



DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY GARRISON
BUILDING 1001 ROOM W321
FORT HOOD, TEXAS 76544-5000

REPLY TO
ATTENTION OF

IMSW-HOD-PWE

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Memorandum of Instruction (MOI) for Environmental Compliance Assessment Team (ECAT)

1. PURPOSE: To establish procedures for conducting Environmental Compliance Assessments at Fort Hood.
2. REFERENCE:
 - a. AR 200-1, Environmental Protection and Enhancement, 21 Feb 97
 - b. Texas Administrative Code, Title 30 Environmental Quality
 - c. Texas Commission on Environmental Quality (TCEQ), Title V, Air Operating Permit, # 0-01659
 - d. Code of Federal Regulations, Title 40 Protection of Environment
 - e. Code of Federal Regulations, Title 49 Hazardous Materials Transportation
 - f. FH Reg 200-1, Environment and Natural Resources, 15 Jul 04
 - g. FH Reg 200-10, Spill Prevention Control and Countermeasure Plan, 15 Jan 00
 - h. FH Reg 420-6, Recycle Program, 15 Sep 00
 - i. FH Reg 420-9, Energy Conservation Program, 11 May 92
 - j. FH Reg 420-27, Care, Maintenance and Alteration of Facilities, 15 Mar 00
 - k. FH Supplement 1 to AR 385-10, The Army Safety Program
 - l. International Organization For Standardization 14001: 2004
 - m. Environmental Management Procedure 4.5.5. Environmental Management System Internal Audit

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3. OBJECTIVES:

- a. Provide a seamless environmental compliance assessment, Environmental Management System (EMS) internal audit, and assistance program for Fort Hood.
- b. Support the goals of environmental protection and sustainable operations for Fort Hood.
- c. Ensure all operations at Fort Hood are performed in a manner that protects human health and the environment in accordance with federal, state, and local regulations.
- d. Evaluates and assists with conformance to Fort Hood's EMS.

4. APPLICABILITY: ECAT serves all units/activities assigned, attached, conducting training or residing within the limits of the Fort Hood military installation to include, but not limited to: military units, tenant organizations, garrison activities, partners in excellence, and contractor activities.

5. ECAT RESPONSIBILITIES:

a. Provide technical assistance to all units/activities located on Fort Hood in all areas related to environmental management/compliance and assist in the preparation and revision of all applicable unit references and guidelines. Assistance is based on the following:

(1) Assistance visits will be provided to all units/activities upon request by contacting the appropriate ECAT member (see paragraph 8 for POC information).

(2) Assistance visits will not be conducted within 30 days of a scheduled, formal assessment.

(3) Assessment schedules are worked through the Division G3 training section. Non-military activities are scheduled by communicating through Division Chiefs, Deputy Directors, Managers, and Contracting Officers Representatives.

(4) EMS Audits/Compliance Assessments are scheduled based on environmental aspect significance of the activity and results of prior audits/assessments.

b. Conduct routine Quality Assurance (QA) and Quality Control (QC) checks on the assessment program and EMS.

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c. Maintain a database on all units/activities to include, but not limited to: tracking semi-annual assessments, internal EMS audits, points of contact, current status, training conducted, and documentation from the routine drive-through, assistance visit, and follow-up checklist.

d. Maintain a current compliance assessment and EMS audit checklist that is updated in accordance with regulatory and policy changes.

6. ECAT PROCEDURES:

a. Prepare and present formal and informal briefings concerning compliance status and progress for the installation, significant activity reports, quarterly review and analysis, motor pool close-outs during time of deployments, inspection of work documentation, and document minutes from meetings as required.

b. Perform semi-annual Environmental Compliance Assessments based on the calendar year. EMS Audits are performed based on environmental aspect significance, and results of prior assessments. Both audits and compliance assessments utilize the enclosed assessment checklist as a guideline. Types of Assessments to be conducted are as follows:

(1) Semi-annual compliance assessments encompass all activities within a unit/activity and are broad in scope.

(a) Each assessment will result in a separate written report that is composed of a memorandum containing an overview of findings and recommendations. Assessment reports are comprehensive, but concise documents written to define problems or recognize commendable efforts. Assessment report template is at enclosure 1.

(b) All assessments are routed according to the assessment flow chart at enclosure 2.

(c) Assessment reports are addressed to the Commander, Division Chief, Deputy Director, Manager, or Contracting Officer's Representative (COR) of the assessed unit/activity, for information, comment, and corrective action as required.

(d) Unit/activity status will be determined utilizing Green, Amber, and Red ratings. Ratings are based on the assessment summary results attached to assessment checklist (enclosure 3) and are determined by the level of environmental compliance. Rating is scored as follows:

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(1) Green: If the unit/activity scores between 90-100%, the unit/activity will receive a green rating.

(2) Amber: If the unit/activity scores between 70-89%, the unit/activity will receive an amber rating.

(3) Red: If the unit/activity scores a 69% or below, the unit/activity will receive a red rating.

If a Notice of Violation (NOV) may be assessed by an outside regulatory agency on a particular discrepancy, the unit/activity will automatically be placed in a red status. The gray shaded areas on the checklist are automatic red items and are not calculated into the overall compliance status.

(e) Assessment reports are provided to other commanders/agencies whose functional areas of responsibility relate to assessment findings.

(f) Other relevant findings are forwarded to the appropriate agencies, including but not limited to Inspector General (IG), Fire, Safety, and Industrial Hygiene, for required corrective action.

(g) The Commander, Director, Activity Chief, or Manager is responsible for required corrective action.

(h) Commanders, Division Chiefs, Deputy Directors, Managers, and Contracting Officer Representatives are required to Reply by Endorsement within 30 days if any discrepancies are found. The Reply by Endorsement must state the root cause of the discrepancy, corrective actions planned and completed, and preventive actions taken to prevent future discrepancies. The Reply by Endorsement must indicate dates of completion and be forwarded to DPW, Environmental, ATTN: ECAT.

(i) A copy of all assessments and Replies by Endorsement are filed in the DPW-Environmental Division. Copies will be furnished to the appropriate Inspector General Office, Higher Command, and III Corps Deputy Chief of Staff.

(2) A follow-up review will be conducted between 30-60 days of the initial assessment, but not earlier than 30 days, to ensure corrective actions were taken to address findings of previous assessment(s). Need for follow-up assessment is determined on a case-by-case basis as indicated by discrepancies noted at initial assessment.

c. The EMS Management Representative, and Chief, Environmental Division, assess the effectiveness of the ECAT and EMS programs.

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d. ECAT prepares semi-annual compliance assessment and EMS status roll-ups of Fort Hood (June and December), to III Corps Chief of Staff. This report is routed through the Director of Public Works. Unit/activity roll-ups are submitted to appropriate Commanders, Directors, Managers, and Activity Chiefs.

7. Fort Hood Environmental Stewardship Award:

a. Purpose: Recognize units/activities and Environmental Compliance Officers (ECOs) for exemplary environmental performance. Recipients will be recognized for their awards at the quarterly Hood Hero Luncheons.

b. Awarding: Winning units/activities and ECO will receive a Certificate of Achievement signed by the Director of Public Works.

c. Requirements: The following criteria must be met to be eligible for the award: The Environmental Stewardship Award is based on a performance beyond compliance mentality exhibited by individuals and organizations. The criteria is based on the III Corps and Fort Hood Commander's environmental policy which holds that everyone is responsible for protecting and preserving the environment. The criteria, based on the SCALE acronym that embodies the policy are: Stop Pollution, Continue Improvement, Assure Compliance, Leadership Commitment, and Everyone Involved.

(1) Receive a green rating on their semi-annual assessment.

(2) All corrective actions completed and replies by endorsement returned to DPW Environmental within stated time frames.

d. Final Criteria: The following criteria determine which eligible unit/activity and ECO will receive the award: Commitment of the entire unit/activity to environmental performance.

e. Assessment: Members of the ECAT team will assess units/activities eligibility and determine the winner using requirements and criteria listed above. A memorandum for record documenting the process will be completed and filed with the ECAT assessments.

8. HOURS OF OPERATION and POC PHONE NUMBERS: ECAT hours of operation are from 0730–1630, Monday through Friday, excluding Government Holidays. Phone numbers for the ECAT members are:

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Team Leader/Garrison Activities	287-9103
1 st Cavalry Division/Contractors	286-7997
4 th Infantry Division	287-9604
13 th Corps Support/Separate Battalions	287-9105

9. Point of contact is Randy Doyle at 287-1099.

FOR THE COMMANDER:

Encl (3)

RODERICK A. CHISHOLM
Director of Public Works

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