPONENT EXCEPTION AUTHORITY. The proponent of this pamphlet is the Environmental Division (ED), Directorate of Public Works (DPW), Fort McCoy.

ARMY MANAGEMENT CONTROL PROCESS. A review of Army Regulation 200-1 has determined that this pamphlet contains management control provisions in accordance with AR 200-1. Appendix B of AR 200-1 is used to evaluate and document key management controls.

SUPPLEMENTATION. Supplementation of this pamphlet is prohibited without the prior approval of the Garrison Commander, Headquarters, Fort McCoy, (IMMC-ZA).

SUGGESTED IMPROVEMENTS. Users are invited to send comments, suggested improvements, or updates on DA Form 2028 (Recommended Changes to Publications and Blank Forms) directly to: DPW, IMMC-PWE, 2171 South 8th Avenue, Fort McCoy, WI 54656-5132.

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Chapter 1 Introduction

1-1. Purpose

The purpose of this pamphlet is to specify the operations/processes that constitute Fort McCoy's Environmental Management System (EMS), in compliance with International Organization for Standardization (ISO) 14001:2004, Army Regulation 200-1, and Executive Order 13693. EMS references are included in appendix A. The EMS recognizes that factors outside regulatory requirements can seriously affect mission and sustainability. A major goal of EMS is to identify and manage environmental issues that can potentially interfere with mission requirements. The EMS provides a set of internal controls to ensure that systems utilized by the installation to manage environmental issues are operating effectively and are continually improving. EMS focuses on Fort McCoy environmental operations/processes that affect mission, sustainability, and regulatory compliance, not on compliance itself.

1-2. Scope

The Fort McCoy EMS includes all military, garrison, civilian, contractor, and tenant employees working at or providing services for the installation. The EMS is established, documented, implemented, maintained, and continually improved utilizing the programs listed in Table 1.

Chapter 2 Environmental Policy

a. Fort McCoy Memorandum 200-2 is the Installation Environmental Policy and it is available on the Fort McCoy SharePoint and public website. It includes a commitment to pollution prevention and continual improvement, and provides the basic framework for establishing environmental objectives and targets. This publication is reviewed every 18 months by installation management to ensure that it remains appropriate to the nature, scale, and environmental impacts of Fort McCoy's activities and services. It will be updated as appropriate, and serves as the foundation for establishing and operating the Fort McCoy EMS. This publication is available to the public upon request.

b. All organizations within the scope of Fort McCoy's EMS:

- (1) Comply with applicable Federal, State, and local environmental laws, regulations, and executive orders (EOs).
- (2) Strive to achieve continual improvement in overall environmental performance and supporting management systems.
- (3) Ensure that the EMS policy is implemented, maintained, and communicated to all military, garrison, civilian, contractor, and tenants personnel (including units that are training at the installation), and supporting contractors.

c. All contracts and contract modifications shall specify that contractors are liable for any enforcement actions, fines, and/or penalties resulting from their failure to comply with applicable environmental requirements.

Chapter 3 Resources, Roles, Responsibility and Authority

a. Garrison Commander: The Garrison Commander is the champion of the installation EMS, makes the EMS an installation priority, is personally involved in annual management reviews, and issues directives as necessary. Responsibilities include approving and communicating the Environmental Policy, and approving this EMS pamphlet. The Commander provides the leadership and support from military, garrison, civilian, contractor, and tenant personnel to implement an effective installation-wide EMS. In addition, the Commander designates an EMS management representative (EMSMR) and delegates the authority necessary to establish, design, implement, and maintain the EMS program to the EMSMR.

**TABLE 1
PROGRAMS UTILIZED TO IMPLEMENT
FORT MCCOY EMS**

PROGRAM
Air Management
Archeology
Asbestos Management
Biology, Wildlife Management
Cultural Resources Management
Endangered Species
Energy
Emergency Planning and Community Right-To-Know Act (EPCRA)
Fisheries
Forestry
Hazardous Waste & Hazardous Materials Management
Internal Environmental Program Assessment System
Invasive Species
Lead Based Paint Management
National Environmental Policy Act
Noise Management
Pest Management
Pollution Prevention/Green Procurement
Polychlorinated Biphenyl Management
Remediation/restoration, Military Munitions Rule, Spill response
Solid Waste/Recycling
Spill Prevention Control, and Countermeasures
Storage Tanks (USTs/ASTs)
Stormwater/Oil-Water Separators
Wetlands Management
Water Supply/Waste Water Treatment Plant

b. Senior Management Board (SMB): The Senior Management Board (SMB), which functions as the Fort McCoy Environmental Quality Control Committee (EQCC), chaired by the Garrison Commander, functions as the installation's senior leadership (top management) team. The SMB meets quarterly and provides enterprise level direction to the EMS operations, and a summary of EMS performance is presented to the SMB annually.

c. Environmental Management System Management Representative (EMSMR): The EMSMR ensures that the EMS is established, implemented, maintained, and improved in accordance with the requirements of ISO 14001:2004, applicable Executive Orders, and DoD regulations and guidance, annually reports EMS performance to the SMB during the management review, and provides recommendations for improvement. The EMSMR approves the annual internal audit plan and audit report, appoints an EMS Coordinator, and delegates the authority necessary for the EMS Coordinator to provide all necessary assistance.

d. EMS Coordinator: The EMS Coordinator is responsible for assisting the EMSMR in establishing, implementing, maintaining, and improving the EMS. Duties of the EMS Coordinator include updating this pamphlet and the Environmental Policy at least every five years (or as necessary); assisting in preparing the presentation slides for the annual management review; providing coordination assistance during EMS audits; tracking and coordinating implementation of preventive/corrective actions; keeping the EMSMR informed of all actions taken with regard to these responsibilities.

e. Tenants: All tenants will comply with the requirements of this pamphlet, and will cooperate during annual audits and other information requests, as well as during implementation of preventive/corrective actions that involve their organization. In addition, all tenants will ensure that their staff review the EMS awareness guide located on the Fort McCoy public website (www.mccoy.army.mil).

f. Unit Commanders: Unit Commanders will support the installation-wide EMS, and provide oversight, encouragement, and guidance to assist unit members in implementing policies outlined in this pamphlet. They will ensure that their units cooperate during annual audits and other information requests, as well as during implementation of preventive/corrective actions that involve their organization. In addition, unit commanders will ensure that their staff review the EMS awareness guide located on the Fort McCoy public website (www.mccoy.army.mil).

g. All Directorates/Organizations: All organizations are included in the scope of the Fort McCoy EMS and will ensure that personnel at all levels conform to the requirements in this EMS pamphlet, and cooperate during annual audits and other information requests, as well as during implementation of preventive/corrective actions that involve their organization. In addition, all Directorates/Organizations will ensure that their staff complete the required EMS awareness training located under “Mandatory Training” on the Fort McCoy SharePoint site.

h. Contractors: Contractors are included in the scope of the Fort McCoy EMS and will ensure that personnel at all levels conducting work at the installation conform to the requirements in this EMS pamphlet, and cooperate during audits or other information requests, as outlined in FAR Clause 52.223-5 “Pollution Prevention and Right-to-Know Information”. The installation environmental policy and EMS awareness guide are located on the Fort McCoy public website (www.mccoy.army.mil).

Chapter 4 Environmental Aspects

Environmental aspects are those specific elements of installation activities that can interact with and affect the environment. Managers of each EMS program listed in Table 1 possess a unique and thorough understanding of how installation activities and services under their program(s) interact with the environment. Program managers understand the impacts of those interactions and evaluate methods that can be utilized to control or mitigate those interactions. In addition, program managers remain current on regulatory and mission changes and regularly evaluate how such changes impact their programs. Therefore, significant and insignificant Fort McCoy EMS aspects are identified on a program-specific basis by the program manager utilizing professional judgment. This reduces the potential for important EMS aspects to be overlooked. Significant environmental aspects are documented in each of the controlled EMS documents listed in Table 2. The controlled documents are updated on the schedule specified by the federal, state, and Department of Defense (DoD) regulations that control each program. Updates of controlled documents include revisions/additions to the program-specific EMS aspects as required by regulatory revisions, changes in program processes/activities, and installation mission changes. Revisions of controlled documents provide a check on whether aspects are being updated as needed.

Chapter 5

Legal and Other Requirements

a. Fort McCoy complies with all DoD directives, applicable Executive Orders, and Army regulations, along with applicable federal, state, and local environmental regulations. EMS program managers are responsible for monitoring all applicable environmental legislation and existing regulations, along with other requirements related to their program areas. Program managers integrate these requirements to the significant environmental aspects related to the programs which they manage utilizing program knowledge and professional judgment.

b. Resources utilized by EMS program managers to monitor and identify legal requirements and apply them to the significant environmental aspects include but are not limited to the following:

- (1) United States Environmental Protection Agency (USEPA), Wisconsin Department of Natural Resources (WDNR), US Fish and Wildlife Service (USFWS), US Forest Service (USFS), and other regulatory agency websites.
- (2) FedCenter.
- (3) Northern Region Review.
- (4) Defense Environmental Network and Information Exchange (DENIX), Army Environmental Center (AEC) and other DoD websites.
- (5) Regulatory publications.
- (6) Professional journals.
- (7) Attendance at environmental training courses and conferences.
- (8) Communication with regulators and other regulatory and technical experts.
- (9) Correspondence and meetings dealing with Notices of Violation (NOV's) and Notices of Noncompliance (NON's).
- (10) Coordination with the Fort McCoy Installation Legal Office.

c. Changes in legal or other requirements are evaluated by the appropriate EMS program manager and utilized to address significant environmental aspects in their program(s). Revisions are made to Fort McCoy EMS controlled documents, policies, and procedures when required by new regulations, Army policies, or operational changes. Changes are reported and provide to customers.

Chapter 6

Objectives, Targets and Programs

a. The Fort McCoy EMS program establishes targets and objectives through both the Strategic Planning Process, directed by the SMB, and on a program-specific basis directed by the EMS program managers.

b. The Strategic Planning Process conducted by the SMB establishes strategic objectives and strategic action plans for meeting those objectives every five years. The Installation Management Command (IMCOM) Strategic Plan provides overall direction during this planning process. The SMB considers installation mission, vision, values, strengths, weaknesses, opportunities, and threats in establishing specific strategic objectives. This process also considers operational and business requirements, financial limitations, technological options (as applicable), and the views of outside groups or individuals (when appropriate). After the strategic objectives are established, installation directorates create action plans to achieve the objectives that relate to their operations. Action plans are time-driven, measurable, and provide clear and tangible outcomes. The SMB meets quarterly to track progress of the action plans, and to update plans as needed, based upon mission changes or other priorities.

c. During the Strategic Planning process the Environmental Division (ED) provides action plans for those strategic objectives related to the EMS. In preparing those action plans the ED considers those environmental issues/significant environmental aspects that could significantly impact the installation mission over the next 5 years due to recent or upcoming regulatory or army policy changes, executive orders, or other factors. Those action plans prepared by the ED are consistent with the environmental

policy, and the commitment to pollution prevention and continuous improvement, and represent an important portion of the installation EMS objectives and targets.

d. In addition to targets and objectives established through the Strategic Planning process, managers of each of the EMS programs establish and track program-specific objectives and targets that address the installation's significant environmental aspects, and contribute to the installation's commitment to pollution prevention and continual improvement. Program managers take into account regulatory requirements, significant environmental aspects, technological options, financial limitations, and operational requirements when selecting program-specific objectives and targets. Each of these objectives and targets are measurable, when practicable. In establishing the objectives and targets, the program managers take into account the legal and other requirements they have reviewed as discussed in chapter 5. Program-specific EMS objectives and targets are documented in the EMS controlled documents listed in Table 2. The documents are updated on the schedule specified by the federal, state, and DoD regulations that direct each program. Updates of controlled documents include revisions/additions to the program-specific EMS objectives and targets as required by regulatory revisions, changes in program processes/activities, installation mission changes, and SMB revisions of controlled documents provide a check on whether objectives and targets are being updated and tracked as needed.

Chapter 7

Competence, Training and Awareness

a. All personnel who perform tasks that may cause significant environmental impacts shall be competent on the basis of appropriate education, training and/or experience. Competency and awareness training requirements are outlined in appendix B. Competency training, along with experience, provides the knowledge necessary for installation staff to recognize and understand the significant environmental aspects associated with their duties. Each organization shall ensure that applicable personnel receive the required training including refresher training (as applicable) specified in appendix B. Organizations can identify and require any additional training (including legally mandated training) their personnel require to maintain competence. Each organization maintains documentation of training completed, and evaluates effectiveness. Supervisors are responsible for ensuring their employees are properly trained.

b. EMS awareness training is included under "Mandatory Training" on the Fort McCoy SharePoint site, and in the EMS awareness guide located on the installation public website. Awareness training (located in the EMS awareness guide) provides Fort McCoy personnel, training units, and contractors with an awareness of the importance of conformity, environmental benefits of improved personal performance, their roles and responsibilities in achieving conformity, and the potential consequences of nonconformance.

Chapter 8

Communication

a. The Garrison Commander is responsible for communicating the Fort McCoy environmental policy. The policy and the EMS awareness guide are controlled documents included on the United States Army Garrison (USAG) Fort McCoy SharePoint site under "Mandatory Training", and are included on the Fort McCoy public website. Additional EMS information is communicated at the two Garrison Staff and Tenant meetings conducted each year, in the post newspaper *The Real McCoy*, SMB meetings, in Staff Action Control (SACs) forms, and in information memos. The POC for all other internal EMS communication is the EMSMR. All levels of management ensure that environmental communication is disseminated to all personnel.

b. Appropriate environmental information and requirements are included in requests for proposal, project work statements, and other contract documents.

c. All external communication is handled by the Public Affairs Office (PAO). Fort McCoy environmental aspects will be communicated to the public if required by applicable regulations, or on a case-by-case basis, when requested.

Chapter 9 Documentation and Control of Documents

a. EMS controlled documents include Fort McCoy publications, available on the USAG Fort McCoy SharePoint site; program-specific plans; memorandums of understanding (MOU's) and biological opinions maintained and managed by the ED; and state-issued permits, with the original copies maintained by the ED. EMS reference documents are listed in appendix A. The master list of EMS controlled documents is summarized in Table 2. As outlined on the table, current versions of each controlled document can be obtained from either the USAG Fort McCoy SharePoint site or the ED. Due to the fact that each of these documents are updated on a regular schedule, or on an as needed basis, only copies currently residing on the USAG Fort McCoy SharePoint site or at the ED can be considered current. All other electronic or hard copies should always be considered obsolete.

b. Program-specific EMS plans are updated in accordance with regulatory needs and the professional judgment of the program manager, and approved by the applicable branch chief and division chief, and EMSMR prior to use. MOU's and biological opinions are entered into and prepared as needed in accordance with existing regulations and guidance with input from the Fort McCoy Installation Legal Office, as required. Permits are prepared and issued by the state or federal regulators in accordance with the regulations current at the time of issuance.

Chapter 10 Operational Control

a. Operational controls ensure that Fort McCoy activities comply with environmental regulatory requirements and contribute to achieving its objectives and targets. The EMS controlled documents specified in Table 2 address operations that are associated with significant environmental aspects and specify specific controls (procedures) for operations where their absence could lead to deviation from the environmental policy, objectives and targets, or applicable regulatory requirements. One of the documents listed in Table 2 is the Fort McCoy Green Procurement Plan (FM 200-7) that outlines requirements for purchasing environmentally friendly products.

b. Operational procedures are modified as needed, and new procedures are developed as required based on regulatory or Army policy changes, the installation's environmental aspects, environmental policy, objectives and targets, training and qualifications of affected personnel, installation mission changes, and SMB directives.

c. EMS operating procedures that are included in (or are affected by) contracted scopes of work are shared with the applicable contractors and suppliers through inclusion in appropriate bidding and contract documents.

Chapter 11 Emergency Preparedness and Response

a. Installation emergency preparedness and response procedures, including activation and operation of the Installation Emergency Operations Center (IEOC) are specified in the Installation Emergency Management Plan (IEMP) maintained by the Directorate of Plans, Training, Mobilization & Security (DPTMS). The IEOC is activated when an all-hazards disaster affects the installation.

**TABLE 2
EMS CONTROLLED DOCUMENTS**

Plans/Manuals/Pamphlets	Location of Most Current Version	Available on the Public Website
FM 200-8 Installation Environmental Management System	FM SharePoint site	No
Asbestos Management Plan	ED	No
FM 200-7 Green Procurement Plan	FM SharePoint site	No
FM 420-25 Hazardous Waste Management Plan	FM SharePoint site	No
Integrated Cultural Resources Management Plan	ED	No
Integrated Natural Resources Management Plan	ED	Yes
Installation Operational Noise Management Plan	ED	Yes
FM 200-3 Integrated Pest Management Plan	FM SharePoint site	No
Lead Management Plan	FM SharePoint site	No
FM 200-6 Pollution Prevention Plan	FM SharePoint site	No
FM 420-28 Spill Prevention Control, Countermeasure and Spill Contingency Plan	FM SharePoint site	No
Storm Water Management Plan	ED	No
FM 200-1 Integrated Solid Waste Management Plan	FM SharePoint site	No
Water Conservation Plan	ED	No
Water System Emergency Response Plan	ED	No
FM 420-30 Well Head Protection Plan	FM SharePoint site	No
Biological Opinion on Karner Blue Butterfly	ED	No
Karner Blue Butterfly Management Plan	ED	No
FM 350-3 Military Munition Rule	FM SharePoint site	No
FM 420-29 Hunting, Fishing, Trapping Laws and Regulations	FM SharePoint site	Yes
FM 420-32 Firewood Movement	FM SharePoint site	No
FM 420-34 Urban Tree Management	FM SharePoint site	No
FM 200-2 Installation Environmental Policy	FM SharePoint site	Yes
FM 200-4 Firewood Cutting	FM SharePoint site	Yes
FM 200-5 Small Lot Timber Sales Regulations	FM SharePoint site	No
Curation MOU with University of Wisconsin-La Crosse	ED	No
FM 14-01 Fort McCoy Installation Energy and Water Conservation Policy	FM SharePoint site	Yes
Malfunction Prevention and Abatement Plan	ED	No
Permits		
Air Pollution Control Operation Permit (642024900-F11)	ED	No
Tier 2 Industrial Stormwater (WI-S067857-3)	ED	No
Tank Permits (USTs)	ED	No
Petroleum Contact Water (WI-004631-05-0)	ED	No
WWTP Permit (WI-0022420-07-0)	ED	No

Each of the plans are regularly reviewed and revised to ensure that significant environmental aspects are being appropriately addressed/controlled in accordance with current regulations, Army policy, and Fort McCoy mission requirements.

b. The Directorate of Emergency Services (DES) fire department Incident Commander (IC) is the responsible party to evaluate the appropriate levels of response for all incidents involving the release or potential release of a possible hazardous material for the purpose of controlling the release using certified and specialized trained Hazardous Materials Technicians' and Hazardous Materials Incident Commander/s. The IC and the Operations Officer at the incident command post are the responsible parties for any and all requests for additional resources through the Mutual Aid Box alarm Systems (MABAS). The garrison commander upon consultation with the DES and the IC may activate and direct the IEOC. The installation annually conducts exercises to test and improve emergency response procedures and the IEMP is revised and updated by DPTMS as required.

c. Specific operations and procedures for responding to and mitigating releases/spills of hazardous substances are outlined in the Spill Prevention, Control, Countermeasure and Spill Contingency Plans (FM 420-28). This plan outlines procedures for avoiding emergencies and accidents that can have impacts on the environment and specifies response procedures when these accidents/emergencies occur. ED personnel, along with installation fire department personnel maintain records of emergency response actions. Spill response and preparedness training is annually provided by the ED to appropriate installation personnel.

d. In addition, environmental permits (Table 2) and the Hazardous Waste/Material Management Plan (FM 420-25) identify conditions that could lead to environmental emergencies and accidents. ED personnel regularly inspect and monitor these conditions and maintain records of such inspections and monitoring.

Chapter 12

Monitoring and Measurement

a. Fort McCoy has several systems in place to monitor and measure environmental operations that have significant environmental impacts. These include environmental procedures and operational requirements along with objectives and targets specified in many of the EMS controlled documents and the strategic action plans, internal and external Environmental Performance Assessment Systems (EPAS), the Installation Corrective Action Plan (ICAP), and preventive maintenance schedules.

b. Several of the controlled documents (plans and permits) include objectives and targets related to the specific EMS program. These are measurable where practicable. As outlined in chapter 6, environmental goals and objectives are included in strategic action plans for meeting strategic environmental objectives. Those action plans are time-driven, measurable, provide a clear and tangible outcome, and are tracked by the SMB and the ED.

c. The internal and external EPAS include environmental processes and aspects of all installation operations. The internal EPAS is conducted through the annual reporting of the various installation EMS programs and through the Resource Conservation and Recovery Act (RCRA) and other program area inspections. Annual program reporting and inspections evaluate operations that can have significant environmental impacts. Reporting and inspections also evaluate progress toward achieving environmental objectives and targets within the individual program areas. Annual reports and inspection documentation are maintained by the ED. The external EPAS is conducted by the Army Environmental Center (AEC) every three years. Documentation of the external EPAS is maintained by AEC and the ED.

d. The ICAP is developed and maintained by the ED, and lists/tracks internal and external EPAS findings, ISO 14001:2004 non-conformities identified during annual program reporting and external EPAS inspections, and findings identified during RCRA inspections (if the non-conformity is not cleared up within 30 days).

**TABLE 3
COMPLIANCE EVALUATION**

Program/Media Area	Evaluation	Frequency
Air Quality	Title V Report	Annually
	Compliance Certification	Annually
	Emissions Inventory	Annually
	Emission Certification	Annually
	Green House Gas Emissions Inventory	Annually
	Ozone Depleting Chemicals Inventory	Annually
	Radon Testing	Every New Occupied Structure (1st 6-months)
Emergency Planning Community Right to Know (EPCRA)	Toxic Release Inventory	Annually
	Tier II Report	Annually
National Environmental Policy Act	Evaluate Every Proposed Project or Action for Potential Impacts	Prior to each action
Program Management	Installation Status Report	Quarterly
	Army Environmental database-Environmental Quality (AEDB-EQ)	Semi-annual
Resource Conservation and Recovery Act (RCRA)	Facility Inspections	Semi-annual
	Hazardous Waste Report	Annually
	Closed Site Cap Inspections & Remedy Evaluation	Annually
Solid Waste	SWMP Annual review	Annually
	Solid Waste Facility Operation Licenses renewal	Annually
	SWAR Report	Semi-annual
	Solid Waste/Recyclables Transporter Licenses renewal	Annually

Spill Control and Counter Measures (SPCC)	Underground Storage Tank-Permit to Operate Inspections/Testing	Annually
	Aboveground Storage Tank-Inspections	Monthly
	Spill Prevention Training	Annually
Storm Water	Water System Emergency Response Plan (revision)	Annually
	Review Well Construction Permits and Reports	As Required
	Update Wellhead Protection Plan and Map	Annually
	Construction Permit Inspections	Weekly
	Industrial Permit Inspections	Quarterly
	Oil/Water Separator Discharge Sampling	Quarterly
Toxic Substance Control Act	PCB Report	Annually
Water Quality - Wastewater	Compliance Maintenance Annual Report	Annually
	Discharge Monitoring Report	Monthly
	Preventative Maintenance Schedule	Weekly
	Sludge Report	Annually
	Sludge Sampling	Quarterly
Water Quality - Laboratory Operations	QA/QC Plan	Annual review
Water Quality - Drinking Water	Drinking Water Reports	Monthly
	Quarterly emergency generator testing	Quarterly
	High-Capacity Well Report	Annually
	Cross-connection Report	Annually
	Water Conservation Plan update	Annually
	Consumer Confidence Report	Annually
	Emergency Chlorination Plan review	Annually
	Flushing Plan	Annually
	Valve Condition Report	Annually
	Hydrant Pressure Testing	Annually
	Quarterly south-post emergency generator testing under load.	Quarterly
Annual Backflow Preventer Testing and certification	Annually	

e. Preventive maintenance schedules are maintained by the DPW Works Work Reception Branch and by the State of Wisconsin tenants that conduct maintenance at the state-owned facilities located on the installation. In addition, the Malfunction Prevention and Abatement Plan outlines preventive maintenance schedules for air pollution control devices that are regulated under the Fort McCoy Air Pollution Control Permit (No. 642024900-F11). Documentation of preventive maintenance activities is maintained by the service technicians and shops conducting the work.

Chapter 13 Evaluation of Compliance

a. Evaluation of compliance is achieved by comparing the results of monitoring and measurement obtained in accordance with the procedures outlined in chapter 12, with the standards/thresholds outlined in the applicable EMS controlled documents and with current program-specific federal, state, DoD, and local regulatory requirements, as well as any other program-specific requirements that have been adopted by the installation. A list of regular compliance evaluations conducted as part of the EMS is included in Table 3.

b. Results of these evaluations are documented in RCRA inspection documentation and annual program area reporting records maintained by the ED and the Fort McCoy DPW Operations and Maintenance Division. In addition, findings of regulatory noncompliance/violation are documented in the ICAP. The ICAP is also used to document/track notices of noncompliance or violation received from the WDNR or the USEPA.

Chapter 14 Nonconformance, Corrective Action and Preventive Action

a. Nonconformance refers specifically to ISO requirements and does not relate to regulatory compliance. Nonconformities or potential nonconformities can be identified during the monitoring and measurement processes defined in chapter 12, during planning to implement installation mission changes/additions, through spills or accidents, through staff observations/comments, or during an internal or external audit.

b. Nonconformities identified by an external EMS Audit (conducted as part of an EPAS) are reviewed and approved by the EMSMR prior to being resolved.

c. When a nonconformance or potential nonconformance is identified, the EMS Coordinator works with the manager(s) of the affected EMS program, or installation operation, to identify the root cause and determine corrective/preventive actions that can be taken to either avoid nonconformance or prevent recurrence. The EMS Coordinator then establishes an implementation schedule with the applicable area manager(s) for the preventive/corrective actions and obtains approval from the EMSMR. The EMS Coordinator monitors implementation and completion of the preventive/corrective action. In addition, the EMS Coordinator will evaluate the success of the preventive/corrective actions and implement additional actions as needed to prevent nonconformance or recurrence. Changes to EMS controlled documents will be made when required to address preventive/corrective actions.

d. Nonconformance issues, along with preventive/corrective actions, are documented and tracked utilizing the ICAP.

Chapter 15 Control of Records

a. The installation maintains and controls records that demonstrate conformance to the EMS and ISO 14001:2004. Those records include documentation of required training (chapter 7; appendix B), monitoring and measurement (chapter 12), evaluation of compliance and conformance, including tracking

of nonconformities and implementation of preventive/corrective actions (chapters 13 & 14), internal audits (chapter 16), and management reviews (chapter 17).

b. Records of competency training (appendix B) are maintained and controlled by the applicable installation staff managers. All other EMS conformance records are controlled and maintained by the ED on the division share drive. Records are maintained for at least the length of time required by the regulations that govern each of the EMS programs. EMS program-specific records retention is controlled and managed by the program manager for each EMS program. ISO-specific records that result from implementation of this pamphlet are maintained and controlled by the EMS Coordinator for a period of not less than five years.

Chapter 16

Internal Audit

Internal audits will be conducted to support the Fort McCoy internal environmental assessment program to ensure the EMS is implemented and maintained IAW standards. The EMS will be audited at planned intervals based on ISO 14001:2004 standards and the results of previous audits. Internal audits will be conducted not less than annually.

16-1. Responsibilities

a. The EMS Coordinator will work with Fort McCoy Internal Review and Audit Compliance Office (IRACO) to identify and schedule internal audits. The internal audit will be identified for inclusion in the Internal Review (IR) Annual Plan to ensure time is reserved to support the EMS program. Unscheduled audits, either internal or external, that may arise during the year will be identified to IRACO for scheduling to support compliance with EMS requirements.

b. The EMS Coordinator and Chief of IR will select an audit team ensuring objectivity and impartiality of the audit process. The audit team will primarily be assigned from within the installation. The team will be independent of the area or department to be audited. (Note: An audit team can consist of one individual.)

c. The EMS Coordinator will notify the IRACO in advance of external audits scheduled.

d. IRACO will support required EMS audits, providing professional audit advice and assistance.

16-2. Planning

a. An audit plan will be established by the lead auditor prior to each internal audit. The audit plan will address EMS compliance with ISO 14001:2004 standards. The audit plan may also include verification of compliance evaluations of individual media areas identified in chapter 13 and Table 3.

b. The audit plan will be developed to define the objective(s), scope, criteria, and methodology for executing the audit. Audit criteria will be based on applicable ISO 14001:2004 standards, documented local procedures, and current policy guidance. Audit objectives will, at a minimum, address EMS standards. The audit scope will consider all installation activities but will be limited to a sampling of activities for each individual audit. The audit plan will identify applicable compliance media that require review based on past audits, both internal and external, or internal assessments identifying potential deficiencies. The methodology will include a combination of interviews with select installation personnel and file/document reviews.

c. The audit plan will be reviewed and approved by the EMS Coordinator, the EMSMR, and the Chief, IRACO.

16-3. Conducting

a. The approved audit plan will be executed. Based on the methodology determined to be appropriate, relevant documents and records will be collected, reviewed and verified to determine compliance with

standards. Appropriate personnel will be interviewed. Records reviewed and interviews conducted will be documented to provide evidence of information collected and sources of data.

b. During the course of conducting an audit, any deficiencies or non-conformance issues will be promptly identified to the EMS Coordinator or designee for determination of immediate resolution. Deficiencies or non-conformance issues that can be resolved immediately will be documented in the audit report. Deficiencies or non-compliance findings that cannot be resolved immediately will also be documented in the audit report and recorded on the ICAP by the EMS Coordinator.

16-4. Findings and Recommendations

a. Audit findings must be based on objective evidence that is properly corroborated and authenticated. Any non-conformance issues identified to the EMS Coordinator or designee will be documented to include identification of the root cause of each non-conformance, the corrective action to be taken and the responsible party for correcting the non-conformance.

b. As part of the audit procedure, after conferring with the EMS Coordinator, the appropriate area or functional manager will address findings within a specified number of days by developing corrective actions which will be included in the summary response to the corrective action request. If a non-conformity relates to the EMS itself, the EMS Coordinator will have the primary responsibility to apply the corrective and preventative actions.

c. All non-conformance issues will be recorded and monitored on the ICAP.

16-5. Audit Report

a. An audit report will be prepared. The audit report will document the items checked, individuals interviewed, observations, any corrective or preventative actions taken during the audit, and any findings of non-conformance. Any non-conformance issues will be documented in the final report.

b. A draft audit report will be presented to the EMS Coordinator and EMSMR for review and comment.

c. A final audit report, identifying comments from the EMS Coordinator and EMSMR, will be prepared for the Garrison Commander's approval.

16-6. Retaining Records

a. The EMS Coordinator will retain a copy of the final report and will ensure non-conformance issues are addressed through the ICAP.

b. The IRACO will also retain a copy of the final audit report.

16-7. Follow-Up

a. A follow-up audit will be completed on findings and non-conformance issues not addressed during the audit. Follow-up audits will be completed at 180 days to verify corrective and/or preventative actions have addressed the finding.

b. Corrective and preventative actions that were utilized to rectify a non-conformance during the audit process will be reviewed for effectiveness during the next annual internal audit.

16-8. EMS Reporting

a. Audit results will be included in the Management Review discussed in chapter 17. The internal audit report will be one element of the installation environmental posture.

Chapter 17

Management Review

The annual report of the EMSMR to the SMB functions as the management review of the Fort McCoy EMS. Preparing for these reviews includes evaluating opportunities for improvement, along with the need for changing/revising any of the EMS components. Records of the reviews are maintained in the form of the EMSMR presentation slides and meeting minutes. Inputs to the management review include:

- (1) Findings of internal and external audits and any other evaluations of environmental compliance.
- (2) Revisions (when significant) to EMS controlled documents (Table 2) made since the last review.
- (3) Communications/complaints from external parties important to the installation EMS that occurred since the last review.
- (4) Progress report on environmental objectives and targets, including those that are part of the strategic action plans.
- (5) Status report on corrective/preventive actions.
- (6) Progress report on assignments from previous management reviews.
- (7) Changes (or planned changes) to installation mission, or federal, state, and DoD regulations that impact environmental aspects and the EMS.
- (8) Recommendations for improvement.

**Appendix A
References**

Army Regulation 200-1

“Environmental Protection and Enhancement”, Headquarters, Department of the Army, 13 December 2007.

Army Pamphlet 200-1

“Environmental Protection and Enhancement”, Headquarters, Department of the Army, 2002.

ISO 14001 (also known as ANSI/ISO 14001:2004)

EO 13693, Strengthening Federal Environmental, Energy, and Transportation Management, January 2007

EO 13148, Greening the Government Through Leadership in Environmental Management, April 2000

**Appendix B
COMPETENCE AND AWARENESS TRAINING REQUIREMENTS**

Regulatory Area	Applicable Personnel	Initial Training	Refresher Training	Regulatory Requirement	Responsibility
Air Quality	Refrigerant and HVAC Technicians	Technical Certification	None	40 CFR 82.34(a)(2), 40 CFR 82.40, 40 CFR 81.161	Individual Unit or Organization
Asbestos	Asbestos inspectors, abatement designers & workers & maintenance personnel	Varies from a 5- day course with 14 hrs of hands-on training to 2 hrs of awareness training for maintenance and custodial personnel	1 day course annually except maintenance personnel 2 hr awareness annually	AR 200-1, para 8-3f, 40 CFR 763.92 and app C to subpart E, 40 CFR 763.121(:b); 40 CFR 763.131(e)(6)(ii)(F); 40 CFR 763.121(k)(3)-(4)	Individual Unit or Organization
Emergency Response	Spill Response (HAZMAT) Team Members	Annual training; hours vary. "HAZWOPER" spill team requirements at 29 CFR 1910.120(q). Individual personnel may require specialized training, e.g. firefighters, pressurized cylinder/tank specialists, etc. PPE, confined space and blood borne pathogen exposure training also required.	8 hour refresher annually; 24- hour refresher annually for incident commanders	40 CFR 112.21 and appendix section 1.8.1; 29 CFR 1910.120(q); AR 200-1; 40 CFR 112.7(f)	Individual Unit or Organization
SPCC/FRP	Personnel at facilities covered by an SPCCP and FRP (Facility first responders)	1 hour standard SPCC Training	1- hour refresher course annually	29 CFR 1910.120(q) level 1 (awareness) minimum, higher levels as required: 40 CFR 109.5; 40 CFR 112.7; 40 CFR 112.10-21 and appendix F; AR 200-1	Individual Unit or Organization/Training can be provided by the DPW Environmental Division, Compliance Branch
Environmental Awareness	Everyone on the installation	EMS Awareness Training	As necessary	AR 200-1	Individual Unit or Organization (Located on Fort McCoy SharePoint site and public website).

Regulatory Area	Applicable Personnel	Initial Training	Refresher Training	Regulatory Requirement	Responsibility
Environmental Restoration	Personnel performing operations on HW sites	40 -hour initial "HAZWOPER" training plus 3 days supervised field experience	8 -hour refresher	29 CFR 1910.120(e)	Contractor Responsibility
Hazard Communication	Persons exposed to hazardous chemicals on the job	"Hazard Communication" or "Worker-Right-to-Know" at initial job assignment	Annual refresher or whenever hazards change	29 CFR 1910.1200(b)(1), 29 CFR 1910.1200(e)(1), 29 CFR 1910.1200(h), AR 200-1	Individual Unit or Organization; Training varies with chemicals present
Hazardous Waste	Personnel who manage or handle HW (Bldg 207)	Annual training in HW requirements of their job and measures to take during an emergency. "HAZWOPER" Transportation, storage, disposal facility (TSD) health and safety training; 24 hours initial; 40 hr HW Manifest/DOT Certification	8 -hours refresher; 40- hr biennial Training for DOT	40 CFR 265.16; 29 CFR 1910.120 and, 40 CFR 264.16; 49 CFR 172.704; AR 200-1.	Individual Unit or Organization
HAZMAT or HW	Persons who work in satellite accumulation points	Initial and biennial refresher training HAZMAT familiarization, function or job-specific training, and safety training. OSHA or EPA training may be used to satisfy a portion of the requirement.	1 hr satellite accumulation point training	40 CFR 265.16; 29 CFR 1910.120 and, 40 CFR 264.16; 49 CFR 172.704; AR 200-1	DPW Environmental Division, Compliance Branch
Lead Based Paint	Persons who inspect, perform risk assessments, or abate lead based paint	See 40 CFR 745.223 – 227. Certification must be by accredited training provider for Army civilian employees.	As necessary	40 CFR 745.223; 40 CFR 745.225-226; 40 CFR 745.227(a); AR 200-1	Individual Unit or Organization
Pesticide Application	Personnel applying pesticides identified for restricted use under FIFRA	DOD Pest Management Certification Course and the State Basic Pesticide Application Course for contractors.	5 day DOD Pest Mgmt Certification refresher course every 3 years; State every 4 years	40 CFR 170-171; DODI 4150.7; DOD 4150.7-M; DOD 4150.7-P; Wisconsin Administrative Code, ATCP 29.26.	Individual Unit or Organization

Regulatory Area	Applicable Personnel	Initial Training	Refresher Training	Regulatory Requirement	Responsibility
Storage Tanks	Class A Training is for persons who manage resources and personnel for UST systems.	Overall training requirements can be found at: http://commerce.wi.gov/ER-BST-FedRegUST_Operator_Training.html or at: http://www.epa.gov/oust/cmplastc/soc.htm ; Class A Operators require either a 1) Certificate showing that an individual has passed the Wisconsin underground storage tank operator examination or 2) written proof of equivalent training.	At the discretion of the WI Dept. of Agriculture, Trade and Consumer Protection when UST system is not in compliance.	ATCP 93 Code; 40 CFR 280 (Federal UST Rule)	AAFES, Airfield, and MATES
Storage Tanks	Class B Training is for persons who ensure that requirements for leak detection, recordkeeping and reporting are met.	Class B Training requirements are the same as Class A requirement above.	At the discretion of the WI Dept. of Agriculture, Trade and Consumer Protection when the UST system is not in compliance.	ATCP 93 Code; 40 CFR 280 (Federal UST Rule)	AAFES, Airfield, and MATES.
Storage Tanks	Class C Training is for persons who operate UST systems and provide initial response to leaks or emergencies.	Class C Operators must obtain training and a certificate from the accredited Class A or Class B facility operator where the Class C Operator is employed indicating that the Class C Operator has successfully completed training for the facility.	At the discretion of the WI Dept. of Agriculture, Trade and Consumer Protection when the UST system is not in compliance.	ATCP 93 Code; 40 CFR 280 (Federal UST Rule)	AAFES, Airfield, and MATES.
Water/Waste-Water Treatment	Plant Operators	Complete Wastewater Treatment Plant Operator Course or Water Distribution System Operation and Maintenance Course	Wastewater; 24-hour refresher every 3 years; Water operators 18 hours every 3 years	AR 200-1; NR 114.07 5(b)	DPW

Glossary

NOTE: Definitions adapted from ISO 14001:2004.

Auditor

Person with the competence to conduct an audit.

Continual Improvement

Never ending process of enhancing the environmental management system in order to achieve improvements in overall environmental performance consistent with Fort McCoy's environmental policy.

Corrective Action

Action to eliminate the root cause of a detected nonconformity.

Document

Information and its supporting medium.

Environment

Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.

Environmental Aspect

Element of Fort McCoy's activities, products, or services that can interact with the environment.

Environmental Impact

Any significant change to the environment, whether adverse or beneficial, wholly or partially resulting from any of Fort McCoy's environmental aspects.

Environmental Management System EMS

The part of Fort McCoy's management system used to develop and implement its environmental policy and manage its environmental aspects.

Environmental Objective

Overall environmental goal, consistent with Fort McCoy's environmental policy.

Environmental Performance

Measurable results of Fort McCoy's management of environmental aspects.

Environmental Policy

Fort McCoy's required approach to environmental performance, formally expressed in FM 200-2.

Environmental target

Detailed performance requirement that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.

Interested party

Person or group concerned with or affected by Fort McCoy's environmental performance.

Internal Audit

Systematic, independent and documented process for obtaining evidence and evaluating it objectively to determine the extent to which the environmental management system audit criteria set by Fort McCoy are fulfilled.

Nonconformity

Non-fulfilment of an EMS requirement.

Objective

Overall environmental goal, consistent with the environmental policy that an Fort McCoy intends to achieve. Objectives can be strategic, tactical, or operational and can apply to an organization as a whole or to a system, process, project, product, or service.

Organization

Military, Garrison, Civilians, Directorates, Divisions, Branches, Tenants, training units, and contractors on Fort McCoy which must comply with this EMS Pamphlet.

Preventive Action

Action to eliminate the cause of a potential nonconformity.

Prevention of Pollution

Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse environmental impacts.

Procedure

Specified way to carry out an activity or a process.

Record

Document stating results achieved or providing evidence of activities performed.

Target

Detailed performance requirement, applicable to Fort McCoy or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.