



FedFacs

an environmental bulletin for federal facilities

TWO FEDERAL INSTALLATIONS CHOSEN AS ENVIRONMENTAL LEADERS

EPA has announced the first selection of 12 pilot projects for the Agency's Environmental Leadership Program. Among the pilots are two federal installations that have volunteered to test the design of specific elements of the program. They are McClellan Air Force Base in Sacramento and the Puget Sound Naval Shipyard in Bremerton, Washington. Pilot participants receive public recognition as environmental leaders and the opportunity to inform and directly participate in EPA's effort to reassess its environmental auditing policy.

The Environmental Leadership Program is aimed at exploring ways that EPA and States might encourage industrial and federal facilities to develop innovative auditing and compliance programs and reduce the risk of non-compliance through pollution prevention practices. Each pilot project will work toward achieving one or more of the following key principles or goals:

- *Environmental management systems.* EPA is interested in encouraging facilities to adopt management systems that both prevent violations and assure continuous environmental improvement.
- *Multi-media compliance assurance.* EPA is interested in developing and sharing inspection protocols with industry which can be integrated into corporate environmental management systems.
- *Third party certification.* EPA wants to explore the use of an independent verification of compliance audits to enhance compliance assurance and

the credibility of facility-generated data.

- *Public accountability.* EPA is committed to developing performance measures which are accurate and meaningful to the public, and which allow comparisons of one facility's performance with others.
- *Community involvement.* EPA is committed to "place-based" solutions to

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Director's Word

BARRY BREEN

Dear Reader:

Welcome to the first issue of FedFacs! Depending on how useful you and others tell us it is, we plan for FedFacs to be a regular update on our work and to offer you an avenue for sharing progress on your own work.

Elsewhere in these pages you will find specific coverage of our work on a wide variety of projects. Those of you who know FFEO already realize this is a talented, high energy group. What's more, much of what we accomplish is in partnership with others. For example, EPA Regions and the National Enforcement Investigations Center deserve much of the credit for the Multi-Media Compliance and Enforcement Initiative. The Guidance on Accelerating CERCLA Environmental Restoration at Federal

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STEVE HERMAN



It is a pleasure for me to have been invited to provide the first guest column in this inaugural issue of FedFacs. I am encouraged by the increasing attention that many federal agencies are giving to environmental issues. I do not have to tell you that this has not always been the case. In many respects we are playing catchup and are paying for the sins — of omission and commission — of those who came before us. Today, however, we have no choice but to confront the legacy of past abuse and neglect of our environment. The public demands it, and our laws requiring federal cleanup and compliance with environmental standards reflect these demands.

We have seen the federal environmental restoration and compliance budget increase to over \$12 billion in FY 1995. And the greatest challenges are yet to come, as we move from studying sites to remediating them. Annual needs in the years ahead could go up to \$16 billion per year. And these budget demands come at a time when downsizing, streamlining, and reinventing government have placed even greater demands on limited agency resources.

In my past life, I had the honor of defending the President and the Secretary of Defense in legal disputes involving the deployment of the MX missile system and the Navy's ELF submarine

system. Now, I find myself in a somewhat different position. I was honored to have been chosen by President Clinton and Administrator Browner to be the EPA Assistant Administrator for Enforcement and Compliance Assurance. As such, my office is responsible for ensuring that our environmental laws are complied with by the regulated community... and that includes the federal government.

Now, what is EPA's perspective on all this? By enhancing EPA's enforcement authorities — most recently in the 1992 Federal Facility Compliance Act — Congress sought to ensure that EPA would provide an independent force to keep environmental compliance and cleanup a high federal government priority. The general public also looks to EPA to play a distinct and independent role in federal facilities compliance. In various forums and meetings, citizens have repeatedly stressed to us that they expect EPA to act as an "honest broker" within the federal government, both to oversee other agencies' compliance actions and to take enforcement action when necessary. And we have been doing so. In the first two years of implementing the Federal Facility Compliance Act, for example, EPA and the states have issued over 100 administrative orders and assessed \$12 million in penalties against federal facilities.

Sometimes federal agency staff are outraged or mystified at the notion of one federal agency fining or penalizing another federal agency. They ask: "Why are you

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Federal Facilities Enforcement Actions under FFCA and RCRA, FY 1994:

	EPA	State	Total
Administrative Orders	10	30	40
Proposed Penalties	\$5,722,978	\$791,311	\$6,514,289

Actions under CERCLA, FY 1994:

Interagency Agreements		2
Stipulated Penalties Assessed	\$1,270,000	
Proposed Supplemental Environmental Projects	\$2,150,000	

CASE HIGHLIGHTS:

- **U.S. Air Force, Myrtle Beach AFB, South Carolina, September 19, 1994.** Region 4 issued a unilateral RCRA section 3008(h) corrective action order following months of unsuccessful attempts to negotiate an order on consent for timely cleanup of the closing base.
- **Fort Dix, New Jersey, July 15, 1994.** Region 2 issued a Notice of Violation for a Clean Water Act violation for interim limits on biological oxygen demand.
- **U.S. Coast Guard Kodiak Support Center, Kodiak, AL, July 14, 1994.** EPA Region 10 sought \$1,018,552 in penalties for two RCRA violations: failure to properly monitor groundwater in an area where cleaning solvents had been dumped on the ground, and illegal storage of hazardous waste without a proper permit.
- **U.S. Navy, Naval Construction Battalion Center (NCBC), Rhode Island, June 6, 1994.** Region 1 settled a RCRA penalty order against the Navy. The Navy agreed to pay a penalty of \$57,223 for violations including failure to provide training, failure to label hazardous waste containers, and failure to conduct weekly container inspections.

Facility Planning Guide Aims at Meeting December Deadline

To help federal agencies meet the requirements of a number of recent Executive Orders, EPA's Federal Facilities Enforcement Office has developed a Federal Facility Pollution Prevention Planning Guide. The guide provides detailed, step-by-step assistance in developing facility-specific pollution prevention plans.

Under E.O. 12856, each covered facility must develop a written pollution prevention plan by December 31, 1995. The

plan should define how the facility will contribute to the agency's overall pollution prevention reduction goals.

The guide includes a review of relevant Executive Orders and federal and state legislation; steps in the development of plans; guidance on public participation, developing a measurement process; and lists of publications, programs, and contacts.

For copies of the guide, see the ordering information on p. 11 below.



FEDERAL FACILITY POLLUTION PREVENTION PLANNING WORKSHOPS

FFEO is sponsoring workshops at six different locations on how to develop a facility-specific pollution prevention plan. Small group sessions will offer hands-on experience.

Date	Location	Co-Sponsor
March 21-22	New York, NY	USCG
April 25-26	Gulfport, MS	NASA
May 9-10	Lakewood, CO	EPA NETI
May 16-17	Alameda, CA	USCG
June 13-14	Potomac, MD	USPS
June 26-27	Norman, OK	USPS

To obtain a registration form or more information, fax a request to 202-260-9437 or call 703-821-4630.

GUEST SPOT

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fining us?" "Why are you embarrassing us?" "Why don't you just help us?" "Show us how to do it right." The simple, truthful answer is that the enforcement action and penalty are a deterrent to noncompliance. Congress has charged EPA with the means to swing the "hammer" and we will continue to use it in appropriate circumstances.

While our enforcement efforts provide a strong incentive for compliance, this is not the only set of responses being used by EPA for achieving this goal. By providing compliance assistance tools which promote pollution prevention, EPA is helping to build the capacity of federal

facilities to move toward cleaner, cheaper and smarter methods of environmental management.

One primary area we are targeting our compliance assurance efforts is pollution prevention, much of it related to implementation of the President's Pollution Prevention Executive Order (#12856). Appropriate federal implementation of E.O. 12856 is key to changing the central premise of environmental protection from treatment and disposal to pollution prevention.

In closing, I would like to stress again that EPA's role in federal facilities cleanups and compliance is a unique and sometimes difficult one. On the one hand, we are committed to working with our

sister agencies to address the enormous environmental challenges confronting the federal government. On the other, we are charged by law with being the federal government's principal environmental regulator and enforcer. Although EPA's role is sometimes misunderstood, we intend to persevere because it is in all of our mutual interests to do so. I look forward to continue working with those of you in the federal sector and thank you for the opportunity to share my thoughts in *FedFacs*.

Steven A. Herman is EPA's Assistant Administrator for Enforcement and Compliance Assurance.

INTRODUCING . . . FFEQ, EPA's Federal Facilities Enforcement Office

FFEQ is EPA's front-line office for ensuring that federal facilities take all necessary actions to prevent, control, and abate environmental pollution. FFEQ participates in enforcement negotiations, oversees enforcement activities undertaken by the Regions, and is responsible for resolving enforcement disputes between EPA and other agencies. On nationally significant cases, FFEQ coordinates with the Regions on issuing compliance orders and agreements. Actions against federal agencies include notices of violation, IAGs, orders, and agreements under all relevant environmental statutes.

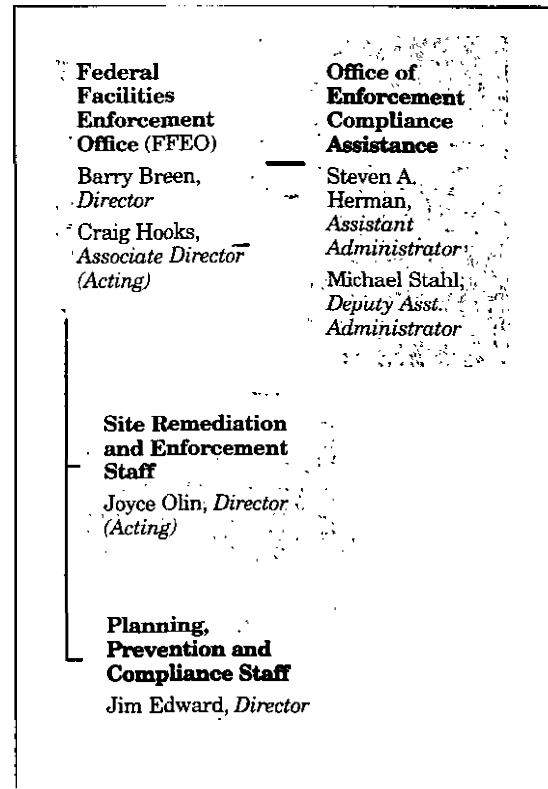
FFEQ is divided into two groups:

The **Site Remediation and Enforcement Staff (SRES)** primarily works with federal agencies and other offices in EPA (including FFRRO) to streamline enforcement and cleanup at federal facilities. Specific SRES responsibilities include:

- Reviewing, coordinating and participating in the negotiation and implementation of CERCLA IAGs and Memoranda of Understanding.
- Coordinating development of CERCLA enforcement policy with EPA Regions through the Federal Facility Leadership Council.
- Developing regulations, policies, guidance, and strategies for federal facilities enforcement under the Resource Conservation and Recovery Act (RCRA) and other environmental statutes.

The **Planning, Prevention and Compliance Staff (PPCS)** is responsible for initiatives to prevent noncompliance at federal facilities and overseeing compliance and enforcement activities. Activities include:

- Developing, coordinating, and tracking federal facility compliance assurance and assistance efforts; improving environmental management and auditing programs; and managing FFTS and other enforcement and compliance databases.
- Promoting pollution prevention and environmental justice goals through implementation of E.O. 12856 and other Executive Orders.
- Managing the Federal Facilities Multi-Media Enforcement/Compliance Program, the "A-106" environmental management program that oversees federal agencies' environmental compliance budget requests.
- Facilitating the use of innovative environmental technologies to attain prevention, compliance, and cleanup goals.



MONTHLY ROUNDTABLE KEEPS COMMUNICATIONS FLOWING

FFEQ's monthly roundtable meetings offer federal agency staff a steady stream of fresh information to keep them up-to-date with EPA policy, existing and pending standards and regulations, and the latest in environmental research. Fifty federal departments and agencies participate in the EPA/Federal Agency Environmental Roundtable.

The Roundtable also provides a forum for the exchange of information on pollution prevention and control techniques as well as innovative cleanup technologies. Other topics include: information needed to prepare the annual federal agency pollution abatement and prevention plans required by E.O. 12088, OMB Circular A-106, and OMB Circular A-11; the hazardous waste docket; technical information systems; and high profile topics such as the National Priorities List and base closure.

The Roundtable was established under authority of Executive Order 12088, to fulfill the consultative and technical assistance mandate envisioned between EPA and other federal agencies. The Roundtable has been in continuous operation at EPA for over 10 years.

Contact: Don Franklin, EPA/FFEQ, 202-260-5908.

and FFRRO, EPA's Federal Facilities Restoration & Reuse Office

Office of Solid Waste & Emergency Response

Elliott Laws,
Assistant Administrator
Timothy Fields,
Deputy Asst. Administrator

Federal Facilities Restoration and Reuse Office (FFRRO)

Jim Woolford,
Director

Base Closure Team

Federal Facilities Policy Team

Stakeholder Enhancement

EPA's Federal Facilities Restoration and Reuse Office is the primary office charged with responsibilities toward restoration and reuse of closing and decommissioned federal facilities. Military base closures, cleanup streamlining, and stakeholder involvement are the primary focus of the FFRRO's efforts. Highlights of projects in these areas are described below.

- **Military Base Closure.** President Clinton's Five Point Plan to speed the economic recovery of communities where military bases are slated for closure is built on a partnership between EPA, DOD, and the States. The Fast Track Cleanup program focuses on cleanup efforts to facilitate reuse of closing bases. The program includes identifying clean parcels, accelerating cleanup, facilitating lease-

ing agreements, encouraging removal actions, technical assistance at non-NPL bases, enhanced community involvement, and integration of cleanup with economic development. In conjunction with DOD and EPA's regional offices, the FFRRO develops long-range environmental policies, plans and programs to expedite the cleanup and transfer of closing military installations.

- **Cleanup Streamlining.** FFRRO has several projects underway to improve the cleanup process at federal facilities. Working with the goal of enhancing the cleanup process to restore sites and facilities to productive use, FFRRO has built strong partnerships with DOD and DOE to improve cleanup guidance, streamline oversight, and promote innovative technologies
- **Stakeholder Involvement.** FFRRO manages the Federal Facilities Environmental Restoration Dialogue Committee, which provides the Federal government advice on how to improve stakeholder involvement at federal facilities, priority setting, and management of the cleanup programs. In conjunction with FFEO, FFRRO provides major contributions to the national debate on Superfund Reform and efforts to improve the federal government's overall approach to environmental management. FFRRO has teamed with DOD and DOE as they build community advisory boards at their sites. FFRRO also works with states, local governments, Native American tribes and community representatives to ensure that social and economic factors are considered in cleanup priority-setting and decision-making at federal facilities.

EPA REGIONAL FEDERAL FACILITY COORDINATORS

FFC's are responsible for coordinating the implementation of FFEO policies and programs at the Regional level. Regional FFCs coordinate with EPA Regional media program staff to implement federal facilities enforcement programs; manage tracking, oversight, and compliance planning activities; coordinate and train federal facilities in developing environmental management program plans; provide program assistance, training, and outreach for federal facilities; and encourage pollution prevention at federal facilities.

REGION 1

(CT, ME, MA, NH, RI, VT)

Anne Fenn,
617-565-3927

REGION 2

(NJ, NY, PR, VT)

Laura Livingston,
212-637-3494

REGION 3

(DE, DC, MD, PA, VA, WV)

Eric Ashton,
215-597-9857

REGION 4

(AL, FL, GA, KY, MS, NC, SC, TN)

Arthur Linton,
404-347-3776

REGION 5

(IL, IN, MI, MN, OH, WI)

Lee Regner,
312-353-6478

REGION 6

(AK, LA, NM, OK, TX)

Joyce Stubblefield,
214-665-6430

REGION 7

(IA, KS, MO, NE)

Craig Bernstein,
913-551-7688

REGION 8

(CO, MT, ND, SD, UT, WY)

Dianne Thiel,
303-294-1059

REGION 9

(AZ, CA, HA, NV, Amer. Samoa, Guam, TT)

Sara Segal,
415-744-1483

REGION 10

(AL, ID, OR, WA)

David Tetta,
206-553-1327

NewsResources

EPA ISSUES NEW A-106 GUIDANCE

Federal Agency Environmental Planning Process Revitalized

An Interagency Advisory Committee formed by EPA to examine the OMB Circular A-106 pollution abatement and prevention planning process has completed its work and made recommendations for revitalizing the system. The committee included members from EPA, OMB, DOI, DOE, FAA, DOT, DOD, Army, Navy, Air Force, USMC, DLA, USACE, NASA, USDA, and Treasury.

The recommendations in the committee's final draft report (issued in August 1994) proposed the largest changes in the A-106 process in the last 15 years. The committee recommended that EPA issue more detailed guidance on the A-106 system to other federal agencies, include pollution prevention project information in the system, change both the timing and type of EPA review of federal agency pollution abatement and prevention plans, and change the timing of the submission of the annual report to OMB.

Following up on these recommendations, Steve Herman, EPA Assistant Administrator for Enforcement and Compliance Assurance, authorized the distribution of new guidance to other federal agencies, entitled Federal Agency Environmental Management Program

Planning, issued under authority of Executive Order 12088 and OMB Circular A-106. This new guidance outlines the major procedures to be followed by all federal agencies in planning and budgeting for environmental compliance. The purpose of this planning process, now called FEDPLAN, is to ensure that federal agencies identify all environmental requirements and target adequate resources to address them.

EPA's FFEO, which manages the FEDPLAN process, has developed a new PC-based management information database, called FEDPLAN-PC, that contains all federal agency environmental project information that supports the review process. FEDPLAN-PC will be fully implemented during this fiscal year. The database provides a powerful data analysis capability to regional media program review personnel and regional Federal Facility Coordinators. EPA staff will be able to perform relational analyses between the project level compliance and budget information contained in FEDPLAN-PC and the inspection and compliance information contained in the new Federal Facility Tracking System coming on-line.

Contact: Don Franklin, EPA FFEO, 202-260-5908. For a copy of the new A-106 Guidance, fax your request to Vicki Nelson at 202-260-9437.

ENVIRONMENTAL JUSTICE PROJECTS

Final environmental justice strategies are due to the President from all federal agencies on April 11, 1995. FFEO is reviewing draft EJ strategies of other agencies pertinent to FFEO's mission, as required by Executive Order 12898. EPA's Office of Enforcement and Compliance Assurance has developed a detailed series of workplans outlining EJ projects underway and planned in OECA, which were presented to the National Environmental Justice Advisory Council's Enforcement and Compliance Subcommittee in January 1995. FFEO also is developing GIS (geographic information systems) Environmental Justice Profile reports for 25 federal facilities in all 10 EPA Regions which are due to be issued in April.

For more information, contact Darlene Boerlage, FFEO, 202-260-0413.

BENCHMARK STUDY IDENTIFIES BEST IN CLASS BEHAVIORS

Study Shows Civilian Federal Agencies Lagging Behind Private Sector Leaders and Defense Related Agencies

A new study released by EPA's Office of Enforcement and Compliance Assurance evaluates the environmental management systems in place in 17 civilian federal agencies, 3 private corporations, and four defense-related agencies. The purpose of the study was to evaluate how private and government organizations perform against a benchmark considered to be state-of-the-art environmental management performance.

The study compared CFA responses on a 1993 survey questionnaire to private sector and defense-related agency practices in six areas of evaluation: organiza-

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FacilityFacts

Number of buildings owned by the Federal Government:
over 450,000

Number of installations owned or operated by the Federal Government:
31,500

Number of acres in the United States owned or managed by the Feds:
over 662 million

Number of federal facilities listed on the National Priorities List of hazardous waste sites:
154 final, 8 proposed

Number of military installations scheduled to be closed that are listed on the NPL:
23

Source: U.S. EPA, Office of Enforcement, "The State of Federal Facilities" (EPA 300-R-94-001, February 1994).

BENCHMARK STUDY

Continued from page 6

tional structure; management commitment; implementation of programs; information collection, use, and follow-up; internal and external communications; and personnel management.

On most of the six areas and associated benchmark criteria, the civilian federal agencies lagged significantly behind industry leaders (Chevron, Xerox, and 3M) as well as their counterparts in defense-related agencies (Departments of Energy, Army, Navy, and Air Force). For example:

- Only 5 of 17 CFAs report a management commitment to go beyond compliance with environmental requirements, in terms of resource allocation, training, and support;
- Only 3 CFAs report having well-publicized channels for employees to raise environmental concerns;
- Only 5 CFAs reported that facility managers have environmental compliance as part of their performance evaluations;
- While a majority of CFAs report that agency employees receive formal guidance on environmental requirements associated with their jobs, only 5 CFAs report utilizing formal training programs for compliance staff.

By contrast, the private and defense-related respondents rated significantly better on all key indicators of "Best in Class" performance.

An EPA-led interagency Civilian Federal Agency Task Force is scheduled to release a strategy for improving CFA environmental compliance within the next few months. Also soon to be released is a study of CFA environmental auditing issues by the U.S. General Accounting Office.

To order a copy of EPA's Benchmark Report, see ordering information on p. 11. For more information, contact Richard Satterfield, FFEO, 202-260-9759.

LOG ON, SIGN UP, JOIN IN!

EPA Bulletin Boards Offer Full Spectrum Services for Federal Facilities

EPA has joined the information revolution with electronic bulletin board systems (BBS) and databases to serve federal facilities' environmental needs. Currently in operation is the FFLEX (Federal Facilities Environmental Leadership Exchange) system, which features information on pollution prevention and other innovative technologies, contacts, case study documents, *Federal Register* documents, training opportunities, laws, executive orders, regulations, and guidelines.

Just waiting final approval is the merger of FFLEX with EnviroSense, a new full-service EPA BBS just coming on line in Spring 1995. EnviroSense will contain a series of directories exclusive to federal facilities. Included will be all of the FFLEX data, several on-line databases, and on-line access to other agencies' BBSs and databases. EnviroSense also includes information on:

- Recycling, controls and disposal
- Base closure and cleanup
- Alternate chemicals and solvents
- Other federal and state agencies
- Industry, universities, environmentalists

Showcase Your Achievements!

State, federal, and environmental organizations: You are invited to establish your own directories on EnviroSense, at no cost to you! FFEO is aware that a BBS can only reach its full potential with a large amount of high-quality data and timely information. FFEO is committed to providing a value-added service to help agencies comply with environmental regulations at the lowest possible cost.

To widen the electronic information available to the federal community,

HOW TO ACCESS FFLEX

(Until June 1995)

Until June 1995, FFLEX is accessible only by modem (4 lines). Call 202-401-5930 and set your system to:

Data Bits: 8

Parity: None

Stop Bits: 1

Emulation: VT-100 or ANSIBBS

Speed: 2,400-14,400 baud

HOW TO ACCESS ENVIROSENSE:

Beginning April 15, 1995, EnviroSense is accessible both by modem and via the World Wide Web on the Internet.

By modem (28 lines):

Call 703-908-2092

Data Bits: 8

Parity: None

Stop Bits: 1

Emulation: VT-100 or ANSI

Speed: 2,400-14,400 baud

By Internet: (World Wide Web)

<http://wastenot.intel.gov/envirosense>

FFEO invites you to showcase your organization's successes and accomplishments. This can be done in several ways: either by starting your own directory and placing your information directly into it, or by uploading your data into one of the existing directories.

Either way, FFEO staff will be happy to help you make the best possible use of BBS services to meet your needs.

Contact Louis Paley at 202-260-4640 or via the Internet at: paley.louis@epamail.epa.gov.

ENVIRONMENTAL LEADERS

Continued from page 1

pollution problems, and to environmental justice for all communities regardless of race or income.

- *Mentoring.* Large corporations or agencies can help small ones understand and comply with environmental regulations and new technologies.

The 12 projects selected were chosen from a pool of 40 projects submitted, 10 of which were federal facility applicants. The selection process was a cooperative effort of EPA Regional Offices, State environmental agencies, and EPA OECA offices.

For more information, contact Tai-Ming Chang, ELP Project Director, Tel: 202-260-6777, Fax: 202-260-8511; or Louis Paley at 202-260-4640.

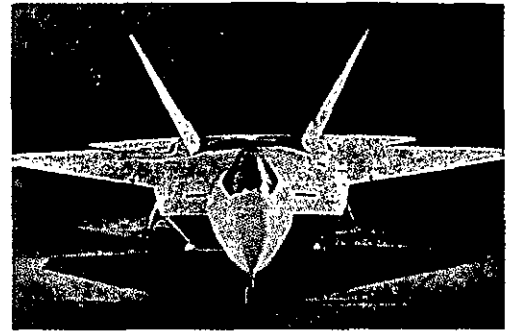
PUGET SOUND NAVAL SHIPYARD

The Puget Sound Naval Shipyard in Bremerton, Washington employs about 18,000 military and civilian personnel. The facility's proposal is to conduct a pilot project that goes a step beyond compliance audits by conducting pollution prevention opportunity assessments through a partnership with EPA and the Washington State Department of Ecology. The assessments will be directed at identifying and improving regulations whose unanticipated consequence is to harm human health or the environment. A model program will be outlined on computer disk that will encourage other facilities to operate beyond compliance in a similar fashion.

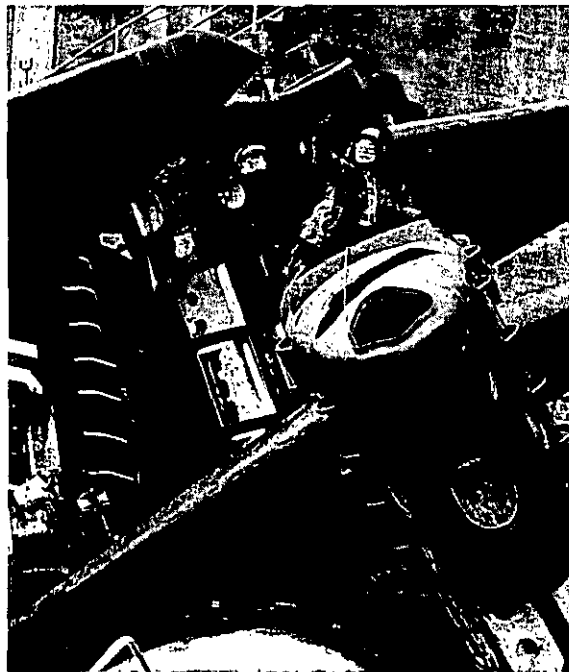
LEADERS IN ACTION:

McClellan Air Force Base

Located on 3700 acres in Sacramento, California, the 15,500 employees of McClellan AFB are involved in depot maintenance and 40 associated units. McClellan has shown its leadership in pollution prevention with over 150 projects already underway, managed through a computerized tracking system. McClellan's other tracking systems provide daily accounting of the disposition of hazardous materials and track hazardous waste containers from the time they are issued for use until they are turned in for disposal. Since 1985, McClellan has reduced its hazardous waste by 78 percent; an additional 14% reduction is planned by 1996.



The F-22 Advanced Tactical Fighter; for the first time, engineers and designers are working together to build and maintain an aircraft without using hazardous materials.



Approximately 40% of Puget Sound Shipyard's current workload involves full ship recycling. Here, the sails of several submarines are being readied for recycling in dry-dock after removal from their submarine hulls.

COMING UP
IN THE NEXT
ISSUE OF **FedFacts**

- USING EPA'S FEDERAL FACILITIES TRACKING SYSTEM
- MORE ON THE NEW INTERAGENCY ENVIRONMENTAL AUDIT PROTOCOL

Multi-Med a Inspection Initiative Yields Multiple Benefits

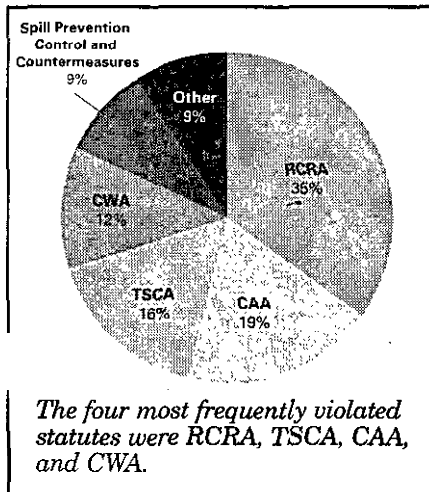
With 41 multi-media inspections of federal facilities under its belt, the Federal Facilities Multi-Media Enforcement/Compliance Initiative has yielded a snapshot of the status of federal facilities and prospects for multi-media inspections in the future. Analysis indicates that EPA and state utilization of multi-media inspections can be effective, regardless of the size of the federal facility or its operating agency.

Established in FY 1993, the initiative was designed to assess compliance of federal facilities with environmental laws, using multi-media inspections and enforcement to address areas of non-compliance. Coordinated team inspections were conducted by all ten EPA Regional Offices, in concert with state officials. Federal facilities were selected based on their compliance records and potential risk. Most of the facilities selected were DOD facilities (33 out of 41); the remainder were DOE installations (2), USDA facilities (2), and

facilities operated by DOT, DOJ, NASA, and DOI (1 each). Pollution Prevention Opportunity Profiles were prepared for all targeted facilities.

These profiles were used by EPA/state teams during the process and provided to the inspected facilities.

Pollution Prevention Opportunity Profiles were prepared for all targeted facilities. These profiles were used by EPA/state teams during the process and provided to the inspected facilities.



RESULTS

Results of the first year of the initiative were as follows:

- Just over half of the facilities inspected violated more than one statute.
- EPA and the States together issued 75 enforcement actions at 31 facilities. The actions ranged from warning letters (15) to formal administrative orders (18) with proposed penalties of \$2.1 million.

- The average time to issue an enforcement action ranged from 2 weeks for a field citation to 14 months for a Federal Facility Compliance Agreement.

- Of the facilities inspected, 24% received no formal enforcement action.

Regional Offices participating in the initiative reported good coordination with state officials and a strengthening of EPA-state working relationships. Facilities involved were considered professional and cooperative in the inspection, even in cases where the "facilities initially responded with shock to the arrival of inspection teams!" Despite some difficulties with allocating resources and coordinating schedules, the Regions found that multi-media inspecting provided multiple benefits, including the desired comprehensive review of a facility's environmental compliance status, and the attention of top-level managers to the facility's compliance.

For a copy of the interim report, "Federal Facilities Multi-Media Enforcement/Compliance Initiative," see p. 11. For more information, contact Jim Edward (202-260-8859) or Reggie Cheatham (202-260-4641).

DIRECTOR'S WORD

Continued from page 1

Facilities was a joint project with DOD, DOE, key EPA Regions, and the Office of Solid Waste and Emergency Response's Federal Facilities Restoration and Reuse Office. Implementing President Clinton's pollution prevention executive order is a joint effort with the Office of Prevention, Pesticides and Toxic Substances' Environmental Assistance Division. Indeed, this last project has participation from over a dozen other agencies besides EPA. To our partners, thank you. I expect

we'll be approaching you again soon.

These and other specific efforts grow out of the mission the President has laid out for us: help other agencies "ensure their cost effective and timely compliance" in meeting "the same substantive, procedural, and other requirements that would apply to a private person," through technical advice and assistance, reviews and inspections, review of proposed budgets, and, sometimes, direct enforcement.

Longtime friends of our program will see that the specific tools we use have evolved over the years. But one theme

remains constant: We help the government earn the trust of its citizens by living up to its environmental promises. As you will read in the column from Assistant Administrator Steve Herman, our efforts parallel EPA's larger themes. For me, there is special meaning in applying these themes to the federal government itself.

Barry Breen, Director, FFEQ

Federal Agency HazWaste Compliance Docket

Section 120(c) of CERCLA, as amended by SARA, requires EPA to establish a Federal Agency Hazardous Waste Compliance Docket. The purpose of the docket is to identify federal facilities that manage hazardous waste or from which hazardous substances may be or have been released. The docket is updated with new information every six months. Agencies are notified that one or more of their facilities has been considered for inclusion on the docket, and upon verification by the federal agencies, the facilities are listed in the *Federal Register*. The first docket published in 1988, listed 840 facilities. The latest update, published in the *Federal Register* as Update #9, lists 2,070 facilities.

For more information, contact *Augusta Wills*, 202-260-1686.

EPA and Army Agree on Pollution Prevention Technical Assistance Project

Following months of negotiations EPA's FFEO and the Army have reached agreement on establishing a pollution prevention technical assistance pilot project. The Memorandum of Agreement was signed by EPA Assistant Administrator Steven A. Herman and Army Under Secretary Joe R. Reeder in March 1995.

The Agreement sets up a partnership effort under which EPA and the Army will conduct pollution prevention assessments at three Army installations: **Rock Island Arsenal, IL; Fort Benning, GA; and White Sands Proving Ground, NM.** EPA's Risk Reduction Engineering Laboratory in Cincinnati will fund and conduct a pollution prevention opportunity assessment at each facility, to include an on-site visit, consultation with Army personnel, and a written report which will be made public. The report will contain a range of pollution prevention options and recommendations, to which the Army has agreed to respond within

four months of receipt of the assessment. Draft pollution prevention assessments will be completed by June 1, 1995 so that the Army can use them in preparing pollution prevention plans for these installations (as required by Executive Order 12856).

The Army has agreed to share the results of the pollution prevention opportunity assessments with other similar Army installations as applicable. In addition, the Office of the Deputy Assistant Secretary of the Army (Environment, Safety, Occupational Health) will review this pilot program, including the assessments and the installations' responses, and will comment on the appropriateness of adopting any of the assessment procedures and recommendations Army-wide. The review document will be made available to the public.

For more information, contact: *Bill Frank*, 202-260-5074 or *Reggie Cheatham*, 202-260-4641.

New Audit Protocol Goes Online

A newly-released Generic Protocol for Conducting Environmental Audits of Federal Facilities is available online on EnviroSense (see p. 7 for access information) for use by federal agencies. Prepared as a collaborative effort by the member agencies of the Federal Audit Protocol Workgroup for the Federal Community (EPA, DOE, DOD, USPS, NASA, DOI, USDA, and FAA), the protocol is meant to assist in the conduct of environmental audits and environmental management assessments. Because of its size — 920 pages! — the protocol is being made available to federal agency staff on computer diskette and via NTIS, as well as online. Federal agencies are encouraged to customize the protocol to their own needs before issuing it to auditors.

For more information, contact *Richard Satterfield*, 202-260-9759. The next issue of *FedFacs* will have a detailed article about the contents and uses of the audit protocol.

Six Committees Set Up to Promote E.O. 12856

EPA's Office of Enforcement and Compliance Assurance and Office of Prevention, Pesticides and Toxic Substances are co-chairing an Interagency Pollution Prevention Task Force. The Task Force has just established six committees to help the Federal Government comply with the Executive Order 12856 (TRI reporting & P2 compliance) requirements, and foster innovative technological P2 solutions. The six committees are:

- P2 Language for Federal Acquisition Regulations;
- P2 R&D and Technology Diffusion;
- Information Transfer and Technical Assistance;
- Standardized Material Safety Data Sheet Reporting;
- Outreach and Publicity for the Federal Government Executive Order and P2 Progress; and
- Substitute Chemicals and Alternative Processes.

Contact: *Louis R. Paley*, 202-260-4640 or via Internet at: paley.louis@epamail.epa.gov.

To Read FedFacs Electronically:

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To Receive FedFacs in the Mail or to Order Documents Mentioned in the Newsletter:

- Please include me on the FedFacs mailing list (no charge).
- Please send one copy of the following documents (no charge):
 - "Federal Facilities Multi-Media Enforcement/Compliance Initiative"** (EPA 300-R-94-007, November 1994).
 - "Federal Facility Pollution Prevention Planning Guide"** (EPA 300-B-94-012, November 1994)
 - "Federal Agency Environmental Management Program Planning Guidance"** (EPA 300-B-95-001, October 1994)
 - "Environmental Management System Benchmark Report"** (EPA 300-R-94-009, December 1994).

Complete the following:

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LIST OF ACRONYMS

CAA	Clean Air Act
CERCLA	Comprehensive Emergency Response, Compensation, and Liability Act
CFA	Civilian Federal Agency
CWA	Clean Water Act
DLA	Defense Logistics Agency
DOD	Department of Defense
DOE	Department of Energy
DOI	Department of the Interior
DOT	Department of Transportation
EJ	Environmental Justice
EO	Executive Order
EPA	Environmental Protection Agency
FAA	Federal Aviation Administration
FFC	Federal Facility Coordinator
FFCA	Federal Facilities Compliance Act
FFEO	Federal Facilities Enforcement Office (EPA)
FFLEX	Federal Facilities Environmental Leadership Exchange
FFRRO	Federal Facilities Restoration and Reuse Office (EPA)
IAG	Interagency Agreement
NASA	National Aeronautics and Space Administration
NETI	National Enforcement Training Institute (EPA)
NPL	National Priorities List
OECA	Office of Enforcement and Compliance Assurance (EPA)
OMB	Office of Management and Budget
P2	Pollution Prevention
RCRA	Resource Conservation and Recovery Act
TSCA	Toxic Substances Control Act
USMC	U.S. Marine Corps
USACE	U.S. Army Corps of Engineers
USCG	U.S. Coast Guard
USDA	U.S. Department of Agriculture
USPS	U.S. Postal Service

FedFacs

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CALENDAR

April 18-20

THE 21ST ENVIRONMENTAL SYMPOSIUM AND EXHIBITION OF THE AMERICAN DEFENSE PREPAREDNESS ASSOCIATION
San Diego, CA

This year's event is entitled: Environmental Protection and a Changing Defense Mission: A Mid-Decade View. For more information, fax ADPA at 703-522-1885.

April 20-21

AN INNOVATIVE CONCEPTS TECHNOLOGY & BUSINESS OPPORTUNITIES FAIR
Denver, CO.

Contact: Jerry Holloway, Pacific Northwest Laboratory, 509-375-2007

May 15-19

FEDERAL FACILITIES ENVIRONMENTAL COMPLIANCE INSTITUTE
Knoxville, TN

Run by Government Institutes, Inc.
Contact: 301-921-2345. (Will be run again on August 21-25, in Keystone, CO. See later listing)

May 16-18

DOE'S 11TH POLLUTION PREVENTION CONFERENCE
Knoxville, TN
Contact: Linda Josie McDonald, DOE
Oak Ridge, 615-435-3415.

Aug 15-18

AIR FORCE WORLDWIDE POLLUTION PREVENTION CONFERENCE
San Antonio, TX.
Over 1500 attendees are expected from government and industry. Contact: W. Bruce Holt, American Defense Preparedness Association, 703-247-2579.

August 21-25

FEDERAL FACILITIES ENVIRONMENTAL COMPLIANCE INSTITUTE
Keystone, CO
Run by Government Institutes, Inc.
Contact: 301-921-2345.

EPA Regional Federal Facilities Conferences:

Regions

1, 2, and 3	<i>April 11-13</i>	<i>Providence, RI</i>
Region 4	<i>April 4-6</i>	<i>Atlanta, GA</i>
Region 5	<i>June</i>	<i>Chicago, IL</i>
Region 6	<i>May 23-25</i>	<i>Dallas, TX</i>
Region 7	<i>June 13-14</i>	<i>Kansas City, KS</i>
Region 8	<i>June 29-30</i>	<i>Denver, CO</i>
Region 9	<i>TBA</i>	<i>San Francisco, CA</i>
Region 10	<i>September</i>	<i>Seattle, WA</i>

Contacts: See Federal Facility Coordinators listed on page 5.

Workshops on Executive Order 12856:

Free EPA-sponsored workshops open to federal facility staff responsible for implementing E.O. 12856. To register, call 703-218-2709.

Region 8	<i>April 10-13</i>	<i>Denver, CO</i>
Region 10	<i>April 18-20</i>	<i>Seattle, WA</i>
Region 7	<i>April 25-57</i>	<i>Kansas City, KS</i>
Region 1	<i>May 2-4</i>	<i>Boston, MA</i>
Region 9	<i>May 8-10</i>	<i>San Francisco, CA</i>
Region 2	<i>May 16-18</i>	<i>Edison, NJ</i>
Region 5	<i>May 23-25</i>	<i>Chicago, IL</i>

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