

GREEN MATTERS

DPW-ED NEWSLETTER

SPECIAL EDITION

Compliance Inspections



What is compliance? Conforming to a rule, policy, standard or law. The Army is required to abide by and meet state, federal and local environmental requirements. **Inspections** ensure that laws are followed for the protection of human health and the environment. They are used as a tool to assess the environmental compliance status of an organization and the installation as a whole.

Inspections are conducted to evaluate Environmental programs or media areas using the following methods:

- Interviewing facility or site representatives
- Reviewing records, reports and permits
- Taking photos
- Observing facility or site operations

Types of inspections

- **Self-Assessment** – conducted by individual activities or organizations.
- **Annual Environmental Performance Assessment (AEPA) System**- conducted by installation Environmental staff members.
- **External Environmental Performance Assessment & Assistance System (EPAAS)** - conducted by the IMCOM & AEC.
- **Environmental Protection Division/Environmental Protection Agency compliance inspections** – State and Federal inspections used to determine compliance and support enforcement actions.

Upcoming Events/Training

- **3 NOV**-Cross-Functional Team Meeting, 1300-1400, Bldg. 14600
- **4 NOV** – HAZMAT/ Waste Refresher, 0830 & 0945, Bldg. 11307.
- **2 DEC** – EQCC Meeting, 1300-1430, GC Conf Rm, Darling Hall
- **2 DEC** – SPCC Trng. 0900-1300, Bldg 11307.
- **7-11 DEC** – EPAAS Inspection All-Day, Ft Gordon & Gillem Enclave

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DPW, ENVIRONMENTAL DIVISION NEWSLETTER

515 15th Street Address, Bldg 14600
 Fort Gordon, GA 30905
 706.791.6278/6106 office 706.791.4222 fax
usaarmy.gordon.imcom.mbx.dpw-enrmo@mail.mil

ENVIRONMENTAL PERFORMANCE ASSESSMENT & ASSISTANCE SYSTEM (EPAAS)



MOST COMMON FINDINGS/ISSUES

- Improper or lack of hazardous waste labeling.
- No or infrequent weekly inspections of waste storage areas.
- Lack of properly trained personnel in HW management.
- Lack of properly trained personnel in Spill Prevention.
- No Activity/Unit Environmental Officer
- Personnel not familiar with the installation Environmental Policy.
- Poor recordkeeping
- Failure to maintain updated SOPs and Management Plans.
- Failure to make SOPs and Management Plans available for use.
- Improper disposal of solid waste.
- Lack of planning for projects to include NEPA review.
- Lack of collision barriers for tank protection.

EPAAS is the Army's program for assessing installation level environmental performance. With the Army's development and implementation of Environmental Management Systems (EMS), the EPAAS program now includes environmental management performance auditing. EPAAS assessments provide Garrison Commanders with an objective assessment of their compliance posture and determine the effectiveness of their EMS, providing a baseline from which Garrisons can mitigate environmental risks that could negatively impact mission, community, and the well-being of our Soldiers. All active Army installations are assessed on a 3-year cycle.

The EPAAS is a multimedia assessment of an installation's compliance status. There is an external and an internal EPAAS. The external is conducted every 3 years by USAEC on a risk schedule. The internal is conducted by the DPW, Environmental Division on an annual basis.

The US Army Environmental Command (USAEC) will perform an EPAAS **7 DEC – 11 DEC 2015** at Fort Gordon & Gillem Enclave. The scope of the multimedia inspection will include all activities, units, tenants and contract operations on the installation. Once the assessment is complete, the executive summary of findings is briefed to the Garrison Commander.

External and internal findings are compiled into a web-based database and added to the Installation Corrective Action Plan (ICAP). The Environmental Division maintains the ICAP by tracking the progress of the outstanding findings until they are closed. The ICAP status is briefed quarterly to the Garrison at the EQCC meeting.

Multimedia = Major environmental programs (Air, Water, Hazardous Waste, Stormwater, Solid Waste, Natural Resources, etc.)

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*Mark your calendars. Installation- Wide
EPAAS, 7-11 December 2015.*

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“We do not inherit the earth from our ancestors; we borrow it from our children.”

~ Native American Proverb

“Preparation allows you to prevent the intensity of the ordeal.”



HOW TO PREPARE FOR AN INSPECTION

Inspections can be very stressful especially if you've never been through one. The best way to relieve the stress is to be prepared.

Here are some of the things you need to do:

1. Make sure all SOPs, procedures, checklists, management plans and inspection records are updated.
2. Contact the Environmental Division for a copy of any previous deficiencies sited during the last assessment.
3. Review and make sure you have implemented corrective actions for all deficiencies.
4. Know who your Environmental Officer(s)-is(are).
5. Make sure all personnel are properly trained and certifications are current.
6. Familiarize yourself with the Installation Environmental Policy http://www.gordon.army.mil/media/pages/Super_Users/documents/TMP_DOCUMENTS/Garrison_Commanders_Policy_Letters/GCPolicy_69.pdf
7. Make sure your area is organized and free of improperly disposed recyclables.
8. All hazardous materials and waste should be properly stored and managed.
9. Make sure personnel are available to escort the assessors and provide access.

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ROOT CAUSE ANALYSIS

The Root Cause Analysis is a process used to identify:

- The true reason for a violation or noncompliance.
- Identify the solution to correct and prevent future findings.
- Properly defining the cause of the problem is 90% of the solution.
- Not just “WHAT is wrong, but “WHY”?

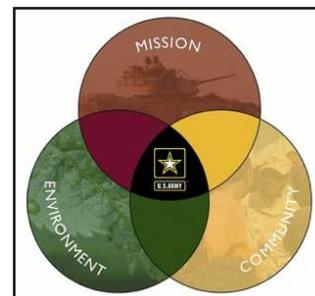
This process is the key to maintaining compliance. If you know what the problem is, then you can minimize the potential for future deficiencies and/or regulatory violations.



SUMMARY

The EPAAS program assists all Army commanders in attaining, sustaining, and monitoring compliance with Federal, State, and local environmental laws and regulations, as well as DoD and Army compliance and performance requirements. EPAS external and internal multi-media assessments:

- Identify non-compliance with environmental regulations and non-conformance with the ISO 14001 environmental performance standard used by Army EMS;
- Provide suggestions for both immediate and long-term corrective actions; and
- Indicate resources needed for implementation.



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