

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. (Footnotes in Level Section refer to footnoted comments in the Remarks Section).

This checklist is to be used by Battalion/Division level to conduct OIP inspections of Company/Branch levels. Applicable sections are contingent upon unit level activities. This checklist is also applicable to Company/Branch level self inspections.

INSPECTION CRITERIA:	LEVEL	GO	NO GO	REMARKS
1. PROGRAM ADMINISTRATION - AR 200-1, 1-32, (d), FLW 200-1 para. 2-1	BN			Applicable to all units
a. Does unit have a copy of the Environmental Compliance Officer (ECO) desk reference with DPW Policies, SOPs, inspection records and environmental guidance?	BN			
b. Is an Environmental SOP established?	BN			
c. Has Unit ECO been appointed in writing?	BN			
d. Has the designated ECO attended the ECO Course?	BN			
e. Does the unit conduct environmental awareness training and is it documented on unit training schedule?	BN			
f. Does the Unit conduct internal OIP inspections and are checklists available for review?	BN			
2. CRITICAL HAZARDOUS WASTE (HW) MANAGEMENT - 40 CFR 262.34, FLW 200-1 para 2-2 (d)	BN			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.	BN			
b. Is the HW managed IAW Federal, State and FLW policies and procedures and does unit have a copy of memorandum ATZT-DPW-EE, SUBJECT: New Hazardous Waste/Material Turn-in Procedures, 1 Nov. 2000?	BN			
c. Does unit maintain FLW Form 767 (Material Information Pick-up Slip) for HW Turn-ins? Records must be kept on file for one year.	BN			
d. Is facility considered a HW Satellite Accumulation Point (SAP)? If no, skip to Spill Prevention Section.	BN			
e. Are SAP containers marked and labeled as: hazardous waste, the type of contents, and accumulation start date?	BN			
f. Are containers in serviceable condition and free of leaks and dents?	BN			
g. Are containers closed when not in use?	BN			

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>	BN			
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INSPECTION CRITERIA:	LEVEL	GO	NO GO	REMARKS
i. Are containers compatible with contents?	BN			
j. Is the SAP properly posted with "Hazardous Waste Accumulation Site" to include points of contact, emergency numbers and fire extinguishers?	BN			
k. Is SAP at or near the point of generation and under the control of the operator generating the waste?	BN			
l. Is each type of HW maintained in a separate container?	BN			
m. Is spill response kit labeled "Spill Control Kit" and safety equipment available at or near the point of generation to respond to HW spills?	BN			
n. Is a copy of Spill Prevention Response Plan (SPRP) posted at SAP?	BN			
o. Have unit personnel who handle or manage HW received training to carry out their responsibilities?	BN			
p. Has the SAP been approved by the DPW Environmental Branch?	BN			
3. CRITICAL SPILL PREVENTION - 40 CFR 112, AR 200-1 Chapt. 3, FLW 200-1 para 2-2(e)	BN			Applicable to users of Hazardous Materials only
a. Is FLW Spill Prevention and Response Plan (SPRP) on file and posted?	BN			*
b. Are spill response materials/kits readily available and in proximity to potential spill sites?	BN			
c. Do personnel understand spill/emergency response and reporting requirements?	BN			
d. Is contaminated soil properly disposed of IAW SPRP?	BN			
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?	BN			
4. WASHRACK MANAGEMENT - ECO Desk Reference Lesson 5g	BN			Applicable to users/managers of washracks only
a. Do personnel know limitations of oil/water separator; i.e., changing vehicle oil or pouring large quantities of POL into separator is not authorized?	BN			
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?	BN			
c. Is the wash rack drain system clean?	BN			
d. Is steam cleaning performed on washrack or other area so that wash water drains to wastewater collection system?	BN			
e. Are operation procedures established for washrack? Does SOP explain how to request oil water separator and wash rack maintenance?	BN			
f. Is washrack residue/silt properly disposed of?	BN			
5. CRITICAL POL/USED OIL MANAGEMENT - 40 CFR Part 279, 10 CSR 25-11	BN			Applicable to units that use/manage POL.
a. Are all containers and tanks used for the accumulation of used oil labeled "USED OIL"?	BN			

b. Are lids kept closed on used oil tanks and containers?	BN			
INSPECTION CRITERIA:	LEVEL	GO	NO GO	REMARKS
c. Are used oil filters crushed or punctured and drained for a minimum of 24 hours?	BN			
6. CRITICAL POL STORAGE TANK MANAGEMENT - 40 CFR Part 112, 10 CSR 20-10 thru 15, FLW 200-1 para. 2-2(g)	BN			Applicable to Units that manage POL Storage Tanks
a. Are leak detection systems working on underground storage tanks and underground piping?	BN			
b. Is rainwater drained from secondary containment of above ground storage tanks?	BN			
c. Does containment drain valve remain closed & locked except when draining rainwater?	BN			
7. ENVIRONMENTAL BEST MANAGEMENT PRACTICES - 40 CFR 112, ECO Desk Reference	BN			Criteria contingent upon unit operations as applicable
a. Are POL spills being cleaned up in parking lot to reduce runoff contamination?	BN			
b. Are POL storage areas clean and maintained to prevent contamination of the environment?	BN			
c. Are spill response kits available on mobile equipment?	BN			
d. Do personnel understand how to manage and report an off-post spill incident?	BN			
e. General housekeeping. Are small spills cleaned?	BN			
f. Do motor pool personnel know where drains are connected, e.g., sewage system, oil water separator or storm drainage ditch?	BN			
g. Is dry sweep properly disposed of IAW Memorandum ATZT-DPW-EE, Environmental Bulletin, July 2001?	BN			
h. Are dumpster lids closed and in serviceable condition?	BN			
i. Does equipment (including spigots) leaking POL have drip pans to contain the leak ?	BN			
j. Are drip pans serviceable?	BN			
k. Does the unit have a copy of the Environmental management procedures for solvent tanks memo?	BN			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?	BN			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?	BN			Applicable to units Operating solvent Tanks
n. Does the unit have an SOP for managing their spent filters and solvent for solvent tanks?	BN			Applicable to units Operating solvent Tanks
o. Are lids on solvent tanks, closed unless in use?	BN			Applicable to units Operating solvent Tanks
p. Is the unit required to provide data for the TRI and EPCRA Reports annually? Is report data available?	BN			

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.	BN			Applicable to units That maintain air permits
a. Is there a copy of applicable air permit on site?	BN			
b. Are records kept on file in compliance with permit conditions?	BN			
INSPECTION CRITERIA:	BN	GO	NO GO	REMARKS
c. Are records sent forward to DPW Environmental Division on a monthly basis?	BN			
d. Do personnel have required certification for maintaining/repairing refrigerant systems?	BN			
e. Are refrigerant recycling systems EPA certified and on record?	BN			
f. Is the unit required to report data to Environmental for the Emissions Inventory Questionnaire? Are copies of report data available?	BN			
9. RECYCLING - EO 13101, AR 200-1 Chapt. 5	BN			Applicable to all units
a. Is a Unit Recycling Coordinator appointed? ATZT-DPW-EE, SOP for Recycling & Solid Waste Diversion on FLW, 31 AUG 1999.	BN			
b. Is recyclable material removed from the waste stream?	BN			
c. Is a recycling program in place with cardboard, office paper and aluminum cans recycled to the maximum extent?	BN			
d. Does the unit recycle scrap steel and iron?	BN			
e. Are oversized lumber and barrier material reduced to manageable length (less than 4') and transported to the St. Robert Transfer Station?	BN			
f. Is unit participating in the reusable (shop) rags program?	BN			
10. CRITICAL SOLID WASTE MANAGEMENT – 10 CSR 80	BN			Applicable to all units
a. Are dumpsters free of yard wastes, paint, flameless ration heaters, POL containers or other hazardous materials that may leak into the environment?	BN			
b. Does the unit store more than 23 tires? (A maximum of 24 tires may be stored without a permit.)	BN			
c. Are tires covered while in storage to prevent rainwater collection and vector habitat?	BN			
11. NATIONAL ENVIRONMENTAL POLICY ACT - AR200-2, FLW 200-1 para 2-2 (d)	BN			Applicable to all units
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?	BN			
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?	BN			
c. Does the unit notify DPW Environmental during the planning phases for new technology demonstrations and fielding/testing new weapons, chemicals or equipment.	BN			
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REMARKS AND FINAL COMMENTS: