

ENVIRONMENTAL PROGRAM

Proponent For Inspection: DPW

Point of Contact: _____

Unit Inspected: _____

Date of Inspection: _____

Unit Representative: _____

Unit Phone No.: _____

Inspector's Name: _____

Inspector's Phone No.: _____

Unit Overall Rating: T P U

REFERENCES:

- | | | |
|---|---|---------------------------------|
| a. AR 200-1, 21 FEB 97 | b. DA PAM 200-1, 17 JAN 02 | c. FLW Reg 210-14, 2 AUG 99 |
| d. FLW Reg 200-1, 18 MAR 98 | e. FLW ECO Desk Reference, 1 OCT 01 | f. Executive Order (E.O.) 13101 |
| g. 40 Code of Federal Regulations (CFR), 1 JUL 02 | h. 10 Code of State Regulations (CSR), 1 JUL 01 | |

STANDARDS: "T"= 90% success rate of evaluated tasks with no failed critical tasks. "P"= 70% success rate of evaluated tasks with no failed critical tasks. "U"= less than 70% success rate of evaluated tasks or one failed critical task. Critical Tasks are based on Federal and State Regulations (see highlighted references above) that if not complied with may result in a Notice of Violation and/or fine.

INSPECTION CRITERIA:	LEVEL	GO	NO GO	REMARKS
1. PROGRAM ADMINISTRATION - AR 200-1, para 1-32(d); FLW Reg 200-1, para 2-1	ALL¹			¹ BCT Units-BDE and BN Level only
a. Does the unit have a copy of the Environmental Compliance Officer (ECO) desk reference with current DPW Policies, SOPs, inspection records and environmental guidance?	ALL			
b. Is an Environmental SOP established?	ALL			
c. Has the Unit ECO been appointed in writing?	ALL			
d. Has the designated ECO attended the ECO Course?	ALL			
e. Does the unit conduct environmental awareness training and is it documented on the unit training schedule?	ALL			
f. Does the Unit Tactical SOP address environmental procedures?	ALL			
2. CRITICAL HAZARDOUS WASTE (HW) MANAGEMENT - 40 CFR 262.34, FLW Reg 200-1, para 2-2(d)	ALL²			² Applies to HW generators, only
a. Does the unit generate HW such as: flameless ration heaters, chemical mask filters, DS2, lithium, magnesium, nickel cadmium and mercury batteries? If no, skip to Spill Prevention Task.	ALL			
b. Is the HW managed IAW Federal, State and FLW policies and procedures and does the unit have a copy of memorandum ATZT-DPW-EE, SUBJECT: New Hazardous Waste/Material Turn-in Procedures, 1 Nov. 2000?	ALL			
c. Does the unit maintain FLW Form 767 (Material Information Pick-up Slip) for HW Turn-ins? Records must be kept on file for one year.	ALL			
d. Is any facility considered a HW Satellite Accumulation Point (SAP)? If no, skip to Spill Prevention Section.	ALL			
e. Are SAP containers marked and labeled as: hazardous waste, the type of contents, and accumulation start date?	ALL			
f. Are containers in serviceable condition and free of leaks and dents?	ALL			
g. Are containers closed when not in use?	ALL			
h. Has HW accumulation been in containers less than one year from start date and/or less than 55 gallons of HW or less than <u>one quart of acute HW?</u>	ALL			
j. Are containers compatible with contents?	ALL			
k. Is the SAP properly posted with "Hazardous Waste Accumulation Site" to include points of contact, emergency numbers and fire extinguishers?	ALL			
l. Is the SAP at or near the point of generation and under the control of the operator generating the waste?	ALL			
m. Is each type of HW maintained in a separate container?	ALL			
n. Is the spill response kit labeled "Spill Control Kit" and safety equipment available at or near the point of generation to respond to HW spills?	ALL			

ENVIRONMENTAL PROGRAM

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o. Is a copy of the Spill Prevention Response Plan (SPRP) posted at the SAP?	ALL			
p. Have unit personnel who handle or manage HW received training to carry out their responsibilities?	ALL			
q. Has the SAP been approved by the DPW Environmental Branch?	ALL			
3. CRITICAL SPILL PREVENTION - 40 CFR 112; AR 200-1 Ch 3; FLW 200-1, para 2-2(e)	ALL³			³Applicable to users of Hazardous Materials only
a. Is the FLW Spill Prevention and Response Plan (SPRP) on file and posted?	ALL			
b. Are spill response materials/kits readily available and in proximity to potential spill sites?	ALL			
c. Do personnel understand spill/emergency response and reporting requirements?	ALL			
d. Is contaminated soil properly disposed of IAW SPRP?	ALL			
e. Is drainage of non-storm water discharges (i.e. soapy water, steam cleaning, equipment/container rinsing), restricted to sanitary sewer drains/washracks rather than into the street or storm drain system?	ALL			
4. WASHRACK MANAGEMENT - ECO Desk Reference Lesson 5g	ALL⁴			⁴Applicable to users/managers of washracks only
a. Do personnel know the limitations of oil/water separators; i.e., changing vehicle oil or pouring large quantities of POL into the separator is not authorized?	ALL			
b. Soaps that emulsify oil and grease hinder the oil/water separator in its ability to separate oil and grease from the water. Are only non-emulsifying soaps used in motorpools?	ALL			
c. Is the wash rack drain system clean?	ALL			
d. Is steam cleaning performed on the wash rack or other area so that wash water drains to wastewater collection system?	ALL			
e. Are operation procedures established for wash rack? Does the SOP explain how to request oil water separator and wash rack maintenance?	ALL			
f. Is wash rack residue/silt properly disposed of?	ALL			
5. CRITICAL POL/USED OIL MANAGEMENT - 40 CFR Part 279, 10 CSR 25-11	ALL⁵			⁵Applicable to units that use/manage POL.
a. Are all containers and tanks used for the accumulation of used oil labeled "USED OIL"?	ALL			
b. Are lids kept closed on used oil tanks and containers?	ALL			
c. Are used oil filters crushed or punctured and drained for a minimum of 24 hours?	ALL			
6. CRITICAL POL STORAGE TANK MANAGEMENT - 40 CFR Part 112; 10 CSR 20, 10 thru 15; FLW 200-1, para. 2-2(g)	ALL⁶			⁶Applicable to Units that manage POL Storage Tanks
a. Are leak detection systems working on underground storage tanks and underground piping?	ALL			
b. Is rainwater drained from secondary containment of above ground storage tanks?	ALL			
c. Does containment drain valve remain closed & locked except when draining rainwater?	ALL			
7. ENVIRONMENTAL BEST MANAGEMENT PRACTICES - 40 CFR 112, ECO Desk Reference	ALL			
a. Are POL spills being cleaned up in parking lots to reduce runoff contamination?	ALL			
b. Are POL storage areas clean and maintained to prevent contamination of the environment?	ALL			
c. Are spill response kits available on mobile equipment?	ALL			
d. Do personnel understand how to manage and report an off-post spill incident?	ALL			
e. General housekeeping. Are small spills cleaned?	ALL			
f. Do motor pool personnel know where drains are connected, e.g., sewage system, oil water separator or storm drainage ditch?	ALL			

ENVIRONMENTAL PROGRAM

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g. Is dry sweep properly disposed of IAW Memorandum ATZT-DPW-EE, Environmental Bulletin, July 2001?	ALL			
h. Are dumpster lids closed and in serviceable condition?	ALL			
i. Does equipment (including spigots) leaking POL have drip pans to contain the leak?	ALL			
j. Are drip pans serviceable?	ALL			Applicable to units Operating solvent Tanks
k. Does the unit have a copy of the Environmental Management Procedures for solvent tanks memo?	ALL			Applicable to units Operating solvent Tanks
l. Does the unit use a solvent with flash point above 145 degrees F., and without traces of EPA "F" listed compounds?	ALL			Applicable to units Operating solvent Tanks
m. Does unit have a copy of the SPRP posted near the area where the solvent tanks are used?	ALL			Applicable to units Operating solvent Tanks
n. Does the unit have an SOP for managing their spent filters and solvent for solvent tanks?	ALL			Applicable to units Operating solvent Tanks
o. Are lids on solvent tanks closed unless in use?	ALL			Applicable to units Operating solvent Tanks
8. CRITICAL CLEAN AIR ACT (CAA) PERMIT COMPLIANCE (10 CSR 10-6.060) Does the facility have an air permit issued by the Missouri Department of Natural Resources? If no, Air portion is complete. If Yes, continue.	ALL			Applicable to units That maintain air permits
a. Is there a copy of the applicable air permit on site?	ALL			
b. Are records kept on file in compliance with permit conditions?	ALL			
c. Are records sent forward to DPW Environmental Division on a monthly basis?	ALL			
d. Do personnel have required certification for maintaining/repairing refrigerant systems?	ALL			
e. Are refrigerant recycling systems EPA certified and on record?	ALL			
9. RECYCLING - EO 13101; AR 200-1, Ch 5	ALL			
a. Is a Unit Recycling Coordinator appointed? (ATZT-DPW-EE, SOP for Recycling & Solid Waste Diversion on FLW, 31 AUG 1999)	ALL			
b. Is recyclable material removed from the waste stream?	ALL			
c. Is a recycling program in place with cardboard, office paper and aluminum cans recycled to the maximum extent?	ALL			
d. Does the unit recycle scrap steel and iron?	ALL			
e. Are oversized lumber and barrier material reduced to manageable length (less than 4') and transported to the St. Robert Transfer Station?	ALL			
f. Is the unit participating in the reusable (shop) rags program?	ALL			
10. CRITICAL SOLID WASTE MANAGEMENT – 10 CSR 80	ALL			
a. Are dumpsters free of yard wastes, paint, flameless ration heaters, POL containers or other hazardous materials that may leak into the environment?	ALL			
b. Does the unit store more than 24 tires? (A maximum of 24 tires may be stored without a permit.)	ALL			
c. Are tires covered while in storage to prevent rainwater collection and vector habitat?	ALL			
11. NATIONAL ENVIRONMENTAL POLICY ACT – AR 200-2; FLW Reg 200-1, par 2-2 (d)	ALL			
a. Is DPW Environmental notified prior to beginning self-help projects to ensure project will not violate requirements related to lead based paint, asbestos, historic and cultural resources?	ALL			
b. Does the unit notify DPW Environmental during the earliest planning stages of proposed construction or land clearing projects, significant POI changes, or significant personnel or organizational realignments?	ALL			

