

# FORT SILL QUARTERLY ENVIRONMENTAL NEWSLETTER

Fall 2014



## Environmental Training and Environmental Inspections

- **Environmental Training why bother?**

We as leaders must ensure our personnel are properly trained in order to ensure proper handling of hazardous waste because it is the right thing to do for our families, Fort Sill, the Army and the environment.

Environmental training at the unit level is required in accordance with Army and federal regulations.

40 Code of Federal Regulation (CFR), 49 CFR and 32 CFR are the federal regulations requiring training for personnel who handle hazardous waste. DOD 4500.9-R and 6050.5 provides Department of Defense environmental policy which fully supports federal training and compliance requirements. The US Army fully supports the above regulations, and has published its environmental policy in AR 200-1. In addition different states can have more

stringent requirements. Here at Fort Sill we also must comply with Title 252, Oklahoma laws.

The Fort Sill Environmental team has put together the USAFCOEFS Hazardous Materials and Waste Management Plan. This document simplifies what the environmental standards are on Fort Sill. This plan is available on the P: drive in the environmental folder or hard copy is available for pick-up at Bldg 2515.

Currently an environmental notice of violation can cost a unit \$27,500 per incident per day. This is important because training completion is inspectable, and is on most environmental checklists. Being professionals we must ensure our personnel are properly trained so that they can assist the commander / director at all levels accomplish the Army's environmental mission which focuses on COMPLIANCE.

Compliance with environmental regulation, as always, is a commander's responsibility. Commanders must ensure training is conducted for all personnel that have contact with HM or HW within 90 days of assignment and annually thereafter. They must also ensure that personnel who have not yet received initial environmental training are properly supervised when they

work with materials potentially hazardous to themselves or the environment. Commanders must also train all personnel to accomplish their tasks according to laws and regulations and to respond properly in emergencies.

Environmental Officers (EOs) and POL Handlers must receive training within 6 months after their hire date (with an annual refresher) that teaches them to perform their duties. Initial and annual training is required to ensure that EOs receive adequate training and remain compliant at their facilities. EOs and POL Handlers will receive required training by way of 40-hour Hazardous Waste Generator classroom instruction. Contact the Environmental Office at 442-3266 for more information.

## Proper Handling of Hazardous Waste is Army Policy



- **Environmental Inspections, why so many?**

As with training requirements, inspections are also mandated by Federal, DOD, OK State, U.S. Army and Ft. Sill policies.

All Fort Sill activities are subject to environmental inspections by Federal, DoD, OK State regulatory agencies to include local government agencies which may also inspect for compliance with permits, local codes, or other regulations. With the implementation of the Federal Facility Compliance Act, federal or state regulators may inspect any installation without prior notice. Often,

the first indication that a federal, state or other inspectors are on post is when they visit the installation environmental management office or the provost marshal's office, asking for directions to a specific site on the installation.

If anyone representing agencies other than Ft. Sill EQD requests to inspect your facility for environmental compliance, immediately notify the EQD by telephone (442-3266).

While inspection frequency is specific and mandated by federal regulation for certain equipment/ facilities, they otherwise state unit

inspections should be routinely conducted. This

does allow a commander some latitude on how and when to conduct internal assessments. The regulations do require organizations to establish, to post and follow an inspection schedule. Preparing for regulatory inspections should be a necessary part of the day-to-day routine.

It is Ft. Sill's policy to conduct semi-annual environmental inspections for all units on the installation. Organizations will be inspected either during 1<sup>st</sup> and 3<sup>rd</sup> QTR or 2<sup>nd</sup> and 4<sup>th</sup> QTR of the FY. Guidance addressing internal inspection frequency can be found in Table 1-2 of the USAF-CEFS Hazardous Materials and Waste Generator Compliance, EMS Awareness and Storm water Pollution Prevention handbook. Another tool to help ensure that the motor pool is prepared is by completing the Weekly Environmental Inspection Log provided on page 5-7. These inspections must be retained by the unit for 3 years.

Any inspection is only a snapshot in time. It tells us and the commander how an organization is performing at a certain point in time. By utilizing a well planned and executed internal inspection plan an organization should have nothing to worry about when a State or Federal inspector shows up wanting to conduct an assessment.

Ft. Sill organizations conduct a multitude of various missions. If you are not sure how current environmental policies apply to your organization, do not hesitate to **call (580) 442-3266**. We are here to help. Our mission is to help you accomplish your mission, while maintaining Compliance!

- **Recent Inspection Deficiencies**

Fuel cans not labeled or mislabeled (military and civilian)

Expired product (expired material is actually a waste and must be properly disposed of)

Hazardous waste drums must be turned-in at Bldg 2514 within seventy-two hours once they are 4 inches from the top.