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UNITED STATES ARMY GARRISON SCHWEINFURT
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Environmental

THE USAG SCHWEINFURT ENVIRONMENTAL MANAGEMENT SYSTEM

Summary. This regulation prescribes policies, procedures, and responsibilities for the United States Army Garrison (USAG) Environmental Management System (EMS) LAW ISO 14001:2004.

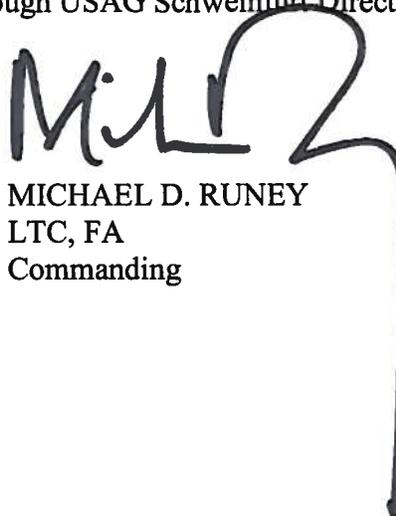
Applicability. This regulation applies to all military units, organizations, and authorized individuals and agencies or otherwise described in Chapter 1-33.

Supplements. Supplements to this regulation are prohibited without prior approval from the Directorate of Plans, Training, Mobilization, and Security (DPTMS).

Interim changes. Interim changes to this regulation are not official unless the Director of Human Resources authenticates them. Users will destroy interim changes on their expiration dates unless sooner superseded or rescinded.

Suggested improvements. This regulation's proponent agency is USAG Schweinfurt and users are invited to send comments to the USAG Schweinfurt ATTN: IMSW-SO, APO AE 09033.

Distribution. This regulation is distributed through USAG Schweinfurt Directorate of Human Resources.



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INTRODUCTIONAL CHAPTER

1-1. References.

Required regulations and publications to this regulation are listed in appendix A.

1-2. Purpose. This regulation prescribes policies, procedures, and responsibilities for the United States Army Garrison (USAG) Environmental Management System (EMS) IAW ISO 14001:2004. It consists of 33 chapter, covering the respective ISO 14001 sections as indicated underneath every chapter title. This regulation provides Schweinfurt specific requirements to supplement the German Final Governing Standards as well as the Army Regulation 200-1. This regulation will assist Schweinfurt leadership, and military and civilian employees in protecting the environment and in ensuring continual improvement of the Installations environmental performance.

CHAPTER 1
ENVIRONMENTAL MANAGEMENT SYSTEM (EMS) POLICY
ISO 14001 Section 4.2

1-1. General. This chapter incorporates elements of International Organization for Standardization (ISO) 14001 EMS standards into the existing installation management structure.

This chapter applies to all reserve and active component units, tenant agencies, United States Army Garrison (USAG) Schweinfurt team members, and off-post units/agencies utilizing USAG Schweinfurt facilities.

1-2. Procedures.

a. The USAG Schweinfurt provides installation operations in order to support readiness and mission execution of stationed and rotational units while ensuring the well-being of the Garrison:

(1) Comply with all applicable environmental policies, laws, and regulations.

(2) Continually assess activities, products and services to determine their effect on the environment. Identify significant environmental impacts ensuring their consideration when establishing objectives and targets in our environmental management programs.

(3) Identify potential sources of pollution and meet or exceed Army goals for pollution prevention.

(4) Fully integrate relevant environmental requirements into standard work practices and procedures. Make environmental awareness and compliance a routine part of daily operations.

(5) Actively pursue improvements in organizational EMS. Establish performance measures to assess system effectiveness.

b. Give this policy widest dissemination and post it in shops, work areas, unit bulletin boards, and on all official bulletin boards, as appropriate.

CHAPTER 2
REVIEW, MAINTENANCE, COMMUNICATION OF ENVIRONMENTAL
MANAGEMENT SYSTEM (EMS) POLICY
ISO 14001 SECTION 4.2

2-1. General. This chapter provides a standard procedure for reviewing, maintaining, and communicating the EMS Policy.

This chapter applies to USAG Schweinfurt personnel involved in reviewing, maintaining, and communicating the EMS Policy.

The following roles and responsibilities apply:

- a. USAG Schweinfurt Commander: Approves EMS Policy upon change of command, change of mission activities, or other updates.
- b. EMSMR: Has overall authority and responsibility for the operation of the EMS. Leads and manages the Cross-Functional Team (CFT). Reviews the EMS Policy and forwards it to the USAG Commander for approval. Ensures that the EMS Policy is distributed and communicated to the CFT and all supervisors including shop foremen within the USAG for further communication. Reports directly to the USAG Commander on EMS issues.
- c. Director of Public Works: Reviews the EMS Policy and forwards it to EMSMR for reviewing.
- d. Chief, Environmental Division: Initiates update of EMS Policy according to requirements of ISO 14001:2004.
- e. Public Affairs Office (PAO): Posts policy on USAG Schweinfurt website. Makes EMS Policy available to public, on request.
- f. Unit Commanders and Supervisors: Communicate EMS Policy to community members and contractors.
- g. CFT: Reviews EMS Policy.
- h. EMS Policy: Statement by the USAG Schweinfurt of its commitment to environmental stewardship and the continual improvement of its overall environmental performance, which provides a framework for action and for the setting of its environmental objectives and targets.
- i. Environmental Management System Management Representative (EMSMR): An individual appointed by the Garrison Commander who has authority and responsibility for the operation of the EMS.

2-2. Procedures.

a. EMS Policy: In order to conform with ISO 14001:2004 and be relevant to the USAG Schweinfurt, the policy must include the following key features:

(1) Reference to the military mission, as the policy must be appropriate for the nature, scale, and environmental impacts of the USAG Schweinfurt's activities, products, and services.

(2) Commitment to continual improvement and prevention of pollution.

(3) Commitment to comply with relevant environmental legislation and regulations and with other requirements to which the USAG Schweinfurt subscribes.

(4) Framework for setting and reviewing environmental objectives and targets.

b. Maintenance of EMS Policy: The EMS Policy is managed and controlled according to the USAG Schweinfurt document control procedure. It is reviewed annually during the management review, after change of command, or after mission changes of the Garrison.

c. Communication of EMS Policy:

(1) The PAO provides the EMS Policy to the public on request. It is also available on the USAG Schweinfurt website.

(2) The EMSMR communicates the EMS Policy to Unit Commanders, the Cross-Functional Team, and directors of all organizations within the USAG Schweinfurt community.

(3) The Environmental Division communicates the policy to community members during in-processing briefings and EMS Awareness Training.

CHAPTER 3
ENVIRONMENTAL ASPECTS AND IMPACTS
ISO 14001 SECTION 4.3.1

3-1. General. This chapter describes the process for identifying environmental aspects and associated impacts, and for assessing their significance in a consistent and reproducible manner. Environmental aspects and impacts are re-evaluated at least once a year or after significant changes of mission or activities.

This chapter applies to all U.S. Army Garrison (USAG) Schweinfurt personnel responsible for the evaluation of environmental aspects and impacts as identified in this procedure.

The following roles and responsibilities apply:

a. Environmental Management System Management Representative (EMSMR): Has overall authority and responsibility for the operation of the Environmental Management System (EMS). Reviews and approves the updated aspects register.

b. Director of Public Works: Provides overall supervision and direction for the environmental program.

c. Operators of relevant activities: Provide data to the Environmental Division.

d. Environmental Division, EMS CFT: Review and re-evaluate environmental aspects.

e. Environmental Aspect: Element of the Garrison's activities, products or services that can interact with the environment.

f. Environmental Impact: Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activity, product or service.

g. Significant Environmental Aspect: An environmental aspect that has or can have a significant environmental impact.

3-2. Procedures.

a. Identify all major installation activities (tactical and non-tactical) and identify their environmental aspects that can be controlled or influenced. Add new aspects/impacts to the existing register, delete obsolete aspects/impacts, and update ratings of aspects/impacts if applicable.

b. The first step for the evaluation of the environmental aspects is the determination of the rating factors "Likelihood" and "Consequence" for each aspect/impact, following the numerical scale below. For a re-evaluation, check if the risk factor has changed since the last review:

Likelihood: The probability that an impact might occur, or how often it actually occurs.

5 = Continuous - ongoing or daily

4 = Frequent - more than once per month

3 = Infrequent - more than once per year, less than once per month

2 = Rare - impact may occur once every year or two

1 = Never - never occurred or highly unlikely

Consequence: Potential severity of an environmental impact.

5 = Immediate threat, likely to result in widespread damage to human health or the environment; requires great effort to remediate or correct

4 = Serious - no immediate health threat, but significant damage to the environment; difficult, but possible to remediate

3 = Moderate - somewhat harmful, but correctable

2 = Mild - small potential for harm to environment, correctable

1 = Insignificant - trivial consequences, easily correctable or no impact

c. After determining the rating factors, the risk factor (RF) is calculated by multiplying Likelihood (L) and Consequence (C): $RF = L \times C$. The aspect is considered significant if the risk factor is ≥ 15 . Additionally, an aspect is considered significant if the consequence of the impact alone is rated 5, irrespective of the likelihood of such an event. It is therefore not essential to develop objectives, targets, and programs for each significant aspect, if sufficient operational controls are available. Some of the aspects included in the register may no longer be significant, as environmental objectives, targets, and programs are implemented in order to minimize environmental impacts. Remove the aspects from the database if an impact no longer exists, or change the significance status if the risk factor has changed. Significant environmental aspects are communicated on the USAG Schweinfurt environmental webpage and during EMS awareness trainings.

CHAPTER 4
LEGAL AND OTHER REQUIREMENTS
ISO 14001 SECTION 4.3.2

4-1. General: This chapter provides a standard procedure for identifying and communicating legal and other requirements applicable to environmental aspects and impacts associated with the processes, activities and services of the United States Army Garrison (USAG) Schweinfurt.

This chapter applies to all personnel residing within the USAG Schweinfurt community.

Implementation of this procedure will ensure that requirements are identified for existing and future processes, activities and services, and the requirements communicated to pertinent organizations and employees. The Final Governing Standards for Germany (GFGS) provide the federal and state legal framework for the activities within the USAG Schweinfurt. In addition to the GFGS requirements, community and local requirements must be obtained from the appropriate host nation sources.

a. Definitions:

(1) GFGS: The FGS-G were developed by comparing and adopting the more protective requirements of the Department of Defense (DoD) Overseas Environmental Baseline Guidance Document (OEBGD) and German national and state environmental laws and regulations, and applicable international agreements.

(2) Legal Requirements: Legal requirements are all laws, regulations, permits, contracts, memoranda of agreement, and consent orders applicable to the USAG Schweinfurt's processes, activities, and services.

(3) Other Requirements: Other requirements are requirements that are not determined by law but to which the organization has committed.

b. Responsibilities:

(1) Environmental Management System Management Representative (EMSMR): Has overall authority and responsibility for the operation of the Environmental Management System (EMS).

(2) Director of Public Works: Provides overall supervision and direction for the environmental program.

(3) Chief, Environmental Division: Supervises activities for the identification of legal and other requirements. Notifies Legal Requirements Coordinator of information received from sources not accessible to Legal Requirements Coordinator.

(4) Environmental Division Legal Requirements Coordinator: Monitors and tracks changes of legal requirements and identifies new requirements. Updates the inventory of legal

and other requirements, and ensures communication of changes during Environmental Quality Control Committee (EQCC) meetings.

4-2. Procedures.

a. Identification of Legal and Other Requirements: The Legal Requirements Coordinator monitors legal and other requirements applicable to environmental program for new requirements and changes, using pertinent information sources, as needed. Updates are conducted annually or in case of significant changes. The primary information source for legal requirements is the latest version of the GFSGS, which includes all current updated chapters and is available through the Army Environmental Center (AEC), Europe environmental website.

(1) Internet resources are listed in the inventory of legal requirements. Additional resources for identification of new requirements come from professional seminars and conferences (e.g. In Progress Review (IPR) meeting), professional publications, and news media.

(2) Applicability determination is performed for new laws/regulations or changes. If necessary, consult with the IMCOM, Europe Law Office to obtain a legal opinion or interpretation.

(3) Update inventory of legal and other requirements, including the title of law/requirement and publication date.

b. Communication of Legal Requirements: Once requirement changes are identified, the EQCC is notified.

c. When receiving new information on legal and other requirements, the Chief, Environmental Division summarizes the information and forwards it to the Legal Requirements Coordinator.

CHAPTER 5

OBTAINING PERMITS AND LICENSES

ISO 14001 SECTION 4.3.2

5-1. General. This chapter describes the process to obtain permits, licenses or other forms of official approval from host nation authorities related to the environment and construction in accordance with (IAW) the Supplemental Agreement to the NATO SOFA.

This chapter applies to all facilities, studies and projects that require official approval according to host nation law.

Facilities operating prior to 29 March 1998 are waived from permitting procedures as long as there is no change in use and they are not upgraded to meet the host nation's standards. This so called Grandfathering does not mean that installations and facilities may operate without complying with appropriate legal requirements.

Permits are legal documents required for the construction and/or operation of certain facilities and activities, and may include limitations for operation. Facilities/activities requiring a permit include, but are not limited to, gas stations, firing ranges, ground water extraction, waste water discharge, Underground Storage Tanks (USTs), fuel points, general construction, activities in nature preserves and Fauna-Flora-Habitat (FFH) areas, and activities affecting cultural resources.

The following roles and responsibilities apply:

a. Federal Assets Office/*Bundesanstalt für Immobilienaufgaben* (BIMA): Submits necessary applications and coordinates relevant legal and administrative proceedings for permits or other official permissions on behalf of the United States Army Garrison (USAG) Schweinfurt.

b. Environmental Management System Management Representative (EMSMR): Has overall authority and responsibility for the operation of the Environmental Management System (EMS).

c. State Construction Agencies, such as *Oberfinanzdirektion* (OFD) and/or *Staatliche Hochbauämter* (SHBA): Carry out administrative proceedings for construction projects.

d. Directorate of Public Works (DPW) Project Proponent: Coordinates with the BIMA for permits not in connection with construction works. Coordinates directly with the authorities if no permits are required and notifies them of studies and inspections. Forwards copies of issued permits to the Environmental Division and Master Planning.

e. Master Planning: Coordinates with the OFD and SHBA for permits in connection with construction works. Maintains a copy of each construction permit with the respective real property files and forwards a copy of the permit to IMCOM, Europe. Maintains a list of grandfathered facilities and property.

f. Environmental Division: Maintains permit information in the Environmental Quality Report.

5-2. Procedures.

a. Permits required for construction works are defined in Article 49 NATO SOFA SA and ABG 75 Agreement:

(1) Indirect construction projects: The state construction agency obtains all necessary construction permits or other required permissions to include any related operational permits (water rights permits, etc.) and/or makes any required notifications to the appropriate host nation agencies on behalf of the USAG Schweinfurt.

(2) Direct construction projects: The state construction agencies carry out the administrative proceedings for all direct construction projects (projects with contractors, in-house projects, and troop construction). They provide general advice and assistance to determine the necessity of construction, operational, other required permits and notifications. The DPW project proponent coordinates with the state construction agency. Coordination occurs in the early planning phase to determine the necessity for a construction permit, license, or other official permission. When an ABG-2 is required for new construction projects, request the SHBA submit the necessary applications and undertake relevant administrative and legal procedures on behalf of the U.S. government. When an ABG-2 is not required, a letter is forwarded to the SHBA requesting submission of necessary applications and coordinating the relevant administrative and legal procedures on behalf of the U.S. government (Annex A). The DPW project proponent meets with the OFD/SHBA during annual ABG-1 program submittal to ensure all projects requiring permissions are annotated as such. The DPW project proponent or its designated design agency provides the OFD/SHBA the necessary project documentation to complete the procedure.

b. Required permits not in connection with construction works: The DPW project proponent forwards any action that requires a permit, license or other form of official permission IAW German law and is not in connection with construction works under Article 49 NATO SOFA SA to the BIMA or *Wehrbereichsverwaltung* (WBV) (= German Defense District Administration). The DPW project proponent requests BIMA/WBV via letter to submit the necessary applications and undertake the relevant administrative and legal proceedings on behalf of the U.S. Government (Annex 2). BIMA processes administrative steps to get official permissions on behalf of the USAG Schweinfurt. Requests for activities that fall into the Area of Responsibility (AOR) of the DPW will be submitted from the DPW to the BIMA of the Federal Republic of Germany (FRG).

c. Studies:

(1) Studies including actions that require a permit, license or other form of official permission. For those studies (e.g. a soil and groundwater study requiring drilling to groundwater level), the project proponent forwards the action to the authorities of the FRG for processing. They get the appropriate permit, license, or other official permission on behalf of the USAG Schweinfurt.

(2) Studies that have no actions that require a permit, license, or other form of official permission: These studies (e.g. a study on threatened and endangered species) do not need any type of permission from host nation authorities. In an effort to promote host nation relations, utilize local subject matter experts and in case study results are not available, the project proponent may coordinate with host nation authorities.

d. *Technischer Überwachungsverein (TÜV)* Inspections: Certificates obtained from organizations like TÜV, *Deutscher Kraftfahrzeug Überwachungsverein (DEKRA)*, etc., do not fall within the definition of a permit, license, or other form of official permission for which BIMA has responsibility. Requests for services are forwarded directly.

e. Permit Filing: The Master Planning Division keeps a copy of each construction permit with the respective facility file. Copies of all environmental permits are forwarded to the Environmental Division. The Environmental Division enters and maintains permit data in the EQR and the document control system. The project proponent keeps one copy of the permit to ensure compliance with regulated limitations or guidance provided by the permit.

CHAPTER 6
OBJECTIVES, TARGETS, AND PROGRAMS
ISO 14001 SECTION 4.3.3

6-1. General. This chapter provides guidance on setting environmental objectives and targets for the implementation of the USAG Schweinfurt Environmental Policy, considering the military mission, applicable legal and other requirements, significant environmental aspects, and economic feasibility.

This chapter applies to the Cross-Functional Team (CFT) and other USAG Schweinfurt personnel responsible for the setting and tracking of objectives and targets as identified in this procedure.

The following roles and responsibilities apply:

- a. Environmental Management System Management Representative (EMSMR): Has overall authority and responsibility for the operation of the Environmental Management System (EMS).
- b. Director of Public Works: Provides overall supervision and direction for the environmental program.
- c. Environmental Quality Control Committee (EQCC): Approves or revises objectives, targets and programs during the annual Management Review.
- d. Environmental Division: Updates and maintains the Environmental Management Program Spreadsheet.
- e. CFT, Environmental Division: Identifies, reviews, and re-evaluates environmental objectives, targets, and programs.

6-2. Procedures.

a. Initial Baseline Data Collection: When determining environmental goals, the first step is to determine the level to which they apply (e.g. the entire installation, certain divisions or units, or individual functional areas). The CFT and the Environmental Division review the list of significant aspects and use it as a basis to develop goals to mitigate, minimize or reduce the environmental impact of these aspects. In addition to the environmental aspects, the following sources may be used to gather environmental baseline data:

- (1) Pollution Prevention (P2) Baseline Inventory
- (2) Waste and emission data
- (3) Internal and external EPAS reports
- (4) Integrated Natural Resources Management Plan

(5) Army Environmental Database – Environmental Quality (AEDB-EQ)

(6) Installation Status Report (ISR) Services and Natural Infrastructure

b. Identification of Preliminary Objectives and Targets: The preliminary objects are grouped by category, following the Final Governing Standards (FGS) chapters (e.g. Air Emissions, Hazardous Waste, Natural Resources, etc.). New regulatory requirements shall be reviewed during this process as they may affect current activities and require a change of activities.

c. Identification of Targets for Achieving Objectives: Targets shall be quantified and a specific timeframe for their completion shall be provided. Targets shall be achievable and at the same time motivate the affected organizations to improve their environmental performance.

d. Evaluation and Monitoring of Environmental Objectives and Targets: The CFT reviews the list of environmental objectives and targets, and discusses if they are feasible, reasonable, measurable, and/or consistent with the EMS Policy, and return on investment. From this evaluation, a final list of objectives and targets is compiled and environmental management programs are defined.

e. Evaluation and Monitoring of Environmental Objectives and Targets: Environmental objectives and targets are translated into action through environmental management programs. Key items in the Environmental Management Program Spreadsheet include:

- (1) The action(s) for achieving a target or objective
- (2) Legal requirements for achieving a target or objective, if applicable
- (3) Responsibilities for implementation
- (4) The timeframe, including intermediate deadlines, for achieving the target or objective
- (5) Resources required
- (6) Performance indicators (metrics) necessary to measure completion

The Environmental Division enters the items listed above into the Environmental Management Program Spreadsheet. As part of the EMS program, performance data is reported quarterly to the EQCC for incorporation into the EMS Management Review.

CHAPTER 7
COMPETENCE, TRAINING, AND AWARENESS
ISO 14001 SECTION 4.4.2

7-1. General. This chapter provides guidelines for conducting and documenting regular EMS Awareness and Competency Training at U.S. Army Garrison (USAG) Schweinfurt.

This chapter applies to USAG Schweinfurt team members, tenant agencies, off-post units and service providers.

The following roles and responsibilities apply:

a. USAG Schweinfurt Commander: Provides command support for the EMS Awareness and Environmental Competency Training Program. Signs memorandum for mandatory EMS Awareness Training and training certificates.

b. Environmental Management System Management Representative (EMSMR): Coordinates and plans training activities.

c. Director of Public Works: Provides overall supervision and direction for environmental awareness and competency training.

d. Chief, Environmental Division: Ensures development of EMS Awareness Training, provision of training material to employees, provision of training, and maintenance of the training plan.

e. Supervisors: Ensure personnel attend EMS Awareness Training, appropriate personnel receive Environmental Competency Training, and training records are kept.

f. Community Members: Attend EMS Awareness and Environmental Competency Training Program. Be aware of the EMS Policy.

7-2. Procedures.

a. Awareness Training:

(1) Objectives: EMS Awareness Training provides an overview of the purpose, scope, and importance of EMS and environmentally significant aspects. Topics to be addressed in the EMS Awareness Training include:

(a) An explanation of the USAG Schweinfurt's EMS and the importance of policy compliance.

(b) The Army's requirement to implement EMS, and how EMS procedures and requirements help protect the environment.

(c) Examples of relationships between USAG, mission activities, and significant environmental impacts.

(d) What individuals can do to protect the environment.

(e) Roles and responsibilities in achieving compliance with the USAG Schweinfurt EMS Policy, procedures, and overall EMS.

(f) Potential consequences of deviation from operating procedures.

(2) Command and Functional Level Awareness Training: All USAG Schweinfurt organizations, tenant units, and service providers must participate in EMS implementation and maintenance. It is mandatory for the Garrison Commander, every director, and other key personnel, to complete EMS Awareness Training. Initial Awareness Training is provided to the Cross-Functional Team (CFT) during CFT Meetings. EMS Refresher Training and Updates are provided during regular Environmental Quality Control Committee (EQCC) meetings.

(3) Tactical Unit EMS Awareness Training: EMS Awareness Training is mandatory for tactical Units. The Environmental Division schedules the program so it does not interfere with military training, deployment, redeployment and re-integration activities. Training is provided via classroom trainings and by distributing the Garrison-specific training film on DVDs.

(4) Community Level EMS Awareness Training:

(a) *In-processing training: Newly assigned Soldiers and family members that attend Safe Neighborhood Awareness Program (SNAP) receive a general environmental briefing that addresses the Separate or Recycle Trash (SORT) program and EMS at the USAG Schweinfurt.*

(b) *Environmental Updates: An environmental newsletter is sent out via email and posted on the environmental website. This newsletter includes EMS updates.*

www.schweinfurt.army.mil/directorates/dpw/environmental/environmental_newsletter.htm).

b. Competency Training:

(1) Objectives: Environmental competency training ensures that any person(s) performing tasks for or on behalf of USAG Schweinfurt, that has the potential to cause a significant environmental impact, is competent on the basis of appropriate education, training, or experience.

(2) Employees performing work or mission activities associated with significant environmental impacts need competency-based training. In addition, various regulatory requirements mandate special environmental training. On an annual basis, and if required, supervisors identify environmental competency training needs for their employees. At a minimum, significant environmental aspects and legally required trainings must be considered. Basic competency training regarding the significant environmental aspects is provided in combination with EMS Awareness Training. A summary of environmental training required by

the Final Governing Standards for Germany (FGS-G) and Army Regulation (AR) 200-1 is included in Annex A. Competency-based training requirements must be relevant to specific work activities. The level of training required may vary according to the level of responsibility assigned to various grade levels or military ranks. According to the U.S. Army EMS Implementer's Guide, at a minimum, competency-based training for employees should include the following:

(a) The significant environmental impacts, actual or potential, of their work activities and the environmental benefits of improved personal performance.

(b) Specific objectives and targets related to their work activities.

(c) The potential consequences of deviation from specified operating procedures.

(d) Environmental training required by applicable regulatory requirements.

(e) Training necessary to obtain or retain required licenses or registrations.

(3) Competency training does not always have to take place in a classroom. On-the-job training, brownbag sessions, and computer-based training are good alternatives. Service providers and contractors shall ensure that personnel performing activities with an actual or potential impact on the environment are appropriately trained.

CHAPTER 8
INTERNAL AND EXTERNAL COMMUNICATION
ISO 14001 SECTION 4.4.3

8-1. General. This chapter provides a standard procedure for ensuring effective and timely internal communication of the Environmental Management System (EMS) and environmental information within the United States Army Garrison (USAG) Schweinfurt as well as a standard procedure for the communication of environmental issues with interested external parties.

This chapter applies to all personnel involved in the communication of environmentally relevant information, as identified in this procedure under Section 2.

Internal Communication is an exchange of environmental information within the Schweinfurt Military Community that includes verbal communication, e-mail, intranet, memoranda, newsletters, and bulletin boards. Whereas external Communication are all inquiries, complaints, and requests received from interested parties and all release of information to interested parties.

The following roles and responsibilities apply:

(1) USAG Schweinfurt Commander: Provides command support for the overall EMS program. Reviews and approves environmental documents prior to external release. Determines what type of environmental information is publicly communicated.

(2) EMS Management Representative (EMSMR): An individual appointed by the USAG Commander who, irrespective of other duties, has authority and responsibility for the operation of the EMS.

(3) Public Affairs Office (PAO): Releases information to the public, receives and processes inquiries and complaints, forwards them to appropriate POCs. Interfaces between interested parties, USAG Schweinfurt Commander, and Environmental Division.

(4) EMSMR: Reviews EMS and other environmental documents, forwards them to USAG Schweinfurt Commander for final approval.

(5) Director of Public Works: Reviews EMS and other environmental documents and forwards them to EMSMR for review.

(6) Interested External Parties: Stakeholders such as surrounding communities, suppliers, media representatives, local authorities or environmental groups.

(7) Environmental Quality Control Committee (EQCC): The EQCC consists of representatives of all directorates, tenant organizations, Brigade Commanders, and Executive Officers and meets quarterly to discuss environmental issues.

(8) Cross-Functional Team (CFT): A CFT consists of EMS representatives from different functional levels and directorates concerned with key functional areas such as operations and

training, logistics, acquisition, contracting, ranges, property planning, and quality management. It is a permanent team that works on environmental procedures, aspects and impacts.

(9) Chief, Environmental Division: Communicates environmental issues in meetings.

8-2. Procedure.

a. Internal Communication: Different channels exist to communicate EMS and other environmental issues within USAG Schweinfurt.

(1) Environmental Division Staff Meetings: The Environmental Division conducts weekly internal meetings to discuss current environmental and EMS topics.

(2) Directorate of Public Works (DPW) Staff Meetings: DPW Division Chiefs meet at a minimum weekly to communicate current management issues. The Environmental Division Chief provides information on environmental issues to the other participants.

(3) Schedule Meetings: DPW Division Chiefs and project proponents meet weekly to communicate and coordinate current work orders and service orders. ED reviews work orders and service orders and addresses environmental issues during meetings, if applicable.

(4) EQCC Meetings: Quarterly meetings with environmental representatives of all directorates, military Units, and tenant organizations, to communicate and discuss current environmental issues. Minutes are taken and filed by the Environmental Division.

(5) Director's Meeting: USAG Directors meet bi-weekly to discuss current issues and schedules. Director, Public Works communicates environmental issues to the directorates.

(6) CFT Meetings: EMS representatives discuss EMS issues, and review the performance of the EMS. CFT meetings are organized by the Environmental Division in cooperation with the EMSMR.

(7) Environmental Awareness Training: Communication of the USAG Schweinfurt EMS and the EMS Policy.

(8) Community Meetings: Housing area coordinators meet monthly with interested residents, the USAG Commander and the Director of Public Works to communicate community issues. Director, Public Works communicates environmental issues to the participants.

b. External Communication: Required to maintain a positive relationship with German authorities and other interested parties. Significant environmental aspects are communicated on the USAG Schweinfurt environmental website.

(1) Inquiries from interested parties are received and processed by the PAO. Relevant information pertaining to environmental issues is forwarded through a communication line including the Chief, Environmental Division; Director, Public Works; and the USAG

Commander. The Safety Office, the Directorate of Emergency Services, and affected organizations are notified if required. Any emergency or other case requiring immediate action is immediately forwarded to the USAG Commander. Information is released by the PAO after coordination with the concerned organizations and directorates.

(2) Relevant environmental information that is being released includes, but is not limited to, information on hazardous waste, spills, soil or groundwater contamination, noise, and maneuver damage.

(3) Project Meetings are performed regularly to coordinate planning processes with the Federal Real Estate Office (*Bundesanstalt fuer Immobilienaufgaben*) and appropriate local parties/authorities.

(4) Annual Forestry Coordination Meetings are attended by the local forest authorities, representatives of the Federal Real Estate Office, Units, Environmental Division and the Chief, Training Support Center (TSC). The forest authorities present the annual forest management plan to the U.S. government representatives. TSC and forest authorities coordinate activities such as logging, planting, fencing/unfencing and military training schedules. Additional meetings are coordinated as needed.

(5) Information released through the local newspaper or other press media must be coordinated with the PAO prior to external communication.

(6) The PAO offers informational visits to local students, environmental groups, and other external interested parties.

(7) The Environmental Division publishes environmental information on the USAG Schweinfurt website.

CHAPTER 9
CONTROL OF DOCUMENTS AND RECORDS
ISO 14001 SECTION 4.4.5, 4.5.4

9-1. General. This chapter provides a standard procedure for control of environmental documents and records. To ensure all relevant environmental documents and records are up to date and readily available to all appropriate personnel. To ensure adequate identification, storage, protection, retrieval, retention, and disposal of environmental documents and records.

This chapter applies to all personnel of the Directorate of Public Works (DPW) for environmental documents only.

The following roles and responsibilities apply:

- a. Director of Public Works: Provides overall supervision and direction for the environmental program.
- b. Chief, Environmental Division: Checks regular maintenance of the document control database.
- c. Database Manager: Adds and changes data in the database. Labels hardcopies and CD-ROMs with ID-Code. Informs Chief, Environmental Division if electronic documents placed on the webpage are outdated. Database Manager is the translating assistant of the Environmental Division.
- d. Media Area Managers and Personnel Responsible for Individual Facilities/ Processes: Regularly review documents and initiate development of new versions when required. Inform Database Manager if data entry or maintenance is required. Recommend approval of documents applicable for the respective area of accountability.

9-2. Procedures.

- a. Format: To the extent possible, documents are formatted according to the standard U.S. Army memorandum format. Standard sections include:
 - (1) Reference(s)
 - (2) Purpose
 - (3) Applicability
 - (4) Policy
 - (5) Procedure(s)
 - (6) Proponent

b. Document: information and its supporting medium. Medium is paper, magnetic, electronic or optical computer disc, photographs or master sample, or any combination. Documents issued by outside USAG Schweinfurt entities (e.g. authorities or contractors) have formats different from that described within this procedure. Document Control data according to Figure 1 needs to be added to these documents. Documents not formatted according to the standard U.S. Army memorandum format at a minimum need to be dated and signed to identify revision status and approval.

c. Procedure: Specified method to carry out an activity or process. Procedures may or may not be documented.

d. Record: Document stating results achieved or providing evidence of activities performed.

e. Types of Records: EMS records are evidence of the ongoing operation of the EMS and consist of, but are not limited to, the following:

- (1) Inventory of environmental aspects and impacts and their associated ranking
- (2) Environmental Management Program Spreadsheet
- (3) Environmental training records
- (4) Regulatory required submittals, inspection logs, and monitoring data
- (5) Environmental compliance and EMS audit reports and action plans
- (6) Management briefings, reviews and meeting minutes
- (7) Notices of Violations (NOV)
- (8) Internal and external communication records

f. Document/Record Control and Filing System Database:

(1) Identification-Code (ID-Code): All documents and records entered in the USAG Schweinfurt Document/Record Control and Filing System Database are identified using the format in Figure 1. In accordance with Army Record Information Management System (ARIMS) requirements, documents are categorized as “K” or “T” to designate the length of time for maintenance within the USAG Schweinfurt system prior to either transfer to the Records Holding Area (RHA) (T); or discard because retention is no longer required (K).

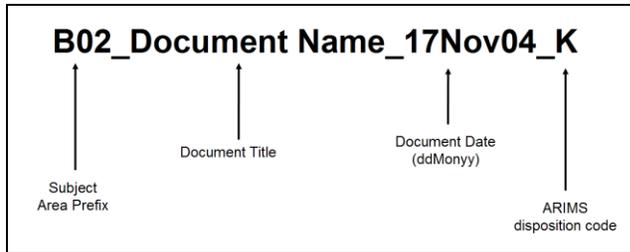


Figure 1: ID-Code

Label hardcopies and CD-ROMs with the ID-Code, electronic files copied on the shared drive are renamed using the ID-Code. All EMS documents and records are identified by a code including the respective ISO 14001 element, an ongoing number, and the revision number (e.g. 4.4.5-1-00).

(2) Document Review and Update: Documents should be reviewed at least once per year or as required by the Final Governing Standards for Germany (FGS-G). Review and update is conducted by ED Chief, EMS Manager and the respective Media Manager.

(3) Database Data Entry and Maintenance: Database Managers can add and change data in the database. All other users have read-only access to the database. Every Media Area Manager or personnel responsible for individual facilities/processes are responsible to inform the POCs when data entry or maintenance is required to ensure maximum consistency in data entry.

(4) Hardcopy Filing and Electronic Files: Many documents are available as hardcopies. Electronic data is filed on the DPW shared drive. Filing of all hardcopies and electronic data is organized according to a subject area prefix, as per the Final User's Guide Document/Records Control and Filing System.

(5) Controlled and Uncontrolled Documents: Controlled documents are entered in the document/record control database and identified by a unique ID-Code. They are assigned to designated personnel, who are responsible for keeping the document current. Electronic documents converted to hardcopy are considered uncontrolled documents. Unofficial copies of documents may be maintained for personal use but these documents are not part of the official file organization.

g. Approval of Documents: The Garrison Commander approves USAG Schweinfurt EMS Regulation 200-1 and other EMS documents relevant to the entire community.

h. Distribution/Availability of Documents: The USAG Schweinfurt EMS Regulation 200-1 and many other important environmental documents are available electronically on the USAG Schweinfurt web page. Electronic documents placed on the website are maintained by the Chief, Environmental Division. In hardcopy, these documents are uncontrolled copies and only current at the time of printing.

CHAPTER 10
EMERGENCY PREPAREDNESS AND RESPONSE
ISO 14001 SECTION 4.4.7

10-1. General. This chapter provides a standard procedure for the organization of environmental emergency planning and response processes at the USAG Schweinfurt. To determine possible environmental emergency situations and to create and maintain precautionary measures and emergency plans in order to prevent or mitigate negative environmental impacts.

This chapter applies to all personnel living or working within the USAG Schweinfurt community.

The following roles and responsibilities apply:

a. USAG Schweinfurt Commander: Provides command support for the EMS. Has overall responsibility for development, implementation, review, and testing of emergency preparedness and response processes.

b. Environmental Management System Management Representative (EMSMR): Has overall authority and responsibility for the operation of the Environmental Management System (EMS). Conducts annual safety inspections and meanwhile keeps an eye on environmental issues.

c. Director of Public Works: Provides overall supervision and direction for the environmental program.

d. Environmental Division: Coordinates with Directorate of Emergency Services (DES) on emergency preparedness and response items. Coordinates the disposal of hazardous waste related to emergency response operations.

e. USAG Schweinfurt DES: Maintains technical emergency preparedness and response equipment. Coordinates with the Environmental Division for appropriate emergency response procedure. Receives all internal emergency calls, evaluates emergencies, and leads operations on US controlled territory. If required, informs external Host Nation Fire Department and informs other authorities.

f. Fire Prevention Inspectors: Conduct regular fire prevention inspections.

g. Host Nation Fire Brigades: Lead operations on German controlled territory (e.g. leased housing). On request, they support USAG Schweinfurt DES on US controlled territory.

h. Public Affairs Office (PAO): Responsible for press releases in the event an emergency affects areas outside the military community.

10-2. Procedure:

a. Emergency Preparedness: DES identifies in cooperation with the Environmental Division potential emergency situations and potential accidents that can have an impact on the environment and how they will respond to them and documents results in the Hazmat Response Plans/SOP'S *Gefahrstoffe*. DES staff is trained according to the annual training schedule, which includes quarterly trainings on hazardous materials incidents and additional unannounced trainings. They provide information on emergency preparedness and response during inprocessing trainings, quarterly building manager trainings and fire extinguisher trainings (on request).

b. Emergency Response: The USAG Schweinfurt DES receives all USAG-internal emergency calls, evaluates the emergency situation, decides whether to inform the external German Fire Brigade for support, and whether to inform additional Host Nation authorities. In the event that an emergency affects areas outside the USAG Schweinfurt community, the PAO is responsible for communication with the host nation officials. On US controlled territory, the USAG Schweinfurt DES leads the operations. On German controlled territory (e.g. leased housing) the City's Fire Department leads the operations.

(1) The exact response to be undertaken depends on the type of incident (spill, fire, explosion, etc.), the amount of material involved, the location and other factors.

(2) Emergency response operations with environmental relevance are conducted according to National Fire Protection Association (NFPA) standards and Hazmat Response Plans/SOP'S *Gefahrstoffe*.

(3) Disposal of any hazardous wastes related to an emergency response operation is organized by the Environmental Division.

c. Spills: Spills of hazardous materials are the most frequent emergencies of environmental relevance. Therefore, the USAG Schweinfurt has developed a SPRP including the Red Plan. The Red Plan serves as an immediate response tool to ensure the correct actions are initiated at the earliest possible time. The Red Plan is to be used in the early stages of a spill and the user is expected to switch to the SPRP after appropriate notifications and response actions are underway.

CHAPTER 11
MONITORING AND MEASUREMENT
ISO 14001 SECTION 4.5.1

11-1. General. This chapter ensures regular performance of required environmental monitoring and measurement for environmental objectives/targets and facilities/processes that can have a significant environmental impact. It also provides the management with reliable and verifiable information on an ongoing basis to determine whether the environmental performance of the U.S. Army Garrison (USAG) Schweinfurt is meeting the criteria set by the Garrison command.

This chapter applies to all personnel within the Schweinfurt Military community involved in the monitoring and measurement process.

The following roles and responsibilities apply:

- a. USAG Schweinfurt Commander: Provides command support for the Environmental Management System (EMS).
- b. Director of Public Works: Provides overall supervision and direction for the environmental program.
- c. Environmental Division: Tracks and reports on progress in achieving environmental objectives and targets. Maintains and updates the Internal Assessment Plan. Defines Environmental Performance Indicators (EPIs) in close coordination with operators of processes. EPIs are specific expressions that provide information about an organization's environmental performance.
- d. Operators of Facilities/Processes: Monitor adequate data, ensure professional performance of monitoring and measurement activities as required by FGS-G or Host Nation authorities. Provide feedback to the Environmental Division. Define EPIs in coordination with the Environmental Division. Monitor and record environmental data.

11-2. Procedure.

- a. Monitoring of Processes Related to Environmental Objectives and Targets: Progress towards achieving environmental objectives and targets is monitored by the Environmental Division on a quarterly basis. The Environmental Division contacts responsible proponents of individual objectives and targets for updates, and summarizes the status in the USAG Schweinfurt Environmental Management Program Spreadsheet. Each proponent/responsible operator is responsible to monitor respective data at least quarterly. The status of objectives and targets is briefed by the Environmental Division to the Garrison Commander during Environmental Quality Control Committee (EQCC) meetings. Comments during the EQCC meeting, potential changes to objectives/targets, and the Environmental Management Program are tracked by the Environmental Division.
- b. Monitoring of Processes Related to Environmental Aspects and Monitoring Required by Law: The FGS-G and specific Host Nation requirements of NATO Status of Forces Agreement

(NATO SOFA) outline periodic inspections, testing and sampling, record keeping, equipment monitoring, and reporting. FGS-required routine monitoring and measurement activities at the USAG Schweinfurt are summarized in the Internal Assessment Plan, including information regarding frequency, scheduled date, responsible proponent, location, and documentation. Environmental Division uses this plan to ensure that monitoring/ measurement is properly completed. Assessment of compliance is discussed in SOP for Evaluation of Compliance.

c. Calibration Requirements: Personnel performing monitoring and measurement activities shall ensure that monitoring equipment is calibrated according to specifications of the respective manufacturer.

d. Processes: EPIs help the USAG Schweinfurt to

- (1) identify significant environmental aspects,
- (2) identify opportunities for better management of its
- (3) environmental aspects (e.g., prevention of pollution),
- (4) identify trends in its environmental performance, and
- (5) identify strategic opportunities

Performance indicators should be simple and understandable, objective, measurable, verifiable, reproducible, and relevant to the installation's objectives and targets. They should also be practical, cost-effective, and technologically feasible.

The information conveyed through EPIs can be expressed as direct or relative measures or as indexed information. The Environmental Division defines EPIs in close cooperation with operators of processes, which are monitored.

Appendix C includes a selection of potential EPIs for monitoring USAG Schweinfurt's processes. This table should be used as a guideline when defining EPIs for individual measurement categories.

CHAPTER 12
EVALUATION OF COMPLIANCE
ISO 14001 SECTION 4.5.2

12-1. General. This chapter ensures that the USAG Schweinfurt has a documented means of evaluating compliance according to relevant environmental legislation and regulations.

This chapter applies to all personnel within the USAG Schweinfurt community and contractors.

The following roles and responsibilities apply:

- a. USAG Schweinfurt Commander: Provides command support for the EMS and EPAS.
- b. Director of Public Works: Provides overall supervision and direction for the environmental program.
- c. Environmental Division: Coordinates, conducts, and reports on internal Environmental Performance Assessment System (EPAS) activities.
- d. Installation Management Command (IMCOM), Europe: Coordinates, supervises, conducts, and reports on external EPAS activities.
- e. Community Members: Comply with environmental regulations, report noncompliances, ensure that relevant information is accessible during EPAS assessments.

12-2. Procedures.

a. General: The EPAS compliance audit focuses on an annual compliance assessment of all environmental activities at the Garrison. The evaluation process captures a representative sample of the Garrison's environmental program. The assessment includes all tactical/tenant units, organizations, and contractors within the USAG Schweinfurt. Compliance is assessed using twenty media area protocols (19 protocols according to the 19 FGS-G chapters and one protocol referring to EMS implementation) and applicable regional/local legal requirements. Assessment techniques include document reviews, interviews, and on-site inspections.

b. Internal EPAS: Internal assessment are coordinated by and conducted under the direction of the USAG Schweinfurt Environmental Division using installation personnel as evaluators. Internal EPAS assessments are conducted annually using IMCOM, Europe provided checklists. Planning of internal EPAS assessment is conducted based on the USAG Schweinfurt IAP. Results of the assessment are recorded in the Internal Performance Assessment System (IPAS) database to track findings. After completing internal audits, a final report is prepared by the Environmental Division and forwarded to IMCOM, Europe prior to the end of the fiscal year. Milestones for completion of identified findings are tracked in the Garrison's Corrective Action Plan (CAP) by the Environmental Division.

c. External EPAS: External assessments are coordinated by and conducted under the direction of IMCOM, Europe, using IMCOM, Europe personnel, DA personnel, U.S. Army

Center of Health Promotion and Preventive Medicine (USACHPPM) personnel, and contracted specialists as evaluators. External EPAS assessments are conducted at least once every three years. Results of the assessment are recorded in the IMCOM-Europe Performance Assessment Software (IPAS) database to track findings and milestones for completion, and are accessible on the IMCOM, Europe webpage. After completing the external EPAS audit, a final report is prepared by the external assessors and provided to Chief, Environmental Division and IMCOM, Europe.

CHAPTER 13
NONCONFORMITY, CORRECTIVE AND PREVENTIVE ACTION
ISO 14001 SECTION 4.5.3

13-1. General. This chapter describes the process for identifying, documenting, analyzing, and implementing corrective and preventive actions. Preventive/corrective actions are continuously identified, specifically during internal and external Environmental Performance Assessment System (EPAS) assessments, audits of the Environmental Management System (EMS), compliance audits, and other inspections/meetings.

This chapter applies to all personnel working or living within the United States Army Garrison (USAG) Schweinfurt.

The following roles and responsibilities apply:

- a. USAG Schweinfurt Commander: Has overall EMS responsibility and provides command support for the EMS and EPAS. As required, signs letters including corrective actions requests.
- b. Environmental Management System Management Representative (EMSMR): Has overall authority and responsibility for the operation of the Environmental Management System (EMS).
- c. Compliance Manager and Media Area Managers: Identify and analyze noncompliance or environmental issues. Review proposed corrective actions and check implementation of corrective actions.
- d. Media Area Managers: Initiate actions to mitigate acute dangers to the environment.
- e. Responsible personnel for processes/activities: Develop and implement corrective actions for environmental issues. Initiate actions to mitigate acute dangers to the environment.
- f. Community Members: Report noncompliance on environmental issues to the Environmental Division or respective supervisor.

13-2. Procedure.

- a. Identifying and Reporting: Noncompliance is usually identified during audits or inspections. Major processes for the identification of noncompliant/nonconforming conditions are the external EPAS evaluation conducted every three years by Installation Management Command (IMCOM), Europe, and the internal EPAS evaluation conducted annually by the Environmental Division. Noncompliance may also be identified during other environmental external or internal inspections, the annual EMS Management Review or compliance audits, inspections by other offices (e.g. Safety Office) or observations by military or civilian personnel.
- b. Investigation and Analysis: After a noncompliance is reported, the Chief, Environmental Division, determines whether further investigation is required. The investigation required for noncompliance is based on legal requirements. It is used to determine the noncompliance's root cause; magnitude; possible impacts on the environment, health, and safety; and potential

consequences. The root cause analysis identifies why the problems occurred and form the basis for identification of actions to prevent recurrence.

c. Corrective and Preventive Action: According to the severity of the noncompliance, the responsible operator of the respective process and the Media Area Manager initiate actions to mitigate acute dangers to the environment. In cooperation with the Environmental Division, responsible operators develop corrective action plans that include the following elements:

- (1) Immediate actions to re-establish or attain compliance
- (2) Precautionary actions to avoid repeated deviations
- (3) Monitoring to check the effectiveness of actions taken
- (4) Changes to SOPs or work instructions

Findings of environmental relevance and corrective response actions are recorded in the CAP Spreadsheet. This spreadsheet includes all findings from internal and external EPAS evaluations and EMS audits, and other non-compliances. Findings identified during regular inspections (e.g. hazardous materials inspections) are recorded and communicated via email between involved parties. The Compliance Manager and Media Area Managers maintain the CAP Spreadsheet and validate the progress of corrective actions.

CHAPTER 14
INTERNAL AUDIT
ISO 14001 SECTION 4.5.5

14-1. General. This chapter provides a standard procedure for annual internal EMS audits. Internal audits shall be conducted to determine whether the EMS conforms to planned arrangements and has been properly implemented or maintained.

This chapter applies to all USAG Schweinfurt personnel and contractors involved in the internal EMS audit process.

a. Definition:

(1) Internal Audit: Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the EMS audit criteria set by the organization are fulfilled.

(2) Audit Criteria: Set of policies, procedures or requirements.

(3) Audit Evidence: Records, statements of fact or other information, which are relevant to the audit criteria and verifiable.

(4) Audit Findings: Results of the evaluation of the collected audit evidence against audit criteria.

(5) Audit Plan: Description of the activities and arrangements for an audit.

b. The following roles and responsibilities apply:

(1) USAG Commander: Provides command support for the EMS.

(2) Environmental Management System Management Representative (EMSMR): Has overall authority and responsibility for the operation of the EMS.

(3) Director, Public Works (DPW): Provides overall supervision and direction for the environmental program.

(4) Chief, Environmental Division: Initiates the annual audit process. Selects the audit team leader and the audit team. Reviews the audit report.

(5) Audit Team Leader: Ensures preparation of the audit plan, performance of opening and closing meeting, leads overall audit process, and is responsible for the preparation of the audit report and further audit documentation. The audit team leader has to be a member of a garrison other than USAG Schweinfurt.

(6) Audit Team: Conducts the EMS audit including reviewing relevant EMS documents, conducting interviews, and collecting information to reaching audit conclusions. Audit team

members cannot be closely involved with the EMS implementation and therewith not be member of the USAG Schweinfurt Environmental Division. Team members have to be appropriately trained as an auditor prior to conducting the audit.

14-2. Procedure.

a. General: EMS audits shall be conducted annually. It is not required to audit the entire EMS at one time, but each part of the system shall be audited at a minimum once a year. The Chief, Environmental Division shall initiate the annual audit process. Processes and functions to be audited should be selected according to their environmental importance and results from previous audits.

b. Initiating the Audit: The Chief, Environmental Division shall select the audit team leader and audit team. Internal EMS auditors should have been trained appropriately. Audit team members should be sufficiently independent of the day-to-day processes at the USAG Schweinfurt to ensure objectivity and impartiality of the audit.

c. Conducting Document Review: Prior to on-site activities, the audit team shall review relevant management system documents including records and previous audit reports to determine their adequacy with respect to audit criteria.

d. Preparing for the on-site Audit Activities: The audit team leader prepares an audit plan to facilitate scheduling and coordination of audit activities. The Chief, Environmental Division approves the audit plan.

(1) If required, the Garrison Commander shall notify the Environmental Officers (EO), Unit Commanders, and Directors/Chiefs of the audited organization or tenant unit at least ten days prior to the projected audit date.

(2) The audit team prepares work documents including forms for recording information (such as supporting evidence, audit findings and records of meetings) and audit checklists.

e. Conducting on-site Audit Activities: An opening meeting, chaired by the audit team leader, shall be held with those responsible for functions or processes to be audited. The purpose of the opening meeting is to confirm the audit plan and to provide a short summary of how audit activities will be undertaken.

Figure 1 shows an overview of the process from collecting information to reaching audit conclusions.

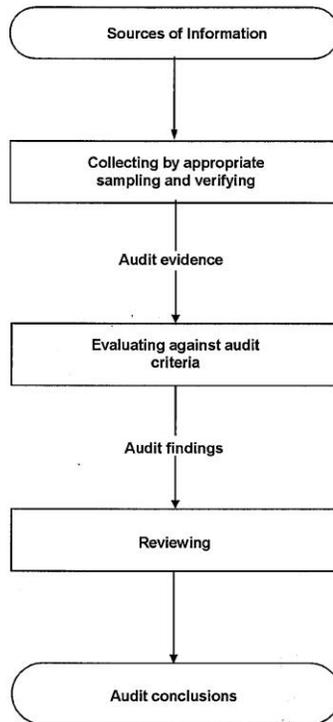


Figure 2: Overview of the process from collecting information to reaching audit conclusions.

(1) Audit evidence should be evaluated against the audit criteria to generate the audit findings. Auditing methods may include document/records review, interviews with individual Garrison staff members, and/or direct observation of site activities. Audit findings can indicate either conformity, potential for improvement, under development or nonconformity with audit criteria. The audit evidence is based on samples of the available information. Therefore, there is an element of uncertainty in auditing.

(2) Following the interviews, a closing meeting, chaired by the audit team leader, should be held to present the draft audit findings and conclusions. Final results will be briefed to the Garrison Commander during the next EQCC meeting.

f. **Audit Report:** The audit team leader is responsible for the preparation of the audit report. The audit report should provide a complete, accurate, concise, and clear record of the audit and shall include the following items: Audit scope, identification of audit team and key personnel contacted from the audited organization, a general statement summarizing the effectiveness of the EMS, and a brief discussion of any findings. The Chief, Environmental Division shall review the audit report.

**CHAPTER 15
MANAGEMENT REVIEW
ISO 14001 SECTION 4.6**

15-1. General. This chapter provides a standard procedure for regular EMS management reviews. Management reviews are designated to ensure that the EMS is working adequately and effectively. The main objectives of these management reviews are to evaluate the effectiveness of the EMS.

This chapter applies to all personnel involved in the regular EMS management review process of the USAG Schweinfurt.

The following roles and responsibilities apply:

- a. USAG Schweinfurt Commander: Responsible for supervising the performance of the management review. Approves results of the management review, and minutes of meetings.
- b. Environmental Management System Management Representative (EMSMR): Has overall authority and responsibility for the operation of the EMS.
- c. Director of Public Works: Provides overall supervision and direction for the environmental program.
- d. Chief, Environmental Division: Schedules and coordinates EMS management review meetings. Reports to the Garrison Commander and Environmental Quality Control Council (EQCC) on the performance of the EMS. Provides input and recommendations for improvement of the system, and overall environmental performance. Prepares minutes of the management review meetings.
- e. EQCC: Approves reports on performance of the EMS, and approves recommendations regarding improvement of the system and overall environmental program performance and compliance.
- f. Individuals Responsible for Processes/Facilities with Significant Aspects: Provide input for the management review process.

15-2. Procedures.

a. Management reviews are one key to continual improvement and for ensuring that the EMS will continue to meet the USAG Schweinfurt's needs over time. Management reviews shall be performed, at least annually, by the USAG Commander, EQCC, EMSMR, and individuals responsible for significant aspects. The EMS management review should be conducted during the first EQCC meeting of the Fiscal Year. Input to the management review must include:

- (1) Follow-up actions from previous management reviews (past records of meeting minutes);

(2) Results from internal EMS audits and results from compliance reviews (e.g., Internal and External EPAS);

(3) The extent to which objectives and targets have been met;

(4) Suitability of the EMS related to changing conditions;

(5) Concerns of relevant interested parties;

(6) Environmental performance of the organization;

(7) Status of corrective and preventive actions;

(8) Recommendations for improvement.

b. The management review should evaluate the need to change the Environmental Policy, objectives, targets, and other elements of the EMS due to:

(1) Changing missions;

(2) Addition of new facilities;

(3) Changing legal requirements;

(4) Changing expectation and requirements of interested parties;

(5) Changes in the Garrison's operations/activities;

(6) Advances in science and technology;

(7) Lessons learned from environmental incidents;

(8) Reporting and communication.

(9) Management Review Questions listed in Appendix D.

(10) Management reviews should assess both positive and negative findings.

c. The Chief, Environmental Division shall prepare minutes of the management review in standard memorandum format that records the results of the review. Minutes of the management review must include any decisions and actions related to possible changes to environmental policy, objectives, targets, and other elements of the EMS consistent with the commitment to continual improvement. Monitor required corrective actions, and solicit support from the Garrison Commander, as required, to ensure that required corrective action is implemented.

CHAPTER 16
ENVIRONMENTAL POLLUTION
ISO 14001 SECTION 4.4.6

16-1. General. This chapter minimizes environmental damage caused by petroleum, oil, and lubrication (POL) products.

This chapter applies to all assigned personnel and tenant organizations in the United States Army Garrison (USAG) Schweinfurt.

16-2. Procedures.

a. Units must properly control waste POL, battery acid, and other hazardous material. Units must take immediate action to address deficiencies to correct this potentially serious shortcoming. On publication of this policy, units will follow described procedures and take corrective actions when necessary:

b. Fuel dispensing vehicles will have drip pans/cans for all couplings and fittings from which fuel may spill. In addition, each fuel dispensing vehicle will have a spill kit or at least one 50-pound bag of absorbent compound (water/oil) available at all times. Fuel operations will be conducted in designated areas only, where POL separators exist.

c. Track and wheeled vehicles will have drip pans/cans under all points where POL products may spill.

d. Collect and store waste POL products in the hazardous waste accumulation facilities, or at the central hazardous waste collection facility at Conn Bks, Bldg # 147.

e. Waste battery acid will be collected at 172nd Support BN, Bldg #1166, Conn Barracks, and disposed of using the same contract pick-up service provided by the Garrison.

f. Waste POL products and battery acid will be labeled in accordance with German Final Governing Standards, Chapter 5, and protected from fire.

g. Do not use wash racks, drainage ditches, and sewer outlets to dispose of waste POL, antifreeze, or battery acid.

h. Remove POL products spilled in motor parks by placing oil/water absorbent compound on the spill. After absorbing the POL product, remove the compound and place in a container in the hazardous waste accumulation facility.

i. In case of a larger spill (1 gallon or more), inform the US Fire Department (DSN 353-8645) immediately so they can take the required corrective actions. The Fire Department then informs the Directorate of Public Works (DPW) (DSN 354-1360) and/or the Environmental Division (DSN 354-6795).

CHAPTER 17 APPOINTMENT, RESPONSIBILITIES, AND TRAINING OF ENVIRONMENTAL OFFICERS

17-1. General. This chapter outlines the appointment, responsibilities, and training of the Environmental Officer (EO).

This chapter applies to all United States Army service members who are appointed EOs and their supervisors.

17-2. Procedures.

a. Appointment: EO (Former: Environmental Compliance Officer): EOs should be appointed at appropriate organizational levels, which means that EOs are generally required at both battalion and company/battery/troop level. This appointment requires an individual preferably with rank WO-1 or above at battalion level and SGT or above at company/battery/troop level to act on behalf of his or her respective commander or supervisor regarding environmental issues. The battalion EO acts as supervisor for the subordinate unit EOs. Formal appointments are required, with appointment letters sent to Department of Public Works (DPW) Environmental Division (ED). Contact the DPW ED for a sample appointment letter.

b. Appointment Period: EOs are appointed until officially relieved or released from appointment, or upon transfer, transmission, reassignment, retirement or discharge. IAW AER 200-1, EOs should be appointed for at least one year. When an appointee is no longer available, a new appointment will be made immediately and the appointment letter sent to the DPW ED to ensure a representative is always in place.

c. Responsibilities of the EO:

(1) The EO's responsibilities are to ensure unit environmental compliance actions take place within his/her organization and to serve as unit Point of Contact (POC) for installation environmental staff.

(2) The EO is also responsible for taking action to manage Spill Prevention and Control:

(a) Report accidental spills to FES immediately after occurrence.

(b) Clean up minor spills and properly dispose of contaminated materials as HW.

(c) Assure that sufficient and the right type of absorbent material are on stock and available at all locations where spills may occur.

(d) Assure that the Garrison Red Plan is posted in all locations where spills may occur.

d. Training: The appointed EO need to be appropriately trained IAW AER 200-1, within 60 days after being appointed. Training requirements include:

(1) 40 hrs Online Environmental Officer Training and annual Refresher Course at <http://imcom-e.safetyskills.com/login.aspx>. To get an assignment for the online-course, contact Ms. Elliott at DSN 354-6795 or angelika.elliott1.ln@mail.mil.

(2) Annual training in spill prevention, HM, and HW requirement (e.g. EO 32-hour Course and annual Refresher Course).

CHAPTER 18
SPILL PREVENTION AND CLEAN UP PLAN (RED PLAN)
ISO 14001 SECTION 4.6

18-1. General. This chapter provides guidance on proper spill response and prevention procedures to tenant Units and organizations within United States Army Garrison (USAG) Schweinfurt.

This chapter applies to all reserve and active component Units, tenant agencies, USAG Schweinfurt team members, and off post Units/ agencies utilizing USAG Schweinfurt.

The attached spill prevention and clean-up guide (known as the “Red Plan”; appendix H and I) will help everyone respond quickly and effectively to the problems associated with accidental spills. It provides information on immediate response actions describes the notification procedures and lists all Points of Contact (POCs) that need to be notified

18-2. Procedure.

a. Hazardous substance spills can cause complex technical, legal, and public relations problems for our Garrison. Spills can also have adverse monetary consequences that reduce our ability to execute mission-essential functions and services. It cannot be overemphasized that the best way to avoid these potential problems is to develop behavior and procedures to prevent spills from occurring. Leadership emphasis, equipment maintenance and adherence to proper operating procedures are our best insurance against spills.

b. A copy of the enclosed Red Plan must be conspicuously posted where Petroleum, Oil and Lubricants (POL) or hazardous substances are handled or stored for quick reference during spill incidents. The primary goal is to limit, as far as practical, damage to human health, property, wildlife, and our environment. Leaders at all levels play a role in implementing our Red Plan. Our collective efforts will ensure that our Garrison’s environment remains a clean and healthy place to live and serve. Red Plan in English and German version is attached in APPENDIX H and I.

CHAPTER 19
INTERNAL COMMUNICATION FOR WORK WITH ASBESTOS CONTAINING
MATERIAL OR ARTIFICIAL MINERAL FIBERS
ISO 14001 SECTION 4.4.6

19-1. General. This chapter provides a standard procedure for communicating information regarding work with or abatement of Asbestos-Containing Material (ACM) or Artificial Mineral Fibers (AMF).

This chapter applies to all personnel living and working within USAG Schweinfurt including contractors.

The following roles and responsibilities apply:

- a. USAG Schweinfurt Commander: Provides command support for the AMC and AMF management program.
- b. Director, Public Works: Provides overall supervision and direction for the AMC and AMF management program. Acts as primary liaison between the ED and DPW employees and contractors.
- c. Chief, ED: Has general AMC and AMF program overview. Serves as point of contact for all AMC and AMF-related activities and has overall authority and responsibility for the existing Surveys. Ensures accessibility of the Survey data and distributes database updates to Survey users.
- d. Asbestos Program Manager (APM): Serves as single point of contact for all ACM or AMF activities and has overall authority and responsibility for the existing Surveys. Reviews Work Orders (WO) and proprietary approval forms; includes information on ACM or AMF which could potentially be affected; and communicates with Project Proponent, Project Designer, Shop Foremen, and the works council about planned activities with potentially affected ACM or AMF. Ensures accessibility of the Survey data and distributes database updates to Survey users.
- e. Business Operations/Integrations (BO&I) Division: Schedules and organizes project review meetings. Forwards copies of new work requests (DA Form 4283) to the ED. Develops proprietary approval forms and forwards them to ED for review and approval.
- f. Project Proponent: Submits WO or Service Order (SO) request. Forwards conclusions of the WO review meeting to project designer. Takes ownership of project designer responsibilities for projects that are independent of DPW.
- g. Project Designer: Obtains detailed information regarding presence of ACM or AMF within the anticipated area of work. Initiates sampling activities if needed and ensures communication with the ED. If ACM or AMF will be affected, project designer must ensure that project is conducted in accordance with *Technische Regeln für Gefahrstoffe (TRGS)* (Technical

Rules for Hazardous Substances) 519 or 521 and that individual workers are instructed accordingly.

h. DPW Shop Foremen:

(1) Obtain detailed information regarding presence of ACM within the anticipated area of work and forward information to individual workers. Initiate sampling activities if needed. If ACM will be affected, DPW Shops must ensure that project is conducted in accordance with TRGS 519. Ensure communication with the ED.

(2) Obtain detailed information regarding presence of AMF within the anticipated area of work and forward information to individual workers. If AMF will be affected, DPW Shops must ensure that project is conducted in accordance with TRGS 521. Ensure communication with the ED.

i. Asbestos: Group of naturally occurring minerals that consist of hydrated silicate fibers. When asbestos is physically disturbed, the fibers or fibrils are released. Inhalation of these minute fibers is proven to cause serious health problems. Asbestos-Containing Material (ACM) are products that have been produced from asbestos, asbestos-containing substances, or asbestos-containing preparations or have parts containing asbestos. Typical ACM identified within USAG Schweinfurt are floor tiles, window sills, lamp insulation, wall insulation panels, gaskets, and roofing material.

j. Artificial Mineral Fiber (AMF): AMFs are continuous fibers, mineral wool, ceramic fibers, micro fibers, whiskers, and polycrystalline fibers that are industrially produced. Inhalation of AMF fibers can cause serious health problems. Most AMF produced before 1995 have carcinogenic potential when inhaled.

k. Project Proponent: The requester of the action that drives the project or mission requirement.

l. ACM and AMF Surveys: Electronic copies of the Surveys are distributed to the Safety Office, Master Planning Division, Operations & Maintenance Division (O&M), and Engineering Services Division (ESD). Respective Division chiefs are authorized to use the databases and GIS tool but may not make edits.

m. HABEL: Document Management System for WOs and other documents at USAG Schweinfurt.

19-2. Procedures.

a. Communication process for work with SOs:

(1) DPW shop foreman receives SO and reviews the respective Survey database for potentially affected ACM or AMF. He forwards this information to the individual workers and ensures that work is conducted in accordance with TRGS 519 or TRGS 521 and that workers are

instructed accordingly. The shop foreman oversees the project performance and informs the APM about any removed or otherwise affected ACM or AMF using the attached notification letter (APPENDIX G).

(2) The APM incorporates all obtained information into the respective Survey database.

b. Communication process for projects with WOs (DA Form 4283):

(1) BO&I receives new WO (DA Form 4283) and forwards copies, including the ACM or AMF Work Permit Form, to the ED for evaluation of potential existence prior to the WO Review Meeting.

(2) The ED conducts a formal review of the WO request and the APM checks the respective Survey data for any information regarding potentially affected ACM or AMF. The APM approves/disapproves the Work Permit and enters comments on the project and the DA Form 4283 into HABEL for further discussion during the WO Review Meeting and distribution to the project proponent.

(3) ACM issues are discussed during the WO Review Meeting. The APM forwards information on planned work affecting to the Work Council. The Project Proponent forwards conclusions of the review meeting to the Project Designer.

(4) The Project Designer obtains more detailed information about all potentially affected ACM or AMF listed in the Survey databases and also reviews the potential for any additional ACM or AMF to be present in the area of work. If information included in the ACM Survey data is not definite, sampling and analysis activities are initiated to determine asbestos type and content.

(5) The Project Designer informs the APM about ACM or AMF abated or otherwise affected during work performance and provides detailed sample information and results using the attached notification letter (APPENDIX G).

(6) The APM incorporates all obtained information into the respective Survey.

c. Communication process for other projects or work affecting ACM or AMF:

(1) BO&I receives construction or renovation/repair project requests from Army and Air Force Exchange Service (AAFES), Department of Moral, Welfare and Recreation (DMWR), Defense Logistic Agency (DLA), Defense Commissary Agency (DeCA), or Department of Defense Dependent Schools (DoDDS) and prepares a proprietary approval form. One copy of the form is provided to the ED.

(2) The APM conducts a formal review of the proprietary approval form and checks the Survey data for any information regarding potential presence of ACM or AMF. Comments are included on the proprietary approval form and resubmitted to BO&I. The APM forwards

information on planned work affecting to the Work Council. BO&I forwards the proprietary approval form to the Project Proponent.

(3) The Project Proponent obtains more detailed information about all potentially affected ACM listed in the Survey database and informs the company contracted to conduct the work. The presence of any other ACM or AMF which could potentially be affected must be investigated prior to starting work. If information included in the Survey database is not definite, samples must be taken for analysis to determine potential ACM or AMF type and content.

(4) The Project Proponent informs the APM about ACM or AMF abated or otherwise affected during work performance and provides detailed sample information and results using the attached notification letter (APPENDIX G).

(5) The APM incorporates all obtained information into the respective Survey.

CHAPTER 20
ASBESTOS CONTAINING EQUIPMENT
ISO 14001 SECTION 4.4.6

20-1. General. This chapter establishes proper maintenance and control procedures for the removal, handling, and disposal of asbestos-containing equipment and implements proper control measures to ensure that health and environmental risks are avoided.

This chapter applies to all personnel within the USAG Schweinfurt Garrison as well as contractor personnel.

The Environmental Division has developed an asbestos management plan that requires proper control measures to be implemented for all asbestos containing material within the Garrison. If proper control measures and procedures are not followed during the removal of asbestos-containing equipment, serious health and environmental hazards may occur.

20-2. Procedure.

a. Information whether material or part components contain asbestos can be obtained from auto manufacturers, auto parts retailers as well as from packaging information or at Fed-Log system. Labels or Material Safety Data Sheets may also indicate whether or not part components contain asbestos.

b. If it cannot be precisely determined whether material or equipment parts contain asbestos, it is automatically assumed that the material or the parts in question contain asbestos and they must be treated accordingly.

c. All personnel servicing asbestos-containing equipment such as brake pads must be trained. Training videos may be requested from the Garrison's Safety Office at DSN 354-1670. Detailed information can be required from reference 1. C, d, and e.

d. Certain safety requirements must be followed, i.e. under no circumstances should compressed air be used to blow dust away from equipment or to clean the surrounding work area. See annex A for WET METHOD for servicing asbestos containing brakes.

e. Care should be taken to restrict access during removal operations and to limit exposure resulting from uncontrolled releases of dust and wastewater.

f. Treat all asbestos-contaminated material as hazardous waste. Asbestos wastewater collected during removal must be placed inside a sealable drum (30 liter) which can be properly sealed. Drum is available at Environmental Division DSN 354-6795 or Bldg. # 147 Conn Barracks.

g. Place any asbestos waste and debris in a plastic bag (best practice is double bagged) and place the bag into a container labeled "Caution Asbestos Waste". The container should be sealed and brought to the Conn Hazardous Waste Storage Area Bldg # 147. Appropriate labels may be obtained at the DPW painter shop located at Ledward Barracks Bldg # 251. Clean the work area

and floor with damp rags (never dry sweep the floor) and dispose of the rags in the bag with the other waste material and seal it.

CHAPTER 21
ENERGY AND WATER AWARENESS AND CONSERVATION
ISO 14001 SECTION 4.4.6

21-1. General. This chapter establishes the standards and responsibilities for proper execution of the USAG Schweinfurt Energy Awareness and Conservation Program. USAG Schweinfurt is committed to operating in an environmentally responsible manner and promoting greater energy efficiency throughout the Garrison.

This chapter applies to all military and civilian personnel, contractors, and concessionaires, residing in, working in, or supported by the USAG Schweinfurt.

The following roles and responsibilities apply:

a. Responsibility.

(1) Garrison Commander, USAG Schweinfurt:

(a) Provide overall guidance and supervision of the USAG Schweinfurt Energy Awareness and Conservation Program.

(b) Ensure implementation of all provisions of AR 420-1.

(c) Ensure Commanding Officers, Directors, and Tenants promote energy conservation, insist on compliance with this policy, and issue amplifying instructions as necessary.

(2) Deputy to the Garrison Commander, USAG Schweinfurt:

(a) Chair the Energy Task Force and ensure meetings are attended by appropriate key personnel.

(b) Monitor the organization's compliance with the energy awareness and conservation program.

(3) Directorate of Public Works (DPW):

(a) Supervises and manages activities of the energy awareness and conservation program within the USAG Schweinfurt area of responsibility.

(b) Provides clear standards and guidance for energy conservation.

(c) Actively publicizes the benefits and requirements of the energy conservation program.

(d) Runs the annual Federal Energy Conservation Month program during the month of October.

(4) Unit Commanders and Civilian Supervisors:

- (a) Ensure widest dissemination of the contents of this directive.
- (b) Encourage members of their unit/organization to conserve energy.
- (c) Monitor and enforce their organization's compliance with the energy conservation program.

(5) Garrison Members:

(a) Residents will monitor their use of utilities with a view toward operating in the most energy efficient manner possible and report facility deficiencies which waste energy and are beyond self-help capabilities for correction.

(b) All individuals residing, working, or receiving support within USAG Schweinfurt will comply with the Garrison Energy Awareness and Conservation Program.

21-2. Procedures.

a. To minimize energy loss through poor heating and airing habits, all garrison members should follow the guidance below.

(1) Practice airing several times a day, briefly and sensibly. During airing, turn off the heat completely before opening windows. Five minutes is the recommended length of time for airing. After airing, turn the heat on again.

(2) During the heating season the DPW controls building temperatures in occupied general office space maintaining a range of 72°F/22°C, plus/minus 2°F during working hours. At unoccupied times (to include overnight, weekends, and holidays), heating temperatures are automatically set to 55°F/13°C, plus/minus 5°F. Building occupants are not required to make any adjustments other than lowering the thermostat valves on radiators to '0' when ventilating rooms.

(3) During heating season, the DPW controls temperatures in open bay facilities (warehouses, maintenance buildings, etc) at 60°F/15°C, plus/minus 5°F during occupancy and 45°F/7°C, plus/minus 5°F during unoccupied times. Warehouses are not heated if they are normally devoid of human activity and if freezing and condensation are not issues. Building occupants are not required to make any adjustments other than lowering the thermostat valves on radiators to '0' when ventilating rooms.

(4) Exterior doors will not be left open while areas are being heated.

(5) The use of outdoor heating devices is prohibited.

(6) The use of space heaters in barracks, housing units, and workspaces is prohibited.

b. Energy consumed through lighting and electricity shall be reduced by adhering to the following guidance:

(1) During daylight hours, make sure that outdoor lighting devices are switched off. This includes exterior lighting of housing units, office buildings, and barracks as well as outside lighting of sports fields, motor pools and beneath maintenance sheds. The use of outdoor lighting during daylight hours is only permitted if required by operations or where it is essential for safety or security purposes. If lighting devices cannot be switched off, inform the DPW, Work Order Section at DSN 354-6342/6357.

(2) Outdoor and indoor electrical holiday lighting and decorations will not be switched on during daylight hours or at times when housing occupants are not present.

(3) All computer monitors and peripherals will be turned off at the end of each workday unless otherwise directed by the System Administrator (SA).

(4) General purpose office equipment, copiers, fax machines, printers, scanners, fans, coffee makers, and all other appliances and electricity-consuming devices will be turned off at the end of the workday and during the day when the device is not needed for use.

c. To minimize the waste of vehicle fuel through inefficient driving, all members of the garrison must adhere to the following guidance:

(1) Avoid aggressive driving, drive smoothly.

(2) Shift to a higher gear as soon as possible.

(3) Avoid idling. It uses more gas than stopping and re-starting your vehicle. Turn off your engine if you stop for more than 30 seconds. It is prohibited in Germany to start your engine and idle it for the purpose of warming prior to driving.

(4) Remove surplus weight in your vehicle.

(5) Maintain proper tire inflation. Poorly inflated tires waste gas and cause more pollution.

(6) Walk short distances instead of driving when possible.

d. The following water conservation measures should be implemented during daily activities:

(1) Report dripping faucets and toilets to the DPW Work Order Section.

(2) Avoid flushing the toilet unnecessarily.

(3) Do not run water at a rate exceeding immediate requirements.

(4) Do not let the water run while brushing teeth or shaving. Turn it on and off as needed.

(5) Avoid washing dishes under a stream of water. Turn off water in between dishes. Operate dishwashers and clothes washers only when you have a full load.

e. Recycling saves energy, prevents pollution, conserves natural resources, and helps sustain the environment for future generations. All members of the Garrison should engage and encourage positive recycling habits:

(1) Actively recycle used and unwanted paper, plastic, metals, and clothing/shoes.

(2) Use the Free cycle Center to avoid disposal of bulk trash for the community.

(3) Use biodegradable products.

(4) Properly dispose of hazardous waste. If you have questions about hazardous materials, you can contact the Environmental Division at DSN 354-6795 (09721-96-6795).

f. Implementation and persistent widespread use of these measures will not only ensure a more efficient expenditure of US tax payers resources, but will greatly benefit the US Army as a whole allowing more investment in essential services and facilities. Continued implementation of energy conservation practices will enhance the environment for generations to come.

CHAPTER 22
SEPARATE OR RECYCLE TRASH (SORT)
ISO 14001 SECTION 4.4.6

22-1. General. This chapter establishes procedures, standards and responsibilities for proper execution of SORT in the USAG Schweinfurt. Proper policing and upkeep will enhance the appearance of military structures and ensure compliance with regulations.

This chapter applies to all military and civilian personnel residing in, working in, or supported by the USAG Schweinfurt. All personnel, especially military unit POCs, Area, Building and Stairwell Leaders, Directorate and Activity Directors as well as Community Leaders will familiarize themselves with the contents of this chapter and execute all tasks to standard.

The following roles and responsibilities apply:

(1) All personnel are responsible for acting in a manner consistent with good SORT practices. Individual residents will be held personally accountable for any SORT violations.

(2) The military chain-of-command is charged with the primary responsibility for enforcing the SORT SOP and adhering to SORT regulations in unit buildings, motor pools, barracks and Army Family Housing areas.

(3) In Community public facilities or places of business designated facility coordinators have the primary responsibility for policy enforcement.

(4) USAG Commander:

(a) Provide command emphasis to the SORT Program.

(b) Offer SORT education through the DPW whenever requested.

(c) Monitor overall progress of SORT Program and recognize areas and individuals who contribute significantly to the recycling effort.

(d) Based upon quarterly inspections of housing areas, designate a "Yard of the Quarter" and "Building of the Quarter". Winners will receive a sign for their building reflecting the award.

(e) Send names of second and multiple time SORT policy violators to their respective Commander and the CSM. In cases of civilian SORT violation, inform respective commanders and the CMAA. Coordinate any disciplinary action with unit commanders and CMAA.

(5) USAG CSM:

(a) Ensure that all personnel are trained and knowledgeable about this SOP and the SORT program.

(b) On behalf of the Commander, routinely inspect all areas and enforce SORT standards. Notify Area Leaders of shortcomings.

(c) Act for the Commander as the Policy Administrator, to include monitoring violations and recommending disciplinary action for SORT violators.

(d) Serve as focal point for issues raised by Area Leaders concerning manpower, resources or policies.

(e) Ensure attendance by all required personnel at mandatory events.

(f) Follow up with Unit Commanders, regarding disciplinary action against second and third time SORT violators.

(6) Tenant Unit Commanders and Community Activity Directors:

(a) Provide command emphasis to the SORT Program.

(b) Ensure that all personnel are trained and knowledgeable about this SOP and the SORT program.

(c) Establish and enforce SORT policies in assigned areas.

(d) Execute over watch responsibilities IAW this procedure.

(e) Support Area Leaders in the execution of any additional duties.

(f) Ensure that community trash and recycling containers in assigned areas are policed and properly maintained. Notify the CSM of any deficiencies.

(g) Notify the DPW, O&M Division, when trash and recycling containers are not emptied by the city and county of Schweinfurt.

(h) IAW AR 600-20, para. 4-6, Consider corrective training for single time and minor multiple time violators.

(i) When necessary, administer appropriate disciplinary action against multiple time and severe one time SORT violators.

(j) Designate a SORT POC to interface with the SORT Coordinator and attend all Environmental Quality Control Committee (EQCC) meetings.

(7) USAG Directorate of Public Works:

(a) Supervise and manage the SORT Program, and actively publicize SORT benefits and requirements.

- (b) Provide materials and equipment required by Area Leaders and Unit POCs.
- (c) Inspect all trash and recycling containers to monitor effectiveness of SORT program.
- (d) Develop and execute SORT training for all area coordination personnel.
- (e) Conduct surveys to measure SORT program effectiveness and community participation levels.
- (f) Coordinate with the CSM to monitor improper sorting in recycling and regular trash containers.
- (g) Send warning letter to first time SORT violators.
- (8) Unit/Community Activity POCs and Housing Area Leaders:
 - (a) Ensure that assigned recycling points are properly maintained.
 - (b) Ensure that subordinate Building and Stairwell Leaders post SORT policies on stairwell bulletin boards, and educate residents on SORT and their responsibilities.
 - (c) Ensure that subordinate Building and Stairwell Leaders maintain SORT standards in their assigned areas.
 - (d) Submit names of individuals not complying with SORT program to the SORT Coordinator or the USAG CSM.
 - (e) Recommend individuals who make significant contributions to the SORT program for awards.
 - (f) Coordinate the efforts of residents to ensure equitable distribution of tasks.
 - (g) Spot check the trash containers and notify the responsible Building and Stairwell Leaders of deficiencies on a biweekly basis.
 - (h) Ensure buildings, grounds and common areas are maintained and policed.
 - (i) Building Leaders are ultimately responsible for dumpsters and recycling containers in assigned area. Notify Area Leader of any violators by getting individual's name, unit, address, and/or automobile license number.
 - (j) Meet with Building and Stairwell Leaders to enforce policies. Assign responsibility to Stairwell Leaders for each trash point, to include containers that are located at front entrance.

(k) Attend or send a representative to attend all Environmental Quality Control Committee (EQCC), Area Leader and Town Hall Meetings.

22-2. Procedure.

a. The Commander's Intent:

(1) To provide command emphasis to the SORT Program, establishing accountability for recycling in every area and building in the USAG Schweinfurt.

(2) To publish and enforce clear standards for recycling.

(3) To give Area, Building, and Stairwell Leaders authority to accomplish assigned tasks. Include Area Leaders in the command decision process. Empower them to execute their responsibilities and reward their residents.

(4) To configure the installation grounds for ease of enforcement.

(5) To establish a responsive unit over watch program.

(6) To take appropriate administrative action against those residents who fail to adhere to the provisions of this SOP, and to reward citizens and coordinators for exceptional performance.

b. Concept of the Operation.

(1) The Community's SORT Coordinator, a member of the DPW Utilities Division, is the primary proponent for SORT policy, procedures, training and education materials. The SORT coordinator serves as liaison between the Schweinfurt Military Community and the local refuse collectors from the city and county of Schweinfurt as well as other local communities where US service members and civilians live through the leased housing program.

(2) Deputy Installation Coordinators (DIC) are the primary assistants to USAG Commanders for recycling management within their area. Assigned Area, Building and Stairwell Leaders have tasking authority over all personnel residing or working in their designated areas to accomplish the recycling mission.

(3) Unit POCs, Housing Area Coordinators and Community Activity Directors will establish internal procedures to ensure that standards established in this SOP are met at all times. This includes, but is not limited to:

(a) Ensuring that SORT regulations are posted in all workplaces, stairwells, etc. and that the available recycling resources are requested and sited in their areas.

(b) That containers are properly utilized, that assigned areas are free of trash, and that trash is removed by the city and county of Schweinfurt, or responsible agency.

(c) When trash is not removed, notify the DPW, O&M Division. When illegally parked POVs impede trash removal, notify the Military Police.

(4) Community trash collection points will be inspected, by the USAG CSM, DICs, and members of the DPW SORT staff.

(5) A contractor will pick up bulk trash twice a month in all Government housing and Government leased housing units. Pick-up dates will be published in the Community Calendar found on the Team Schweinfurt web site. The contractor is provided by the DPW Operations and Maintenance Division.

(6) Twice annually (spring and fall), the USAG Schweinfurt community conducts a comprehensive clean up and area beautification. The Area, Building and Stairwell Leaders and individual residents, who continuously meet or exceed recycling standards will be recognized for their outstanding commitment and community service.

c. SORT Policy Enforcement.

(1) Military Members:

(a) First time SORT violators or suspected violators will receive a letter from USAG Schweinfurt, DPW, describing the alleged violation, a copy of this policy letter explaining the SORT policy and an offer of SORT assistance and education.

(b) Second time SORT violators or suspected violators will receive a letter from the USAG Commander through their respective Unit Commanders. The letter will describe the alleged violation and request that the Unit Commander consider corrective training for the violator. Notwithstanding the guidelines in AR 600-20, para 4-6, the USAG Schweinfurt will offer a detail of trash clean-up and recycling duties as a means of corrective training.

(c) Commanders are encouraged to consider disciplinary action under the UCMJ after repeated violations, or particularly severe one time violations. All means from simple verbal counseling to administrative action to Article 15 non-judicial punishment, to courts martial are at Commanders' disposal.

(2) Civilian Violators:

(a) First time SORT violators or suspected violators will receive a letter from USAG Schweinfurt, DPW describing the alleged violation, a copy of this policy letter explaining the SORT policy and an offer of SORT assistance and education.

(b) Multiple time SORT violators, or particularly severe one time violators and suspected violators will receive a letter from the USAG Commander either through their sponsor's respective unit commander, or their own unit commander if they are civilian employees without military member sponsors. The letter will describe the alleged violation and inform them that they will be referred to the Civilian Misconduct Action Authority (CMAA).

The CMAA will process and investigate the alleged violation IAW the procedures in USAREUR 27-9.

(c) Potential CMAA action include counseling, Letters of Warning, notification of U.S. Hiring Authority of misconduct, Suspension or Revocation of Logistical Support, Suspension of MWR privileges, Termination of Government Quarters, and any other action permitted for SORT violations under USAREUR Reg 27-9.

CHAPTER 23
INTEGRATION OF EMS INTO APPROPRIATE CONTRACTS
ISO 14001 SECTION 4.4.6

23-1. General. This chapter describes the process for identifying and assessing appropriate contracts of USAG Schweinfurt for consideration under the Garrison's EMS. Contracts shall be categorized and included in a register that is re-evaluated at least once a year, after significant changes to mission, activities, or contractual requirements.

This chapter also provides guidance for the process of integrating EMS Requirements, defined EMS roles and responsibilities of contractors into appropriate contracts and to verify that contractors fulfill these defined EMS roles and responsibilities.

Chapter 23 applies to the EMS Cross-Functional Team (CFT) and other Garrison personnel responsible for the identification and evaluation of appropriate contracts which include EMS requirements, as identified in this procedure. It also applies to USAG Schweinfurt personnel responsible to verify that contractors fulfill their defined EMS roles and responsibilities.

a. Definitions:

(1) Contract Days per Year (CDY): The number of contract days per year.

(2) Environmental Effect (EE): The effect of contract activities in relation to the significant aspects of USAG Schweinfurt.

(3) Appropriateness Factor (APF): Result of CDY multiplied by EE. This factor is used to determine whether EMS should be integrated into the contract category.

(4) Appropriate Contracts: An appropriate contract may have an impact on the Garrison's significant environmental aspects, and may include legal arrangements with concessionaires. Only contracts under the direct control of USAG Schweinfurt, which were entered into the system or modified after 01 November 2010, are considered. Contracts/categories may be added to the register, if applicable.

(5) Contractor: Includes suppliers and concessionaires.

b. Responsibilities:

(1) EMS Management Representative (EMSMR): Has overall authority and responsibility for the operation of the EMS. Reviews and approves updated register of contracts.

(2) Director of Public Works: Provides overall supervision and direction for the environmental program.

(3) Environmental Division: Reviews all work orders (WO) and provides environmental review comments/guidance on all WOs performed by contractors.

(4) EMS CFT: Reviews and re-evaluates register of contracts.

(5) EMS Audit Team: Conducts the annual EMS audit including verification that EMS requirements are included in appropriate contracts and contractors fulfill their defined EMS roles and responsibilities.

(6) Contractors: Fulfill the defined EMS roles and responsibilities as described in the Performance Work Statement (PWS) and the guidelines for contractors at USAG Schweinfurt.

(7) Contracting Officer Representatives (COR): Distribute the EMS flyer (see 1.d.) as part of the PWS in German and English language as needed.

(8) USAG Schweinfurt Project Manager: Ensures all WO review comments by ED are addressed in the PWS and added to the contract.

23-2. Procedure.

a. Identify all types of contracts of the USAG Schweinfurt, categorize contracts and identify those which are appropriate for the inclusion of EMS requirements and are under operational control of USAG Schweinfurt.

b. For the evaluation of contracts, the rating factors "Contract Days per Year" (CDY) and "Environmental Effect" (EE) for each category of contract are determined following the numerical scale below. For a re-evaluation, check whether the APF has changed since the last review:

(1) Contract Days per Year (CDY):

5 = Continuous – ongoing or daily contract

4 = Frequent - 150 or more contract days within one year

3 = Infrequent – 50 or more than 50 contract days per year, fewer than 150 days within one year

2 = Rare – 10 or more than 10 contract days within one year, fewer than 50 contract days within one year

1 = Negligible – fewer than 10 contract days within one year

(2) Environmental Effect (EE):

5 = Immediate threat, likely to result in widespread damage to human health or the environment; requires great effort to remediate or correct or/and extreme consumption of energy and/or generation of solid/hazardous waste

4 = Serious - no immediate health threat, but significant damage to the environment; difficult, but possible to remediate or/and high consumption of energy and/or generation of solid/hazardous waste

3 = Moderate - somewhat harmful, but correctable or/and moderate consumption of energy and/or generation of solid/hazardous waste

2 = Mild - small potential for harm to environment, correctable or/and mild consumption of energy and/or generation of solid/hazardous waste)

1 = Insignificant - trivial consequences, easily correctable or no impact or/and insignificant consumption of energy and/or generation of solid/hazardous waste)

Note: Use/storage of POL is only a significant aspect at heating plants and therefore not applicable in this matter.

c. After determining the rating factors, the **Appropriateness Factor (APF)** is calculated by multiplying CDY and EE:

$$\text{APF} = \text{CDY} \times \text{EE}$$

A category of contract is considered appropriate for inclusion of EMS requirements if:

$$\text{APF} \geq 15$$

EE is ≥ 4 or a contract category directly manages a significant aspect of USAG Schweinfurt.

Contract categories are only considered appropriate if the USAG has operational control. Some of the contracts/categories may no longer be appropriate for inclusion of EMS requirements as significant aspects may have changed due to environmental objectives, targets, and programs. Remove the contracts/categories from the register if they are no longer categorized as "appropriate", or change the APF if the status has changed. Adapt the rating factors of this SOP accordingly. Contract register in APPENDIX L shows the rating, type of contract, and appropriateness.

d. During the weekly WO meeting, ED will annotate all WOs involving appropriate contracts with the following wording:

“USAG Schweinfurt Environmental Management System (EMS)”:

USAG Schweinfurt implemented EMS IAW EO13423, ISO 14001:2004(E), DoD and IMCOM requirements. An EMS is an overall management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes, and resources for developing, implementing, achieving, reviewing, and maintaining the environmental policy of an organization. The Garrison’s EMS is designed to ensure that all personnel, including contract personnel, whose work activities can cause real or potential significant environmental impact, are aware of how their work supports the EMS and are competent to perform their roles, responsibilities, and authorities while supporting the Garrison’s mission. Contractors and their personnel are required to be aware of and comply with the Garrison EMS policy and legal and other requirements when performing work at an installation.

More information about the Garrison’s EMS may be at:

<http://www.schweinfurt.army.mil/directorates/dpw/environmental/environmental.htm>

e. For those contracts on which the Garrison has no influence in regard to including EMS clauses into the PWS, such as Job Order Contracting (JOC) contracts, the applicable COR will brief the contractor on their EMS duties at the post-award conference, namely by discussing the EMS guidelines. Post-award conference minutes have to annotate the EMS training of contract had occurred.

f. During the annual EMS audit, the audit team checks contracts to verify that EMS requirements are included and that contractors fulfill their defined EMS roles and responsibilities.

CHAPTER 24
CAR WASH POLICY
ISO 14001 SECTION 4.4.6

24-1. General. This chapter provides a policy for privately owned vehicle (POV) car washing within the USAG Schweinfurt.

This chapter applies to all POVs users located within the USAG Schweinfurt geographical area.

German law regulates vehicle washing within the Schweinfurt Garrison. We will comply with these laws and help local efforts to protect the environment. German police enforce this law and ticket violators.

24-2. Procedure.

a. Unless properly performed in an approved location, washing of POVs pollutes the environment by releasing car grease and oil combined with detergents into the public sewer system. Procedures for proper car washing, in compliance with German law, are as follows:

(1) The washing or rinsing of POVs is strictly prohibited. This includes all Housing Areas and military installations.

(2) Personnel may wash POVs at selected U.S. installation washracks connected to a petroleum-oil-lubricant separator. Use only special, PH neutral soaps and cleaners (e.g. dishwashing liquid, store-bought car wash cleaners) for POV washing at these locations. Specifically prohibited for use are chlorinated and petroleum-based solvents such as gasoline, trichloroethylene, methanol, etc. Wash the undercarriage and engine only when preparing the vehicle for stateside shipment. Military vehicles have priority use when washing at installation washracks. Do not use any soaps for military vehicle washing. Authorized installation POV washracks are:

(a) Conn Barracks, recycling washrack, Bldg #1181.

(b) Conn Barracks, Auto Skill Center, Bldg #49. Note: This is a pay for service facility.

(3) Public car washes sponsored by community groups must also use the above approved washrack facilities. The Garrison Commander is the approval authority.

(4) Do not conduct any type of vehicle maintenance (e.g. oil change, brake job, etc.) at any of these locations. Use the Auto Skills Center located at Conn Barracks, Bldg #49 for all maintenance. Note: This is a pay for service facility.

(5) Car wash facilities are also available on the economy. These facilities comply with German law.

b. Building Coordinators are responsible for enforcing this policy within housing areas.

CHAPTER 25
PROHIBITION OF BURNING PAPER DOCUMENTS AND OTHER RECORD
CARRIERS
ISO 14001 SECTION 4.4.6

25-1. General. This chapter describes the prohibition of burning of paper documents and other record carriers, including burning documents and/or records for destruction purposes within the United States Army Garrison (USAG) Schweinfurt.

This chapter applies to all Soldiers, Family members, and civilian employees within the USAG Schweinfurt.

25-2. Procedures.

a. Based on the references listed above and to reduce environmental pollution, the burning of paper documents, record carriers, and waste material, specifically burning of material for destruction purposes, is prohibited within the USAG Schweinfurt footprint.

b. Documents designated for destruction will be taken to the Conn Barracks Recycling Center, building # 147, which is equipped with an industrial size pulper (secret clearance granted). According to AR 380-5, wet pulping is an appropriate destruction method for classified material. For minor loads (up to 100 lbs/50 kg), the center is open Monday – Friday from 0800-1130 and 1230-1500 hours. For loads over 100 lbs/50 kg, please make appointments by calling DSN 354-6201.

c. During regular inspections, the Environmental Division and Fire Emergency Services will verify adherence to this pollution prevention action.

CHAPTER 26
MATERIAL SHREDDER
ISO 14001 SECTION 4.4.6

26-1. General. This chapter defines the responsibilities for operation of the paper and the plastic and metal shredders located in Building Number 147, Conn Barracks.

This chapter applies to all personnel involved in the operation of the paper and the plastic and metal shredders at Building Number 147, Conn Barracks.

The following roles and responsibilities apply:

- a. United States Army Garrison (USAG) Schweinfurt Commander: Provides command support for the waste management program.
- b. Director of Public Works: Provides overall supervision and direction for the waste management program.
- c. Operations and Maintenance (O&M) Division: Operates the paper and plastic and metal shredders. The Operations and Maintenance Division has oversight over the Shredder operation.
- d. Holders of material to be shredded (Customer/ User): Follow process as described below.

26-2. Procedure.

a. Materials to be shredded: The paper shredder is only to be used for the shredding of classified paper and cardboard. No plastic or metal parts may be shredded. The paper shredder is cleared to handle “secret” documents.

b. Hours of operation: Operating hours of the shredder are the same as for the Recycling Center next to Building Number 147, Conn Barracks: Monday- Thursday 0700 - 1600 hours, Friday 0730 - 1430 hours, closed on Saturdays and Sundays and German Holidays. The customer must arrange an appointment with the Operations and Maintenance Division for quantities over 50 kilograms or 100 pounds.

c. Facility employees responsibilities:

(1) Provide an introduction to customers on how to place material into the funnel of the shredder and which material is to be shredded. Ensure that the operating instructions for the paper shredder are followed by customers.

(2) Ensure proper operation of the shredder and ensures that empty containers are available for shredded material and full containers are emptied with a forklift.

(3) Ensure cleaning of the shredder at close of business each day and ensures proper maintenance and repair of the shredder.

(4) Ensures open access to the shredder during operating hours.

(5) Advise the user of safety and emergency procedures, such as the location of hearing protection, firefighting equipment and emergency exits.

(6) Will not be responsible for any classified materials prior to destruction. This also means that they will not be responsible for feeding material into the shredder. Employee will leave the area for security reasons after instructing the user as described above. If technical difficulties occur and customer needs help, make sure customer has the opportunity to secure classified material before returning to the shredder site.

d. Customer's / user's responsibilities:

(1) Sign into sign-in log and reads operating instructions for shredder operation. Comply with the requirements of this SOP and guidance provided by facility employees.

(2) Screen material to be destroyed to ensure that only classified material is destroyed. The facility will not be used for the destruction of trash/ regular paper; therefore, it must be separated from material to be destroyed prior to arriving at the facility.

(3) Are responsible for placing material into the shredder.

(4) Ensure that the classified material is not openly displayed and that they are correctly shredded. It is the responsibility of the customer to ensure that classified material is never visible to unauthorized personnel (e.g. O&M personnel).

(5) Ensure that all material is destroyed prior to departure. Examine the entire area to ensure that no classified material is overlooked.

(6) Clean up the facility after use.

(7) Seek help from facility employees when technical difficulties occur. Ensure in those situations that classified material is not displayed to neither other customers/users nor to the facility employees.

e. In case of emergency: Emergency shut-off buttons are available on the shredder and must be used immediately in case of emergency. For emergency incidents, immediately call the military emergency number at DSN 117. No one will reach into the funnels at any time. Safety procedures posted at the location of the shredder will be observed at all times.

f. Plastic/metal shredder operation:

(1) Materials to be shredded: The plastic/metal shredder is only to be used for the shredding of classified metal such as hard disks and plastic parts such as CD-ROMs, name tags, video tapes, film rolls, and foils.

(2) Hours of operation: Operating hours of the shredder are the same as for the Recycling Center next to Building # 147, Conn Barracks: Monday- Thursday 0700 - 1600 hours, Friday 0730 – 1430 hours, closed on Saturdays and Sundays and German Holidays.

(3) Shredder operation by the O&M Division: The O&M Division ensures that the shredder is operated by trained O&M personnel only in accordance with reference 1b. The O&M Division ensures that containers for shredded material are emptied as soon as they are full. The O&M Division ensures proper maintenance and repair of the shredder. The shredder shall be operated with closed lid only.

(4) Customers sign in on the sign-in log.

(5) No one will reach into the funnels at any time. Safety procedures posted at the location of the shredder will be observed at all times.

(6) In case of emergency: Emergency shut-off buttons are available on the shredder and must be used immediately in case of emergency. For emergency incidents immediately call DSN 117.

CHAPTER 27
CONSIDERATION OF POLLUTION PREVENTION FOR REGULAR INSPECTION
OF COMPRESSED AIR SYSTEMS
ISO 14001 SECTION 4.4.6

27-1. General. This chapter provides standard processes for the consideration of P2 issues during regular inspections and maintenance of compressed air systems.

This chapter applies to all personnel working with or inspecting compressed air systems.

The following roles and responsibilities apply:

- a. Director of Public Works: Provides overall supervision and direction for the environmental program.
- b. Utilities Branch: Regularly conducts inspection and maintenance of compressed air systems. Records completion of inspection/maintenance in respective operation diaries. Supervisors check completion of scheduled maintenance activities.
- c. Environmental Division: Provides professional advice for P2-related issues.

27-2. Procedure: Utilities Branch conducts quarterly inspection and maintenance of compressed air systems. Scheduling and completion of regular maintenance is recorded in the spreadsheet "Scheduled Inspection and Maintenance". To prevent energy wastage, quarterly facility visits also include inspections regarding leakages in the compressed air system. In case of any leakages or need for repair, the Utilities Branch directly resolves the issues or initiates repair via work orders. Supervisors semiannually check completion of scheduled maintenance activities and regular inspection of all compressed air systems.

CHAPTER 28
SETTING OF HEATING TEMPERATURE OF COMPRESSOR/TRANSFORMER
BUILDINGS
ISO 14001 SECTION 4.4.6

28-1. General. This chapter provides a standard process for the setting of heating temperatures in compressor and transformer buildings.

This chapter applies to United States Army Garrison (USAG) Schweinfurt Operations and Maintenance (O&M) Division, Utilities Branch, and Environmental Division.

The following roles and responsibilities apply:

- a. USAG Schweinfurt Commander: Provides Command support for the Environmental Management System (EMS).
- b. Director of Public Works: Provides overall supervision and direction for the environmental program.
- c. Environmental Management Division: Checks adherence to this SOP.
- d. Operations and Maintenance Division: Sets and controls heating temperatures.

28-2. Procedure.

- a. To avoid frost damage and malfunction of compressors and transformers, respective rooms/buildings need to be heated during the winter season. To ensure that the energy consumption is minimal while at the same time ensuring maximum efficiency of the compressors and transformers, the Utilities Branch sets the heating temperature to 10° Celsius (50° Fahrenheit) and checks these settings during regular maintenance activities.
- b. During regular inspections, the Utilities Branch checks adherence to this pollution prevention determination.

CHAPTER 29
REDUCTION OF ENVIRONMENTAL IMPACT FROM VEHICLE USAGE
ISO 14001 SECTION 4.4.6

29-1. General. This chapter gives guidance to reduce the environmental impact of vehicle use.

This chapter applies to all personnel, military and civilian, within the Schweinfurt Military Community.

The following roles and responsibilities apply:

(1) United States Army Garrison (USAG) Schweinfurt Commander: Provides command support for the Environmental Management System (EMS).

(2) Director of Public Works: Provides overall supervision and direction for the environmental program.

(3) Environmental Division: Tracks and reports on progress in achieving environmental objectives and targets. Provides professional advice for issues related to environmental protection and enhancement.

(4) All Community Members: Follow MOI guidelines.

29-2. Procedures.

a. Reduction of unnecessary and avoidable air pollution and fuel consumption from vehicle use: To reduce air pollution and fuel consumption, all personnel working and living within the US Army Garrison Schweinfurt will not idle vehicle engines while parked. All Garrison members will follow the guidance below:

(1) During wintertime, do not warm up cars or de-ice windshields by running the engine while parked.

(2) Do not leave cars running for cooling purposes during summertime.

(3) Idling of vehicles is only allowed if necessary for maintenance purposes (e.g. adjusting motors, working on the ignition system).

b. Reduction of unnecessary and avoidable noise from vehicle use: To reduce noise, all Community members will follow the guidance below.

(1) Turn off engines while parked.

(2) Do not slam car doors.

(3) Do not unnecessarily drive back and forth within housing areas.

- (4) Loud music from vehicle stereo systems within housing areas is prohibited.

CHAPTER 30
HANDLING, STORAGE, AND TRANSPORT OF COMPRESSED GAS CYLINDERS
ISO 14001 SECTION 4.4.6

30-1. General. This chapter defines the requirements for handling, storage, and transport of compressed gas cylinders at USAG Schweinfurt.

This chapter applies to all USAG Schweinfurt personnel working with compressed gas cylinders, including Military personnel and contractors.

The following roles and responsibilities apply:

a. USAG Schweinfurt Commander: Provides command support for the hazardous material and hazardous waste management program.

b. Director of Public Works: Provides overall supervision and direction for the hazardous waste management program.

c. Director of Logistics: Provides overall supervision and direction for the hazardous material management program.

d. Environmental Division(ED): Operates the hazardous waste management program at USAG Schweinfurt.

e. Directorate of Emergency Services (DES): Inspects dedicated storage areas for compressed gas cylinders and ensures compliance with fire protection requirements.

f. Safety Officer: Inspects dedicated compressed gas cylinder storage areas and ensures compliance with occupational health and safety requirements.

g. Personnel: Handles and stores compressed gas cylinders in accordance with the process described below.

30-2. Procedure.

a. Handling and return of compressed gas cylinders:

(1) Do not order and store excessive numbers of compressed gas cylinders. Only order and store the number required for performing work.

(2) In the event that compressed gas cylinders are empty or unserviceable contact the supplier for return of cylinders. In the event that return to the supplier is not feasible, contact the Hazardous Waste Acceptance Center at Building #147, Conn Barracks or the Directorate of Logistics (DOL) Reuse Center at Building #157, Conn Barracks for return. Used, empty or unserviceable US gas cylinders or cylinders marked US property need to be returned to the US Supply system.

(3) Ensure compressed gas cylinders are emptied prior to the Technischer Überwachungs-Verein (TÜV) expiration date or any other applicable expiration date. If it is likely that the gas will not be used up before the expiration date, contact the supplier for return. In the event that return to the supplier is not feasible, contact the Hazardous Waste Acceptance Center at Building #147 or DOL Reuse Center at Building #157 for return before the expiration date.

(4) During gas cylinder handling and storage, ensure the cylinders cannot be damaged by moving vehicles.

(5) Ensure compressed gas cylinders needed to perform work are placed at a safe distance from fire and heating devices. Minimum distance to open flames (e.g. welding) and other sources of ignition (e.g. electrical sparks) is 3 feet 4 inches (1 meter [m]), minimum distance to heating devices 1 foot 8 inches (50 centimeters [cm]). Ensure appropriate fire suppression/extinguishing equipment is available during handling and storage of compressed gas cylinders.

(6) Ensure applicable Personal Protective Equipment (PPE), Material Safety Data Sheets (MSDS) and operating instructions for working with different types of gas are available.

(7) When working with compressed gas cylinders, ensure tightness of joints (e.g. valves) by testing e.g. with soap/water.

(8) Ensure familiarity with color codes of compressed gas cylinders, e.g. according to EN 1089-3. Color coding is used to identify the properties of the respective gas.

(9) Ensure Hazardous Material stickers on cylinders, which provide information on the gas contained, are not damaged. Ensure that all provided instructions are followed.

b. Compressed gas cylinder storage in dedicated storage areas:

(1) Ensure compressed gas cylinders are only stored in dedicated storage areas.

(2) Ensure unauthorized persons have no access to compressed gas cylinder storage areas.

(3) Ensure only appropriately trained personnel handle and store compressed gas cylinders.

(4) Store compressed gas cylinders upright on a flat, dry and solid surface protected against the elements. Additionally store cylinders with protective caps in place, and appropriately secured (e.g. fastened with a light chain or tie-down strap). The bearing load of the surface shall not be exceeded. Ensure that storage areas, e.g. cabinets and containers, comply with requirements of TRG 280.

(5) Compressed gas cylinders must not be stored on or beneath staircases, in hallways, passages, escape routes, garages, housing space, or basements, except in amounts required for

the continuation of work. Compressed gas cylinders must not be stored in areas regularly frequented by humans.

(6) Ensure storage areas are sufficiently labeled with e.g. no access and no smoking signs. Additionally, ensure other applicable prohibitory and hazard signs are displayed according to the type of gas stored.

(7) Mark empty compressed gas cylinders as empty. Store full and empty gas cylinders clearly separated from each other.

(8) Storage areas must not have open connections to basement rooms, open pits or sewer lines.

(9) Compressed gas cylinder storage areas must have sufficient ventilation.

(10) Flammable material such as flammable liquids, paper, wood, etc. must not be stored with or near compressed gas cylinders.

(11) Flammable and oxidizing gases must be stored separately.

(12) A safe distance of at least 16 feet 5 inches (5 m) or, alternatively, a fire-resistant wall with a height of at least 6 feet 7 inches (2 m) must be maintained between cylinder storage areas and adjacent storage areas containing potential hazards, such as flammable material storage areas. According to DIN 4102, fire-resistant walls resist fire for ninety minutes (*Feuerwiderstandsklasse* [fire resisting class] F90). If compressed gas cylinders are stored next to rooms with a different utilization, fire retardant walls must be maintained that, according to DIN 4102, resist fire for thirty minutes (F30).

(13) For compressed gas cylinders containing chlorine, ensure compliance with applicable additional requirements per FGS, C5.3.21.

c. Transport of compressed gas cylinders:

(1) Ensure only appropriately trained personnel transport compressed gas cylinders

(2) When transporting gas cylinders, ensure protective caps are in place and cylinders are appropriately secured from falling (e.g. fastened with a light chain or tie-down strap).

(3) Compressed gas cylinders must not be transported together with highly flammable material. Ensure appropriate fire extinguishers are available during transport. Furthermore, ensure non-compatible gases are stored separately during transport.

(4) The transport of gas cylinders in open vehicles is preferable. In the event that compressed gas cylinders are transported in closed vehicle types (e.g. vans), vehicles must have sufficient ventilation equipment (at least two vents with a size of at least 100 cm² each). Vents must not be blocked by e.g. cargo. The transport of gas cylinders in passenger cars (e.g. station

wagons) must only be performed as an exception and only if ventilation is ensured through e.g. sufficiently opened windows.

(5) For more information, particularly when transporting gas cylinders on public roads, see regulation on carriage of dangerous goods by road, rail and inland water transportation (Gefahrgutverordnung Straße, Eisenbahn und Binnenschifffahrt, (GGVSEB)).

CHAPTER 31
PLANNING PROCESS
ISO 14001 SECTION 4.4.6

31-1. General. This chapter provides a standard procedure for the consideration of environmental requirements during the planning and decision process for the USAG Schweinfurt at the same time as technical, economic, and other factors are considered.

This chapter applies to all personnel involved into planning processes within the USAG Schweinfurt.

The following roles and responsibilities apply:

- a. USAG Schweinfurt Commander: Provides Command support for the EMS and approves execution of projects.
- b. Environmental Management System Management Representative (EMSMR): Has overall authority and responsibility for the operation of the Environmental Management System (EMS).
- c. Director of Public Works: Provides overall supervision and direction for the environmental program.
- d. Environmental Division: Reviews work orders regarding their environmental relevance and supports the project proponent in the performance of the ER by providing relevant environmental data and information on relevant laws and regulations. The Environmental Division will track reviewed work orders and all ERs in an Excel Spreadsheet.
- e. Project Proponent: The project proponent makes an RER and performs an ER for proposed actions or projects in the early project planning stages in coordination with the Environmental Division. The RER and the REC will be signed by the project proponent. The project proponent provides funds required when significant costs will be needed to conduct an ER.
- f. Master Planning Division: Checks environmental relevance of projects during regular meetings. Summarizes comments on projects and includes them in the Master Plan as appropriate. The Master Planning Division will send all MILCON projects that require DD Form 1391 to the Environmental Division.
- g. Engineering Division: Initiates design meetings, final project meetings, final inspections, and, if applicable, sends copies of permits to the Environmental Division and the Master Planning Division.
- h. Business Operations/Integrations Division (BO&I): Forwards copies of project files to the Environmental Division for comments. BO&I coordinates the Work Order Review Meeting.
- i. Environmental Review (ER): A process to identify the potential effect that projects and activities have on the environment.

j. Environmental Review Guide (ERG): An IMCOM-Europe-developed, automated software program to conduct ERs. This tool is recommended and usually applied to all Army military construction (MILCON) projects in Army Europe (AE).

k. Request for Environmental Review (RER): The form AE 200-1A can be used to initiate the ER process, to document an ER for projects and actions that are expected to have little to no environmental effect or that are included in the list of exclusions, and in place of a full ERG process.

l. Project Proponent: The “owner” of the action that drives the project or mission requirement. The project proponent makes decisions about and validates the integration of environmental considerations into the project planning process.

m. Facilities Engineering Work Request, Department of the Army (DA) Form 4283: Standard form for obtaining services from the Directorate of Public Works (DPW).

31-2. Procedures.

a. ER process for MILCON projects:

(1) The Master Planning Division will send a RER for all MILCON projects that require DD Form 1391 to the Environmental Division.

(2) The Master Planning Division, the Environmental Division, and the project proponent will jointly conduct the ER and sign the Record of Environmental Consideration (REC).

(3) The Environmental Division will complete a Summary of Environmental Consequences (DD Form 1391, tab J), including a cost estimate for environmental compensation measures.

(4) The Master Planning Division will integrate the result of the REC into DD Form 1391 (tab J).

(5) The Master Planning Division will ensure the mitigation and compensation measures identified in the ER are included in the project design and specifications.

(6) The project proponent considers the results of the ER during project execution.

(7) In the event permits are required for the proposed project, the SOP for the Availability of Permits, Licenses, and Other Forms of Official Approval shall be applied. Approved projects are evaluated for inclusion in the Garrison Master Plan.

b. ER process for projects with DA Form 4283:

(1) BO&I will forward copies of new work requests (DA Form 4283) to the Environmental Division for evaluation of their potential effect on the environment prior to the Work Order Review Meeting.

(2) The Environmental Division will conduct a formal review of the work request. Comments on the project and the DA Form 4283 will be entered into "HABEL" (Document Management System for Work Orders at USAG Schweinfurt) for further discussion during the Work Order Review Meeting and distribution to the project proponent or comments will be communicated using a RER form. The Work Order Review Meeting will be scheduled and organized by BO&I.

(3) The project proponent will send an RER to the Environmental Division. The RER will be signed by the project proponent and the Environmental Division. The Environmental Division will forward the completed RER form to BO&I.

(4) The BO&I will attach the RER form to DA Form 4283.

(5) If further analysis and review are required, the project proponent will conduct an ER supported by the Environmental Division. The REC will be signed by the project proponent and the Environmental Division.

(6) The project proponent considers the results of the ER during the project execution.

(7) The Engineering Division or the Engineering Project Manager invites relevant directorates and divisions (including the Environmental Division) to a design review meeting. Upon finalization of the construction work, the Engineering Division or Engineering Project Manager invites relevant parties to a final inspection to ensure that comments provided in the planning phase were included.

(8) Approved projects are evaluated for inclusion in the Garrison Master Plan. In the event a permit/authorization was required for a project, the Engineering Division shall send a copy of the permit/authorization to the Environmental Division and Master Planning Division after finalization of the project.

c. ER process for Service Orders: The Environmental Division will provide data about hazardous substances on request to inform workers and supervisors about the presence of hazardous substances or other environmental consideration, as applicable.

d. Points of Contact (POCs):

(1) POC for MILCON projects: Chief Master Planning Division.

(2) POC for sustainment, restoration, and modernization projects: Chief Engineering Division.

(3) POC for DA Form 4283: Chief BO&I.

(4) POC for Integrated Training Area Management (ITAM) projects: Chief Training Support Center (TSC).

(5) POC for Environmental Division: Chief Environmental Division.

CHAPTER 32
NOISE MANAGEMENT
ISO 14001 SECTION 4.4.6

32-1. General. This chapter defines the process of noise management within the United States Army Garrison (USAG) Schweinfurt. It describes the key responsibilities of the Garrison, military units, tenant organizations, and family members regarding activities/processes which generate significant noise.

This chapter applies to the USAG Schweinfurt, the military units, tenant organizations, and family members within the Garrison area of responsibility.

Significant noise emissions are noise emissions above permitted thresholds (Noise Guide Values, enclosure 1, Noise Limiting Values, enclosure 2) or noise emissions which impact the environment and human health, on and off the installation. This noise can be generated by Army leisure time activities (e.g. youth centers, sports events, club operations, carnivals), military operations (firing ranges, exercises and maneuvers, helicopters), and industrial noise (e.g. rail operations, tanks, generators).

Noise Management Committee is a sub-committee of the Environmental Quality Control Council (EQCC). The noise management committee meets quarterly. Members of the committee include, but are not limited to representatives from DPW Environmental Division, Master Planning Division, Directorate of Plans, Training, Maneuver, and Security (DPTMS), including 7th Joint Maneuver Training Center (JMTC), Public Affairs Office, Safety Office, Staff Judge Advocate, Provost Marshal Office, Directorate of Morale, Welfare and Recreation, 1-91st CAV, 15th Eng Bn, 44th Signal Bn, 1-77th FA Bn, 9th Eng Bn, 172nd Support Bn, 18th Engr Bde HQ (Detachment), 72nd ESB, 7th TTSB HQ, and 12th Chem Co.

The following roles and responsibilities apply:

- (1) Garrison Commander will:
 - (a) Chair the EQCC as well as the Noise Management Committee.
 - (b) Coordinate with Host Nation authorities on noise related issues from military operations.
- (2) Public Affairs Office (PAO) will:
 - (a) Act as the single point of contact for noise complaints from the public.
 - (b) Be a member of the Noise Management Committee.
 - (c) Maintain a log of noise complaints.
 - (d) Report noise complaints to the Noise Management Committee for discussion and coordination.

(3) Safety Officer will:

- (a) Be a member of the Noise Management Committee.
- (b) On request conduct/coordinate noise measurements to evaluate the presence of significant noise emissions.
- (c) Advise the Committee on noise reduction measures.

(4) Director of Public Works will:

- (a) Be the Garrison Commander's representative for managing and executing the Noise Management Program.
- (b) Provide members (Master Planner, Environmental Management) to and also be a member of the Noise Management Committee.
- (c) Respond to noise problems and complaints in consultation with Public Affairs and the Garrison Commander.
- (d) Maintain a log of noise sources and proper permits where applicable.

(5) Director, Plans, Training, Maneuver, Security (DPTMS) will provide a member to the Noise Management Committee.

(6) 7th US Army Joint Maneuver Training Center (JMTC) will:

- (a) Provide a member to the Noise Management Committee.
- (b) Maintain a log of activities on the Ranges.
- (c) Keep range permits on file and provide a copy of the permits to the DPW Master Planner.
- (d) Respond to noise complaints immediately after receiving notice of them.

(7) Military Units and Tenant Organizations will:

- (a) Provide a member to the Noise Management Committee.
- (b) Obey the permitted thresholds of noise emission during their activities.
- (c) Inform the Public Affairs Officer about activities/operations that exceed the thresholds before the activity/operation is executed.

32-2. Procedures.

a. Generation of shooting noise:

(1) Noise emissions are generated by military units due to shooting (training/qualification) at shooting ranges.

(2) The 7th US Army JMTC and the military units will ensure that shooting is only executed in accordance with range permits (e.g. shooting times, calibers).

(3) The 7th US Army JMTC will inform the Noise Management Committee immediately about changes in the range permits and provide a copy of the changes to the DPW Master Planner.

(4) If scheduled shooting activities cause significant noise emissions, 7th US Army JMTC will inform PAO ahead of time.

(5) PAO will inform the public based on established communication SOP.

(6) Complaints regarding shooting noise received by PAO will be forwarded to 7th US Army JMTC and Environmental Division for initiation of necessary immediate action.

(7) Noise complaints will be filed at the PAO and addressed at the Noise Management Committee's meetings.

b. Noise emissions from aircraft operations:

(1) Military Units generating flight noise (helicopter, un-manned area reconnaissance drone) will ensure that flights are executed in accordance with the approved flight routes, flight times, and flight heights.

(2) Noise complaints will be filed at the PAO and addressed at the Noise Management Committee's meetings.

c. Other noise emissions:

(1) Significant noise emissions are generated by various sources, e.g. military convoys, loud music (from cars and clubs, etc), military training on the Tank Crew Proficiency Course (TCPC), youth activities, physical training runs on and off-post.

(2) Everybody generating noise emissions within the area of responsibility of the USAG Schweinfurt will ensure that noise is minimized to the maximum extent possible and does not exceed applicable thresholds. The Provost Marshal's Office will control noise related disturbances.

(3) Noise complaints will be filed at the PAO and addressed at Noise Management Committee's meetings.

CHAPTER 33
PERCOLATION OF PRECIPITATION WATER
ISO 14001 SECTION 4.4.6

33-1. General. This chapter provides a standard procedure for permissible percolation of precipitation water implemented with moderate technical effort.

This chapter applies to all projects planned and executed on USAG Schweinfurt installations.

The following roles and responsibilities apply:

- a. USAG Commander: Provides command support for the water management program and public works activities.
- b. Director, Public Works: Provides overall supervision and direction for the water management program and public works activities.
- c. Master Planning Division: Plans urban land use and has general project overview. Forwards project plans to Directorate of Public Works (DPW) Environmental Division (ED) for review.
- d. Chief, ED: Reviews Work Orders (WOs) and construction/infrastructure projects during WO review and design review meetings.
- e. Planning organizations responsible for infrastructural and or construction projects conducted at USAG Schweinfurt: Schedule and organize project review meetings; forward copies of new work requests (DA Form 4283) and/or project plans to DPW ED; develop proprietary approval forms and forward them to DPW ED for review and approval.

33-2. Procedures.

a. General: Percolation of water is the downward flow or movement of water through the soil. Permissible percolation of water is defined as percolation/discharge practices that comply with criteria set in the Bavarian ordinance. As permission is case-specific, see the above-cited legal requirements for further information. Direct percolation in this SOP is the percolation of water without intermediate storage or discharge. Indirect percolation in this SOP is the percolation of water from connected areas with intermediate storage. Where possible the installation of permeable surfaces should have priority over the installation of sealed surfaces with discharge of run-off water into stormwater or combined sewer systems. The percolation of water ensures optimum management of water resources, reduces flood risks, saves costs, and is ecologically beneficial.

b. Where possible, the most permeable surface shall be selected and considered in the early planning phase of each construction or infrastructure project. Permissible percolation of precipitation shall be considered where feasible. Where sealed surfaces are necessary, directing run-off to grass areas for percolation shall be considered. Examples of different surfaces,

including those from which run-off must not be percolated, and exemplary areas of application are given in Annex B of this SOP.

c. Where possible, direct percolation through e.g. grass areas or grass pavers without intermediate storage of water shall be considered. Where direct percolation is not possible, indirect percolation shall be considered. Indirect percolation can be attained e.g. through swales and/or infiltration basins.

d. In the event that swales or infiltration basins are to be installed for percolation and evaporation of water, they shall be designed in such a way that they are easy to maintain and the inclination of the slope is not so steep as to constitute a safety risk. Emergency inlets to the overflow sewer system shall be installed, as well as structural measures to prevent vehicles entering the area.

e. Indirect percolation is not permitted in water protection areas; in the vicinity of buildings with basements or in the immediate vicinity of supply and sewage lines; it is also not permitted to percolate water from roofs with copper, zinc, or lead flashings, gutters and downspouts. To prevent damage to buildings, a minimum distance to the infiltration area needs to be determined. Infiltration areas shall not be installed in the refilled excavation area of a building.

f. Before the selection of percolation measures, subsurface conditions (soil permeability, depth to water table, groundwater flow direction, etc.), proximity to buildings, and topographic conditions must be evaluated.

g. All Planning organizations will consider the above criteria and forward all construction and infrastructure projects in the USAG Schweinfurt to DPW ED for review and approval.

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APPENDIX B- Roles and Responsibilities

can be viewed at the Environmental Division

DSN 354-6795

APPENDIX C

Table 1: Examples of EPIs

Media/Program Area	EPI
Specific Materials	Total quantity of materials used
	Number of hazardous material products used
	Quantity of hazardous materials used
Drinking Water	Overall quantity of water used
	Quantity of water used per installation or building
	Quantity of water used per occupant and day
Waste Water	Quantity of waste water
	Quantity of storm water
	Quantity of sanitary water
	Number and quantity of pollutants in waste water
Energy	Electricity consumption per month/year
	Peak demand per installation and month
	Heat consumption per month/year
	Quantity of energy used per unit or building
	Average energy consumption per occupant and day
	Average quantity of energy used per occupant
	Quantity of each type of energy used
	Quantity of energy Units saved due to energy conservation programs
Waste	Overall quantity of waste
	Quantity of hazardous, recyclable or reusable waste per year and number of Soldiers in the community
	Total waste for disposal
	Recycling rate
	Disposal rate
Air emissions	Quantity of specific emissions per year
	Quantity of specific emissions per Unit or building
EMS	Number of objectives and targets achieved
	Number of pollution prevention (P2) initiatives implemented
	Number of employees trained
	Number of contracted individuals trained
	Number of environmental improvement suggestions from employees
	Number of suppliers and contractors queried concerning environmental issues

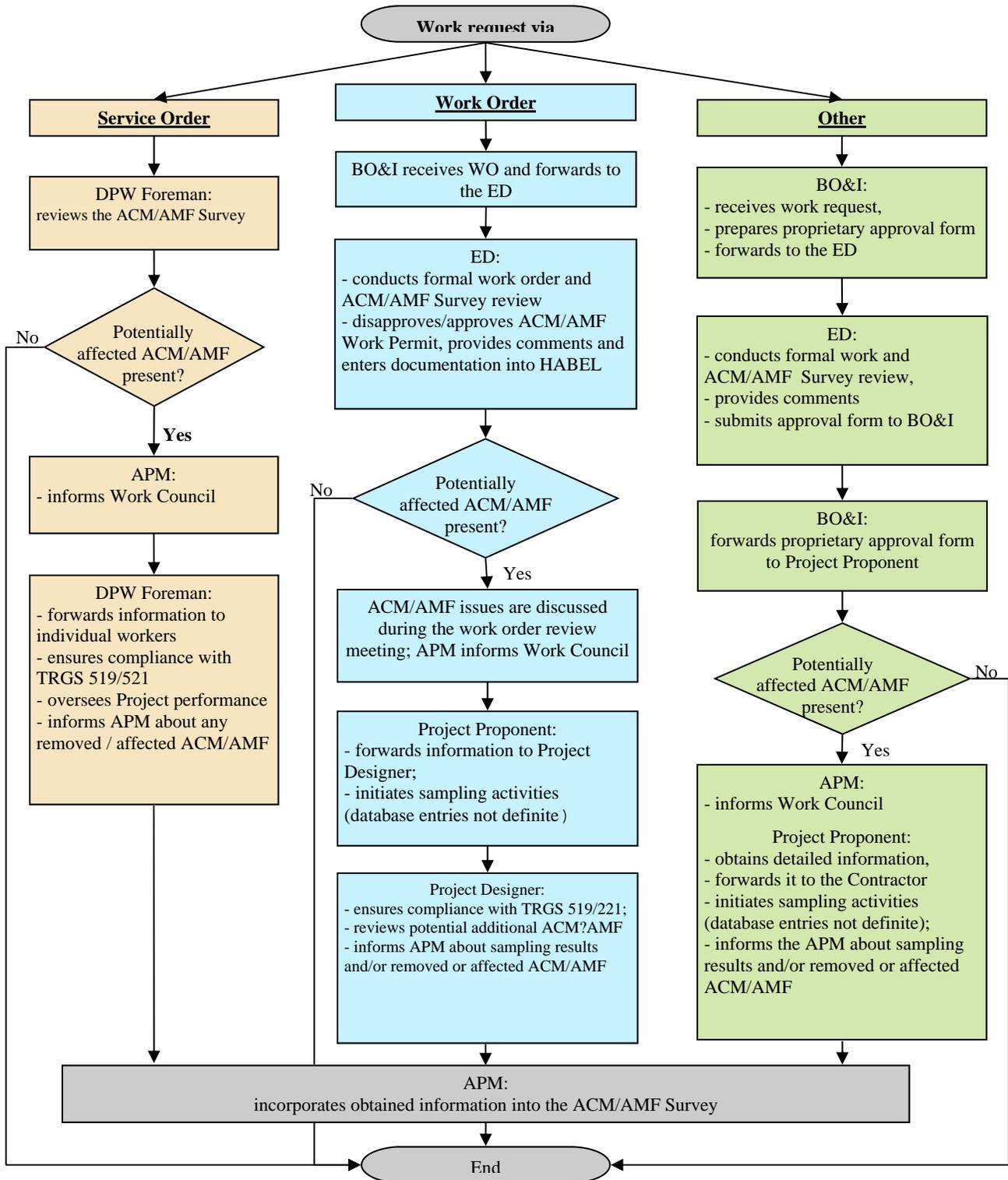
Media/Program Area	EPI
	Number of contracted service providers with an implemented or a certified EMS
Compliance	Degree of compliance with regulations
	Number of identified corrective actions that have been resolved or that are unresolved
	Number of permits and authorizations
Community relations	Number of inquiries or comments concerning environmentally related matters
	Number of Notices of Violation (NOVs)
	Number of press reports on the organization's environmental performance
Physical facilities and equipment	Number of emergency events or non-routine operations per year
	Average fuel consumption of vehicle fleet
	Number of vehicles in fleet with pollution abatement technology
	Size of sealed areas
Financial performance	Costs/Investments that are associated with a process' environmental aspects
	Savings achieved through reductions in resource usage, P2 or waste recycling
	Environmental liabilities that may have a material impact on the financial status of the organization
Other	Noise measured at a certain location
	Quantity of radiation released
	Amount of heat, vibration or light emitted

APPENDIX D:

Management Review Questions

1. Are we monitoring our EMS via EMS audits? What do the results of those EMS audits tell us?
2. What do our Internal and External EPAS results and root cause analysis tell us? [NOTE: This question should also be asked in conjunction with question 3,4,5,6,9,10, and 14.]
3. Is our environmental policy still relevant to what we do?
4. Are roles and responsibilities still clear, do they make sense, and are they communicated effectively?
5. Has EMS awareness training been conducted throughout the Garrison? Was the training effective? Have personnel or unit rotations affected the number of trained personnel? Should additional awareness training sessions be offered?
6. Are our procedures clear and adequate? Do we need other controls? Should we eliminate or modify some of our existing controls?
7. What effects had changes in materials, products, or services on our EMS and its effectiveness? Do we need to modify our aspects register or our ranking methodology for determination of significant aspects?
8. Did we achieve our objectives and targets? If not, why not? Should we modify our objectives and targets?
9. Are we applying resources appropriately?
10. Are we fixing problems when we find them?
11. Do changes in laws, regulations, or Final Governing Standards require us to change some of our approaches?
12. What other changes are coming in the near term? What impacts (if any) will these have on our EMS?
13. What stakeholder concerns have been raised since our last EMS management review? How are these concerns being addressed?
14. Is there a better way? What can we improve?

APPENDIX E:
ACM/AMF process flow chart



APPENDIX G:

Template Letter to Notify Work on or Abatement of ACM/AMF

MEMORANDUM FOR DIRECTORATE OF PUBLIC WORKS, ENVIRONMENTAL
DIVISION

SUBJECT: Notification of projects that involve the work on or abatement of ACM/AMF

1. Reference:

a. Technische Regeln fuer Gefahrstoffe (TRGS) 521, Ausschuss fuer Gefahrstoffe, February 2008.

...b. Technische Regeln fuer Gefahrstoffe (TRGS) 519, Ausschuss fuer Gefahrstoffe, March 2007.

1. Purpose: To notify the DPW ED of projects that involve the work on or abatement of ACMor AMF.

2. Enclosed please find the requested information. Please contact Department/Organization at DSN: XXX-XXXX with any questions regarding this notification.

Name Surname
Position,
Department/Organization

Project/Work-Order	Project Location		Project Summary (including types of ACM/AMF affected)	Date
	Installation/ Bldg.	Rooms affected		
█	█	█		

POC: Name: _____

DSN: _____

E-Mail: _____

The Red Plan

This Red Plan serves as an immediate action tool to initiate the correct response - at the earliest possible time - should a hazardous substance or hazardous waste spill occur within the United States Army Garrison (USAG) Schweinfurt. Our Red Plan guides user actions in the early stages of a spill.

Our Red Plan compliments our Spill Prevention and Response Plan (SPRP). Our SPRP provides more detailed information on:

- Spill prevention,
- Response,
- Notification, and
- Cleanup procedures.

Users are expected to refer to the procedures outlined in our SPRP after appropriate notifications and response actions are underway.

Figure 1

If it is a minor spill, clean it up immediately!
A minor spill does not exceed a reportable quantity of
1 gallon on improved ground.
All spills on unimproved ground are major spills!

If it's not a minor spill, do the following:

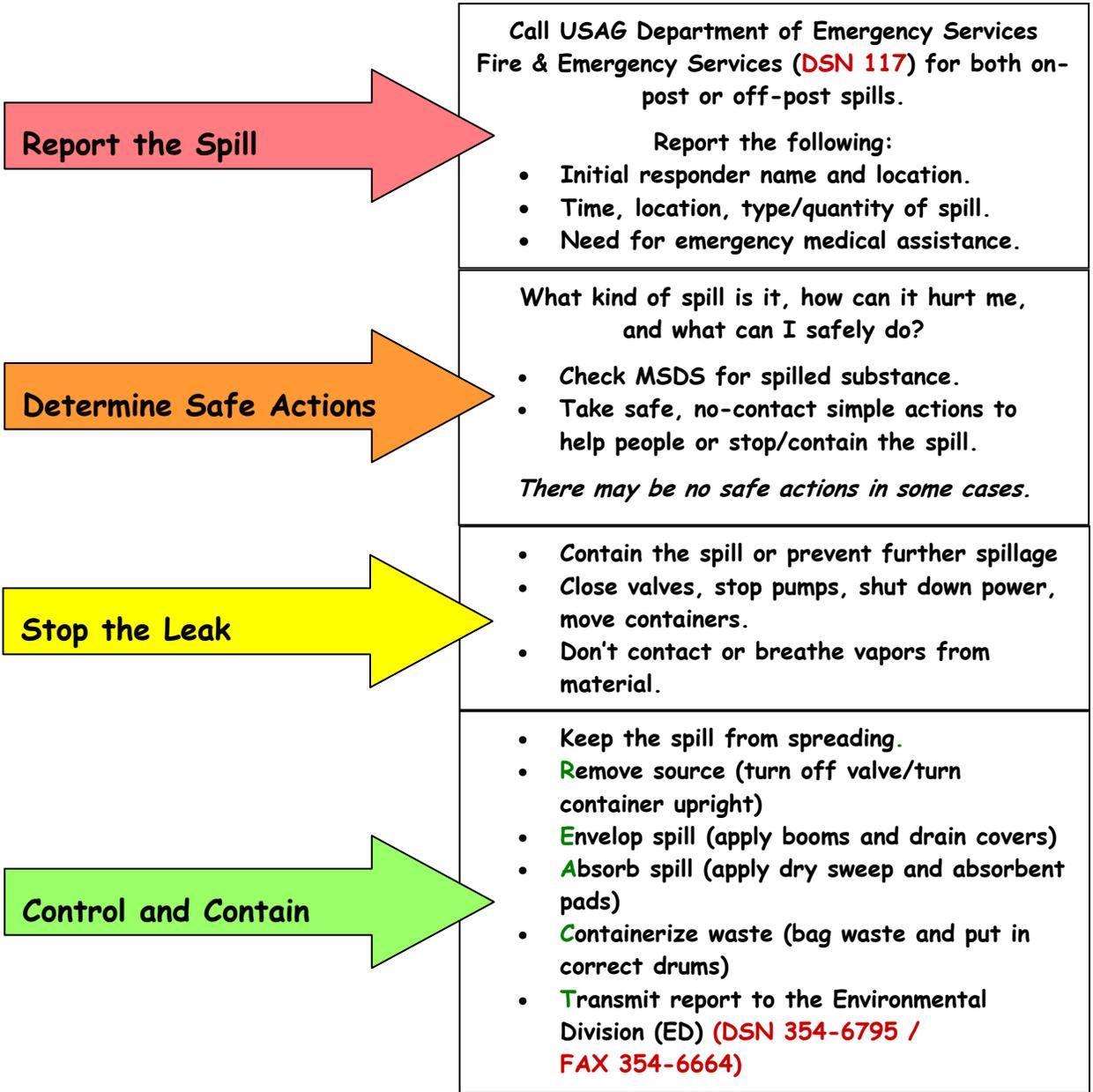


Figure 2

FACILITY RESPONSE TEAM ACTION LIST

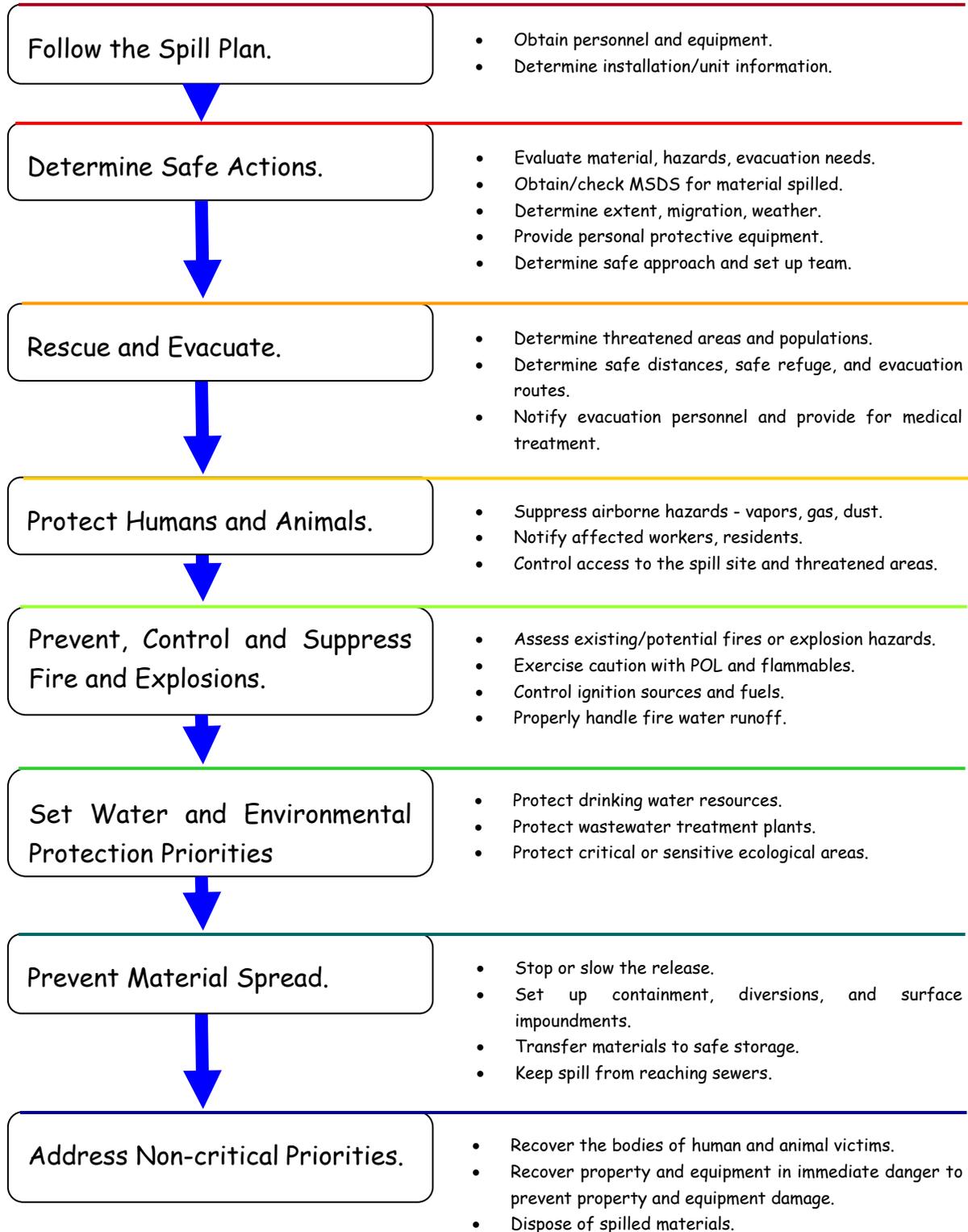
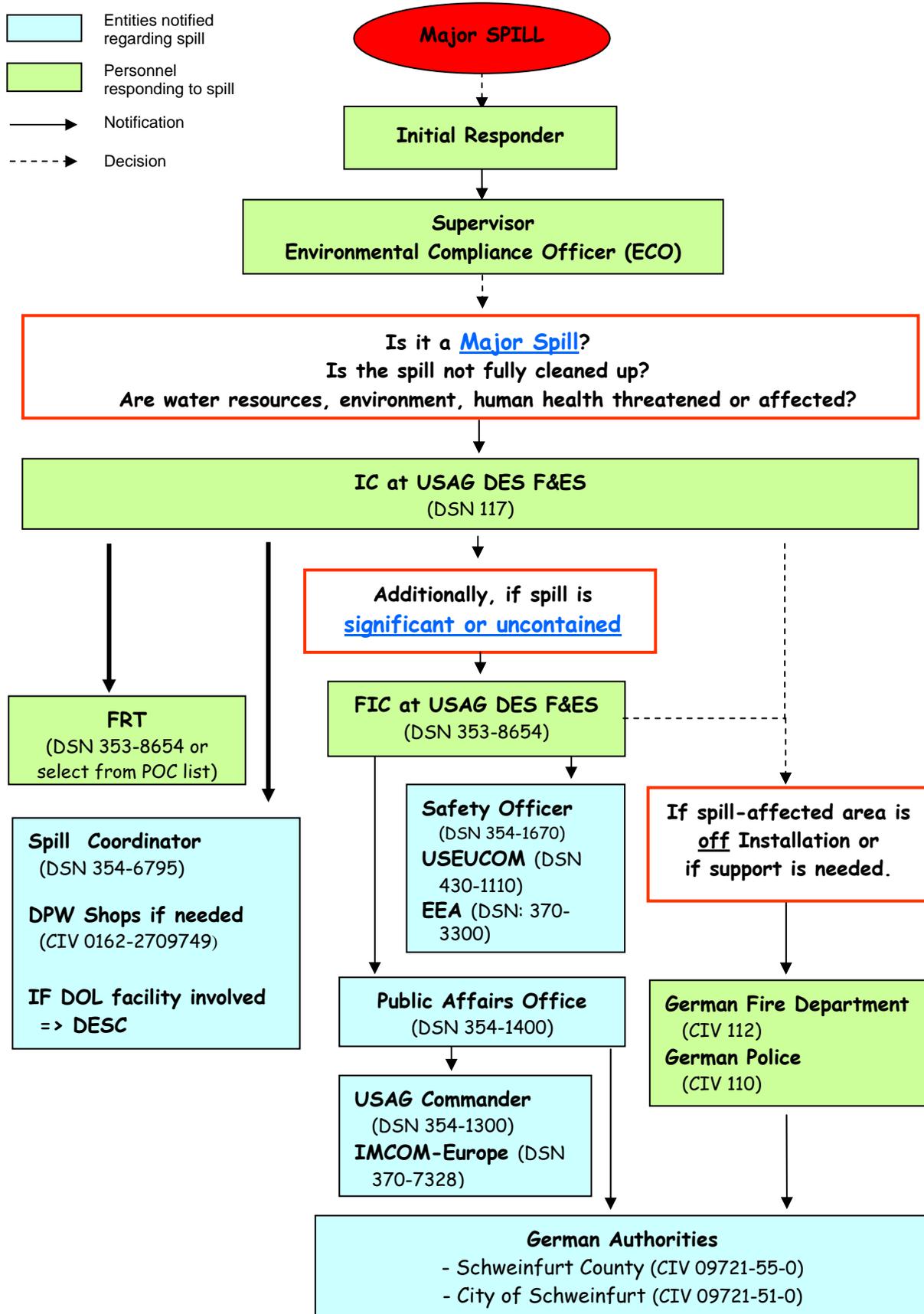


Figure 3

SPILL RESPONSE AND NOTIFICATION PRODEDURE





Alarmplan

Im Fall eines Gefahrstoffunfalls innerhalb der United States Army Garrison (USAG) Schweinfurt dient der vorliegende Alarmplan als Soforthilfsmittel, um einen korrekten Einsatz zum frühestmöglichen Zeitpunkt in die Wege zu leiten. Unser Alarmplan enthält Anweisungen für die ersten Phasen eines Gefahrstoffunfalls.

Unser Alarmplan ergänzt unseren Plan zur Prävention und Kontrolle von Gefahrstoffunfällen (Notfallplan). Unser Notfallplan beinhaltet detaillierte Informationen über:

- Vermeidung von Gefahrstoffunfällen,
- Bearbeitung,
- Meldung, und
- Sanierungsabläufe.

Benutzer werden aufgefordert die Arbeitsanweisungen des Notfallplans heranzuziehen, nachdem eine korrekte Meldung vorgenommen und Maßnahmen zur Bekämpfung eingeleitet wurden.



Abbildung 1

LISTE VON SOFORTMAßNAHMEN

Im Falle eines geringen Ausmaßes den Gefahrstoff sofort aufputzen!
Ein Gefahrstoffunfall geringen Ausmaßes überschreitet nicht die meldepflichtige Menge von

1 Gallone auf festigem Untergrund

Alle Gefahrstoffunfälle auf unbefestigtem Boden sind meldepflichtig!

Für alle anderen Gefahrstoffunfälle gilt:

Unfall melden

Benachrichtige das USAG *Department of Emergency Services, Fire & Emergency Services (DSN 117)* bei Gefahrstoffunfällen innerhalb und außerhalb der Liegenschaft.

Melde folgendes:

- Name und Aufenthaltsort des Ersthelfers.
- Zeitpunkt, Ort, Art/Menge des Gefahrstoffunfalls.
- Bedarf an medizinischer Hilfe.

Sichere Maßnahmen ermitteln

Um welche Art von Gefahrstoffunfall handelt es sich, bin ich gefährdet, welche Maßnahmen kann ich unter Berücksichtigung der eigenen Sicherheit ergreifen?

- Prüfe das Sicherheitsdatenblatt der verschütteten Substanz.
- Ergreife sichere, kontaktfreie, einfache Maßnahmen um Personen zu helfen, Leckagen zu stoppen und weiteres Austreten zu verhindern.

In manchen Fällen sind keine sicheren Maßnahmen gegeben.

Leckage stoppen

- Vermeide Kontakt mit oder Einatmen von Dämpfen.
- Schließe Ventile, schalte Pumpen und Strom ab, entferne den Gefahrstoffbehälter.

Kontrolle und Eindämmung

Verhindere die Ausbreitung der Gefahrstoffs:

- Quelle entfernen (Ventile schließen/Behälter aufrichten)
- Gefahrstoff einhüllen (mit Hilfe von Besen und Auffangvorrichtungen)
- Gefahrstoff auffangen (Bindemittel und Absorbiermatten anbringen)
- Abfall verladen (Abfall verpacken und in sachgemäßem Abfallsammelbehälter entsorgen)
- Bericht erstatten an die Umweltabteilung (DSN 354-6795/ FAX 354-6664)



HANDLUNGSANWEISUNGEN FÜR DAS NOTFALLEINSATZTEAM

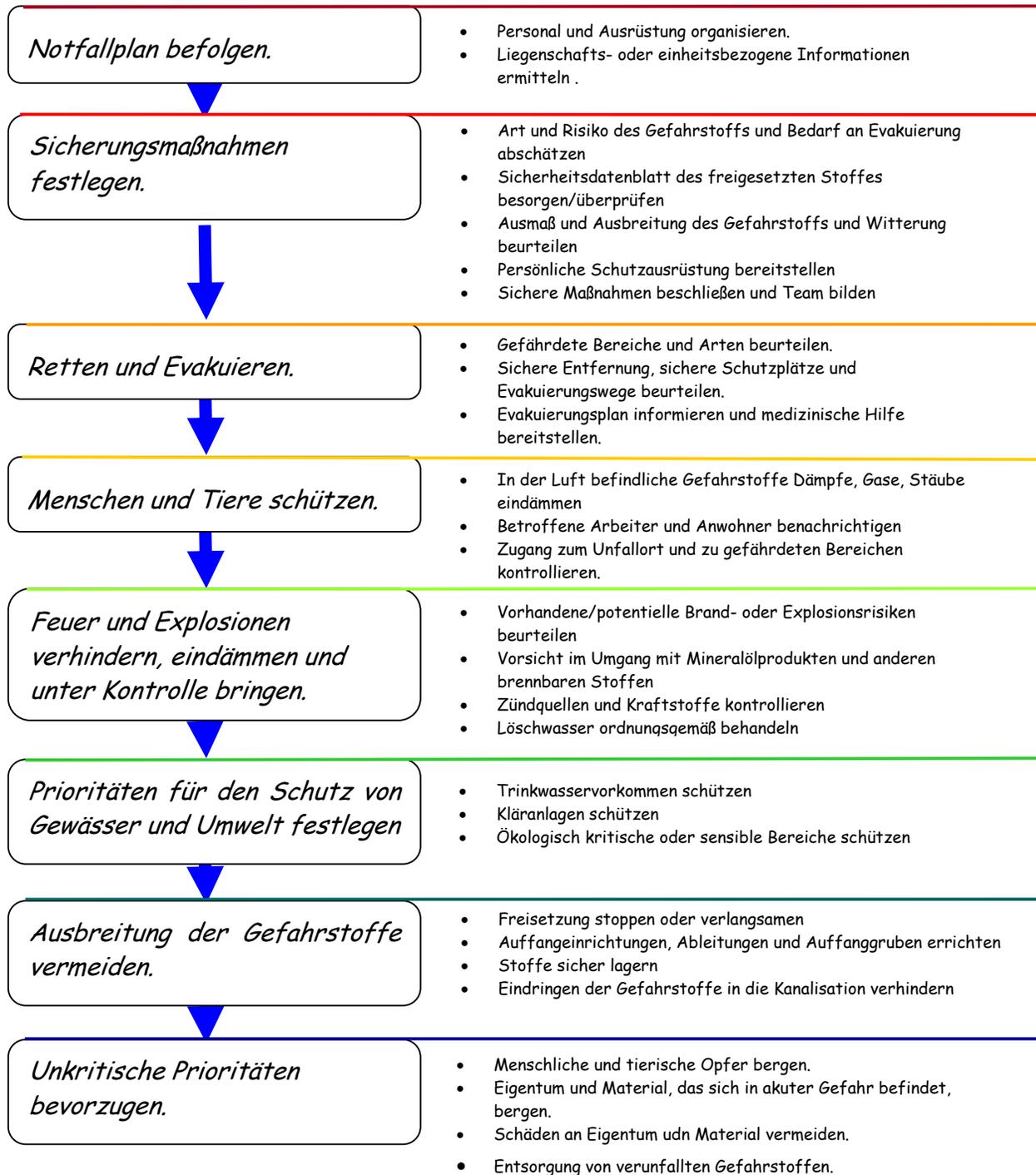
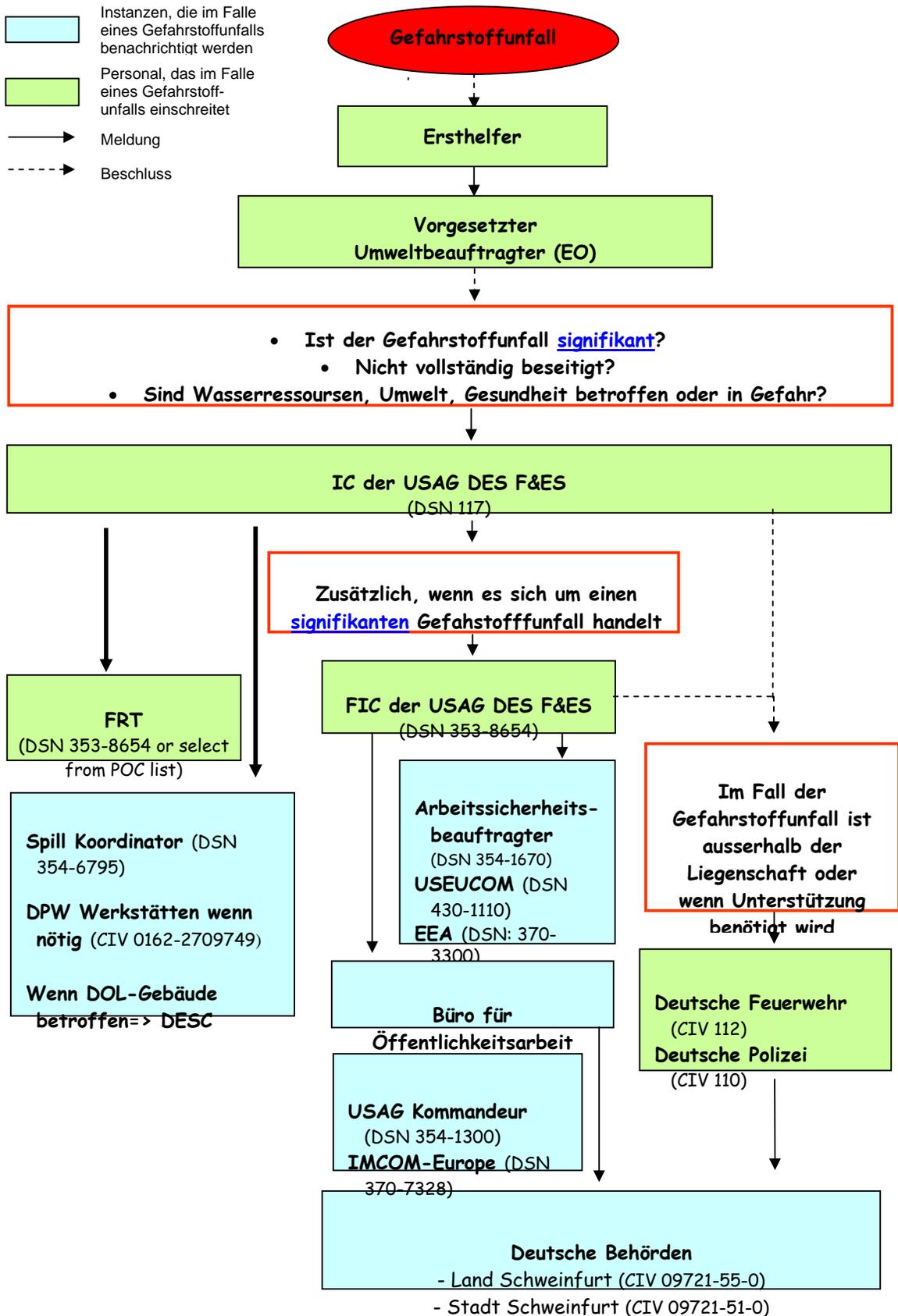




Abbildung 3

ANWEISUNG FÜR ERSTHILFE UND MELDUNG EINES GEFHRSTOFFUNFALLS

- Instanzen, die im Falle eines Gefahrstoffunfalls benachrichtigt werden
- Personal, das im Falle eines Gefahrstoffunfalls einschreitet
- Meldung
- Beschluss



Important Points of Contact (POCs)

Fire Department

Emergency: DSN 117 CIV 09721-96117

Information: DSN 354-8690

CIV 09721-968690

Safety Office

- Safety related questions
- EMS Management Representative

DSN 354-1670 CIV 09721-961670

Environmental Division

- Asbestos
- Lead-Based Paint
- HM/HW and Spills
- Energy Consumption
- General EMS related questions

DSN 354-6795 CIV 09721-966795

O&M Division

- Water Consumption
- Pest Management
- Solid Waste

DSN 354-6201 CIV 09721-966201

Your COR:

What you can do!

As a contractor working at the USAG Schweinfurt you are expected to be aware of the EMS and to be knowledgeable about your specific job duties and how they relate to the EMS.

It is important that you assess and evaluate environmental effects related to your on-post activities in order to:

- save energy,
- reduce waste production, and
- minimize any other pollution to air, water and soil.

Implement environmental consideration into your daily work!

In the event of a spill, always remember to "REACT"

Remove the Source

Envelope the spill

Absorb/Accumulate

Containerize/Clean up

**Tell the Garrison Spill Coordinator
(Fire Department/ Environmental Division)**

DPW - ENVIRONMENTAL DIVISION
USAG SCHWEINFURT

Environmental Management System (EMS)



Guidelines for Contractors at the USAG Schweinfurt

Definition of EMS: An EMS is a management process designed to help an organization meet environmental responsibilities and achieve and demonstrate improved environmental performance. The EMS at USAG Schweinfurt is built upon the international standard ISO 14001:2004.

DOs and DON'Ts

Energy

- Idling is prohibited within the Garrison. Turn off your engine, if you stand for more than 20 seconds!
- Electrical equipment has to be disconnected, if not in use.
- The utilization of an exterior heater is not permitted.
- Switch off the lights and/or heating wherever possible.
- To avoid heating losses, shut the doors and windows.

Hazardous Material/Hazardous Waste (HM/HW)

- Maintain copies of Material Safety Data Sheets (MSDS) for all HM onsite.
- Secondary containment is required for ALL unused containers.
- Keep containers closed.
- Mobile fueling stations need to be located on paved ground, if possible adjacent to a coalescence separator.
- A copy of the manifest and proof of disposal for all HW generated on site has to be provided to the Environmental Division.
- Properly dispose of HW. HW must be disposed off-post, unless otherwise approved.

DOs and DON'Ts

Spills

- The Garrison's Red Plan -a Spill Reaction Plan - has to be posted at all workplaces where HM, HW, Petroleum, Oil, Lubricants (POL), or other restricted items are used or stored. A copy of the Red Plan can be obtained at the Environmental Division.
- Keep a spill kit near HM/HW storage area.

Others

- Use only environmentally friendly and sustainable products in buildings or during renovation.
- Solid Waste cannot be disposed of on-post.
- Burning of any material is strictly prohibited.
- Minimize all air emissions wherever possible.
- Notify the construction supervision office of Asbestos and Lead-Based Paint removal prior to the project start date.

**Help the US Army to
protect the Environment!**

EMS Policy

As the basis for the EMS, the USAG Schweinfurt has established an Environmental Policy statement outlining its commitments to protect the environment.

- Comply with all applicable environmental policies, laws, and regulations.
- Continually assess activities, products, and services to determine their effect on the environment and to identify significant environmental impacts.
- Identify potential sources of pollution to meet or exceed Army goals for pollution prevention.
- Make environmental awareness and compliance a routine part of daily operations.
- Actively pursue improvements in organizational environmental management.

**Areas of emphasis =
Significant aspects in the USAG
Schweinfurt EMS:**

Energy consumption

Generation of solid waste

Generation of hazardous waste

Use of POL

Spills/ Emergency Situation

Handling/ Disposal of Asbestos

Wichtige Ansprechpartner

Feuerwehr

Notruf: DSN (Militär) 117 09721-96117

Information: DSN (Militär) 354-8690

09721- 968690

Abteilung für Arbeitsschutz

- Sicherheitstechnische Fragen
- Beauftragter Umweltmanagementsystem

DSN (Militär) 354-1670 09721-961670

Umweltabteilung

- Asbest
- Bleihaltige Farbprodukte
- Gefahrstoffe/Sonderabfall, Öl- und Chemikalienunfälle
- Energieverbrauch
- Allgemeine Fragen zum Umweltmanagementsystem

DSN (Militär) 354-6795 09721-966795

O&M (Abteilung für Versorgungsleistungen)

- Wasserverbrauch
- Schädlingsbekämpfung
- Hausmüll

DSN (Militär) 354-6201 09721-966201

Ihr COR oder Ansprechpartner:

Was Sie tun können:

Als Unternehmer im Standort Schweinfurt müssen Sie über das Umweltmanagementsystem informiert sein und den Zusammenhang Ihrer speziellen Arbeitsaufgaben mit dem Umweltmanagementsystem kennen.

Das Bewerten und Abschätzen möglicher Umweltauswirkungen Ihrer Arbeiten im Standort Schweinfurt ist aus folgenden Gründen wichtig:

- Energieersparnis
- Abfallreduzierung
- Minimierung von Luft-, Wasser- und Bodenverunreinigungen.

Machen Sie den Umweltschutz zum Bestandteil Ihres täglichen Arbeitsablaufs!

Bei Austritt gefährlicher Flüssigkeiten: HANDELN!

- Beseitigung der Ursache
- Eingrenzung der betroffenen Fläche
- Aufnahme der Flüssigkeit
- Material verpacken und Fläche säubern
- Meldung an die zuständige Dienststelle.

(Feuerwehr/Umweltabteilung)

DPW-Umweltabteilung

Standort Schweinfurt

Umweltmanagement System



Umweltrichtlinien für Auftragnehmer im Standort Schweinfurt

Definition des Umweltmanagementsystems:

Das Umweltmanagementsystem ist ein Prozess, der einen Betrieb bei der Erfüllung seiner Verantwortung gegenüber der Umwelt unterstützt, und die Verbesserungen seiner Umweltleistungen nachweist. Das Umweltmanagementsystem im Standort Schweinfurt ist auf dem internationalen Standard ISO 14 001:2004 aufgebaut.

Was ist erlaubt, was ist verboten?

Energieverbrauch

- Es ist verboten, innerhalb des Standorts Fahrzeuge im Leerlauf zu betreiben. Stellen Sie den Motor ab, wenn Ihr Fahrzeug länger als 20 Sekunden steht!
- Nicht genutzte Elektrogeräte sind abzuschalten.
- Der Einsatz von Außenheizgeräten ist verboten.
- Nicht genutzte Beleuchtungs- und/oder Heizkörper sind auszuschalten.
- Zur Vermeidung von Wärmeverlust sind Fenster und Türen geschlossen zu halten

Gefahrstoffe/Sondermüll

- Sicherheitsdatenblätter müssen für alle auf der Baustelle vorgehaltenen Gefahrstoffe vorhanden sein.
- Auffangwannen sind für ALLE im Moment nicht genutzten Gebinde erforderlich.
- Container sind geschlossen zu halten.
- Mobile Tankstellen müssen auf befestigten Flächen, wenn möglich mit angeschlossenem Koaleszenzabscheider, aufgestellt werden.
- Sonderabfall ist ordnungsgemäß zu entsorgen.
- Kopien der Begleitscheine und Entsorgungsnachweise sämtlicher anfallender Sonderabfälle sind an die Umweltabteilung weiterzuleiten.
- Sonderabfälle müssen ausserhalb des Standorts entsorgt werden, es sei denn, die Entsorgung wurde anderweitig genehmigt.

Was ist erlaubt, was ist verboten?

Öl- und Chemikalienunfälle

- An Arbeitsplätzen, an denen Materialien wie Öl, Fette oder andere Gefahrstoffe bzw. Sondermüll gelagert werden, muss der Rote Plan des Standorts aufgehängt werden. Der Plan kann bei der Umweltabteilung abgeholt werden.
- Auf Sondermüll- und Gefahrstofflagerplätzen muss ein Behälter mit Bindemittel bzw. Auffangmaterial vorgehalten werden.

Sonstiges

- In Gebäuden und bei Renovierungsarbeiten sind nur umweltfreundliche- bzw. verträgliche Materialien einzubauen.
- Müll darf nicht innerhalb des Standorts entsorgt werden.
- Das Verbrennen von Material ist strengstens verboten.
- Luftverunreinigungen sind möglichst zu minimieren.
- Bei Asbestabbrucharbeiten sowie der Entfernung von bleihaltigen Farbanstrichen muss die Bauleitung vor Projektbeginn benachrichtigt werden.

Unterstützen Sie die US-Armee beim Umweltschutz

Umweltpolitik

Das Umweltmanagementsystem ist auf der von der Standortverwaltung festgesetzten Umweltpolitik aufgebaut, in der die Verpflichtung zum Umweltschutz zusammengefasst ist:

- Die Einhaltung aller zutreffenden Umweltrichtlinien, Gesetze und Vorschriften.
- Die ständige Überprüfung der Betriebsorganisation, der Produkte und Dienstleistungen auf ihre wesentlichen Umwelt-einflüsse.
- Die Erfassung möglicher Umweltrisiken, um die von der Armee gesetzten Ziele zur Vermeidung dieser Risiken einzuhalten bzw. zu übertreffen.
- Die Einbeziehung des Umweltbewusstseins in den täglichen Geschäftsablauf unter Einhaltung der Vorschriften.
- Die aktive Umsetzung von Verbesserungen im organisatorischen Umweltmanagement.

**Schwerpunktbereiche =
Signifikante Aspekte im
Umweltmanagementsystem des
Standorts Schweinfurt:**

Energieverbrauch

Hausmüllaufkommen

Sondermüllaufkommen

Heizölverbrauch

Öl- und Chemikalienunfälle

Arbeiten mit Asbest

APPENDIX L

	Significant aspect	Environmental effect	Contract days per year	Total	Description
Construction Contracts					
Demolition	Energy Consumption	4	2	8	
	Solid Waste Generation	4	2	8	
	Hazardous Waste Generation	3	2	6	
	Spills/ Emergency Situation	5	2	10	
	Handling/ Disposal of Asbestos	5	2	10	
	Use/Storage of Petroleum, Oil and Lubricants (POL)	Not applicable (NA)	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants
New work	Energy Consumption	4	2	8	
	Solid Waste Generation	4	2	8	
	Hazardous Waste Generation	3	2	6	
	Spills/ Emergency Situation	5	2	10	
	Handling/ Disposal of Asbestos	5	2	10	
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants
Roadworks, excavation	Energy Consumption	4	2	8	
	Solid Waste Generation	4	2	8	
	Hazardous Waste Generation	4	2	12	E.g. asphalt works
	Spills/ Emergency Situation	5	2	10	
	Handling/ Disposal of Asbestos	5	2	10	
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants

APPENDIX L

	Significant aspect	Environmental effect	Contract days per year	Total	Description
Major renovation, including repair by replacement	Energy Consumption	4	3	12	Indoor/outdoor, more substantial than <i>between-occupancy renovation</i> , e.g. replacement of kitchen, bathroom interior, and windows; and repair of roof
	Solid Waste Generation	4	3	12	Indoor/outdoor, more substantial than <i>between-occupancy renovation</i> , e.g. replacement of kitchen, bathroom interior, and windows; and repair of roof
	Hazardous Waste Generation	3	3	9	Indoor/outdoor, more substantial than <i>between-occupancy renovation</i> , e.g. replacement of kitchen, bathroom interior, and windows; and repair of roof
	Spills/ Emergency Situation	5	3	15	
	Handling/ Disposal of Asbestos	5	3	15	
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants
Service Contracts					
Lab services (including fieldwork)	Energy Consumption	2	3	6	
	Solid Waste Generation	2	3	6	
	Hazardous Waste Generation	2	3	6	
	Spills/ Emergency Situation	2	3	6	
	Handling/ Disposal of Asbestos	5	3	15	during field work, eg taking samples of ACM
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants
Grounds maintenance services	Energy Consumption	3	4	12	Including gardening
	Solid Waste Generation	3	4	12	Including gardening
	Hazardous Waste Generation	1	4	4	Including gardening
	Spills/ Emergency Situation	3	4	12	
	Handling/ Disposal of Asbestos	NA	NA	NA	this aspect is not applicable for this service
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants

APPENDIX L

	Significant aspect	Environmental effect	Contract days per year	Total	Description
Transportation services	Energy Consumption	2	5	10	Bus, TMP, movement (including troop deployments/relocation), bus trips, daily school bus
	Solid Waste Generation	2	5	10	Bus, TMP, movement (including troop deployments/relocation), bus trips, daily school bus
	Hazardous Waste Generation	2	5	10	Bus, TMP, movement (including troop deployments/relocation), bus trips, daily school bus
	Spills/ Emergency Situation	2	5	10	Bus, TMP, movement (including troop deployments/relocation), bus trips, daily school bus
	Handling/ Disposal of Asbestos	NA	NA	NA	No repair work on vehicles, buses, TMP performed
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants
Custodial services	Energy Consumption	2	5	10	Minor maintenance works, e.g. company PAE janitors at schools
	Solid Waste Generation	2	5	10	Minor maintenance works, e.g. company PAE janitors at schools
	Hazardous Waste Generation	1	5	5	Minor maintenance works, e.g. company PAE janitors at schools
	Spills/ Emergency Situation	2	5	10	Minor maintenance works, e.g. company PAE janitors at schools
	Handling/ Disposal of Asbestos	5	5	25	maintenance work on ACM, Dodds has own asbestos mgt plan
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants
Disposal services (SW and sewage water)	Energy Consumption	2	5	10	Consumption of energy by recycling center operators
	Solid Waste Generation	2	5	10	Waste generated by contract employees including recycling center operators
	Hazardous Waste Generation	2	5	10	Hazardous waste generated by contract employees including recycling center operators
	Spills/ Emergency Situation	2	5	10	
	Handling/ Disposal of Asbestos	5	5	25	Improper disposal of ACM
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants

APPENDIX L

	Significant aspect	Environmental effect	Contract days per year	Total	Description
Retail and food services	Energy Consumption	2	5	10	Local companies, excluding AAFES
	Solid Waste Generation	2	5	10	Local companies, excluding AAFES
	Hazardous Waste Generation	1	5	5	Local companies, excluding AAFES
	Spills/ Emergency Situation	2	5	10	
	Handling/ Disposal of Asbestos	2	5	10	
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants
Cleaning services	Energy Consumption	2	5	10	
	Solid Waste Generation	2	5	10	
	Hazardous Waste Generation	2	5	10	
	Spills/ Emergency Situation	2	5	10	
	Handling/ Disposal of Asbestos	2	5	10	cleaning of asbestos-containing tiles
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants
Leasing (container, housing etc.)	Energy Consumption	1	5	5	
	Solid Waste Generation	1	5	5	
	Hazardous Waste Generation	1	5	5	
	Spills/ Emergency Situation	NA	NA	NA	this aspect is not applicable for this service
	Handling/ Disposal of Asbestos	NA	NA	NA	this aspect is not applicable for this service
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants

APPENDIX L

	Significant aspect	Environmental effect	Contract days per year	Total	Description
Events	Energy Consumption	3	2	6	E.g. energy consumption at reintegration, etc.
	Solid Waste Generation	3	2	6	E.g. energy consumption at reintegration, etc.
	Hazardous Waste Generation	3	2	6	E.g. energy consumption at reintegration, etc.
	Spills/ Emergency Situation	4	2	8	E.g. fuel spills at reintegration, etc.
	Handling/ Disposal of Asbestos	NA	NA	NA	this aspect is not applicable for this service
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants
Reproduction services	Energy Consumption	2	5	10	E.g. photo shop, print shop
	Solid Waste Generation	2	5	10	E.g. photo shop, print shop
	Hazardous Waste Generation	3	3	9	E.g. photo shop, print shop
	Spills/ Emergency Situation	NA	NA	NA	this aspect is not applicable for this service
	Handling/ Disposal of Asbestos	NA	NA	NA	this aspect is not applicable for this service
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants
Surveys and studies (incl. fieldwork)	Solid Waste Generation	1	3	3	E.g. environmental, health & safety, security surveys and studies
	Energy Consumption	1	3	3	E.g. environmental, health & safety, security surveys and studies
	Hazardous Waste Generation	1	3	3	E.g. environmental, health & safety, security surveys and studies
	Spills/ Emergency Situation	3	3	9	
	Handling/ Disposal of Asbestos	4	2	8	
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants

APPENDIX L

	Significant aspect	Environmental effect	Contract days per year	Total	Description
Construction Craft Contracts					
Painting/Wallpapering	Solid Waste Generation	1	5	5	Minor repair works, including between-occupancy renovation
	Energy Consumption	2	3	6	Minor repair works, including between-occupancy renovation
	Hazardous Waste Generation	3	4	12	Minor repair works, including between-occupancy renovation
	Spills/ Emergency Situation	2	3	6	Minor repair works, including between-occupancy renovation
	Handling/ Disposal of Asbestos	5	1	5	Minor repair works, including between-occupancy renovation (work with asbestos-containing plaster)
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants
Plumbing	Solid Waste Generation	3	3	9	Minor repair works, including between-occupancy renovation
	Energy Consumption	2	3	6	Minor repair works, including between-occupancy renovation
	Hazardous Waste Generation	1	3	3	Minor repair works, including between-occupancy renovation
	Spills/ Emergency Situation	2	3	6	Minor repair works, including between-occupancy renovation, Deutsche Telekom
	Handling/ Disposal of Asbestos	5	3	15	Minor repair works, including between-occupancy renovation (work with asbestos-containing gaskets)
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants
Electrical works and telecommunication	Solid Waste Generation	3	3	9	Minor repair works, including between-occupancy renovation, Deutsche Telekom
	Energy Consumption	3	3	9	Minor repair works, including between-occupancy renovation, Deutsche Telekom
	Hazardous Waste Generation	1	3	3	Minor repair works, including between-occupancy renovation, Deutsche Telekom
	Spills/ Emergency Situation	2	3	6	Minor repair works, including between-occupancy renovation, Deutsche Telekom
	Handling/ Disposal of Asbestos	5	3	15	Minor repair works, including between-occupancy renovation (work with asbestos-containing plaster)
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants

APPENDIX L

	Significant aspect	Environmental effect	Contract days per year	Total	Description
Carpeting	Solid Waste Generation	2	3	6	Minor repair works, including between-occupancy renovation, Telekom
	Energy Consumption	3	3	9	Minor repair works, including between-occupancy renovation
	Hazardous Waste Generation	2	3	6	Minor repair works, including between-occupancy renovation
	Spills/ Emergency Situation	2	3	6	Minor repair works, including between-occupancy renovation, Deutsche Telekom
	Handling/ Disposal of Asbestos	5	3	15	Minor repair works, including between-occupancy renovation (work with asbestos-containing floor tiles)
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants
Masonry work	Solid Waste Generation	3	3	9	Minor repair works, including between-occupancy renovation
	Energy Consumption	2	3	6	Minor repair works, including between-occupancy renovation
	Hazardous Waste Generation	1	3	3	Minor repair works, including between-occupancy renovation
	Spills/ Emergency Situation	2	3	6	Minor repair works, including between-occupancy renovation
	Handling/ Disposal of Asbestos	5	3	15	Minor repair works, including between-occupancy renovation (work with asbestos-containing floor tiles)
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants
Tiling	Solid Waste Generation	3	3	9	Minor repair works, including between-occupancy renovation
	Energy Consumption	2	3	6	Minor repair works, including between-occupancy renovation
	Hazardous Waste Generation	2	3	6	Minor repair works, including between-occupancy renovation
	Spills/ Emergency Situation	2	3	6	Minor repair works, including between-occupancy renovation, Deutsche Telekom
	Handling/ Disposal of Asbestos	5	3	15	Minor repair works, including between-occupancy renovation (work with asbestos-containing floor tiles)
	Use/Storage of POL	NA	NA	NA	The aspect "use/storage of POL" only applies to the operation of heating plants

APPENDIX L

	Significant aspect	Environmental effect	Contract days per year	Total	Description
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Contract Days Per Year

- 5 = Continuous - ongoing or daily contract
- 4 = Frequent - more than 150 contract days within one year
- 3 = Infrequent - 50 or more than 50 contract days per year, less than 150 days within one year
- 2 = Rare - 10 or more than 10 contract days within one year, less than 50 contract days within one year
- 1 = Negligible - Less than 10 contract days within one year

Environmental Effect

- 5 = Extreme consumption of energy and/or generation of solid and/or hazardous waste
- 4 = High consumption of energy and/or generation of solid and/or hazardous waste
- 3 = Moderate consumption of energy and/or generation of solid and/or hazardous waste
- 2 = Mild consumption of energy and/or generation of solid and/or hazardous waste
- 1 = Insignificant consumption of energy and/or solid and/or hazardous waste

Contracts with a total score of ≥ 15 , an environmental effect of 4 or 5, or contracts that directly manage a significant aspect of USAG Schweinfurt must be included into the EMS (marked red respectively).