

Environmental Compliance Checklist

(DRAFT)

ECHO COMPANY 702D MSB

ORGANIZATIONAL MAINTENANCE AREAS

References:

1. AR 40-5.
2. AR 200-1.
3. AR 200-2.
4. AR 200-3.
5. AR 200-4.
6. AR 710-2.
7. USFK Pam 200-1.
8. EUSA Suppl 1 to AR 40-5.
9. Spill Prevention Control & Countermeasure Plans (SPCCP).
10. Hazardous Waste Management Plan (HWMP)
11. Installation Spill Contingency Plan (ISCP)
12. Storm Water Pollution Plan (SWPP)
13. Recycle Program.
14. EUSA IG Report.
15. Environmental Compliance Program.

Administration

GO NOGO

- | | | |
|--|--------------|--------------|
| 1. Is an Environmental Coordinator been appointed on orders?
(IAW AR 200-1, Sec II, 1.32) | _____ | _____ |
| | <u> X </u> | |
| 2. Does the unit have the following Regulations on hand: | | |
| a. AR 200-1. | _____ | _____ |
| b. AR 200-2. | _____ | _____ |
| c. AR 40-5. | _____ | _____ |
| d. USFK Pam 200-1. | _____ | _____ |
| | <u> X </u> | <u> X </u> |
| | <u> X </u> | <u> X </u> |
| | <u> X </u> | <u> X </u> |
| 3. Does the unit have a spill prevention control and countermeasure contingency plan for their unit? | _____ | _____ |
| | | <u> X </u> |
| 4. Is the plan up to date and approved by the commander? | _____ | _____ |
| | | <u> X </u> |
| 5. Does the unit have a Hazardous Waste Material (HWM) plan/SOP? | _____ | _____ |
| | | <u> X </u> |
| 6. Is the HWM plan up to date and approved by the commander? | _____ | _____ |
| | | <u> X </u> |
| 7. Does the unit have a Material Safety Data Sheet (MSDS) for all Hazardous Material on hand?(close to HM) | _____ | _____ |
| | | <u> X </u> |
| 8. Does the unit have an up to date monthly POL/HM inventory (USFK Form 215)? | _____ | _____ |
| | | <u> X </u> |
| 9. Does the unit maintain USFK Form 216 for each container and file for 3 years? | _____ | _____ |
| | | <u> X </u> |
| 10. Does the unit use DD Form 1348 manifest and file for 3 years? | _____ | _____ |
| | | <u> X </u> |
| 11. Does the unit conduct internal environmental inspections? | _____ | _____ |
| | | <u> X </u> |
| 12. Does the unit have inspection records for the past 3 years? | _____ | _____ |
| | | <u> X </u> |

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- 13. Have all deficiencies from last inspection been corrected? _____ X _____
- 14. Are all training records maintained at the Hazardous Material Storage Facility? _____ X _____
- 15. Does the unit have a copy of their current Authorized Basic Load (ABL) and Operational Load? _____ X _____
- 16. Does the unit have the POCs for emergency response or spill reports? _____ X _____

Training

GO NOGO

- 1. Is the Environmental Coordinator on order trained or slotted in a class? _____ X _____
- 2. Is the unit trained to promptly take actions to cleanup and to report it through the chain of command? _____ X _____
- 3. Does the unit conduct practice drills for emergency environmental situations? _____ X _____
- 4. Does the unit have the date of the last inspection recorded? _____ X _____
- 5. Are unit personnel trained on the use of fire extinguishers? _____ X _____
- 6. Are the hazardous material handlers trained with records on hand? _____ X _____
- 7. Does the unit conduct monthly spill prevention briefings? _____ X _____
- 8. Are hazardous material/waste classes on the training schedule? X _____

Hazardous Material (Petroleum, Oil, & Lubricant) (POL) Storage/Management

GO NOGO

- 1. Does the unit have a complete Authorized Basic Load (ABL)?
Are all shortcomings on a valid requisition? _____ X _____
- 2. Is the ABL separated from the operational load? _____ X _____
- 3. Is there an operational fire extinguisher in the Hazardous Material (HM) storage area? _____ X _____
- 4. Is the basic load stock rotated with the operational load? _____ X _____
- 5. Does the unit have a sign out log at the HM storage area? _____ X _____
- 6. Does the unit have the MSDS sheets located at the HM storage area? _____ X _____
- 7. Does the unit have outdated products in their HM storage area? _____ X _____
- 8. Does the unit's HM storage area have a secondary containment area? _____ X _____
- 9. Do all containers have a label identifying the type of product, national stock number, and manufacturer? _____ X _____
- 10. Are all containers free of POL substance, and dirt? _____ X _____

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| 11. Are all dented, and/or rusted containers used first? | _____ | ___ X ___ |
| 12. Are there leaking containers stored in the HM area? | _____ | ___ X ___ |
| 13. Are fuel cans properly marked? | _____ | ___ X ___ |
| 14. Is the area where fuel cans are stored marked with appropriate signs? | _____ | ___ X ___ |
| 15. Are proper material placards for HM and ammo used and posted on vehicle transporting these materials? | _____ | ___ X ___ |
| 16. Is there controlled access to the HM area? | _____ | ___ X ___ |
| 17. Are HM stored properly (neat and organized)? | _____ | ___ X ___ |
| 18. Does the unit have any procedures to minimize the use of HM? | _____ | ___ X ___ |

Hazardous Waste Storage/Management

GO NOGO

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|--|------------------|------------------|
| 1. Does the unit have a Hazardous Waste (HW) accumulation point (stored less than 3 months)? | ___ X ___ | _____ |
| 2. Is there more than one type of waste and are they separated? | _____ | ___ X ___ |
| 3. Is there more than one 55 gallon drum of any one HW? | _____ | ___ X ___ |
| 4. Is there more than one quart of any toxic HW? | ___ X ___ | _____ |
| 5. Are DD Forms 1248-1 and 1387-2 prepared for each HW drum? | _____ | ___ X ___ |
| 6. Is the storage located less than 50ft from the installation boundary? | ___ X ___ | _____ |
| 7. Is there controlled access to the HW storage area? (Use Echo DS HW Area) | N/A | |
| 8. Is there a bilingual sign “ Hazardous Waste Storage, Unauthorized Personnel Keep Out” posted? | N/A | |
| 9. Are all containers in good condition? | _____ | ___ X ___ |
| 10. Are all ignitable/flammable drums grounded? | _____ | ___ X ___ |
| 11. Are all containers closed? | _____ | ___ X ___ |
| 12. Do all HW containers have the proper HW labels? | _____ | ___ X ___ |
| 13. Are all HW labels completed properly? | _____ | ___ X ___ |
| 14. Is the fill date stenciled or tagged on each container? | _____ | ___ X ___ |
| 15. Does the HW storage area have a proper secondary containment area? | _____ | ___ X ___ |
| 16. Is the HW storage area located in a safely elevated are away from floods and land slides? | ___ X ___ | _____ |

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17. Is waste properly transported to consolidated facility (DPW accumulation point) in a reasonable time period? _____ X
18. Does the unit have a place for contaminated fuel? _____ X
19. Are used propane tanks/bottles turned in as hazardous material? _____ X
20. Does the unit have an established storage area for contaminated soil and dry sweep? _____ X
21. Is the contaminated disposed of properly and in a timely manner? _____ X
22. Does the unit have a container with a lid and lined with a plastic bag for storing contaminated rags? _____ X
23. Are the following NBC hazardous waste items stored correctly?
- a. Protective Mask Filters? _____ N/A
 - b. M256/A1 Detection Kits? _____ N/A
 - c. M258/A1 Decontamination Kits? _____ N/A
24. Does the unit have a drum for storing used oil filters, and are filters allowed to drain prior to placing them in an overpack? _____ X
25. Does the unit allow fuel filters and transmission filters to drain, and steam clean them prior to placing them in the scrap metal areas? _____ X
26. Are empty 5 gallon cans allowed to drain on a catch container, and then triple rinsed prior to placing them in the scrap metal area? _____ X
27. Are empty quart cans of oil and transmission fluid allowed to drain on a catch container and triple rinsed with soap and water prior to discarding? _____ X
28. Are lithium batteries stored properly in cardboard boxes: to include BA 30/30 batteries? _____ X
29. Are empty brake fluid containers allowed to drain on a catch container and washed with soapy water prior to disposing of it? _____ X
30. Are leaking or seeping container properly taken care of? _____ X

Facilities

GO NOGO

1. Are fire extinguishers placed in the proper areas within the Motorpool? _____ X
2. Are fire extinguisher inspected monthly to ensure functionality? _____ X
3. Does the unit have sufficient environmental supplies for emergency responses available and HM collection kits (shovels, brooms, dry sweep empty containers)? _____ X
4. Are there signs identifying the location of emergency response kits? _____ X
5. Is there a functional oil/water separator in the motor pool? _____ X

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| 6. Is the oil/water separator maintained and serviced properly? | _ X _ | _ _ _ |
| 7. Do all Above ground Storage Tanks (AST) have the proper secondary containment structure? | _ X _ | _ _ _ |
| 8. Are AST or Underground Storage Tanks (UST) in a potential flood plain? | _ X _ | _ _ _ |
| 9. Are bilingual “No Smoking” signs posted near all ASTs and USTs? | _ _ _ | _ X _ |
| 10. Are good housekeeping practices being conducted (no evidence of spillage, trash polices, rags placed in proper containers)? | _ X _ | _ _ _ |
| 11. Are HW and HM storage area in a potential flood plain? | _ X _ | _ _ _ |
| 12. Are fuel tanks and storage areas located at least 10 meters from streams to prevent releasing materials into nearby streams? | _ X _ | _ _ _ |
| 13. Does the unit have a solvent tank with a sign stating “Goggles and Gloves must be worn while using this equipment”? | N/A | _ _ _ |
| 14. Does the unit have an adequate amount of containers for HW/trash? | _ _ _ | _ X _ |
| 15. Are there valid work orders for any facilities not functioning properly? | _ _ _ | _ X _ |
| 16. Are vehicles/equipment being washed or steam cleaners being used in an area other than an authorized washrack? | _ X _ | _ _ _ |
| 17. Is the grating/baffles damaged or removed from the oil/water separator? | _ X _ | _ _ _ |
| 18. Oxygen, Acetylene, Nitrogen bottles/tanks separated 50 meters apart and properly stored and secured? | _ _ _ | _ X _ |

Conservation and Prevention

GO NOGO

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|---|--------------|--------------|
| 1. Does the unit have drip pans for every vehicle in the motorpool? | _ X _ | _ _ _ |
| 2. Is there a designated place for dumping oil from the drip pans? | _ _ _ | _ X _ |
| 3. Is protective clothing/equipment available? | _ X _ | _ _ _ |
| 4. Are spills cleaned up as soon as they are identified (both in the bay areas and the vehicle line)? | _ X _ | _ _ _ |
| 5. Do all soldier know when a spill must be reported to their CoC? | _ _ _ | _ X _ |
| 6. Are wooden/metal objects removed from the dumpster? | _ X _ | _ _ _ |
| 7. Do storm drains/ditches show evidence of spills? | _ X _ | _ _ _ |
| 8. Does the unit have an adequate pollution prevent SOP for the motorpool maintenance area? | _ _ _ | _ X _ |
| 9. Does the unit have a recycle program? | _ N/A _ | _ _ _ |
| 10. Is unit parking or driving on the grass in the motorpool? | _ X _ | _ _ _ |

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11. Is there damage to the motorpool surface area that could have been prevented? X _____

12. Is there litter observed in the unit area? X _____

Comments:

Solvent Tank: 6850-01-0666

RECOMMENDATIONS

- CONTINUE TO MAINTAIN STANDARDS
- CONTINUE TO ENFORCE ENVIRONMENTAL AWARENESS & TRAINING
- Need to ensure unit level environmental officer & NCO are properly trained
- Order or download ARs from internet: WWW.USAPA.ARMY.MIL
- Local/Installation/Bn Environmental SOPs is not approved by battalion commander on memorandum
- Need to enforce unit level environmental awareness training
- Maintain Fire Points and Fire Extinguisher
- Need to part washing machine for shops

FIRE CABINET FOR POL PRODUCTS

- Establish only one location for UBL/ABL connex
- Missing MSDS and Inventory Sheets
- Replace outdated POL Products
- Establish Basic Load List and Valid Requisition for shortages
- Fire Cabinet for daily used POL Products missing warning placard on outside of door

BAY AREA

- HM Waste Drums not properly marked and improperly stored in maintenance bay
- Improperly stored operational POL products
- Improper stored fuel cans in maintenance bay
- Improper disposal of used POL products
- Unorganized MSDS/HAZMAT information board
- Unorganized Fire Points in work bay areas