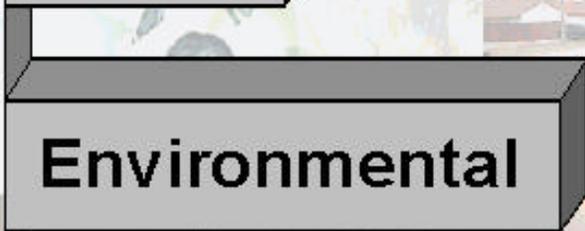




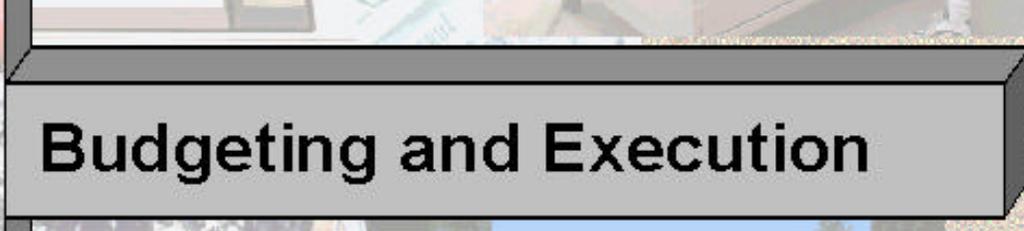
AETC



Environmental



Planning, Programming,



Budgeting and Execution



Handbook



March 1999

The AETC Environmental Planning, Programming, Budgeting and Execution Handbook

March 1999

Table of Contents

Chapter 1 General Program Management Guidance

| Section | Page |
|---|-------------|
| 1.1 Introduction..... | 1 |
| 1.2 The USAF Environmental Budgeting Process..... | 3 |
| 1.3 Environmental Requirement Identification and Programming..... | 10 |
| 1.4 A-106 Requirement Classifications..... | 17 |
| 1.5 Requirements Prioritization Model and Pollution Prevention Investment Strategy..... | 21 |

Chapter 2 Specific Program Guidance

| | |
|---|----|
| 2.1 Architect-Engineer (A-E) Design..... | 25 |
| 2.2 Air Quality..... | 28 |
| 2.3 Asbestos..... | 37 |
| 2.4 Certifications and Licenses..... | 40 |
| 2.5 Civilian Pay..... | 42 |
| 2.6 Community Planning/General Plans..... | 44 |
| 2.7 Contract Services..... | 47 |
| 2.8 Cultural Resources..... | 50 |
| 2.9 Environmental Compliance Assessment and Management Program..... | 53 |

| | | |
|------|--|-----|
| 2.10 | Environmental Impact Analysis Process (EIAP) Requirements..... | 56 |
| 2.11 | Emergencies, Inspections, Fines, Penalties and Supplemental Environmental Projects..... | 68 |
| 2.12 | Hazardous Materials..... | 70 |
| 2.13 | Hazardous Waste..... | 73 |
| 2.14 | Integrated Natural Resources..... | 77 |
| 2.15 | Lead Based Paint..... | 82 |
| 2.16 | Polychlorinated Biphenyls (PCBs)..... | 85 |
| 2.17 | Pesticide and Herbicide Reduction..... | 88 |
| 2.18 | Petroleum, Oil and Lubricants (POL) Storage Tanks..... | 89 |
| 2.19 | RCRA Corrective Action Cleanup (New Section)..... | 92 |
| 2.20 | Recycling..... | 94 |
| 2.21 | Safe Drinking Water Act (SDWA) Compliance..... | 102 |
| 2.22 | Sampling, Analysis and Monitoring)..... | 106 |
| 2.23 | Solid Waste..... | 110 |
| 2.24 | Storm Water Point Source Discharge Permit Compliance..... | 113 |
| 2.25 | Supplies, Publications, Equipment and Maintenance..... | 117 |
| 2.26 | Temporary Duty Assignments (TDYs), Education and Training..... | 120 |
| 2.27 | Wastewater Discharge Permit Compliance..... | 126 |

Appendices

| | | |
|---|--|------|
| 1 | Definitions and Acronyms..... | A1-1 |
| 2 | Environmental Guidance Document List..... | A2-1 |
| 3 | Environmental EEIC List..... | A3-1 |
| 4 | Valid Pollution Prevention Strategies List, HQ USAF/ILEV, 12 Sep 99..... | A4-1 |
| 5 | The Environmental Team..... | A5-1 |

CHAPTER 1

GENERAL PROGRAM GUIDANCE

Section 1.1 Introduction

1.1.1 Purpose

This handbook provides base and MAJCOM environmental team members (see Appendix 5 for team member responsibilities) a concise yet complete common set of funding guidelines for planning, programming, budgeting and executing AETC's Environmental Compliance, Pollution Prevention and Environmental Planning programs. It is intended to supplement current Air Force guidance.

1.1.2 Air Force Environmental Funding Guidance

The following are our primary references. Additional references are at Appendix 2.

- Air Force Program Directive, (AFPD) 32-70, 20 Jul 94, Environmental Quality
- AFI 32-7001, 9 May 94, Environmental Budgeting
- HQ USAF/CEV Programming and Budgeting Guidance, 25 Aug 95 (Draft 3)
- AFI 32-7002, 31 May 94, Environmental Information Management System
- HQ USAF/ILEVQ Memo, 12 Sep 97, Pollution Prevention Funding Guidance
- AFI 32-7080, Dec 98, Compliance Assurance and Pollution Prevention (Draft)

1.1.3 Document Review

This handbook will be updated annually by HQ AETC/CEV. Suggestions for changes, improvements, corrections, updates or requests for copies may be sent to HQ AETC/CEVA, 266 F Street West, Randolph AFB TX 78150-4321. Send faxes to DSN 487-3597 or commercial 210-652-3597. This handbook is available on the HQ AETC/CEV Internet Home Page at <http://hqce-nt2.aetc.af.mil/cev/index.htm>.

1.1.4 Summary of Changes

- 30 Jan 98, Initial Publication
- 25 Mar 99, Annual update to execution goals, media strategies and Environmental Programming Narratives (EPN). RCRA Cleanup section added.

Section 1.2 The USAF Environmental Budget Process

1.2.1 Major Formal Budget Exercises

The Air Force Programming and Budgeting process includes four main parts:

- The Program Objective Memorandum (POM), the Adjusted or Amended POM (APOM)
- The Financial Plan (FINPLAN)
- Execution Year
- The Budget Execution Review (BER)

These processes manage funding and manpower resources to meet Air Force goals and objectives. Ineffective and inefficient use of our manpower and funding wastes these critical resources. It is imperative that you understand what these processes are and what your roles are in each in order to support the Air Force's real mission, to fly, fight, and win.

Program Objective Memorandum (POM)

Bases' Role: *To ensure all known and future requirements are entered into the WIMS-ES A-106. The validity of A-106 records will dictate the integrity of a MAJCOM's POM submittal.¹*

The POM identifies total program requirements for the six years beyond the next fiscal year (as constrained by published guidance) and includes rationale for planned changes to the Air Force Future Years Defense Program (FYDP). The FYDP is the official document and database that summarizes Secretary of Defense approved plans and programs for the DOD. See Figure 1.2.1. Dynamic and constantly changing, the programming and budgeting process is cyclic without a defined start or end. The POM requires nine months of concentrated effort to construct. In the odd years, the Air Staff will provide each MAJCOM a current,

¹A new automation system called Automated Civil Engineer System-Project Management (ACES-PM) will be replacing the WIMS-ES A-106 in CY99. The A-106 portion will be called Environmental Requirements. POM, FINPLAN and Spend Plan information will be entered and managed with this application.

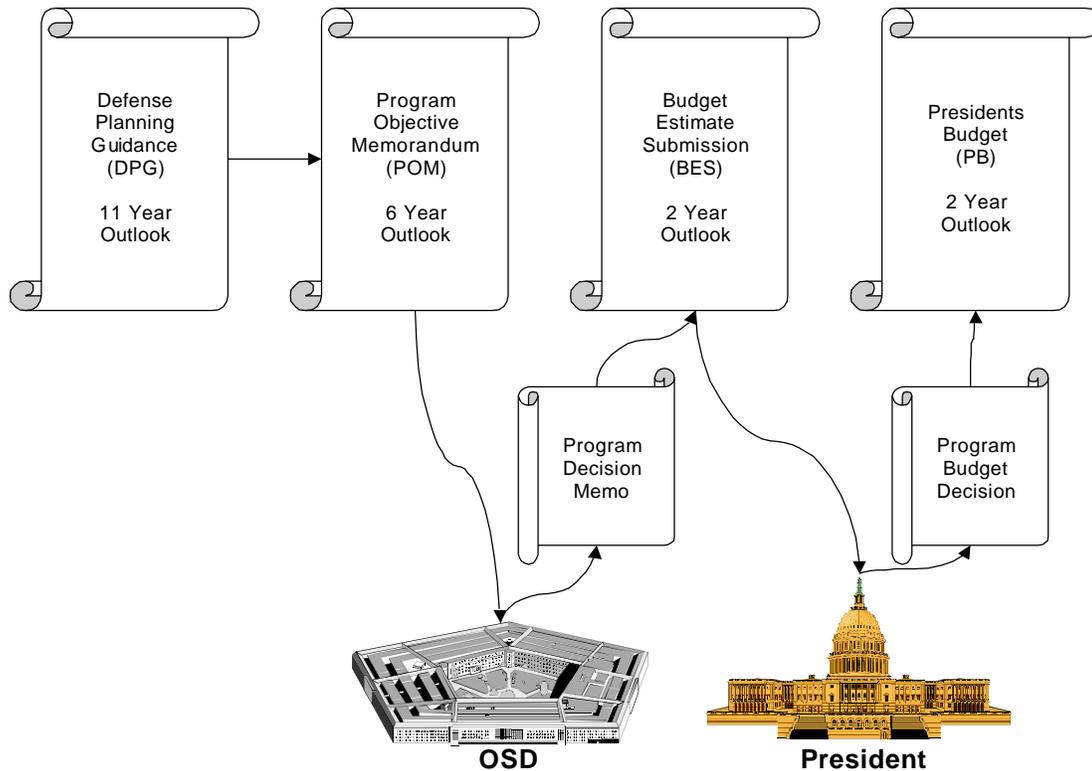
re-priced AF baseline and a MAJCOM specific baseline. The MAJCOM-specific baseline will define which dollars and resources a MAJCOM can program during its POM build. Base and MAJCOM POM adjustments are made based on requirement validation.

Each MAJCOM develops and presents its POM proposal to Air Staff in a single prioritized list with disconnects, initiatives, and offsets ranked based on need.

- A **disconnect** is a requirement that is part of an approved program which has become unexecutable due to insufficient funding. There is a mismatch between resources available and the content approved by the Secretary of the Air Force and Chief of Staff of the Air Force at the conclusion of the POM. Specific Air Force decisions to change the program content or pace in the POM cycle are not candidates for disconnects in the following year's cycle. These decisions represent initial Air Force adjustments to programs and must compete as new content in the initiative phase of the next cycle if restoration of content is desired. All disconnects must be validated by the using MAJCOM.
- An **initiative** is a proposal/requirement for additional funds which adds to an on-going program's content, a proposal for an alternative to a current program or a proposal for a new start.
- **Offsets** are a resource identified to "pay" for disconnects, initiatives or corporate bills . MAJCOMs must identify offsets to fund initiatives or adjust program content to meet available resources. Resources may be taken from scaled down programs, canceled programs, lower priority programs, or re-priced programs whose estimates were reduced. Both dollar and personnel resources can be used as offsets.
- **Zero balance transfer (ZBT)** is an exact reallocation of resources normally within a single program element. A ZBT is a non-programmatic action accomplished to "clean up" a data base error or realign resources to allow for better management.

Usually the POM is performed during even years (FY00, 02, 04, etc.) and APOM is accomplished during the odd years (FY01, 03, 05, etc.).

Figure 1.2.1 The PPBS Process



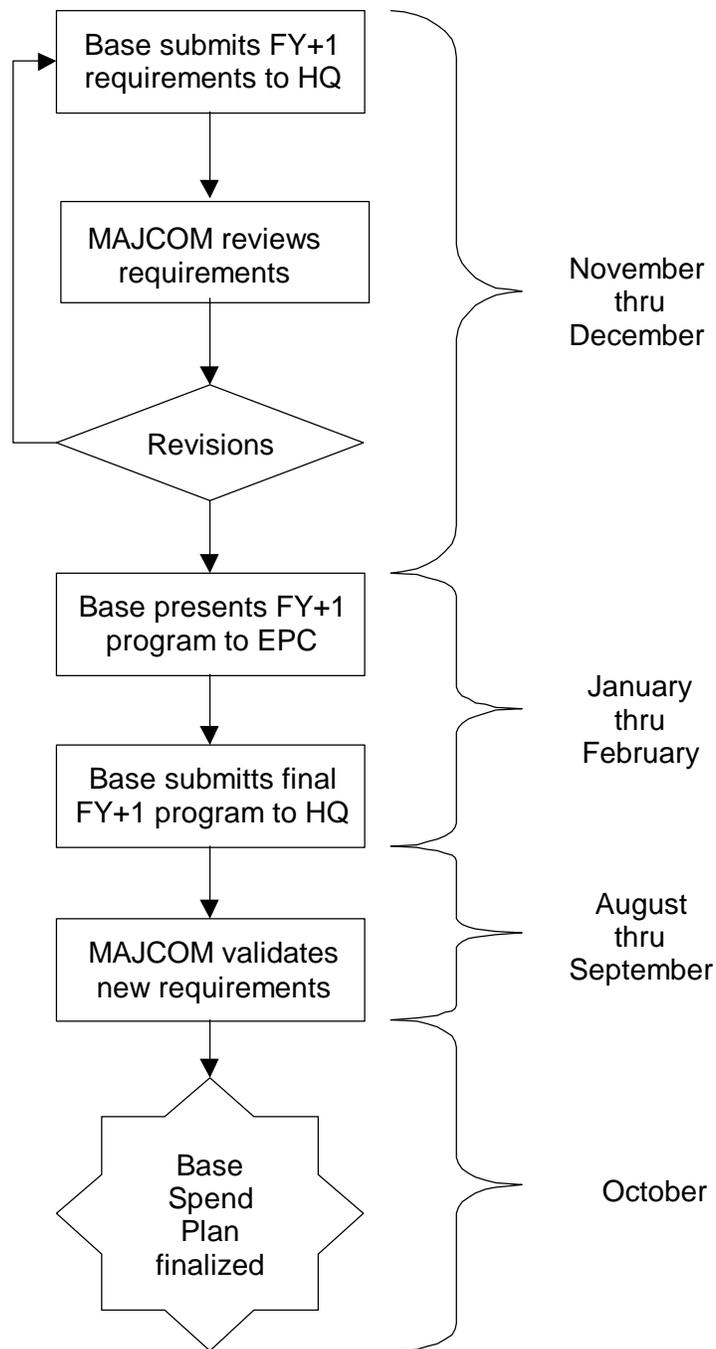
1.2.3 Financial Plan (FINPLAN)

Bases' Role: *Identify and submit valid environmental requirements to the Resources Flight and HQ AETC/CEV for consideration. Records in the A-106/ACES and the FINPLAN should be identical. See Figure*

Air Staff provides the MAJCOM a projected budget by Program Element Code (see Appendix A-1, paragraph A.1.5) for the next fiscal year. The FM community uses the FINPLAN for two purposes (1) to ensure we have requirements to match the budget and (2) to identify unfunded requirement. We use the Environmental Program Narrative (EPN) as justification for your budget to FM. In essence, the FM community is looking for dollars to fund other organizations unfunded requirements. Therefore, it is important that your requirements be well justified. Another issue is prior to initial distribution in an execution year FM makes a comparison to the

previous years FINPLAN; differences must be justified. Therefore, it is important that your FINPLAN be as accurate as possible to the requirements in the execution year. More accuracy equates to less justification.

Figure 1.2.2 The FINPLAN Process



1.2.4 Execution Year

1.2.4.1 Goals

Effective and efficient funds obligation is critical to the planning, programming, budgeting process. The bottom line is early obligation supports your fight for additional dollars during the year. It is difficult to convince through the corporate process the need for additional funding when there are environmental dollars waiting to be obligated. In order to force a more aggressive approach to funds obligation, we have established the goals detailed below for the bases to meet.

- **Class 0 Goal**
 - Obligate 25 percent of funds by 31 December
 - Obligate 50 percent of fund by 31 March
 - Obligate 75 percent of funds by 30 June
 - Obligate 100 percent of funds by 15 September

- **Class 1 Goal**
 - Obligate 80 percent of funds by 15 April

Funded Class 0 requirements will be distributed to the bases as soon as possible, typically in the month of December. Funded Class 1 requirements will be held at HQ AETC until the requirement is identified as “**Ready to Advertise**” by the base. Funded Class 1 requirements that do not meet the 15 April goal will lose their guaranteed funding. If a base has regulatory circumstances that force the requirement to be awarded after 15 April, a waiver request must be signed by the Base Civil Engineer.

1.2.4.2 New Requirements

Quarterly, HQ AETC/CEVA will send out a letter requesting EPNs for new requirements. New requirements are defined as projects identified after the start of the new fiscal year. Once these new requirements are validated, they will compete for funding after 15 April.

1.2.4.3 Mid-Year Review

The Mid Year Review will consist of a prioritization of new requirements and unexecuted funded requirements. Based upon the priority, remaining funds at the HQ will be distributed to projects that are Ready to Advertise.

1.2.4.4 End-of-Year Funding

During the end-of-year process, bases should submit EPNs requirements that can be executed late in the fiscal year. After a review of 3rd Quarter spending, a final unfunded project listing will be developed. Some requirements may be considered for “straddle bid” or “fill or kill” (see explanation below). Typically, end-of-year funds are not available for distribution to the bases until after 15 September. Bases should explain this to the service agents when developing a contract for award.

- A “**straddle bid**” program can be developed for critical unfunded projects to enable late FY contract awards using fallout funds at year-end. One disadvantage of this strategy is that it commits the installation to funding the project off the top of the MAJCOM's next FY program if fallout funds are not available. This requires HQ AETC approval.
- A “**fill or kill**” program can be developed for critical unfunded projects to enable late FY contract awards using fallout funds at year-end. One advantage of this strategy is that it does not commit the installation to funding the project off the top of the next FY program if fallout funds are not available. A disadvantage is that it may require redundant contract preparation work if the project is funded in the next FY. This requires approval by HQ AETC Contracting Office.

1.2.5 Budget Execution Report (BER)

The BER identifies to Air Staff unfunded requirements, including environmental, by base and MAJCOM in the current fiscal year which are executable but not funded. This activity normally occurs twice during the execution year; in March (BER I) and in June (BER II). The Base Comptroller consolidates all installation requirements and typically submits a top ten unfunded requirement list to HQ AETC/FM. The MAJCOM unfunded environmental requirements are collected, reviewed, prioritized and approved by the MAJCOM EPC. The environmental BER is prioritized within the MAJCOM BER. The entire BER is submitted to Air Staff. At the MAJCOM and Air Staff levels, environmental requirements compete with all other O&M requirements for funding.

**Table 1.2.1 Environmental Budgeting Schedule of Events
Oct 98 – Dec 99**

| <u>Month</u> | <u>EVENT</u> | <u>OPR</u> |
|--------------|---|---------------|
| Oct 98 | FY00 Program (signed EPNs) due to MAJCOM | Installations |
| Nov 98 | Call to installations for FY01-05 Amended Program Objective Memorandum (APOM) data | MAJCOM |
| Dec 98 | FY99 initial distribution of O&S and authorization of Class 1 requirements FY00 FINPLANS finalized and returned to installations | MAJCOM |
| Dec 98 | 1st quarter call for FY99 unfunded requirements | Installations |
| Feb 99 | Submit APOM to Air Staff | MAJCOM |
| Feb 99 | FY00 FINPLANS (approved by EPC) due to MAJCOM | Installations |
| Mar 99 | Submit FY00 FINPLANS to Air Staff Mid-year review of FY99 obligations Class 1 requirements 100% obligated) | MAJCOM |
| Apr/May 99 | Reprioritization/re-authorization of FY99 Class 1 requirements Formulate plan for end-of-year execution FY00 PMR call letter to installations | MAJCOM |
| Jul 99 | Review of 3rd quarter obligations, final re-authorization of Class 1 requirements Finalize plan for end-of-year execution/straddle program | MAJCOM |
| Jul/Aug 99 | FY00-06 Program Management Reviews | Installations |
| Sep 99 | Finalize FY00 Spend Plans | MAJCOM |
| Oct 99 | Signed EPNs for FY01 program due | Installations |
| Nov 99 | Call letter to installations for FY02-06 Program Objective Memorandum (POM) data | MAJCOM |
| Dec 99 | Initial distribution of FY00 O&S & Authorization of Class 1 requirements FY01 FINPLANS finalized and sent back to installations | MAJCOM |
| Dec 99 | 1st quarter call for FY00 unfunded requirements | Installations |

Section 1.3 Environmental Requirement Identification and Programming

1.3.1 What is an environmental requirement?

An environmental requirement includes all work necessary to ensure Air Force activities comply with applicable federal, state, and local environmental regulations and DOD and Air Force environmental policies, guidance and instructions.

1.3.2 How are requirements identified?

- Codified in federal, state or local laws or regulations, Air Force or DOD instructions, policies directives or guidance
- Federal, state or local regulatory agency inspection identifies an out of compliance situation (i.e., regulatory multi-media, Environmental Compliance Assessment and Management Program (ECAMP), and media sampling)
- Incidental or supplemental records search and aerial photo interpretation
- Employees or former employees provide information leading to the discovery of environmental requirements
- Construction activities needing permits and pollution prevention measures
- Recurring requirements, either annually, quarterly or multiple times per year, such as hazardous waste disposal, permits and fees, sampling, analysis, and monitoring
- Recurring requirements that support daily flight operations such as supplies and training
- Compliance deadlines specified in environmental regulations or regulatory agreements
- Nonrecurring requirements, i.e., projects, such as underground storage tank (UST) removals, subsurface investigations, pollution prevention equipment, cleanup of contaminated soils, and installation of air emission controls

1.3.3 What's not an environmental requirement?

Any requirement that does not satisfy environmental regulations or policies, such as those that benefit the environment but are not regulatory driven. These types of requirements are often eligible for non-environmental funding, and HQ AETC/CEV does not approve environmental funds for such requirements. Carefully review exclusions listed in A5.1 of AFI 32-7001. Specific media information is provided in Chapter 2 of this book.

1.3.4 Funding Documentation Importance

Well-prepared program documentation is the most important aspect of program development and the key to project approval by MAJCOM/CEV. The program documents must "sell" the requirement that in turn directly impacts the installation's ability to successfully execute its environmental program. The following provides details about developing program documents.

1.3.4.1 General Guidance for Programming Documents

There are two formats for programming documents:

- EPN form, Figure 1.4.1, used for all valid environmental funding requirements. The EPN is a generic document; therefore, use the format outlined in Figure 1.4.1. Specific examples are at the end of each section in Chapter 2 of this handbook.
- Military Construction Project Data, DD Form 1391, Figure 1.4.2, used for construction requirements such as installing emission controls, landfill caps, stormwater collection systems, and new fuel systems. This document is fairly straightforward. See your Engineering Flight Chief for additional information.

A separate EPN is required for each new requirement. However, if the requirement is a construction project, one may use the 1391 in lieu of the

Here are some general guidelines:

- Follow EPN and DD Form 1391 format
- Be specific on deadlines and regulations
- Focus requirements on pollution prevention initiatives, compliance, cleanup and risk-based closure
- Ensure requirement will help obtain Air Force goals
- Be specific on impacts if not funded (**mission impact**, fines, penalties, Notice of Violation, health risk)

- Be precise in the description. If a site has a large area of contamination, phrase the facts as: “field data and laboratory analysis indicate an area approximately 20’ x 20’ was found to have total petroleum hydrocarbon levels ranging from 50 to 25,000 ppm to a depth of 20 feet.”
- Cost/Benefit analysis for pollution prevention requirements
- For additional information, review AFI 32-7001, Environmental Budgeting, particularly Chapter 3 and Attachments 4 and 5

1.3.5 Annual Program Development Responsibilities

Installation responsibilities:

- Load requirements in WIMS-ES A-106 and keep up to date
- Submit a Base EPC approved prioritized requirements to MAJCOM/CEV
- Submit complete documentation to command for each new requirement
 - EPNs and/or 1391s
 - Engineering cost estimates
 - Legal driver (Permit, order, state agreement)
 - Site location maps
 - P2 cost/benefit analysis
- To reduce cost and maintain technical proficiency, consider using in-house personnel instead of contractors for preparation and update of plans, permits, assessments, and surveys
- Review program with command

MAJCOM responsibilities:

- Media Program Managers validate program requirements, and provide comments to installation
- Media Program Managers update and validate the requirement in the A-106
- Integration and Analysis Branch integrates and prioritizes installation requirements into MAJCOM environmental program
- Media Program Managers combine like requirements into MAJCOM-wide requirement and update the A-106

Base Program Submittal Requirement

Once the command has validated a Class 0 requirement one time, bases **do not** have to resubmit EPNs, unless changes have occurred, warranting resubmission. Bases, however, do have to submit a list of previously validated requirements to address those EPNs not submitted as follows:

Programmed FY

| <u>Proj #</u> | <u>Title</u> | <u>Cost</u> | <u>FY Validated</u> | <u>Validated Cost</u> |
|---------------|--------------|-------------|---------------------|-----------------------|
|---------------|--------------|-------------|---------------------|-----------------------|

Figure 1.3.1 Environmental Program Narrative Form

| Base Name | Environmental Program Narrative | Date: _____ |
|--|---------------------------------|-------------|
| FY (Execution FY) Project Number: <i>from A-106</i> Project Title: <i>from A-106</i> | | |
| Category: <i>picklist linked to staff</i> Compliance Date: <i>date base will go out of compliance</i> | | |
| Estimated Cost: <i>Current working estimate</i> Class: <i>0 (recurring), 1 (single time)</i> | | |
| Estimated RTA Date: <i>for Class 1 Req's</i> Service Center: <i>for Class 1 Req's</i> | | |
| <p>Requirement: <i>Provide in detail what is required to be done. This will be compared to the requirements mandated by the legal driver to determine.</i></p> <p>Legal Citation: <i>The legal citation adds credibility to a requirement for non-environmental types who want to cut our program; therefore, it is important that this is (1) included and (2) accurate. It also helps the reviewer research you requirement. (Example: 40 CFR ...)</i></p> <p>History: <i>Provide a history of the requirement so that Air Staff and the MAJCOM technical reviewer can grasp the big picture.</i></p> <p>Impacts if Not Funded: <i>Provide specific mission impacts if the requirement is not funded.</i></p> <p>Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.</p> <p><i>All of the Environmental Program Narratives must be signed by the Environmental Flight Chief and the total FY program must be approved by the Base EPC.</i></p> <p>_____</p> <p>Chief, Environmental Flight</p> <p>Approved / Disapproved</p> <p>_____</p> <p>Commander, Civil Engineer Squadron</p> | | |

Figure 1.3.2 Example DD Form 1391

| | | | | | |
|---|--|--|---|------------------------|-------------------------------|
| 1. COMPONENT AIR FORCE | | FY 1996 MILITARY CONSTRUCTION PROJECT DATA | | 2. DATE 30 Jan 1997 | |
| 3. INSTALLATION AND LOCATION Example AFB, TEXAS | | | 4. PROJECT TITLE Subsurface Investigation, AAFES Service Station | | |
| 5. PROGRAM ELEMENT xxx56 | | 6. CATEGORY CODE N/A | 7. PROJECT NUMBER ABCD967058 | | 8. PROJECT COST (000) 43.0 |
| 9. COST ESTIMATES | | | | | |
| ITEM | | U/M | QUANTITY | UNIT COST | COST (\$000) |
| SUBSURFACE INVESTIGATION | | LS | | | 5.24 |
| Monitoring Wells | | EA | 3 | 7.0 | 21.0 |
| Disposal of Development Water | | GL | 175 | .0025 | 0.4375 |
| Disposal of Drill Cuttings | | Drm | 6 | .055 | 0.330 |
| WRITTEN REPORT | | LS | | | 4.5 |
| Subtotal | | | | | 31.5075 |
| Profit (8.29%) | | | | | 2.612 |
| Contingency (0%) | | | | | |
| Subtotal | | | | | 34.1195 |
| O&M Service Contract | | | | | |
| Profit (26.0%) | | | | | 8.8711 |
| TOTAL | | | | | 42.9906 |
| <p>10. DESCRIPTION OF PROPOSED CONSTRUCTION: This requirement includes all labor, material, equipment, transportation and support for the installation of 3 monitoring wells and investigation report at the AAFES Service Station. The system will be installed in accordance with Air Force and State underground storage tank investigation guidance documents.</p> <p>11. REQUIREMENT:</p> <p><u>PROJECT:</u> The purpose of this project is to further determine the level of subsurface impact to soils and groundwater at the site.</p> <p><u>REQUIREMENT:</u> Texas Administrative Code Chapter 334, Subchapter D, Section 334.81(e), requires remediation of petroleum contaminated sites. Since 1996, the groundwater plume at the AAFES Service Station has been monitored. Monitoring detected levels of TPH, MTBE, and BTEX compounds in groundwater above regulatory clean-up levels. State environmental office has directed further subsurface investigations to further delineate subsurface impact.</p> | | | | | |

DD FORM 1391 ¹ DEC 76

Figure 1.3.2 Example DD Form 1391 (con't)

| | | |
|--|---|------------------------------------|
| 1. COMPONENT AIR FORCE | FY 1996 MILITARY CONSTRUCTION PROJECT DATA | 2. DATE 30 Jan 97 |
| 3. INSTALLATION AND LOCATION Example AFB, Texas | | |
| 4. PROJECT TITLE Subsurface Investigation, AAFES Service Station | | 5. PROJECT NUMBER ABCD967058 |
| <p>CURRENT SITUATION: AAFES Service Station has been in operation since 1957. In 1957 three 10,000-gallon gasoline tanks and one 550-gallon used oil tank were installed. During the summer of 1995 suspected leaks in the underground storage tank system were discovered through review of product inventory records. Inventory records indicated a release of 200 to 2,000 gallons of fuel. All tanks were tested in 1995 and found to be tight. Further investigation showed the lines to be corroded and the source of the fuel release. Dispenser, vent, vapor return lines and wiring were replaced in early 1995. A site assessment began in Jan 96 with the analysis of soil and groundwater. Three monitoring wells were installed in Feb 96. Monitoring over time shows a groundwater plume exists, but the plume size is unknown. In Aug 96, the State UST Compliance Office issued an eight-point letter requiring additional subsurface investigations to delineate the plume, including the installation of three monitoring wells.</p> <p>IMPACT IF NOT PROVIDED: Failure to approve this project will result in noncompliance with state UST regulations and State UST Compliance office direction. Notice of Violation may be issued for non-compliance. Delay of initiation of remedial design or site closure.</p> <p>ADDITIONAL: Classification : 1. Contracting Agent: Tulsa Corps of Engineers</p> | | |
| I have reviewed this requirement and certify it meets the eligibility criteria for use of ECP funds. | | |
| CONCUR/NON-CONCUR: _____ BASE ENVIRONMENTAL FLIGHT CHIEF DATE | | |
| CONCUR/NON-CONCUR: _____ BASE CIVIL ENGINEER DATE | | |
| CONCUR/NON-CONCUR: _____ MAJCOM/CEV DATE | | |
| _____ | | |

Section 1.4 A-106² Requirement Classifications

The Work Information Management System, Environmental Sub-System (WIMS-ES) A-106 Report, is actually a computer database. Recurring or one-time requirements are classified in the A-106 based on its priority with respect to environmental compliance. The classes are Class 0 (Operations and Services) for annually or more frequent recurring requirements, and Class 1, Class 2 and Class 3 for one-time requirements.

1.4.1 Recurring Requirements - Class 0, Operations and Services (O&S)

Activities necessary to cover the recurring administrative, personnel, and other costs associated with managing environmental programs that are necessary to meet applicable compliance requirements or which are in direct support of the military mission (e.g., manpower, training and education, sampling and analysis, permits, fees, hazardous waste disposal). When in WIMS-ES A-106 "New" requirement generation screen, type an "O" for O&S in the "E'PA, 'Internal Project, or 'O' O&S" field.

- According to AFI 32-7001, O&S requirements are recurring, annual "must do" services and projects associated with "keeping the gates open."

Please note: Due to funding shortages, AETC no longer funds or sub-divides operations and services requirements into "must pay" and "should pay" as outlined below. Please refrain from using or programming by this term

²A new automation system called Automated Civil Engineer System-Project Management (ACES-PM) will be replacing the WIMS-ES A-106 in CY99. Environmental requirements will be entered and managed with this application. Hard copy Environmental Program Narratives (EPNs) will no longer be required by AETC when this system is implemented Air Force-wide.

1.4.2 One-time Requirements - Classes 1, 2, and 3 (formally known as levels)

1.4.2.1 Class 1 Requirements: One-time projects, activities, surveys etc.

- **Environmental compliance:** required to correct **existing** violations of applicable federal, state, county, or local regulations and standards (especially those identified in Notices of Violation or Compliance Agreements).
- **Pollution prevention:** required to comply with pollution prevention Executive Orders or Air Force policy. **Pollution prevention solutions to resolve/ eliminate Class 1 environmental compliance requirements**
- **Environmental conservation:** required to comply with conservation-related federal, state, county or local regulations and standards.

At this time, **neither AETC nor Air Staff supports funding Class 2 or 3 requirements with environmental resources.** Therefore, AETC bases should not program these requirements. Bases should, however, program Class 1 requirements in the FY proceeding the year they go out of compliance.

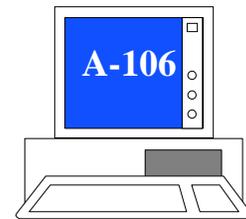
1.4.2.2 Class 2 Requirements: One-time projects, activities, studies, surveys etc., to correct environmental situations addressed in the base's current planning cycle to meet a known regulatory deadline in the immediate (1-5 years) future. The base is currently not out of compliance, as the regulatory deadline has not passed during the current fiscal year.

1.4.2.3 Class 3 Requirements: One-time projects, activities, studies, surveys, etc., to correct problems which are not directly related to compliance with currently applicable standards mentioned above. This category addresses those areas where compliance is not an issue, but demonstrates environmental leadership. Examples are wetlands or storm drainage improvements not specifically dictated by law. Infrastructure projects for routine maintenance and repair.

AETC will not provide funds unless requirements are eligible for environmental funding, entered into the WIMS-ES A-106 module and validated. The narrative within A-106 must adequately justify the requirement



Remember, if your requirement is not in the A-106, command cannot support it to Air Staff!



1.4.3 WIMS-ES A-106 -- Minimum Requirement Information

For each requirement, complete the list of the **minimum required information**. This is the minimum information required in order for MAJCOM to validate and advocate for the base's environmental programs. Please note, it is more information than the WIMS A-106 program will require you to input before the computer will accept the record.

1. Base (automatic)
2. MAJCOM (automatic)
3. Project Number
4. Project Title
5. Programmed Fiscal Year (FY)
6. Base Priority (EPC approved)
7. Fund Type (O&M, MILCON, etc)
8. EEIC (Five Characters)
9. Program Element Code
10. Progress Code
11. Programmed Amount and Current Working Estimate (CWE)
12. Statutory Authority
13. Pollution Category
14. Compliance Status and Level (Class 0 (O&S), Class 1, 2 or 3)
15. Compliance Required Date

16. Narrative to include Purpose of the Requirement and Impact if Not Provided (Just being out of compliance in some cases is insufficient, especially if the risks are low. Consider relating impacts to mission accomplishment)

Bases should place emphasis on last three line items in the above list, these are the most difficult to convey. In fact, bases should complete each WIMS-ES A-106 requirement entry to the fullest extent possible to ensure the requirement receives the proper attention and priority at the base, MAJCOM and Air Staff

1.4.3.1 Required updates

Once a requirement is in the A-106, continue to update the record. AETC requires constant updating of the following data fields:

1. Ready to Advertise (RTA) date (use Construction Start Project Milestone)
2. CWE
3. Base Priority
4. Progress Codes
5. Impacts in Narrative

Section 1.5 Requirements Prioritization Model and Pollution Prevention Investment Strategy

Editor's Note: This model is a tool to help base and command personnel prioritize unfunded requirements emphasizing compliance through pollution prevention. It is not mandatory at the time of publishing of this Handbook.

Program Strategy

- To integrate and prioritize environmental compliance, conservation, and pollution prevention requirements to allocate program resources effectively. The model is designed to best reflect the overall MAJCOM needs
- The model is also used to prepare the integrated MAJCOM priority list of requirements for the “end-of-year” buyout program
- The model is most valuable when attempting to prioritize unfunded Class 1 requirements

Air Force Guidance

- AFI 32-7001, Programming and Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs--Draft 3, 25 Aug 95
- HQ USAF/ILEVQ memo, Pollution Prevention Funding Guidance, 12 Sep 97 (included at Appendix 4)

1.5.3 How to Use the Model

The scoring process is divided into three equally weighted rating areas: **Operational Risk Management (ORM)**, **Installation EPC Priority**, and the **Business Analysis**. The maximum overall score of a project is 30 points.

1.5.3.1 ORM Rating Matrix (Max 10 points)

- Select a rating based on the Categories and Significance definitions and matrix

| | A | B | C | D |
|---|----|---|---|---|
| 1 | 10 | 9 | 8 | 7 |
| 2 | 9 | 8 | 7 | 6 |
| 3 | 8 | 7 | 6 | 5 |
| 4 | 7 | 6 | 5 | 4 |

- Tests for rating process:
- 1) If requirement is funded, who directly benefits?
 - 2) If requirement is not funded, who is directly impacted?

ORM Rating Matrix Categories and Significance

| Categories | Significance |
|---|--|
| <p>A Legal Compliance/Life Safety Requirements mandated by law or treaty to protect the environment; or to protect human life, safety, and health.</p> | <p>1 Critical Directly prevents significant loss of operations mission capability; health risk, injuries or disabilities to personnel; or significant damage to property or the natural environment.</p> |
| <p>B Direct Wing Mission Support Requirements directly supporting the Wing mission.</p> | <p>2 Essential Directly prevents loss of some operations or mission support effectiveness, or degradation to property or the natural environment. Project with companion funding.</p> |
| <p>C Base Support Requirements to meet Base Operating Support needs.</p> | <p>3 Accomplishment Directly prevents future limits on operations mission effectiveness, minor degradation to property or the natural environment. Fire Safety Deficiencies (FSD) III or Risk Assessment Codes (RAC) III.</p> |
| <p>D Corporate Support Requirements that support the USAF and DOD goals.</p> | <p>4 Enhancement The project will enhance mission effectiveness, or will prevent increased costs in the out years if smart investments are made now. FSD IV and V and RAC IV and V.</p> |

1.5.3.2 Installation EPC Priority (Max 10 points)

The installation EPC's priority ranking. Ten points given to projects in top 20 percent of program by cost (\$), eight points for next 20 percent, and so on down to two points for projects in the bottom 20 percent.

1.5.3.3 Business Analysis (Max 10 points)

- Select a rating based on the Categories and Significance definitions and matrix
- Gives precedence to environmental projects with tangible payback or potential for reducing overhead cost via cost avoidance.

| | A | B | C | D |
|---|----|---|---|---|
| 1 | 10 | 9 | 8 | 7 |
| 2 | 9 | 8 | 7 | 6 |
| 3 | 8 | 7 | 6 | 5 |
| 4 | 0 | 0 | 0 | 0 |

Business Analysis Categories

| Categories | Significance |
|---|--|
| <p>A Cross-functional benefits Tangible benefits of project reduce 2 or more categories of expense – environmental, BOS, or Mission.</p> <p>B Environmental Tangible benefits of project reduce mandatory environmental compliance, conservation, or pollution prevention expense.</p> <p>C Base Operating Support (BOS) Tangible benefits of project reduce mandatory base support expenses.</p> <p>D Direct Wing Mission Support Tangible benefits of project reduce mandatory training mission expenses.</p> | <p>1 Immediate Payback The project will pay back the investment in the first year via recurring cost avoidance and/or revenue generation.</p> <p>2 Short Payback The project will pay back the investment within the first 3 years via recurring cost avoidance.</p> <p>3 Payback The project will facilitate program management decision making or will pay back the investment within the first 10 years via recurring cost avoidance.</p> <p>4 No Payback The project will not pay back the investment within the first 10 years.</p> |

1.5.3.4 Total Score

$$\begin{array}{l} \text{ORM Rating Matrix (Max 10 points)} \\ + \text{Installation EPC Priority (Max 10 points)} \\ + \text{Business Analysis (Max 10 points)} \\ \hline \text{Total (Max 30 points)} \end{array}$$

1.5.3.5 Tiebreakers

Projects with the same total score will be prioritized based on the following order:

- 1st tiebreaker - Highest ORM Matrix Score
- 2nd tiebreaker - Highest Business Analysis Score
- 3rd tiebreaker - Earliest Ready to Obligate Date
- 4th tiebreaker - Most years Awaiting Funding

1.5.4 Investment Strategy

It is Air Force policy to use pollution prevention as the “first choice” to meet new legal requirements, ensure adherence with existing compliance requirements, and return to adherence when violations are identified. It is clear that pollution prevention will reduce liability and cost to the Air Force in the future and will be funded at the expense of the environmental quality budget. Our goal is to identify pollution prevention solutions to environmental compliance problems in order to avoid unnecessary cost. To help implement this strategy, critically review and validate 100% of your recurring and nonrecurring Environmental Compliance (EC) budget requirements and apply the environmental management hierarchy:

- 1) Reduce
- 2) Reuse
- 3) Recycle
- 4) Treat
- 5) Dispose

To help identify valid pollution prevention requirements for programming, HQ USAF/ILEVQ provided the Funding Guidance table at Appendix 4 to help identify valid pollution prevention requirements for programming.

CHAPTER 2

SPECIFIC PROGRAM GUIDANCE

Section 2.1 Architect-Engineer (A-E) Design

Program Strategy

- To have all Class 1 requirements executable on 1 Oct of the fiscal year. Therefore, under normal conditions, any design for these requirements should be programmed to be complete by 30 Sep of the previous fiscal year

Policy and Regulatory Guidance

- AFI 32-7001, 9 May 94, Environmental Budgeting, page 15, paragraph A4.1.14.; page 17, paragraph A5.1
- HQ USAF/CEV Programming And Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs, Draft 3, page 1

Validation

What's valid for environmental funding

- Design costs for environmental requirements programmed within the next fiscal year
- Air Staff allows **total** environmental funding of infrastructure **repair** projects, including design, that are 51% compliance driven. Obviously, if you can dual-source the construction aspects of the project with regular O&M funds, do so. Your Wing Commander has approval authority for repair projects up to \$3M. Repair projects between \$3M-\$5M require HQ AETC approval and SAF/MII notification. Repair projects over \$5M require SAF/MII approval. Consider reviewing Air Staff 5 Sep 97 guidance, FY00-05 Program Objective

Memorandum (POM) Programming Guidance for Drinking Water Infrastructure Requirements.

What's not valid for environmental funding

- Design costs for requirements other than environmental

2.1.4 Calculation

- A-E design costs are estimated at 6% of the current working estimate (CWE) of the requirement and at 3%-4% of the CWE for site assessments, planning, etc. For example when programming the construction of a hazardous waste accumulation building at an estimated cost of \$50.0K, one could reasonably expect to pay \$3.0K for A-E design, \$2.0K for the site assessment
- Program and link A-E design cost to a **specific requirement** (to include project number) with a compliance (and therefore a design and construction) deadline

2.1.5 Standard A-106/EPN Entries

- Statutory Authority – Same as driving requirement
- Pollution Category – Same as driving requirement
- EEIC - 532.XX
- Class 1

Sheppard Environmental Program Narrative Date: 21 Dec 98

FY00 Project Number: **ABCE00123** Project Title: **Design Corrective Measure**
Category: **Non-ERA Cleanup** Compliance Date: **10 Apr 01**
Estimated Cost: **\$500,000** Class: **1**
Estimated RTA Date: **10 Sep 00** Service Center: **AETC Contract**

Requirement: **To develop the corrective measure implementation plan for site O-22**

Legal Citation: **RCRA 3008(H) Order**

History: **The base received the 3008(H) Order from EPA in Nov 96. The corrective action is the next step.**

Impacts if Not Funded: **Base will be in violation of the EPA Order**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.2 Air Quality

Program Strategy

- The Clean Air Act Amendments of 1990 (CAAA) generated a number of requirements that will reach well into the 21st century. Today however, it is a challenging task to program for many of these requirements because EPA has not yet finalized the regulations
- It is likely that EPA's recently revised National Ambient Air Quality Standards (NAAQS) for ozone and particulate matter and the scheduled promulgation of a number of new NESHAPs in November 2000 will impact some AETC bases
- AETC strategy for FY00-FY02 will be to utilize Air Opportunity Assessments to identify areas to reduce or eliminate criteria and hazardous air pollutants (HAPs) and develop follow-on pollution prevention implementing measures or facility emission control compliance upgrades. This will help us to avoid triggering future compliance requirements

Policy and Regulatory Guidance

- AFI 32-7001, 9 May 94, Environmental Budgeting
- AFI 32-7040, 9 May 94, Air Quality Compliance
- AFI 32-7080, 12 May 94, Pollution Prevention Program
- AFI 48-119, 25 Jul 94, Medical Service Environmental Quality Programs
- HQ USAF/CEV Interim Compliance Through Pollution Prevention Implementation Guidance, 5 Jan 99
- HQ USAF/ILEV Memo, Clean Air Act, (CAA) Requirements for FY00-05

Validation

What's valid for environmental funding

- Air permit development (Environmental Compliance; Class 1; EEIC 534.30) and associated fees (Environmental Compliance; O&S; EEIC 683.30)
- Air permit upgrades. Title V permits must be updated every 5 years. (Environmental Compliance; O&S, EEIC 534.32)

- Air emission fees levied by regulatory agencies (Environmental Compliance; O&S; EEIC 683.30)
- Projects to eliminate the need for air permits or reduce air permit or emission fees (Pollution Prevention; Class 1; EEIC 534.30)
- Air pollution monitoring and/or control design and equipment required to achieve environmental compliance with regulations or permits (Pollution Prevention; Class 1; EEICs 534.32, 521.30, 522.30, 523.30, 529.30)
- Air emission inventories. Complete annually and include both actual and potential emissions. Bases in a existing or projected nonattainment area or maintenance area should also include emissions from mobile sources. (Accomplish in-house by Bioenvironmental Engineer whenever possible; otherwise accomplish by contract. (Estimate \$\$30-\$60K, Pollution Prevention; O&S Must Pay; EEIC 534.32))
- Developing air pollution episode plans (initial plan development only) (Environmental Compliance; Class 1; EEIC 534.30)
- Clean Air Act required Ozone Depleting Substance (ODS) technician training for personnel working with ODS (freons, etc.) recovery equipment (Environmental Compliance; O&S; EEIC 409)
- Activities to recycle ODSs (Pollution Prevention; O&S ; EEIC 534.31) and projects to reduce or eliminate the need and use of ODSs to meet established Air Force goals (Pollution Prevention; Class 1 or 2; EEIC 534.31)
- Professional development air compliance training for CEV air program personnel (up to a total of \$1,000/employee for all professional development training) (Environmental Compliance; O&S; EEIC 409)
- Sampling, analysis and monitoring (if required by a regulation or permit). This includes collection supplies and equipment, shipping, analysis and data interpretation (Environmental Compliance; O&S; EEIC 534.30)
- Projects to eliminate or reduce sampling, Analysis and Monitoring (if required by a regulation or permit). (Pollution Prevention; Class 1, or 2; EEIC 534.32)
- Conformity studies. Bases located in nonattainment should program for conformity analysis for projected mission changes. (Pollution Prevention; O&S; EEIC 534.32)
- Equipment and process changes to reduce or eliminate the requirement to report under Section 313 of the Emergency Planning Community Right-to-Know Act (EPCRA) (treatment or “control” type projects are not valid) (Pollution Prevention; Class 1, 2, or 3; EEICs 534.32, 521.32, 522.32, 523.32, 529.32)
- Equipment and process changes to reduce or eliminate air compliance requirements and emissions (Pollution Prevention; Class 1, 2, or 3; EEICs 534.32, 521.32, 522.32, 523.32, 529.32)
- Initial development of Opportunity assessments targeted at reducing or eliminating air emissions to alleviate the need for air permits, reduce fees, or reduce or alleviate other compliance requirements (such as NESHAPs) (Pollution Prevention; Class 1; EEIC 534.32). Updates may be programmed every three years by contract as a recurring cost (Pollution Prevention; O&S; EEIC 534.32)

- Training for Air Opportunity assessments, if to be done in-house (Pollution Prevention; Class 1; EEIC 409).
- Costs associated with state site assistance visits to identify air emission reduction opportunities (Pollution Prevention, O&S; EEICs 409, 609, 619)
- State Implementation Plan -- Cost of Compliance Studies (O3/PM2.5 Std.). Cost of compliance studies is recommended for bases in non-attainment regions. It is anticipated that the state implementing requirements will be known prior to the 2003/2005 deadline and allow the projected standards to be integrated with the P2 assessment efforts. The P2 assessment efforts should include costs of compliance analyses to establish compliance baseline costs. (Estimate \$30-50K, Pollution Prevention; Class 1; EEIC 534.32)
- State Implementation Plan -- Cost of Compliance Facility Upgrades (O3/PM2.5 Std.). Program anticipated facility control requirements as follows:
 - For installations currently in ozone attainment areas but forecasted to be in revised ozone nonattainment areas, estimate up to \$3M in FY03 (Environmental Compliance, Class 1, EEICs 521.3, 522.3, 523.3, 529.3, 534.5)
 - For installations currently in PM attainment areas but forecasted to be in PM nonattainment areas, estimate up to \$3M in FY05 (Environmental Compliance, Class 1, EEICs 521.3, 522.3, 523.3, 529.3, 534.5)
 - For installations currently in ozone nonattainment areas and forecasted to be in revised ozone nonattainment areas program up to \$1 million in FY03 (Environmental Compliance, Class 1, EEICs 521.3, 522.3, 523.3, 529.3, 534.5)
 - For installations currently in PM nonattainment areas and forecasted to be in revised PM nonattainment areas program up to \$1M in FY05 (Environmental Compliance, Class 1, EEICs 521.3, 522.3, 523.3, 529.3, 534.5)
- Risk Management Plans (RMPs). Sources subject to Section 112® requirements under the CAA are required to update their Risk Management Plans every 5 years. Thus any installation that is a covered source under 112® (stores above threshold quantities of a regulated substance in a process) will need to update their RMP in FY05. (Pollution Prevention; O&S; EEIC 534.32)
- NESHAP Applicability. All AETC bases are HAP minor sources and consequently not required to comply with the Current NESHAPs (such as Aerospace Rework (Coatings, Chromium Plating/Anodizing, Dry Cleaning (PCE), Halogenated Solvent Cleaners, Wood Furniture Mfg. And Offsite Waste and Recovery Operations). EPA is currently promulgating some new NESHAPs that will apply at HAP Major Source facilities regulating Engine Testing Facilities, Hazardous Waste Combustors, Industrial Combustion (ICCR) boilers, engines, turbines, Misc. Metal Parts, Paint Stripper Users, R&D Facilities, etc. Since AETC bases are not HAP Major Sources, we currently (as of Jan 99) have no reason to POM for future NESHAPs. In the event EPA writes the new HAP standards for Area Sources they may apply. POM guidance will be provided as these new rules unfold. Compliance deadlines are generally three years after promulgation. Installations who have taken HAP limits to achieve minor source status should program pollution prevention opportunity assessments surveys targeting HAP air

emissions. Follow-on P2 measures or facility emission control compliance upgrades should be programmed accordingly

- Costs associated with acquisition or installation of CNG refueling facilities. Costs associated with the conversion of government vehicles to alternative fuels. For installations in nonattainment regions for ozone, requirements necessary to achieve environmentally mandated emission reductions are considered Class 1 for pollution prevention; all others Class 2 maximum

What's not valid for environmental funding

- Costs associated with a non environmental compliance driven upgrade or alteration of an industrial process
- Annual EPCRA reporting (after the initial contracted report). Annual reports will be developed by installation personnel
- Standard office automation computers and software will not be budgeted through environmental funds at base level. Bases should send requests to the command Media Managers for command-wide purchases
- Sampling, analysis, and other costs associated with Occupational Safety and Health Administration (OSHA) requirements (i.e., is not an environmental requirement)

Calculation

- Fees for permitting and emission/inspection fees vary from state to state. In some states, fees for air permits are fixed for federal government applications (example \$450 in Texas). Emission fees are typically in the range of \$25-\$30/ton of emissions (for stationary sources). Use actual emission rates established by annual emission inventories and historical invoice records for paying emission fees. Use historical costs for any required sampling or obtain vendor quotes. Obtain vendor quotes for any equipment and training; contact HQ AETC/CEVQ for costs of similar projects, Example: Emission fees: \$26/ton x 400 tons* = \$10,400
Notional sum of actual base-wide emissions of criteria Pollutants from Stationary Sources. Criteria pollutants include Volatile Organic Compounds (VOCs), Nitrogen Oxides (NOx), Sulfur Oxides (SOx), Carbon Monoxide (CO), Lead, and Particulate Matter.

2.2.1 Standard A-106/EPN Entries

See Section 2.2.3 Validation, "What's valid for environmental funding" for details

| | | |
|-----------------|--|-------|
| Randolph | Environmental Program Narrative | Date: |
|-----------------|--|-------|

| | |
|---------------------------------------|---|
| FY00 Project Number: ABCE00123 | Project Title: Update Risk Management Plan |
| Category: Air | Compliance Date: 21 Jun 05 |
| Estimated Cost: \$50,000 | Class: 0 |
| Estimated RTA Date: 01 Jan 05 | Service Center: AFCEE Contract |

Requirement: **Sources subject to Section 112(r) requirements under the CAA are required to update their Risk Management Plans every five years. Thus, any installation that is a covered source under 112(r) (i.e., has more than a threshold quantity of a regulated substance in a process) will need to revise their existing Risk Management Plan. The compliance date for the initial filing of a Risk Management Plan is 21 Jun 99.**

Legal Citation: **CAA, Title III (40 CFR 68)**

History: **This project involves the revision of the installation's Risk Management Plan. The revision to the existing plan is required within 5 years of the plan's initial submission or its most recent update as required by a newly-regulated substance or process or a change to a covered process.**

Impacts if Not Funded: **If the required update is not submitted to EPA, the installation will be in direct violation of CAA standards and subject to EPA issuance of an administrative penalty order up to \$200K.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

| | | |
|-----------------|--|-------|
| Randolph | Environmental Program Narrative | Date: |
|-----------------|--|-------|

FY **00** Project Number: **ABCE00123** Project Title: **Update Title V Operating Permit**
 Category: **Air** Compliance Date: **21 Jun 05**
 Estimated Cost: **\$50,000** Class: **0**
 Estimated RTA Date: **01 Jan 05** Service Center: **AFCEE Contract**

Requirement: **CAA; Part 70, Title V Operating Permits Program Revisions**

Legal Citation: **Title V requires that EPA develop regulations that set minimum standards for state operating permits programs. Those regulations, codified in 40 CFR 70 Chapter I, were originally promulgated on July 21, 1992 (57 FR 32250). EPA is proposing revisions to Part 70 to include new provisions that include changes in certification by a responsible official, the affirmative defense for violations of permit terms during an emergency, changes in the definition of Title I modifications, and changes in public review requirements of Title I minor NSR permits (59 FR 44460 and 60 FR 45530).**

History: **This project requires the revision of the installation's Title V Operating Permit Application to incorporate changes to the state's Title V Operating Permit Program. If a state operating permit program has adopted changes, these changes will need to be addressed as part the renewal application of a major source's Title V Operating Permit, as they affect the sources within the installation.**

Impacts if Not Funded: **If a renewal application for Title V operating permit is not submitted as required, EPA can issue an administrative penalty order up to \$200K.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

 Chief, Environmental Flight

Approved / Disapproved

 Commander, Civil Engineer Squadron

| Randolph | Environmental Program Narrative | Date: |
|--------------------------------------|--|--|
| FY00 | Project Number: ABCE00123 | Project Title: Submit Operating Permit Application to State |
| Category: Air | Compliance Date: 01 Jan 03 | |
| Estimated Cost: \$50,000 | Class: 0 | |
| Estimated RTA Date: 01 Jan 05 | Service Center: AFCEE Contract | |

Requirement: **CAA, Titles I and II (40 CFR 51; 40 CFR 81)**

Legal Citation: **The CAA requires states to submit a revised SIP within three years of the NAAQS revisions (i.e., ozone and PM) to implement measures to meet the new standards. Note: This requirement is essentially the same as the Milestone A212 requirement. EPA will also revise the NSR and conformity rules to address preconstruction issues. Expected fiscal year required 03/05.**

History: **Installation in nonattainment areas for the revised ozone and PM standards must submit an operating permit application to your state demonstrating that the new requirements are being met. (This project is required for sources in states that have amended their SIPs to adopt any new requirements that EPA promulgates. It may be necessary to implement ozone and PM reduction measures through work practices or add-on controls to meet the SIP requirements. You may need to check with your state air quality program to determine whether your state has amended its SIP to respond to any new requirements that EPA may need to promulgate. You may also need to determine whether any SIP revisions are applicable to your sources.)**

Impacts if Not Funded: **Without an approved operating permit, an installation may not be able to continue operations that are considered to be ozone and PM air emission sources. In addition, if CAA standards are not met, EPA can issue an administrative penalty order up to \$200K.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Randolph Environmental Program Narrative Date:

FY **00** Project Number: **ABCE00123** Project Title: **Develop and Submit an NSR Permit Application**
 Category: **Air** Compliance Date: **01 Jan 00**
 Estimated Cost: **\$60,000** Class: **0**
 Estimated RTA Date: **01 Jan 00** Service Center: **AFCEE Contract**

Requirement: **The CAA requires sources that are undergoing a major modification must meet NSR requirements, including the submittal of an NSR permit application. This Title I rulemaking addresses NSR reforms, including new applicability criteria for modifications, greater flexibility in applying controls, greater use of plant-wide emission caps, and requirements for ODSs.**

Legal Citation: **CAA, Title I, NSR Reform Proposal - 61 FR 38250 (40 CFR 51.160–166; 40 CFR 52.21 and 24)**

History: **Develop and submit an NSR Permit Application. This project involves developing and submitting an NSR permit application for a major modification. A major modification means any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation. It may be necessary to calculate your projections of emission changes using the new requirements to determine whether your modification is considered major under NSR, prior to developing a full inventory of sources for the purposes of the NSR permit application. The NSR permit application requires a BACT or LAER determination and an air impact analysis in addition to the development of source and stack application forms. Once submitted, the NSR permit application requires state, EPA, and public review.**

Impacts if Not Funded: **If a NSR permit application is not developed and submitted, construction or modification of a source cannot take place. If CAA standards are in violation, EPA can issue an administrative penalty order up to \$200K.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

 Chief, Environmental Flight

Approved/Disapproved

 Commander, Civil Engineer Squadron

| Randolph | Environmental Program Narrative | Date: |
|--|---|--------------|
| FY00 Project Number: ABCE00123 | Project Title: Meet Transportation Conformity Procedures | |
| Category: Air | Compliance Date: 01 Jan 00 | |
| Estimated Cost: \$60,000 | Class: | |
| Estimated RTA Date: 01 Jan 00 | Service Center: AFCEE Contract | |

Requirement: **Under 40 CFR 93, transportation conformity pertains to federally funded or approved transportation plans, programs, and projects to conform to the purpose of the SIP. This rule will allow local areas to establish transportation procedures specific to their areas as part of the transportation conformity rule pilot program.**

Legal Citation: **CAA, Titles I and IV (40 CFR 51; 40 CFR 93)**

History: **This project involves meeting new conformity procedures for areas that are participating in the transportation conformity rule pilot program. The CAA's federal "conformity" provisions provide that no federal department may engage in, support in any way or provide financial assistance for, or license or approve any activity that does not conform to a SIP. You may need to contact your state and local transportation and air quality agencies to determine their status with respect to the pilot program.**

Impacts if Not Funded: **Because this is intended to be a less burdensome process, the consequences of not fully funding this activity may be meeting more stringent requirements than are necessary.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.3 Asbestos

Program Strategy

Proactively manage the responsibilities, policies and procedures to minimize exposure to airborne asbestos fibers

- Monitor the status condition, abatement and removal or repair of Asbestos-Containing Materials (ACMs) (greater than 1% by weight asbestos)

Policy and Regulatory Guidance

- DoD Memo, 31 Oct 94, Asbestos, Lead Paint and Radon Policies at BRAC Properties
- AFI 32-7001, 9 May 94, Environmental Budgeting
- AFI 32-1052, 22 Mar 94, Facility Asbestos Management
- AFI 48-119, 25 Jul 94, Medical Service Environmental Quality Programs
- HQ USAF/CEV Programming And Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs, Draft 3
- Instructions for the Environmental FY 99-03 APOM Submittal
- AETC Environmental Program Guidance Document, 94-001, Asbestos Program Guidance Document
- In conjunction with the Base Civil Engineer, the base Bioenvironmental Engineer provides advice to the installation commander for determining whether repair, maintenance, or “must remove” mandates are appropriate for ACM. Removal and disposal should not be programmed in environmental compliance unless it is a BECHH

Validation

What’s valid for environmental funding

- Initial base-wide asbestos surveys
- Initial base Asbestos Register (continual in-house update required to keep current) and system upgrades every three years
- Professional development training (up to a total of \$1,000/employee per year for all professional development training, including TDY costs)

- Mandatory training for one primary and one alternate in each of the state required disciplines (inspector, mgmnt planner, supervisor, air monitor, etc.)
- Sampling, Analysis and Monitoring associated with a Bioenvironmental Engineer Certified Health Hazard (BECHH)
- Design and implementation of cleanup or abatement project with a BECHH and a “must remove” determination
- Transportation and disposal costs associated with a BECHH

What’s not valid for environmental funding

- Asbestos work associated with military family housing (MFH). Use MFH funds to accomplish this work
- Asbestos work associated with a construction, demolition, repair, or renovation project, including contract air monitoring for abatement projects
- Asbestos work where OSHA is the regulatory driver except for BECHH.
- Training and equipment for base asbestos abatement team members except minimum, (one worker and one supervisor) required to respond to a BECHH
- Asbestos abatement notification fees, transportation and disposal except for BECHH
- Computers and Software. Send requests to command media manager

2.3.4 Calculation

- Since sampling, analysis, removal and disposal work must be an “emergency” situation, annual cost is difficult to estimate. Review the Asbestos Management Plan and use this information in conjunction with historic costs to project the annual requirement. Contact local and federally sponsored training facilities to obtain regulatory driven training costs. Costs for simple abatement of floor tile run around \$1 per square foot. Small diameter pipe insulation (<12 inch) and easily accessible friable material (no scaffolding) abatement costs run from \$3 to \$7 per linear foot. Abatement projects involving working in or over occupied spaces, live steam, and high-visibility areas can run as high as \$30 per square or linear foot. You can assume a two-man abatement team will not show up for less than \$1,200 per day. An industrial hygienist typically charges from \$325 to \$500 per day to monitor abatement and collect air samples

2.3.5 Standard A-106/EPN Entries

- All requests for emergency sampling or clean-up funding must be accompanied by a signed Certified Health Hazard memo from SG and a “must remove” memo from the base EPC chairperson
- Updating asbestos database EEIC: 534.60, Training EEIC: 409.60

Luke **Environmental Program Narrative** Date: 21 Dec 98

| | |
|--------------------------------------|---|
| FY00 Project Number: OS005300 | Project Title: Toxic Substance Program |
| Category: Air | Compliance Date: 10 Apr 01 |
| Estimated Cost: \$2500 | Class: 0 |
| Estimated RTA Date: 10 Sep 00 | Service Center: Base Contracting |

Requirement: **To fund training requirements for Asbestos Initial and Refresher Courses for key base personnel county and state regulations require all inspections, surveys and abatement be performed by a certified competent person. Regulation specifies use of accredited personnel, air sampling methods, and waste disposal procedures.**

Legal Citation: **TSCA, 40 CFR Part 61, ADEQ 5 Oct 95 memo, MCAPC 301.8**

History: **Performing this work in-house has saved the government \$10,000 in contractor fees annually.**

Impacts if Not Funded: **Certifications will expire and work related to the asbestos program will stop.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.4 Certifications and Licenses

2.4.1 Program Strategy

Fees incident to obtaining licenses or certificates necessary to qualify a federal employee to perform the duties of the position are considered, generally, to be personal expenses not properly chargeable to agency appropriations. Over the past several years, federal law has increasingly subjected the federal government to state environmental regulations.

2.4.2 Policy and Regulatory Guidance

- AFI 32-7001, Environmental Budgeting, page 15, paragraph A4.1.4; page 17, paragraph A5.7
- HQ USAF/CEV Programming and Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs, Draft 3, pages 8, 12, and 17
- "... when Air Force members are required by federal law to comply with state and local regulations, the Air Force, in its discretion, may use appropriations to cover the cost of obtaining licenses or certificates necessary to perform the regulated activities. We note, however, that appropriated funds are not available to meet the licensing requirements of professional personnel such as teachers, accountants, engineers, lawyers, doctors and nurses." Comptroller General Decision B-252467, June 3, 1994. "Payment of licensing fees will most likely be appropriate for active duty personnel who are required to move from state, and in situations where new requirements are levied that were not part of the position was created or filled. JA and FM coordination should be obtained in all cases before expending funds for licensing requirements"

2.4.3 Validation

What's valid for environmental funding

- Training and certification required by law. For example, annual Resource Conservation and Recovery Act (RCRA) training for personnel involved in the day-to-day management of hazardous waste

What's not valid for environmental funding

- Fees associated with professional certifications/licenses/registration unless received as part of a mandatory training course. For example, training for water and wastewater treatment plant operators should be funded with other than environmental dollars, i.e., regular O&M
- Funding training costs for other base functionals (LG, SG, SE, JA, etc.) is not valid, unless that person is being trained to perform specific regulatory requirements. Training costs to do the day-to-day job are the unit's responsibility

2.4.4 Calculation

- See Section 2.26, TDYs, Education and Training

2.4.5 Standard A-106/EPN Entries

- See Section 2.26, TDYs, Education and Training

Section 2.5 Civilian Pay

2.5.1 Program Strategy

- To fund all authorized full-time environmental civilian positions at AETC bases and MAJCOM
- To fund temporary and term positions as valid requirements dictate
- **Base-level managers do not need to program for civilian pay.** All civilian pay programming is performed by HQ AETC/CEVA based on calculations received from HQ AETC/FM. No WIMS-ES A106 input or EPN is required.

2.5.2 Policy and Regulatory Guidance

- AFI 32-7001, 9 May 94, Environmental Budgeting; pages 15, 18 and 21
- HQ USAF/CEV Programming and Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs, Draft 3, pages 2, 9, and 14

2.5.3 Validation

What's valid for environmental funding

- Permanently assigned personnel with an environmental compliance, environmental conservation, or pollution prevention cost center and who spend at least 50% of their time on environmental duties
- Temporary and term positions as valid requirements dictate

What's not valid for environmental funding

- Personnel who spend less than 50% of their time on environmental duties.
- Overhires who exceed MAJCOM work-year end strengths
- Interns who spend less than 50% of their time on environmental functions and/or after internship is complete cannot be absorbed within the base work-year end strength
- Personnel associated with wastewater/drinking water treatment or the sampling and analysis functions

- Personnel paid from Environmental Restoration Account (ERA) funds or reimbursed funds (forestry, agricultural outlease, fish and wildlife)

2.5.4 Calculation

- Work temporary and term position calculations through base manpower office

2.5.5 Standard A-106/EPN Entries

- Appropriate program element code (xxx56f; xxx53f; xxx54f);

Section 2.6 Community Planning and General Plans

Program Strategy

- Provide base leadership with an updatable long-rang comprehensive plan by using documents, maps, and other data for base-wide development decisions. Automated tools such as word processing documents, computer mapping, and digital photographs are used to formulate plans and define base mission potential, constraints to development, and future opportunities.

Policy and Regulatory Guidance

- AFI 32-7062, Base Comprehensive Planning
- HQ USAF/CEV Programming And Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs; Draft 3
- Instructions for the Environmental FY99-03 APOM Submittal
- HQ AETC/CEP Memo, 13 Feb 95, Proposed Schedule for General Plans

2.6.3 Validation

What's valid for environmental funding

- Comprehensive Plan mapping, utility tabs, Commander's Summaries, associated Computer-Aided Design/ Graphical Information System (CAD/GIS) mapping and aerial photography of bases and General Plans

What's not valid for environmental funding

- Area plans, transportation/traffic studies and analysis, CAD/GIS mapping, and base capacity analysis
- Site planning for individual construction programs or major mission beddowns are funded by the project/proponent

2.6.4 Calculation

- Use historic costs to estimate costs for General Plans, utilities and base layout mapping, and CAD/GIS implementation.
- Updates to base General Plans, tabs, and CAD/GIS maps/data bases should be programmed as O&M or accomplished in-house.

2.6.5 Standard A-106/EPN Entries

- All community planning and General Plans are Class 2 requirements.

Maxwell-G/A Environmental Program Narrative Date: 21 Dec 98

FY00 Project Number: **OS006033** Project Title: **Gunter Annex General Plan**
Category: **Natural/Cultural Resource Planning** Compliance Date: **10 Apr 01**
Estimated Cost: **\$100,000** Class: **2**
Estimated RTA Date: **10 Sep 00** Service Center: **Base Contracting**

Requirement: **To prepare the General Plan for Gunter Annex, based on similar costs of preparing the General Plan for Maxwell AFB. The General Plan for Gunter Annex will provide the installation commander and other key decision makers with a document explaining the investment strategy, stewardship for natural and cultural resources, and compliance with federal laws, legislation, and good planning practices. It will serve as the basic decision-making document from the installation to the Air Force Staff level, to include support for Base Realignment and Closure (BRAC) activities.**

Legal Citation: **AFR 86-4**

History: **HQ AETC is funding a General Plan and new base mapping for Maxwell AFB, as well as new mapping for Gunter Annex. No new plan is currently planned for Gunter; however, a comprehensive plan was completed in the early 1990s. It has been consistently stated that Gunter needs to be included in the current General Plan effort because numerous changes have taken place at Gunter that were not include in the previous comprehensive plan. HQ AETC has recently stated that they would support the general planning effort through the A-106 program should funds become available.**

Impacts if Not Funded: **General Plan for Gunter Annex will enable commanders to have confidence that their decisions are in line with an approved plan the installation and not randomly changed with every new crisis.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.7 Contract Services

2.7.1 Program Strategy

- The key to a successful contracting effort is teamwork between the user and the service agent and base Contracting Office
- The Contracting Office should be contacted when the user ANTICIPATES a contract need
- Contracting will serve as advisors on what avenues are available and the requirements that must be met to have a successful contract award

Policy and Regulatory Guidance

- AFI 32-1023, 19 Jul 94, Design and Construction Standards and Execution of Facility Construction Projects
- Air Force Advisory and Assistance Services Interim Policy Memo, 19 Jul 96
 - Federal Acquisition Circular (FAC) 90-33
- AETC Supplement 2, AFI 32-1023

2.7.3 Validation

What's valid for environmental funding

Contract acquisition for environmental services occurs within all environmental pillars and across all environmental programs. In order for contract services to be funded, **two conditions must be met**:

1. The requirement **MUST** be a valid environmental need (see other sections of this guidance for validation procedures)

and

2. A determination must be made if Government manpower and expertise are available to perform the task. If so, the Government must perform the work *in-house* or show contracting the work is more economical. If not, contracting of

the requirement can proceed. Documentation of this decision must be done in accordance with FAC 90-33 as outlined in the AAS Interim Policy letter. Normally, this decision has been made and documented, meeting this condition. If not, both guidance documents are available from the base Contracting Office.

What's not valid for environmental funding

Requirements not meeting the above two conditions

2.7.4 Calculation

- A government cost estimate must be prepared no later than the execution year, using labor and material costs appropriate for the contract
- Include Contract Services costs in the over all Requirement cost estimate
 - Corps of Engineers
 - Supervision and Administration (S&A) 8 1/2%
 - Supervision and Review typically 10%, but could be higher
 - Navy charges
 - Contingency 5%
 - SIOH 6%
 - AFCEE charges none
 - HQ AETC charges none
- For future year programming, an estimated cost developed in-house, provided by a Service Agent (AFCEE, Army Corps of Engineers or Navy Engineers), or based on experience with similar projects may be used

2.7.5 Standard A-106/EPN Entries

- Include Contract Services costs in the overall requirement cost estimate

Goodfellow Environmental Program Narrative Date: 21 Dec 98

FY00 Project Number: JCGU0010001 Project Title: UST Assessment (Plan B)
Category: USTs Compliance Date: 10 Apr 01
Estimated Cost: \$40,000 Class: 1
Estimated RTA Date: 10 Sep 00 Service Center: Base Contracting

Requirement: To perform additional assessment at former UST site in order to determine if remedial action will be required.

Legal Citation: 40 CFR 280, 30 TAC 334

History: Three old USTs were removed and replaced at the AAFES station. The tank pits were over-excavated. The state directed the base to perform additional investigation at the site. Six monitoring wells were installed. Free product was found in one well. The state requires that performing the Plan B Risk Assessment delineate the extent of fuel contamination. Additional soil and groundwater testing is required to accomplish this assessment.

Impacts if Not Funded: Risk assessment can not be performed. Base expects a Notice of Violation (NOV) from the state for not performing required assessment.

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

 Chief, Environmental Flight

Approved / Disapproved

 Commander, Civil Engineer Squadron

Section 2.8 Cultural Resources

2.8.1 Program Strategy

- For all AETC bases to have completed baseline archeological reconnaissance surveys, historic structures surveys, and cultural resource management plans

2.8.2 Policy and Regulatory Guidance

- AFI 32-7065, 13 Jun 94, Cultural Resources Management
- HQ USAF/CEV Programming And Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs, Draft 3, page 18
- Instructions for the Environmental FY99-03 APOM Submittal
- Air Force Environmental Impact Analysis Process (EIAP) Desk Reference
- HQ AETC/CEP Memo, 22 Jul 93, Interim Guidance for Cold War Resources
- HQ AETC/CE Memo, 18 Dec 96, Air Force Nominations to the National Register of Historic Places
- HQ AETC/CE Memo, 29 Apr 97, Air Force Compliance with the National Historic Preservation Act

2.8.3 Validation

What's valid for environmental funding

- Preparation of archaeological reconnaissance, testing, and evaluation studies for bases and ranges
- Analysis of potentially historical facilities, sites, and objects, including analysis of condition of structures
- Curation of archaeological materials, including costs for cataloging, stabilization, and storage

- Preparation of Cultural Resource Management Plans (CRMPs). Development of nomination packages for sites, facilities, or districts for the National Register of Historic Places
- Projects associated with the protection of archaeological sites, Native American graves, or religious sites
- Historic American Building Survey/Historic American Engineering Record (HABS/HAER) documentation

What's not valid for environmental funding

- Archeological monitoring or excavations for construction projects where baseline surveys indicate sites could be avoided
- Ethnographic, historical, or documentary studies

2.8.4 Calculation

- Statements of Work (SOW) for cultural resources work requirements are available from AETC/CEVN
- Use historic costs to estimate archaeological reconnaissance, testing, and curation. Use contractor hourly rates on base-wide contracts for historic structures, HABS/HAER, or CRMPs.

2.8.5 Standard A-106/EPN Entries

- Class 1 (not O&S)
- Annual CRMPs updates should be programmed O&S

| | | |
|---|---|-----------------|
| Maxwell | Environmental Program Narrative | Date: 21 Dec 98 |
| FY00 Project Number: OS006025 | Project Title: National Register Nominations | |
| Category: Nat/Cult Resource PIng | Compliance Date: 10 Apr 01 | |
| Estimated Cost: \$70,000 | Class: 1 | |
| Estimated RTA Date: 10 Sep 00 | Service Center: Corps of Engineers | |

Requirement: **To nominate 112 structures located on Maxwell AFB for listing on the National Register of Historic Places.**

Legal Citation: **EO 11593, 36 CFR 60.6, AFI 32-7065, Cultural Resources Management**

History: **EO 11593 directs federal agencies to locate, inventory, and nominate properties under their jurisdiction within 5 years for historic nomination. Maxwell currently has 152 structures on the National Register of Historic Places, and 405 structures have been considered potentially eligible for listing. An inventory of the potentially eligible structures was completed in November 1996 and reviewed by the State of Alabama Historic Preservation Officer (SHPO); 112 structures are recommended for eligibility by the base. The National Historic Preservation Act (NHPA) requires that these structures be nominated for listing on the National Register of Historic Places. Upon completion of the architectural inventory in FY96 and concurrence by the Alabama SHPO on properties considered eligible for the National Register, a nomination package will be prepared. Nomination will contain historic context for the entire installation and will include previously listed properties and those determined eligible for listing as a result of the inventory. Included in the nomination are: NCO housing, African-American barracks, hangars, and "best examples" of other barracks and support facilities.**

Impacts if Not Funded: **Maxwell AFB would not comply with the NHPA**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.9 Environmental Compliance Assessment and Management Program (ECAMP)

2.9.1 Program Strategy

- External ECAMPs are a HQ AETC-led team assessing base programs. Because HQ AETC performs the work as a service to the Wing Commander, external ECAMPs are funded completely by HQ AETC
- Internal ECAMPs are base personnel assessing base programs. Because they are self-evaluations, internal ECAMPs should be conducted with minimal external support or resources. When requested by a base, HQ AETC may provide a small amount of support for internal ECAMPs.

2.9.2 Policy and Regulatory Guidance

- AFI 32-7045, Environmental Compliance Assessment and Management Program, Sections 1.3.3 and 1.3.4

2.9.3 Validation

What's valid for environmental funding

- Internal ECAMP reproduction and support costs up to \$1K per internal ECAMP or annually, whichever is less.

What's not valid for environmental funding

- External ECAMP TDY costs (paid for by HQ AETC/CEV).
- Internal ECAMP contractor support costs (at the request of the base, HQ AETC/CEV may provide a small amount of internal ECAMP support under the HQ AETC ECAMP contract).
 - Only HQ AETC programs for “consultation services” in the ECAMP contract. We use these consultation services to support either internal or external ECAMP assessments (technical support on a specific protocol, management support of the ECAMP team, or administrative support for the ECAMP team).

An installation may request support for an internal ECAMP. If HQ AETC decides to support the request through the ECAMP contract, HQ AETC will fund up to 40 man-hours including travel, lodging, and per diem costs. If HQ AETC decides to support the request through our own staff, the installation will have to fund the full amount of travel, lodging, and per diem costs. The installation should carefully consider the type of external support required for its internal ECAMP

2.9.4 Calculation

- For each internal ECAMP, it is reasonable to reproduce copies of past ECAMP reports, copies of ECAMP checklists and other references, and copies of the new ECAMP reports. These costs should be contained below the \$1K amount validated by HQ AETC
- If the base chooses to conduct a "continuous" internal ECAMP by assessing compliance year-round, the \$1K annual limit should be sufficient to cover reproduction and support costs of the base program

2.9.5 Standard A-106/EPN Entries

- EEIC - 534.BJ
- PEC - xxx56
- Class – 0
- Pollution Category - Mult

Maxwell Environmental Program Narrative
Date: 21 Dec 98

FY00 Project Number: **ABCE00123** Project Title: **Internal ECAMP Support**
 Category: **ECAMP** Compliance Date: **10 Apr 01**
 Estimated Cost: **\$1,000** Class: **0**
 Estimated RTA Date: **10 Jan 01** Service Center: **Base Contracting**

Requirement: **To provide administration of and support for the internal Environmental Compliance Assessment and Management Program (ECAMP) at Maxwell AFB/Gunter Annex for reproduction and distribution of ECAMP report**

Legal Citation: **AFI 32-7045**

History: **ECAMP is an audit of the base's compliance with federal, state, local, and Air Force environmental requirements. Internal ECAMP audits are performed by base personnel on a biennial basis. Maxwell is due to have an internal ECAMP audit this FY.**

Impacts if Not Funded: **Limited reproduction and distribution of ECAMP report**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.10 Environmental Impact Analysis Process Requirements

2.10.1 Program Strategy

- The installation EPC must identify out-year requirements. Based on these inputs, the Environmental Flight completes the Government Cost Estimate as described in the following Section 2.10.4.

2.10.2 Policy and Regulatory Guidance

- AFI 32-7061, 24 Jan 95, The Environmental Impact Analysis Process
- AFI 32-7066, 25 Apr 94, Environmental Baseline Surveys in Real Estate Transaction
- Programming and Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs (Draft 3), 25 Aug 95, page 15
- Air Force Environmental Impact Analysis Process Desk Reference, May 95
- HQ AETC/CEV Memo, 11 Apr 96, Air Force Policy on Funding of Newspaper Display Advertisements for Environmental Activities
- HQ AETC/CEPE Memo, 24 Oct 95, Environmental Documentation Matrix, Real Estate Transactions Validation

What's valid for environmental funding

- Preparation of EIAP documents (Class 1; EEIC 534.BJ). All EIAP projects must be programmed as Class 1 (**NOT O&S**). Program Environmental Assessments (EA) at least one year before the need date. Program Environmental Impact Statements (EIS) at least two years ahead of the need date. Combine projects into a single EA or EIS whenever reasonable to minimize contract costs. List specific projects to be addressed in EIAP project narratives. AETC contracts should be used for EIAP contracts, unless specific justification is provided to use a different contractor
- Preparation of Phase I or Phase II environmental baseline surveys (EBSs) (Class 1; EEIC 534.75)
- Sampling and analysis to fill data gaps in a Phase II EBS. This may include collection supplies and equipment, shipping, analysis and data interpretation (O&S Must Pay; EEIC 534.75)

- Preparation of noise analyses/Air Installation Compatible Use Zone (AICUZ) studies when required for proposed actions undergoing EIAP (Class 1; EEIC 534.75)
- Completion of surveys needed to support actual regulatory required actions identified in EIAP Decision Documents (Class 1; EEIC 534.75) Optional surveys are not considered Class I, even though they may contribute to fulfilling an EIAP data gap
- Cost of advertising (usually, local newspaper) the public review period of EIAP documents, when required by AFI 32-7061 (Class 1; EEIC 534.BJ)
- Public meeting facilities in support of EIAP documents requiring public participation (usually Environmental Impact Statements) (O&S; EEIC 534.BJ)
- Minimal expenses needed to maintain National Environmental Policy Act (NEPA) files, which might include costs of document indexing (O&S; EEIC 534.BJ)
- Professional development NEPA training for CEV EIAP personnel is available through the AFIT Environmental Education Center (EEC) (formally known as ONEE) and is at no cost to the base. Request forms are available from the EEC web site: <http://cess.afit.af.mil/eec/Default.asp>

What's not valid for environmental funding

- EIAP for Military Family Housing (MFH) projects, including private sector financed projects to provide military family housing
- EIAP for Non-Appropriated Fund (NAF) projects (including Army and Air Force Exchange Service)
- EIAP for Base Realignment and Closure (BRAC) actions and Weapons Acquisition proposals
- Unprogrammed requirements (pop-ups): It is the proponent's responsibility to fund the EIAP when conservation funds are unavailable. (This needs to be briefed by the environmental flight to their respective EPC)
- EIAP for outside agencies or entities except when it is determined that it is in the best interest of the Air Force to do so (e.g., Federal Highway Administration, Federal Aviation Administration, local governments, etc.)
- Mitigation measures: Funding for mitigation measures approved by the decision maker is the responsibility of the proponent

2.10.4 Calculation

- Costs vary depending on the complexity of the project, contractor labor rates, amount of travel involved, and many other factors. Ideally, a government cost estimate is prepared to account for many of these variables. For programming purposes, a government cost estimate should be prepared. The use of historic costs of previous environmental documentation completed for the base may not

provide a valid programming projection. HQ AETC/CEVN developed an Excel spreadsheet for estimating cost. If you need a copy, please contact your command EIAP Action Officer. General guidance for preparing a government cost estimate, considering labor, direct and indirect cost is provided below. As with all government estimates for delivery orders, knowledge of the contract and experience will play a part in your government estimates for labor hours. If you need assistance, contact your command EIAP base lead

2.10.4.1 Labor

- Labor rates (\$) are based on the negotiated contract rate for a given year. Typically, these change in May, June or July of a given calendar year when option years are exercised. Your estimate should be based on the higher rate for the fiscal year in which the contract award will occur. Even though you should be postured to award in the first quarter of a fiscal year, you should use the higher contractor hourly rate for programming purposes. Total estimated labor costs are calculated by adding the costs for each labor category per the generic format in the table below. Labor rates for a particular contractor can usually be obtained through the HQ AETC EIAP Program Manager for AETC contracts or through other organizations' points of contact (e.g., AFCEE, Corps, etc.) or their Contracting Manager.
- In addition to the prime contractor's labor rate, you will need to estimate the labor hours for their subcontractors identified in the contract. Typically, subcontractors have a specific specialty used to support the prime contract. A few examples of specialties include aircraft noise analysis, demographic analysis, and historic/cultural resources. The subcontractor's rates are generally different than the prime contractor. The subcontractor estimate should not include the labor categories of Program Manager and Senior Professional, as the prime contractor provides these resources.
- Labor hours for each labor category vary widely between contractors. The labor categories presented in Table 2.10.1, page 63, provide a generic basis for estimating the labor cost. While there are no hard values for the various labor categories, the following may help provide some insight for preparing better estimates.
- **Program Manager (A)** typically resides in the "home office" of the prime contractor. This individual provides the high-level oversight of the project. The Program Manager hours are calculated from the total work force hours. Depending on the size and complexity of the project and the structure of the contractor's organization, we have seen from 1 to 25 percent of the total labor hours of a project attributed to this individual. Based on the complexity of the project, we use 1 to 10 percent of the total of all other projected worker labor

hours for this line item. Our total projected worker labor hours includes those hours attributed to the prime contractors' and the subcontractors' workforce. This labor category is a typical negotiation point during the award of a delivery order or contract. Thus, it is important to make yourself a note as to why you determined this level of effort for the Program Manager.

- **Senior Professional (B)**, like the Program Manager, typically resides in one of the company offices and is usually in the position of managing the overall contract, individual delivery order, or ensuring submittals are delivered on time. This individual's hours are not part of the worker labor hour totals described for the Program Manager. Typically, we estimate this individual will have the same number or up to three times the number of hours determined for the Program Manager. The larger number of hours is usually attributed to this individual when he/she provide actual hands-on quality control or quality assurance for a project. Whether he/she is in a position of quality control is determined from the specifications in the contract. The amount of hours allotted to this labor category is based on the contractor's organizational setup and is relational to the Program Manager's hours.
- **Project/Site Manager (C)** can be thought of as a working first-line supervisor. This individual will typically be a hands-on project manager, "supervising" or 'managing' the workers. To develop the hours for this individual, we must first consider the duration of the project. As an example, our SOW or statement of objectives states the project must be completed in nine months. Nine months equates to approximately 40 weeks. A work-week is 40 labor hours. Thus, a nine-month project would equate to a potential of 1600 hours available to the Project/Site Manager. We then take a subjective approach to how many of these hours will actually be used in the capacity of project "supervisor." The Project/Site Manager typically has an expertise that falls in the Staff Professional category. Part of his/her time will be in this labor category, thus the need for subjectivity on hours assigned to this category. Typically, the estimated hour is 20 to 60 percent of the total hours available for the project. If you consider 1600 hours for a nine-month project and a 20 to 60 percent subjective value, the Project/Site Manager would be allocated 320 to 960 hours.
- **Staff Professional (D)** for most projects would have the greatest number of labor hours. This line item typically represents more than one individual worker. This line represents the senior work force who typically analyzes the data and combines all parts of the document into the final products. To determine hours you need to determine what expertise is required to the potentially affected environmental areas (referred to as "attributes") by the proposed action and alternatives. The following information will help you through the hourly determination for this line item.

To estimate the number of hours, begin by completing Section II of the Air Force Form 813, Request of Environmental Impact Analysis. For each attribute in Section II requiring analysis, you will need to look at several factors.

- **Factor 1** -- Whether the Description of the Proposed Action and Alternatives (DOPAA) (Air Force Form 813, Section 1) adequately describes the potential mission changes affecting the attributes you have determined. If not, how many hours of your time would it take to get the proponent to provide adequate descriptions of both the proposed action and alternatives? The contractor will need at least the same number of hours as you would need to complete an accurate DOPAA. These hours should be proportioned between the Project/Site Manager and the Staff Professional. The largest amount of the hours will go toward the Staff Professional category for two reasons. The Project/Site Manager will function more closely to a Staff Professional in completing a DOPAA. About 10 to 20 percent of the overall estimated hours to enhance a DOPAA would typically go to the category of Project/Site Manager to support the quality program
- **Factor 2** -- You will need to estimate the cost of analysis for each attribute potentially affected by the proposed action and any different attributes affected by the alternatives. For example, there are three potential sites for a new facility. One of the sites has been identified for further investigation for historic resources. The other sites are known not to have historical resources. Thus, the amount of time to prepare a single site evaluation of the potential impacts would be required, versus the hours for three sites. To estimate the contractor's hours, talk to functional experts to see how long they would need to update the baseline and conduct the analysis for the potential changes associated with both the proposed action and alternatives. Each functional expert (e.g., Environmental Flight, Safety, Bioenvironmental Engineering, etc.) should be able to give you an estimate of work effort. Their estimate should consider the upgrading of baseline data and additional analysis for the attributes affected by the proposed action and alternatives. The cumulative totals for all functional experts would become the line hours for the Staff Professional. A further consideration is the time necessary to learn the base specifics for a given attribute. A suggestion is to add five to 10 percent of the total cumulative hours to this line to cover the learning curve
- **Factor 3** – How much of the information currently exists (previous documents and electronic files for previous documents) that will aid in addressing development of the environmental base line (Chapter 3 information)? The more we provide the contractor in electronic format or even hardcopy, the fewer contract hours are required. In the SOW or Statement of Objectives for the delivery order or contract, you need to list government-furnished documents.

These documents can serve as negotiation points with the contractor and reduce the cost

- **Junior Professional (E) and Environmental Technician (F)** typically provide support to the Project/Site Manager (C) or Staff Professional (D). The skill levels for these two labor categories can be related to a civilian intern or a new Second Lieutenant. Both have skills they have learned from their educational experiences, but experience is minimal. Their support generally involves number crunching, documentation search and retrieval, database searches, and managing the physical production and distribution of the final document. Depending on their degree of experience, they may produce part of the document for review, editing, and incorporation by a higher-level labor category. The number of hours allocated to each of these labor categories is based on your judgment of the complexity of the issues surrounding a particular attribute. You should ask yourself two questions when working these labor categories: “What can be handled at this level of expertise?” and “What requires a higher level of expertise?” If you believe a simple record search and compilation of findings is the extent of a requirement, then this labor category can probably handle the task. This is an area where negotiations typically occurs, related to the level of expertise required to meet the analyses requirements. Please keep in mind the more work accomplished at this level, the less cost is incurred. Be ready to negotiate your stance on why this work can be accomplished by this level of expertise
- **Graphic Technician (G)** develops maps, overlay of noise footprints and other GIS or CADD figures for the document. By looking at previous documents for similar actions, estimate the number of graphics you will require. Depending on what you supply (Government Furnished Materials) the contractor in electronic format (e.g., digitized base maps, previous electronic digitized noise contours on maps, previous environmental impact analyses in electronic format) will drive the number of hours to place against this labor category. Typically, each new graphic figure will take from four (existing electronic data file) to 24 hours (new electronic file) to develop and prepare for incorporation into the final document. Determine what you can provide in electronic format, determine how many figures you will need for the document, talk to a CADD technician about the amount of time required to accomplish what you need, and estimate the labor hours accordingly
- **Administrative/Clerical (H)** is generally one of the lowest number of labor hours. Be cautious on your assigning the hours to this category. Some contractors use this category for the labor cost of QA/QC. Others use it to cover the labor cost of faxing materials, mailings, copying, and minor editorial review. Typically, the labor hours in this category are no higher than the hours in the

Program Manager (A) line. To determine the hours, one should consult the contract and determine the duties of this position

Table 2.10.1 EXAMPLE OF LABOR COST ESTIMATE

| Labor Category | Labor Rates | Hours | Labor Cost |
|----------------------------|-------------|-------|------------|
| Program Manager* | \$ | A | \$ times A |
| Senior Professional* | \$ | B | \$ times B |
| Project/Site Manager** | \$ | C | \$ times C |
| Staff Professional** | \$ | D | \$ times D |
| Junior Professional** | \$ | E | \$ times E |
| Environmental Technician** | \$ | F | \$ times F |
| Graphics Technician** | \$ | G | \$ times G |
| Administrative/Clerical** | \$ | H | \$ times H |
| | | | |
| TOTAL | | | |

*Management

**Workers

- As with all government estimates for delivery orders, knowledge of the contract and experience will play a part in your government estimate for labor hours. If you need assistance, contact your command EIAP program manager

Other Direct Costs

- The table below is a laundry list of other costs required in a cost estimate. Only those items pertinent to your project should be used. The values indicated are from a FY98 action and are subject to change between fiscal years and contractors. As with the labor hours, the contract needs to be reviewed to determine which of these costs were negotiated. For instance, per diem, lodging, mileage, and transportation (airlines and rental cars) are generally negotiated items or covered by the Joint Travel Regulations. Thus, if it is a negotiated cost, that is the value for estimating. If based on the JTR, then you should use the latest JTR costs for estimating. In some cases, the contract has other negotiated stipulations for the completion of awarded actions. For instance, the contract can call for the document to be printed on recycled paper with 50 percent or more post consumer paper content (additional cost per page) or rental cars shall be subcompacts (reduced cost over a larger vehicle). If you

have questions on how to estimate items in the laundry list, contact your HQ AETC EIAP Program Manager.

Table 2.10.2 EXAMPLES OF OTHER DIRECT COST

| | Unit Cost | Units | Number of Units | Direct Cost |
|---|------------------|--------------|------------------------|--------------------|
| Travel | | | | |
| Airfare (Based on Joint Travel Regulations) | \$280.00 | round trip | | |
| Rental Car | \$32.00 | per day | | |
| Rental Car Gasoline | \$3.00 | per day | | |
| Parking | \$10.00 | per day | | |
| Home Station Vicinity Mileage | \$0.33 | per mile | | |
| Local Area Per Diem allowance | \$30.00 | per day | | |
| Local Area Lodging Allowance | \$77.00 | per day | | |
| Supplies | | | | |
| Document Reproduction | | | | |
| Color | \$0.99 | per page | | |
| Black and White | \$0.04 | per page | | |
| Computer Disk | \$1.20 | per disk | | |
| Computer Time | | | | |
| PC | \$3.70 | per hour | | |
| CADD | \$5.00 | per hour | | |
| Fax | \$0.37 | per page | | |
| Telephone | \$6.25 | per call | | |
| Letter USPO | \$0.32 | per letter | | |
| Package USPO | \$3.80 | per pkg | | |
| Box USPO | \$5.75 | per box | | |
| Maps | \$10.00 | ea map | | |
| Film & Developing | \$13.25 | ea roll | | |
| Reference Material | \$0.04 | ea page | | |
| TOTAL | | | | |

Indirect Costs

- There are several areas of indirect cost that can create problems at the time of award. If your government estimate does not include the cost of:
 - the overhead and profit for the prime contractor based on the prime contractors hours to be worked;

- the overhead and profit for the prime contractor to provide oversight to the subcontractor (usually a percentage (e.g., five percent) applied against the total value of the subcontractor labor costs and other direct costs);
 - the subcontractors overhead and profit; and
 - contract incentive award fees, it fails to capture all costs.
- This failure usually is the driver for requesting more money to make the award. For the foreseeable future, request for funding to make-up for shortfalls in estimating cost will be closely reviewed. Oversight of the cost of any contracting line item is not good support for additional funding.
 - The prime contractor's overhead and profit margin are stated in the contract. If the contract has multiple option years, these costs can vary by year. The variance can be in the form of an inflation factor. Thus, it is very important to look for changes in the option year cost structure.
 - In most cases, the prime contractor will also have an additional cost for overhead and profit associated with oversight of their subcontractors. The percentage of cost associated with the subcontractor oversight may be the same, may be less, or can be more than their standard percentage. The overhead and profit percentage value can be determined from the contract. You need to determine the right option year for the subcontractor, as well as the prime.
 - Subcontractors will usually build overhead and profit into their hourly rate or provide a separate percentage based on their total labor and other direct costs. Determine which method was used for the contract. If the overhead and profit are part of the hourly rate, then you need to consider them when you accomplish the hourly rate analysis. If they are an additional percentage, you will need to base it on the labor hour cost and the other direct costs.
 - In looking to contracting by other means than the two HQ AETC/CEV prime contractors, you need to be aware that the contract may have an incentive clause, which is like a bonus for the contractor. In order to award a contract or delivery order with an incentive fee award, the entire cost of the contract plus the incentive award fee must be provided with the funding. Typical incentive award fees range from 5 to 10 percent of the total negotiated cost. If in the contract, to cover this cost you should determine the sum of the labor hour cost, the direct costs and the indirect costs. Then take the sum of those costs and multiply it by the incentive award fee percentage. The product of the costs and percentage is then added to the sum of the total cost to determine the bottom line for the government cost estimate.

2.10.5 Standard A-106/EPN Entries

- Programmed EIAP and EBS funding will be held in HQ AETC/CEVA and released when the project is ready to award for delivery orders or ready to advertise for new contracts. Installation EIAP leads should posture to award the delivery order or contract no later than the end of the first quarter of the fiscal year.
- Your Environmental Protection Committees and Facility Boards (Capital Improvement Program) should identify potential mission changes and facility requirements. These changes should be identified no later than 1 Oct, two fiscal years prior to implementation, in order to allow for inclusion into the POM/APOM cycle. Failure to identify a requirement at this point in time, may result in the proponent of the action funding the environmental impact analysis.
- For five-year (POM) planning purposes, EIAP is the only approved programmable “wedge” which should be included in a base’s program using historical EIAP costs. However, program known individual EIAP requirements in the out-years, program for them. Here are some rough order of magnitude values. As always, if you have more accurate information, please use it.

Simple EA: Estimate labor hours multiplied by an average contractor hourly rate

$$470 \text{ hours} \times \$60/\text{hour} = \$28,200$$

Average EA: $760 \text{ hours} \times \$80/\text{hour} = \$60,800$

Average EBS: $280 \text{ hours} \times \$60/\text{hour} = \$16,800$

Complex EA or Simple EIS: $4,500 \text{ hours} \times \$80/\text{hour} = \$360,000$

Complex EIS: $12,528 \text{ hours} \times \$80/\text{hour} = \$1,002,240$

- Also see Section 2.10.2, Validation, “What’s valid,” for other A-106/EPN guidance

Keesler**Environmental Program Narrative**

Date: 21 Dec 98

FY 00 Project Number: **ABCE00123** Project Title: **Environmental Assessment**
 Category: **Nat/Cult Resource Planning** Compliance Date: **10 Jan 01**
 Estimated Cost: **\$100,000** Class: **1**
 Estimated RTA Date: **10 Jan 00** Service Center: **AETC Contract**

Requirement: **To prepare an environmental assessment (EA) and environmental baseline survey (EBS) for a new off base firing range to be leased beginning in FY 00. Additionally, the requirement will provide for advertising the EA in local newspapers, and reproduction costs of EA and EBS.**

Legal Citation: **Coastal Zone Management Act (MS Code, 1972, Sections 57-15-1 through 57-15-17), NEPA and AFI 32-7061, CERCLA and AFI 32-7066**

History: **The potential environmental impacts of a proposed action must be assessed in accordance with the NEPA and AFI 32-7061 prior to making a decision on a proposed action and its alternatives. EBSs are required by CERCLA and AFI 32-7066 prior to any real estate transaction. EBSs characterize the property conditions, identify potential or actual contamination, meet disclosure requirements for hazardous contaminants, and protect the Air Force from unknowingly acquiring environmental liabilities. Keesler AFB leases a small arms firing range off-base to perform small arms qualifications training. The US Forest Service has notified the base that when the lease expires in FY 00, it will not be renewed. No private sector small arms ranges in the local area can handle the rate of fire associated with Security Forces proficiency training. Two sites have been identified as possible replacements for the firing range. Before a final decision on a new range site is made or a lease agreement for any property is entered, an EBS and EA will be required. Additionally, an EBS will be required for the existing firing range to document the condition of the property upon lease termination**

Impacts if Not Funded: **Requirement is programmed for FY 99 to meet a need date for a new small arms firing range (and expiration of old range lease) in FY 00. Cost is estimated based on a preliminary government estimate based on current labor hours and current material values. (EA = \$XXK in EEIC 534BJ; Two EBSs = \$XXK in EEIC 534.75)**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.11 Emergencies, Inspections, Fines, Penalties and Supplemental Environmental Projects (SEPs)

2.11.1 Program Strategy

- AETC does not normally plan or program for environmental emergencies, fines, penalties or SEPs
- SEPs usually are picked from existing pollution prevention projects, but can be a new requirement based on the project's merit to resolve an issue with regulatory agencies

2.11.2 Policy and Regulatory Guidance

- AFI 32-7001, 9 May 94, Environmental Budgeting
- HQ USAF/CEV Programming And Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs, Draft 3, page 4
- HQ USAF/ILEV Memo, 17 Mar 98, Reimbursement Policy to EPA for Inspection of RCRA TSDF

2.11.3 Validation

What's valid for environmental funding

- Costs associated with emergency requirements that are needed to ensure compliance with environmental laws or Air Force policy
- Reimbursement costs to the EPA for "inspecting each hazardous waste treatment, storage, or disposal facility (TSDF) annually" via a Military Interdepartmental Purchase Request (MIPR). Bases should forward EPA requests for reimbursement to HQ AETC/CEV for payment. The EPA

reimbursement procedures are outlined in above reference. **Bases do not have to program for this requirement**

- SEPs normally are funded from the pollution prevention account, as the project is required to be of a pollution prevention nature

What's not valid for environmental funding

- Emergency requirements normally funded by other means. For example, all funds for aircraft crash clean-up efforts should be requested in the crash cleanup reimbursement request
- Reimbursement costs to the EPA for inspections other than TSDFs
- Requirements to pay fines and penalties. When the fine is actually paid, it should be funded from the regular O&M account. Bases should move the funds from regular O&M into the Environmental Compliance account for **tracking** purposes only
- Taxes or payments from which no service is received. Fines and penalties will not be paid out of environmental funds

2.11.4 Calculation

- There is no way to predict how much a fine will be. Each state and the EPA have their own methods by which to calculate fines. During the settlement proceedings however, that fine is often reduced and the amount to be spent on a SEP is settled on.

2.11.5 Standard A-106/EPN Entries

- Luckily, emergencies rarely occur and are therefore worked individually. However, an A-106 entry and EPN are still required to track expenditures
- SEPs normally become high priority due to their association with resolving a Notice of Violation or regulatory agreement. These points should be noted in the narrative justification. They are P2 in nature and may be a one-time project or a new recurring event.

Section 2.12 Hazardous Materials

2.12.1 Program Strategy

- The Hazardous Material Management Process (HMMP) is responsible for ensuring that all hazardous material users are identified, that hazardous materials are authorized for use prior to procurement, and that hazardous material use and disposal are reduced to the maximum extent economically practicable
- CE is the team lead for this cross-functional program
- Air Force strategy is to use this data to meet the diverse tracking and reporting requirements of several organizations, to include environmental, safety, occupational health and logistics
- Information tracked through the Air Force Environmental Management Information System (AF-EMIS) database assists in the completion of EPCRA, air emission and AF Form 2761 data. Additionally, reports can be provided to shops, safety and fire department personnel showing the location of hazardous materials and their associated hazards

2.12.2 Policies and Regulatory Guidance

- AFI 32-7086, 1 Aug 97, Hazardous Material Management
- AFI 32-7080; 12 May 94, paragraph 2.4, Pollution Prevention Program
- AFI 32-7001, 9 May 94, Environmental Budgeting
- HQ USAF/CEV, Programming And Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs; Draft 3
- Instructions for the Environmental FY 99-03 APOM Submittal (need a date)
- Air Force Pollution Prevention Action Plan, Jan 93

2.12.3 Validation

What's valid for environmental funding

- Start-up and recurring costs for the Hazardous Material Pharmacy Program (HPP) and the AF-EMIS that qualify for pollution prevention funds (includes supplies, equipment, and facilities))

- Efforts identifying hazardous materials in Technical Orders, Military Specifications, and other such documents (Class 1,2 or 3; EEIC 534.31, 534.90)
- Projects to reduce or eliminate Class I Ozone Depleting Substances (aqueous parts washers, recovery and recycling equipment, etc.) (Class 1; EEIC 534.31)
- Training/TDY associated with operating pharmacies. (O&S; EEIC 409)
- Equipment and process changes to reduce or eliminate the requirement to report under Section 313 of EPCRA (Class 1,2, or 3; EEIC 534.90) (Treatment or “control” type projects are not valid)
- Equipment primarily purchased to switch from an environmentally unfriendly material or process to a more environmentally friendly material or process (Class 1,2, or 3; EEIC 534.90)
- Hazardous material response training, equipment, and supplies as defined in 29 Code of Federal Regulations (CFR) 1910.120(p) (O&S ; EEIC 409)

What’s not valid for environmental funding

- Disposal of Hazardous Materials as a waste (O&S; EEIC 534.10).
- Hazardous Material items to comply with OSHA regulations (i.e. eye baths and safety showers, flammable storage lockers, sprinkler systems, etc.)
- Hazardous material response training, equipment, and supplies as defined in 29 CFR 1910.120(q)
- Annual EPCRA reporting
- Projects to replace halon fire protection systems and extinguishers with non-halon systems and extinguishers
- Replacing or retrofitting air conditioning systems.
- Recycling equipment when a viable source reduction project can be implemented instead
- Hazard communication or other training already the responsibility of another function
- Computer software which is not in direct support of Hazardous Material Pharmacy (HMP)

2.12.4 Calculation

- Use historic costs to estimate Hazardous Material Pharmacy supplies
- Obtain vendor quotes for any equipment and training
- Contact HQ AETC for costs of similar projects and for recommended HPP Tracking System Hardware specifications

2.12.5 Standard A-106/EPN Entries

- See Section 2.12.2 Validation, “What’s valid for environmental funding” for standard programming information

Laughlin

Environmental Program Narrative

Date: 3/28/97

| | |
|---------------------------------------|---|
| FY98 Project Number: | Project Title: Pharmacy, IMP Equipment |
| Category: Pollution Prevention | Compliance Date: 1998 |
| Estimated Cost: \$4,000 | Class: 1 |
| Estimated RTA Date: 31Dec97 | Service Center: |

Requirement: **A seven CD-ROM disc changer will add to the existing four CD-ROM capability. AF-EMIS supports a direct interface to HMIS to allow the automatic upload of MSDS data. The alternate method requires calling vendors to acquire MSDSs and manual loading of data. Automatic importing of data results in significant man-hour savings, and data entry errors are reduced. Currently, HMIS is two CDs, FEDLOG is five CDs and ENFLEX is three CDs. Periodically, these applications increase the CD quantity requiring CD slots for growth.**

Legal Citation: **AFI 32-7086**

History: **The purchase of ADPE in the HAZMAT Pharmacy to include a CD-ROM disc changer. HAZMAT Pharmacy personnel will access the disc changer through the AF-EMIS server. HAZMAT personnel require daily access to HMIS, FEDLOG and ENFLEX, which are available only on CD. The AF-EMIS application supports a direct interface to CD-ROMs to facilitate automatic data entry.**

Impacts if not Funded: **Failure to procure additional CD-ROM capability will result in diminished customer service and data entry delays. Failure to procure the additional bar-code scanners will prohibit the use of bar-code technology at remote issue locations, delaying full implementation.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.13 Hazardous Waste

2.13.1 Program Strategy

- It is the Air Force policy to use pollution prevention as the “first choice” to meet new legal requirements, ensure adherence with existing compliance requirements, and return to adherence when violations are identified. Hazardous waste (HW) management subjects the generator to intense regulatory oversight and unending liability.
- In light of the above, the AETC goal with regard to HW is to eliminate or reduce to the extent economically practical all HW generations. The Command will measure its progress toward the goal by tracking HW reductions in pounds against base specific targets established by each base from its CY 95 baseline. Additionally, bases will maintain a rolling list of “Top Ten” hazardous waste streams and eliminate or reduce these waste streams where possible. Progress of the Top Ten initiative will be briefed quarterly to the base EPC with an information copy to HQ AETC/CEVQ.

2.13.2 Policy and Regulatory Guidance

- AFI 32-7042, 12 May 94, Solid and Hazardous Waste Management
- Air Force Pamphlet (AFP) 32-7043, Air Force Hazardous Waste Management Guide, 1 Nov 95
- Hazardous Material and Hazardous Waste Training Policy Memo, 14 Jul 95
- AFI 32-7001, 9 May 94, Environmental Budgeting
- HQ USAF/CEV, Programming And Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs, Draft 3
- Instructions for the Environmental FY 99-03 APOM Submittal (not dated)
- AETC Supplement to AFI 32-7042, 7 Jan 99
- AETC Hazardous Material and Hazardous Waste Training Guidance, 26 Mar 96, (Reference Number 96-001)
- AETC Policy on Environmental Release Reporting, 29 Aug 94 (Reference Number 94-004)
- AETC and Armstrong Lab Service Class Agreement (SLA) for Environmental Compliance Program Sampling, Analysis, and Monitoring (SAM) Services

2.13.3 Validation

What's valid for environmental funding

- Transportation
- Sampling and Analysis
- Treatment and/or disposal of HW
- Closure of Resource Conservation and Recovery Act (RCRA) interim permitted or permitted facilities
- Design of permitted facilities
- Required initial accumulation point and 90-day accumulation site supplies
- HW management plan and HW analysis plan updates (should be done in-house)
- Hazardous material disposal as a waste
- Permits and fees associated with HW management
- HW spill response supplies
- Training required by law
- Equipment required by law for environmental compliance
- Absorbent booms to collect oil spills from water surfaces
- Initial Accumulation Point and 90-day accumulation point construction
- Clean up of soil and water contamination from fuel, oil, and HW spills
- Publications required by law
- Equipment for HW recycling/reclamation will be considered for validation
- Contracts for recycling HW will be considered for validation if more cost effective than disposal and waste stream(s) reduction is achieved as a result of the contract

What's not valid for environmental funding

- Facilities, supplies, equipment not solely for HW
- Cleanup and disposal of lead from active shooting ranges
- Environmental Restoration Account (ERA) eligible projects
- Vehicles for response to spills or other emergencies
- Computers and software
- Publications not required by law
- Household HW disposal
- Funding of programs originally intended to reduce HW generation, but now administered as ongoing operations

2.13.4 Calculation

- Use historic costs to estimate HW disposal costs
- Training should be limited to personnel responsible for HW management in the Environmental Flight
- Required HW training for personnel in organizations outside the Environmental Flight should be developed and provided in-house
- Use historic costs to estimate HW spill supplies and equipment costs

2.13.5 Standard A-106/EPN Entries

Tyndall **Environmental Program Narrative** Date: 20 Mar 97

FY **00** Project Number: **OS005001Z8** Project Title: **Disposal, HW, Contract**
Category: **Environmental Compliance** Compliance Date: **1 Oct 97**
Estimated Cost: **\$275,000** Class: **OSM**
Estimated RTA Date: **10 Jan 00** Service Center: **RCRA**

Requirement: **To dispose of hazardous waste generated on Tyndall AFB by contract.**

Legal Citation: **AFI-32-7042**

History: **Historically, approximately 45 tons of hazardous waste are generated annually at prior costs of approximately \$261,000. The cost for the routine disposal of hazardous waste during FY98 is based on prior-year costs plus inflation is estimated at \$275,000.**

Impacts if not Funded: **Hazardous waste disposal will not be accomplished. The base would be out of compliance with RCRA within 90 days and fines and penalties may be assessed.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.14 Integrated Natural Resources

2.14.1 Program Strategy

- Base CEV is responsible for preparation, annual review, amendments and a five year update/rewrite of the Integrated Natural Resources Management Plan in coordination with the state conservation agencies under an AF/state/federal agency MOU

2.14.2 Policy and Regulatory Guidance

- AFI 32-7064, Integrated Natural Resources Management, 1 Aug 97

2.14.3 Validation

What's valid for environmental funding

- Initial development of Integrated Natural Resources Management Plans (INRMPs) is required by the Sikes Act, Class 1. Annual updates to INRMPs required to maintain a five-year work plan are eligible for Conservation funds but are a priority, Class 2
- Development of Initial and annual updates of the INRMPs may be accomplished by contract
- Develop natural resources database as a Class 2. All initial developments for AETC bases were initiated by Sep 97
 - Review/update maps annually
 - Database may be developed by contract
- Survey and maintain current inventory of wetland to plan for long-term protection or mitigation as a Class 2. Survey should be reaccomplished every five years
- Review wetland boundaries as required by the United States Army Corps of Engineers (USACE) District Regulation
- Determine floodplain using National Flood Insurance Program maps or request a USACE or contract hydrologic analysis as Class 2

Integrated Natural Resources

- Consult with the United States Fish and Wildlife Service (USFWS) and state fish and game agency to determine whether consumptive or non-consumptive wildlife habitat exists and whether it has management potential as a Class 2
 - Category I installations will develop a fish and wildlife component plan in the INRMP and a cooperative agreement as a Class 2
- Conduct surveys under the Endangered Species Act as a Class 2 to identify endangered plants and animals and their habitat
- Determine suitability for commercial forestry purposes as a Class 1 using 57X funds. Installations having over 500 acres of commercial forestry land must develop a forest management component plan to the INRMP and revise the plan every 2 years as a Class 1 using 57X funds
- Survey and assess crop and grazing land suitability as a Class 1 using 57X funds
- Installations permitting crop production or grazing under agricultural outleases, service contracts or special licenses must develop an agricultural component plan within the INRMP
- Determine the outdoor recreation potential compatible with the mission and develop a component plan within the INRMP for suitable lands as Class 2
- Resurvey or review wetlands, floodplains, fish and wildlife potential, commercial forestry potential, grazing and cropland potential and outdoor recreation potential as necessary or as required as a Class 2 if qualified expertise is not available on base
- Revise, rewrite, or amend the INRMPs or components, conduct studies or surveys under the Sikes Act, Migratory Bird Treaty Act, Endangered Species Act, Wilderness Act, various Fish and Wildlife Acts, International Biodiversity Act, Forest Ecosystem Act, various Regional Wilderness Acts, Executive Orders, and DoD and Air Force Instructions specifically required by legislation as Class 1 or 2

What's not valid for environmental funding

- Conduct studies or surveys under the Sikes Act, Migratory Bird Treaty Act, Endangered Species Act, Wilderness Act, various Fish and Wildlife Acts, International Biodiversity Act, Forest Ecosystem Act, various Regional Wilderness Acts, Executive Orders, and DoD and Air Force Instructions not specifically required by legislation
- Specific studies or consultations as part of the EIAP process for certain proposed actions must be funded from other sources: Military Construction Program
- Military family housing projects must be funded with MFH funds
- Non-appropriated Fund (NAF) projects (including AAFES) should be funded with NAF
- Base Realignment and BRAC and AFMC funded Closure (BRAC) actions and Weapons Acquisition proposals, respectively

- FY 98 (and beyond) specific guidance: The Natural Resources Program is an O&M program working under the concept of best management practices. Unless there are specific legislative or regulatory drivers, Natural Resources projects will not be eligible for Class 1 or Ops and Services “must fund” funding. Most Natural Resources projects should be programmed as Ops and Services in FY 98 and beyond. See guidance on EIAP for further details
- Projects identified in budgets for special programs including commercial forestry, fish and wildlife and grazing and outlease
- Urban forestry and Tree City USA
- Earth Day, Coastal America, Cool Communities, and similar voluntary programs

2.14.4 Calculation

- Use historic costs or contact HQ AETC/CEVN natural resources manager

2.14.5 Standard A-106/EPN Entries

- See Section 2.14.2 Validation “What’s valid” for typical programming information
- Initial plan may be prepared in-house or by contract as a Class 1
- Five year update/rewrite may be prepared in-house or by contract as a Class 2
- Category 1 installations shall prepare a fish and wildlife component plan as part of the initial plan as a Class 1 requirement. Later determinations of a requirement under the MOU will be funded as a Class 2 unless a compliance date has passed

Luke

Environmental Program Narrative

Date: 13 Mar 97

FY **98** Project Number: **OS005275**

Project Title: **Bald Eagle Nest Monitoring**

Category: **Conservation**

Compliance Date: **1998**

Estimated Cost: **\$50,000**

Class: **OSM**

Estimated RTA Date: **31 Mar 98**

Service Center: **ESA**

Requirement: **To conduct nest observation at Bald Eagle nest sites to monitor compliance with the provisions of a US Fish and Wildlife Service Biological Opinion. Luke AFB has begun discussions with Arizona Game and Fish Department (AGFD), one of the main partner agencies responsible for the nest watch program. AGFD is preparing information on the location(s) of nest sites and setting up meetings with Forest Service and FWS. Luke AFB expects to receive the location of nest sites from AGFD. The monitoring program should start immediately after notification of requirements from AGFD.**

Legal Citation Basis: **ESA Section 7 Consultation**

History: **During 1994, an environmental assessment was prepared to address potential effects of realignment and widening of several military training routes (MTRs). Luke AFB consulted with the US Fish and Wildlife Service (FWS) under Section 7 of the Endangered Species Act. On 12 December 1994, the FWS issued a biological opinion on the proposed action (2-21-94-I-066). As part of the "reason able and prudent measures" and the "terms and conditions for implementation" of the measures, the FWS is requiring that the Air Force fund monitoring and evaluation of active Bald Eagle breeding areas within MTRs on an annual basis as long as the Air Force continues to use the MTRs. In addition to the issue with bald eagles, the FWS is requiring that some type of monitoring be conducted on Spotted Owls in those areas where the MTRs cross spotted owl habitat on the Tonto National Forest.**

Impacts if not Funded: **If the Air Force does not hold strictly to the terms and conditions of the Biological Opinion, it may be possible that a lawsuit could be filed restricting use of the MTRs. This would have serious implications for the Air Force's ability to carry out its training mission at Luke AFB.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.15 Lead Based Paint (LBP)

2.15.1 Program Strategy

- To maintain a “manage-in-place” philosophy. Remove and dispose of LBP debris only if it poses a health or
- Proactively manage the responsibilities, policies and procedures to minimize exposure to LBP
- Monitor the status, condition, abatement and removal or repair of LBP-containing materials

2.15.2 Policy and Regulatory Guidance

- AFI 32-7001, 9 May 84, Environmental Budgeting
- HQ USAF/CEV Programming And Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs, Draft 3
- Instructions for the Environmental FY 99-03 APOM Submittal (not dated)
- AFI 48-119, 25 Jul 94, Medical Service Environmental Quality Programs
- AETC Environmental Program Guidance Document, 94-002, Lead Based Paint Policy Review Update and Implementation Guidance
- AL/OE-TR-1993-0175, Lead Exposure Hazard Mgmt Guide, Dec 93
- DoD Memo, 31 Oct 94, Asbestos, Lead Paint and Radon Policies at BRAC Properties
- DoD LBP Policy Memo, 24 Nov 92
- 40 CFR 745
- 29 CFR 1926.62
- Public Law 102-550, Title X, Residential LBP Hazard Reduction Act

2.15.3 Validation

What’s valid for environmental funding

- Initial LBP surveys for high-priority facilities

- Initial base LBP Register (continual in-house update required to keep current) and system upgrades every three years
- Professional development training (up to a total of \$1,000/employee per year for all professional development training, including TDY costs)
- Mandatory training for one primary and one alternate in each of the state required disciplines (inspector, management planner, supervisor, air monitor, etc.)
- Sampling, analysis and monitoring associated with a Bioenvironmental Engineer Certified Health Hazard (BECHH)
- Design and implementation of cleanup or abatement project with a BECHH and a “must remove” determination
- Transportation and disposal costs associated with a BECHH

What’s not valid for environmental funding

- LBP work associated with MFH. Use MFH funds to accomplish this work
- LBP work associated with a construction, demolition, repair, or renovation project, including contract air monitoring for abatement projects
- LBP work where OSHA is the regulatory driver, except for BECHH
- Training and equipment for base asbestos abatement team members except minimum (one worker and one supervisor) required to respond to a BECHH
- LBP abatement notification fees, transportation and disposal, except for BECHH
- Computers and software. Send requests to command media manager

2.15.4 Calculation

- Local and federally sponsored training courses run from a low of around \$450 for an inspector class to around \$695 for the contractor/supervisor or project designer class. For projects, use historic funding requirements in conjunction with a thorough review of the LBP management plan. Lead abatement runs from a low of about \$1.95 per square or linear foot for simple, easily accessible material (door and window frames, etc.) to around \$30 per square foot for water tower and bridge abatement projects. You can assume a two- man abatement team will not show up for less than \$1,200 per day. Industrial hygienists typically charge from \$325 to \$500 per day to monitor abatement and collect air samples.

2.15.5 Standard A-106/EPN Entries

- All requests for emergency sampling or clean-up funding must be accompanied by a signed Certified Health Hazard memo from the SG and a “must remove” memo from the base EPC Chairperson

Luke **Environmental Program Narrative** **Date:** 3 Mar 97

FY 01 Project Number: **OS005301** Project Title: **Toxic Substance Program (LBP)**
Category: **Environmental Compliance** Compliance Date: **2001**
Estimated Cost: **\$1,800** Class: **OSS**
Estimated RTA Date: **1 Apr 01** Service Center: **TSCA**

Requirement: **LBP abatement training and certification requirements and training grants: Pub. L. 102-139, title III, 28 Oct 91, 105 Stat. 765, 766, which provided for regulations governing lead-based paint abatement activities to ensure that individuals engaged in such activities are properly trained, that training programs are accredited, that contractors are certified, and that laboratories engaged in testing for substances are certified, and which also provided for grants for training and education of workers who are or may be directly engaged in lead-based paint abatement activities, was omitted as superseded by section 2682(a)(1) of Title 15, Commerce and Trade, which provided in part that on 28 Oct 92, the provisions of law formerly set out in this note would cease to have any force and effect. USCODE 42063, Sec 4822 (d)(1)(B). A qualified inspector, industrial hygienist, or local public health official shall make final inspection and certification after abatement.**

Legal Citation: **40 CFR Part 745 and Title X require that all inspections and surveys be performed by an EPA certified component person.**

History: **To fund training requirements for LBP courses.**

Impacts if not Funded: **Certifications will not be obtained and the program will stop. Potential exposures are likely due to untrained personnel evaluating material conditions. Subject to regulatory violations as sovereign immunity is waived in all LBP issues**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.16 Polychlorinated Biphenyls (PCBs)

2.16.1 Program Strategy

- To be “PCB free” in accordance with USAF policy
- To manage the PCB program in a way to ensure that items and materials containing regulated levels of PCB are identified, reported, and managed in place or disposed of in accordance with EPA PCB regulations and USAF policy

2.16.2 Policies and Regulatory Guidance

- AFI 32-7001, 9 May 94, Environmental Budgeting, paragraph A4.2.5, page 16
- 40 CFR 761
- 63 FR 35383, et seq, 29 Jun 98, Disposal of PCBs, Final Rule ("PCB Megarule")
- HQ USAF/CEV Programming And Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs, Draft 3, pages 5 and 6

2.16.3 Validation

What's valid for environmental funding

- Disposal of real property installed electrical equipment containing oil compounds in an amount greater than three pounds per item, with PCB content > 50 parts per million (ppm)
- Characterization of PCB-contaminated sites, including costs for the design of the characterization project
- Removal and replacement or retrofill of regulated items, but not including the cost of the replacement item
- Disposal of PCB-contaminated materials, including PCB remediation waste
- Repair/replacement or cleanup of leaking regulated PCB-containing items, including spill cleanup supplies
- Decontamination of PCB-contaminated areas to achieve regulatory cleanup standards
- Sampling and analysis in accordance with the PCB management plan or to comply with regulatory requirements for site characterization, cleanup verification and disposal characterization

What's not valid for environmental funding

- Disposal of small items containing less than three pounds of PCB fluid per item (such as fluorescent light fixture ballasts or small capacitors) unless applicable state law requires its disposal as a PCB waste. Lighting upgrade projects are to budget lawful disposal of ballasts as a project cost.
- Activities associated with PCB-containing items or materials located in MF areas.
- Demolition and construction costs incident to replacement of PCB-containing equipment or materials
- Sampling and analysis of organizational equipment to meet DRMO turn-in requirements

2.16.4 Calculation

Use historic information to develop projected costs. Contact HQ AETC/CEVQ for information on contractor rates and expenses of similar projects, or use comparable historic information

2.16.5 Standard A-106/EPN Entries

- Recurring expenses are to be programmed as Operations and Services, Class 0
- Specific corrective action projects are to be programmed as Class 1, and must be thoroughly justified, including project need and evaluation of alternatives, in the project narrative

Altus**Environmental Program Narrative**Date: 21 Dec 98

| | |
|---------------------------------------|--|
| FY00 Project Number: OS 005277 | Project Title: Toxic Substance Prgm-PPE |
| Category: PCBs | Compliance Date: 10 Apr 99 |
| Estimated Cost: \$750 | Class: 0 |
| Estimated RTA Date: 10 Apr 99 | Service Center: Base Supply |

Requirement: **Purchase Personal Protective Equipment (PPE)**

Legal Citation: **40 CFR Part 761 TSCA and 29 CFR 1910.134**

History: **Personal Protective Equipment (PPE) is required for respiratory and personal protection from toxic substance hazards. Performing this work in-house will in turn save the government money for contractor assistance.**

Impacts if Not Funded: **Inspections of abatement projects, along with sampling for asbestos or lead-based paint cannot be performed.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.17 Pesticide and Herbicide Reduction

2.17.1 Program Strategy

- CEV responsibilities are to act as the base pest management coordinator to:
 - assist the pest management shop with compliance issues
 - assist in preparation or review documents, including the quarterly report, the pest management plan and the annual work plan
 - incorporate the pest management plan and amendments into the Integrated Natural Resources Management Plan

2.17.2 Policy and Regulatory Guidance

- AFI 32-1053, Pest Management Program, 18 May 94

2.17.3 Validation

What's valid for environmental funding

- Environmental funds are not normally used to support the pest management program, which is an O&M funded program in CEO

What's not valid for environmental funding

- Funding pest management operations and annual pest management plan. Environmental funds are not used to support the Pest Management Program, an O&M funded program in CEO

2.17.4 Calculation

- Use historic costs

2.17.5 Standard EPN/A-106 Entries

- None

Section 2.18 Petroleum Storage Tanks

2.18.1 Program Strategy

- Maintain compliance with federal, state and local regulations on USTs, ASTs and associated piping
- Minimize the installation of new USTs by locating tanks in vaults, installing above-ground tanks or revising operating practices
- Remove inactive and non-essential USTs

2.18.2 Policy and Regulatory Guidance

- 40 CFR 280, Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks
- 40 CFR 112, Oil Pollution Prevention
- AFI 32-1022, 29 Jun 94, Planning and Programming Non-appropriated Fund Facility Construction Projects
- AFI 32-7001, 9 May 94, Environmental Budgeting
- AFI 32-7044, 25 Apr 94, Storage Tank Compliance
- HQ USAF/CEV Programming And Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs, Draft 3
- Instructions for the Environmental FY 99-03 APOM Submittal (need a date)
- AFI 23-201, 1 Oct 96, Fuels Management
- AFI 23-204, 27 Apr 94, Organizational Fuel Tanks
- AFI 65-106, 28 Oct 94, Appropriated Fund Support of Morale, Welfare and Recreation and Nonappropriated Fund Instrumentalities

2.18.3 Validation

What's valid for environmental funding

- UST/AST removals and upgrades to comply with regulatory requirements
- UST fees (AF does not pay AST fees)
- UST leak detection and associated piping tightness testing

- Initial development of Spill Control and Countermeasures Plan and other spill plans as required by regulation
- Professional development training (up to a total of \$1,000/employee for all professional development training)
- Confirmatory sampling and analysis required for removal of USTs and associated piping. This includes collection materials and equipment, shipping, analysis and data interpretation

What's not valid for environmental funding

- Upgrade or increase in tank size to support a change in mission
- Financial Responsibility Fees for USTs
- Defense Energy Support Center (DESC) eligible projects. These projects are essentially those environmental compliance costs associated with storage tanks and associated piping and appurtenances holding DLA/DESC-owned product
- Detailed guidance on DESC projects is available on the DFSC web site at http://www.dfsc.dla.mil/main/f/home_f.htm. The information is in the Maintenance Repair and Environmental (MRE) Projects guidance. The status of existing projects can be tracked through the MRE Database on this web site
- Upgrade or removal of unregulated tanks unless there is a documented release
- Petroleum site assessments and clean-up work. These items are covered in Section 2.19

2.18.4 Calculation

- Fees vary from state to state (typically in the \$25-\$50/tank range)
- Use RACER, similar UST costing software, or historical costs for any required upgrades or removals.
- Obtain vendor quotes for any equipment and training
- Contact HQ AETC or DFSC for costs of similar projects

2.18.5 Standard A-106/EPN Entries

- EEIC: Various (409, 521.20, 522.20, 523.20, 529.20, 534.20, 619, 628, 683.20)
- Fund Type: O&M
- Compliance Class: Class 0, 1 or 2
- Regulatory Driver: (Statutory Authority) RCRA
- Pollutant Category: USTS, ANAL, PRMT

Luke **Environmental Program Narrative** Date: 13 Mar 97

| | |
|---|--------------------------------------|
| FY00 Project Number: NUEX987032 | Project Title: Repair of USTs |
| Category: Environmental Compliance | Compliance Date: 1998 |
| Estimated Cost: \$530,200 | Class: 1 |
| Estimated RTA Date: 1 Oct 97 | Service Center: RCRA |

Requirement: **According to federal and state UST regulations, all active UST systems must meet leak detection construction requirements by no later than December 1993 and corrosion protection and spill/overfill protection requirements by no later than December 1998. Two USTs at Luke AFB are no longer required and must be removed. One 10,000-gallon UST at Gila Bend AFAF has already been cited for not meeting state regulation, and it is more cost-effective to remove the tank.**

Legal Citation: **A.R.S. 49-1001 et seq; A.A.C. R18-12-102 et seq, A.A.C. R18-12-101 et seq; 40 CFR Sections 280.20 and 280.21**

History: In FY97 Luke, AFB will remove six 50,000-gallon USTs, leaving only the twelve USTs in service at Luke AFB and four USTs in service at Gila Bend AFAF. One of USTs at Gila Bend AFAF has received a Notice of Violation and as part of the corrective action, Luke AFB has committed to the removal of the tank. Of the twelve USTs at Luke AFB, one UST has a leak detection system that is in need of repair, one 50,000-gallon UST and one 2,000-gallon UST are not in compliance with performance standards and are no longer being utilized and four USTs are scheduled to remain in service required corrosion protection system, leak detection system, and/or spill prevention system installation in order to meet the EPA and the Arizona Department of Environmental Quality minimum construction standards which will be required of all UST systems after Dec 98.

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.19 RCRA Corrective Action Cleanup

2.19.1 Program Strategy

- The RCRA-CA program is a clean-up program designed to evaluate the nature and extent of releases of hazardous waste or constituents that are ineligible for Environmental Restoration Account (ERA) funding and to implement an appropriate corrective measure or measures to protect human health and the environment
- All efforts should be made to keep investigation and cleanup of petroleum products under the UST regulations as they are generally less costly than implementing cleanup under the RCRA-CA process
- Risk Based Corrective Action (RBCA) should be applied as appropriate to ensure significant cost savings over other alternatives
- Successful implementation of this program will require close coordination between Restoration and Environmental Compliance (EC) personnel

2.19.2 Policy and Regulatory Guidance

- 40 CFR 264 Subpart S
- 1994 Corrective Action Plan, May 94
- Subpart S Initiative (ANPR 61 FR 79432), 1 May 96
- 40 CFR 112, Oil Pollution Prevention
- 40 CFR 280, Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks
- Air Force Interim Guidance on RCRA-CA, Apr 98
- AETC Installation Restoration Program Guide, Jan 99
- AETC Guidance on Investigative-Derived Waste (IDW), 8 Dec 98
- AFI 32-7001, 9 May 94, Environmental Budgeting
- AFI 32-7044, 25 Apr 94, Storage Tank Compliance

2.19.3 Validation

What's valid for environmental funding

- RCRA Facility Investigation (RFI) of SWMU or AOC required by RCRA Facility Assessment, RCRA Order (3008h, 3004u, 3004v) or RCRA Part B or Subpart X permit. Provide back-up documentation of requirement with project narrative
- Corrective Measures Study (CMS)/Corrective Measures Implementation (CMI) required as a result of RFI. Provide regulator comments and/or schedule showing timeline for implementation
- Remedial Action-Operation (RA-O), Long Term Monitoring (LTM) required as a result of CMS/CMI
- Supervision and Administration (S&A) or Supervision and Review (S&R)
- Site Assessment, RBCA, or RA of UST Sites required by Federal or State regulations
- Management Action Plan (MAP) and updates
- Engineering Evaluation/Cost Analysis (EE/CA)
- Spill Cleanup
- Training required by law
- Courses related to Environmental Restoration (as approved by MAJCOM)

What's not valid for environmental funding

- Removal of unregulated tanks unless there is a documented release
- ERA eligible site cleanups

2.19.4 Calculation

- RACER estimates are required for all EC funded site cleanup

2.19.5 Standard A-106/EPN Entries

- EEIC: Various (409, 534.10, 534.20, 534.70)
- Fund Type: O&M
- Compliance Level: Class 0 or 1
- Regulatory Driver: (Statutory Authority) RCRA, CWA

Section 2.20 Recycling

2.20.1 Program Strategy

- To promote cost effective waste prevention and recycling of reusable materials
- Programs should provide an economic benefit when compared to disposal by landfilling or incineration

2.20.2 Policy and Regulatory Guidance

- 40 CFR Parts 243-253
- 40 CFR Part 172
- Public law 97-214, 10 USC Section 2577, Disposal of Recyclable Materials
- Public law 99-580, 42 USC Sections 6901-6987, Resource Conservation Recovery Act of 1976 as amended
- Executive Order 13101, Fed Acquisition, Recycling and Waste Prev'n, 14 Sep 98
- AFI 32-7001, 9 May 94, Environmental Budgeting
- AFI 32-7042, 12 May 94, Solid and Hazardous Waste Management
- AFI 32-7080, Pollution Prevention, 12 May 94 (under revision)
- AETC Supplement to AFI 32-7042, 16 Feb 96
- AETC Supplement to AFI 32-7080, 6 Jan 95 (under revision)
- AETC 94-003 Qualified Recycling Program Implementation Guidance, 30 Aug 94
- USAF Resource Recovery and Recycling Program Guidance, May 95 DoDD 4165.60
- Instructions for the Environmental FY 99-03 APOM Submittal (not dated)

2.20.3 Validation

What's valid for environmental funding

- Recurring costs to operate Qualified Recycling Programs (QRPs) and Composting Programs. **Bases must submit cost/benefit analysis for MAJCOM approval see examples QRP 20-1 through 20-3**

- Equipment to start up or expand a QRP or composting program
- Solid waste (SW) management plan and SW analysis plan updates
- SW Opportunity Assessments (every 3 years with annual in-house updates)
- Permits and fees associated with operating a QRP or compost facility
- Training required by law; training required to manage an effective QRP. (Costs should not exceed \$1000/employee per year for all professional training including TDY costs.)
- Equipment required by law for environmental compliance
- Publications required by law
- Equipment for SW recycling/reclamation will be considered for validation
- Contracts for recycling SW will be considered for validation if it's more cost effective than disposal as shown in a MAJCOM approved cost analysis

What's not valid for environmental funding

- Transportation and disposal of municipal solid waste
- Environmental Restoration Account (ERA) eligible projects
- Vehicles
- Computers and software
- Publications not required by law
- Household HW recycling
- Recycling or composting equipment when a viable source reduction alternative exists
- QRPs which are not cost effective as determined by a MAJCOM-approved cost analysis
- Achieving Compliance through Pollution Prevention Initiatives

2.20.4 Recurring Operating and Start-Up Costs

Recurring operating (proceeds shortfall) and start-up costs for the QRP and composting programs will be programmed in Program Element Code (PEC) xxx54 and Element of Expense Investment Code (EEIC) xxx15. Operating costs are classified as a recurring requirement, and start-up costs are identified as a Class P1 requirement.

2.20.5 Proceeds Distribution

Recycling proceeds generated from QRPs or composting programs operated under the Civil Engineer (nonappropriated fund owned) will be returned to the Civil Engineer QRP suspense account. Proceeds will first be used to recover appropriated fund costs incurred managing and operating the QRP to include but

Recycling

not limited to manpower, equipment, supplies, equipment, utility, and real property costs. After appropriated cost reimbursement, the installation commander may use up to 50% of the remaining sales proceeds for pollution abatement, energy conservation, and occupational safety and health activities. Any remaining proceeds may be transferred to the Morale, Welfare and Recreation Fund. Proceeds from Services, Army/Air Force Exchange Services (AAFES) or DECA operated QRPs will be returned to the respective organization

2.20.6 Calculation

- Funds authorized for training should be limited to personnel responsible for QRP management in the Environmental Flight. Required QRP training for personnel in organizations outside the Environmental Flight should be developed and provided in-house. Use historic costs to estimate SW disposal unit cleanup or site closure

QRP Example 2.20-1, Annual Recycling Budget (Submit with EPN)

| MANPOWER | EST'D COST | |
|---|-------------------|------------------|
| Recycling Operations Manager/Coordinator to manage daily operation of recycling program Annual = \$51,000 - \$12,740 residual from \$20,000 for 1998 | Contractor loaded | \$38,220 |
| Worker 1 to pick up recyclables on daily basis | Contractor loaded | \$33,000 |
| Worker 2 to pick up recyclables daily | Contractor loaded | \$33,000 |
| Worker/Vehicle operator to drive and pick up recyclables | Contractor loaded | \$33,000 |
| One-ton stakebed flatbed truck w/ball hitch and Tommy lift | | \$22,000 |
| A recycling flatbed w/sectional dividers | | \$9,000 |
| Five roll-off dumpsters (60ft x 12ft x 5ft high) for paper, tin cans, plastic, cardboard, metal | | \$20,000 |
| Bailer for cardboard/paper (purchase from 12 services) | | \$8,000 |
| Oil filter crusher and floor stand to crush oil filters and other cans for recycling | | \$2,000 |
| Total Phase 1 | | \$198,220 |

QRP Example 2.20-1, Phase 2 Recycling Budget FY99 (Submit with EPN)

| | | |
|--|--|-----------------|
| Fluorescent lamp tube crusher to crush and recycle fluorescent lamps | | \$5,000 |
| 48-gallon four-compartment recycling bins from Rubber Maid | | \$48,000 |
| 10 mobile recycling bulk collection trucks, 16.1 cubic foot | | \$1,000 |
| 4 standard 55-gallon drums for fluorescent lamps | | \$350 |
| Total Phase 2 | | \$54,350 |

**QRP Example 2.20-2, In-house Effort
(Submit with EPN)**

QUALIFIED RECYCLING PROGRAM COST/BENEFIT ANALYSIS _____ AFB

| | ASPECT | COST | PROFIT | AVOIDED COST |
|------------------------------------|--|---------------------|---------------------|---------------------|
| OPERATING COSTS | Civilian Salaries (____x avg rate) | \$ 83,400.00 | | |
| | Military Salaries (____x shop rate) | \$ 27,500.00 | | |
| | MFH Collection Contract | | | |
| | Basewide Collection Contract | | | |
| | Vehicle/Equipment Purchase* | \$ 39,000.00 | | |
| | Vehicle Lease | \$ 20,000.00 | | |
| | Vehicle/Equip Maint (annual cost/4) | | | |
| | Equipment Lease | | | |
| | Supplies | \$ 3,000.00 | | |
| | Misc (Award Plaques...) | \$ 1,200.00 | | |
| PROFITS | Proceeds (Direct Sales) | | \$ 42,500.00 | |
| | Proceeds (DRMO) | | \$ 4,500.00 | |
| | Other profits (explain) | | | |
| | Monies Owed by DRMO (estimated) | | \$ 3,200.00 | |
| AVOIDED COSTS | Solid Waste Fee Reduction (Landfill Fee avoided)** | | | \$ 54,554.00 |
| | Solid Waste Disposal Cost Reduction (Contract Cost avoided)*** | | | \$ 68,904.00 |
| | Other benefit (explain)**** | | | \$ 18,500.00 |
| TOTALS | | \$174,100.00 | \$ 50,200.00 | \$ 41,958.00 |
| TOTAL PROGRAM COST/BENEFIT: | | | | \$ 18,058.00 |

* For quarterly reporting appropriate amortization schedules should be used to spread costs over the expected life of vehicle, equipment, etc.

** This figure is based on our annual landfill fee of \$ 19.00/ton.

For taking 2871 tons (last CY amount) less to the landfill, \$19 x 2871 = \$54,554

*** Recycling was directly responsible for reducing the amount of solid waste collected.

Our average contract cost less tipping fees is \$24/ton (SW contract \$468,700/10,900 tons = \$43/ton – \$19/ton = \$24/ton)

For recycling 2871 tons, SW cost reduction, \$24 x 2871 = \$68,904

**** Other benefits include disposal cost avoidance associated with recycling the following:

Lead-acid batteries \$0.65/pound x 2,961 pounds = \$1,924.65

Used oil \$0.25/pound x 28,000 pounds = \$7,000.00

Tires \$0.25/pound x 10,000 pounds = \$2,500.00

Lead dust and shot from range \$0.80/pound x 2,000 pounds = \$1,600.00

Antifreeze \$0.25/pound x 10,000 pounds =

\$2,500.00

**QRP Example 2.20-3, Contractor Effort
(Submit with EPN)**

QUALIFIED RECYCLING PROGRAM COST/BENEFIT ANALYSIS _____ AFB

| | ASPECT | COST | PROFIT | AVOIDED COST |
|------------------------------------|--|---------------------|---------------------|----------------------|
| OPERATING COSTS | Civilian Salaries (____x avg rate) | | | |
| | Military Salaries (____x shop rate) | | | |
| | MFH Collection Contract | \$ 60,000.00 | | |
| | Basewide Collection Contract | \$ 95,000.00 | | |
| | Vehicle/Equipment Purchase* | | | |
| | Vehicle Lease | | | |
| | Vehicle/Eqp Maint (annual cost/4) | | | |
| | Equipment Lease | | | |
| | Supplies | \$ 3,000.00 | | |
| | Misc (Award Plaques...) | \$ 1,200.00 | | |
| PROFITS | Proceeds (Direct Sales) | | \$ 11,000.00 | |
| | Proceeds (DRMO) | | | |
| | Other profits (explain) | | | |
| | Monies Owed by DRMO (estimated) | | | |
| AVOIDED COSTS | Solid Waste Fee Reduction (Landfill Fee avoided)** | | | \$ 54,554.00 |
| | Solid Waste Disposal Cost Reduction (Contract Cost avoided)*** | | | \$ 68,904.00 |
| | Other benefit (explain)**** | | | \$ 18,500.00 |
| TOTALS | | \$159,200.00 | \$ 11,000.00 | \$ 141,958.00 |
| TOTAL PROGRAM COST/BENEFIT: | | | | (\$ 6,242.00) |

* For quarterly reporting appropriate amortization schedules should be used to spread costs over the expected life of vehicle, equipment, etc.

** This figure is based on our annual Landfill fee of \$ 19.00/ton.

For taking 2871 tons (last CY amount) less to the landfill, \$19 x 2871 = \$54,554

*** Recycling was directly responsible for reducing the amount of solid waste collected.

Our average contract cost less tipping fees is \$24/ton (SW contract \$468,700/10,900 tons = \$43/ton – \$19/ton = \$24/ton). For recycling 2871 tons, SW cost reduction, \$24 x 2871 = \$68,904

**** Other benefits include disposal cost avoidance associated with recycling the following:

Lead-acid batteries \$0.65/pound x 2,961 pounds = \$1,924.65

Used Oil \$0.25/pound x 28,000 pounds = \$7,000. Tires \$0.25/pound x 10,000 pounds = \$2,500

Lead dust and shot from range \$0.80/pound x 2,000 pounds = \$1,600.00

Antifreeze \$0.25/pound x 10,000 pounds = \$2,500.00

Benefit Increase Plan: (Required if costs exceed benefit) Based on our local market analysis, the contractor does not appear to be getting fair market value for metals and cardboard. By providing assistance in locating better markets, we expect our revenues to increase to bring the program to break-even or better by the second quarter.

Maxwell **Environmental Program Narrative** Date: 13 Mar 99

FY00 Project Number: OS005091 Project Title: **Recycling Contract**
Category: **Environmental Compliance** Compliance Date: **1998**
Estimated Cost: **\$530,200** Class: **1**
Estimated RTA Date: **1 Oct 97** Service Center: **RCRA**

Requirement: **Recycling as a pollution prevention initiative. EO 13101 and 12870 also require recycling.**

Legal Citation: **40 CFR 243-245; EO 13101 and AF MSW Reduction Goals**

History: **Federal Regulation, Executive Orders, and Air Force directives require solid waste reduction and recycling. As a minimum, each installation will recycle metals, plastic, glass, used oil, lead-acid batteries, tires, paper cardboard and newspaper.**

Impacts if not Funded: **Unable to meet solid waste reduction goals and corresponding increase in solid waste disposal fees and contract costs. FY98 estimated cost avoidance was \$60,300.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Environmental Program Narrative Date: 13 Mar 00

FY98 Project Number: **OS005262**Project Title: **QRP Scrap Metal Program, Equipment**Category: **Pollution Prevention**Compliance Date: **2000**Estimated Cost: **\$30,000**Class: **OSS**Estimated RTA Date: **31 Mar 00**Service Center: **PRVN**

Requirement: **In order for the sale of scrap metal to generate revenue for the base, material handling equipment must be purchased. Source segregated metal commands a higher selling price as opposed to selling mixed metals. The current program generates between \$250,000 to \$300,000 per year. The purchase of metal cutting tools, a fork lift, and a storage bin should increase the revenue generated by \$15,000 per year. This equates to a 2-year payback with an estimated \$13,000/year profit in outyears.**

Legal Citation: **A.R.S. Title 49, Chapter 5, Article 4; 40 CFR 243-245 ; DODI 4715.4; EO 12870, 13101; DoDD 4165.60.**

History: **DOD Instructions, EOs, and environmental regulations require installations to comply with and establish pollution prevention, recycling, and affirmative procurement practices. The QRP is a cost-effective program, which reduces the volume of non-hazardous solid waste. Sales of scrap metal will allow all facilities to participate. The program diverts material from the solid waste stream, where it can be economically recycled.**

Impacts if not Funded: **Base will not maximize the potential for revenue created by the recycling program.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.21 Safe Drinking Water Act (SDWA) Compliance

2.21.1 Program Strategy

- To manage the drinking water program, in conjunction with Bioenvironmental Engineering Services, to assure that all Safe Drinking Water Act and applicable state regulations are followed
- The foundations of the program include:
 - performance of required sampling and analysis
 - immediate corrective action to halt adverse conditions
 - preventing of the spread of illness associated with drinking water contamination
 - management of the drinking water supply and distribution systems in a manner which will minimize hazards to the base population
- All system operators are to be adequately trained and certified according to regulatory requirements

2.21.2 Policy and Regulatory Guidance

- 40 CFR 130, 141-143 (Safe Drinking Water Act)
- 42 USC 300f et seq.
- AFI 32-1066, 4 May 94, Plumbing Systems
- AFI 32-1067, 25 Mar 94, Water Systems
- AFI 48-119, 25 Jul 94, Medical Services Environmental Quality Programs
- MIL-HDBK-1164, Operations and Maintenance of Water Supply Systems
- Air Staff guidance, FY00-05 Program Objective Memorandum Programming Guidance for Drinking Water Infrastructure Requirements, 5 Sep 97
- Applicable state and local drinking water statutes

2.21.3 Validation

What's valid for environmental funding

- State fees and permits associated with administration of state drinking water monitoring programs.

- Projects or activities required to close specific open regulatory enforcement actions, meet a regulatory deadline, or achieve compliance with specific federal, state and/or local Safe Drinking Water Act requirements. Such projects will be limited in scope to address specific problems
- Air Staff allows **total** environmental funding of infrastructure **repair** projects that are 51% compliance driven. Obviously, if you can dual source the construction aspects of the project with regular O&M funds, do so. Program **repair** projects in MILCON when they exceed \$5M
- Surveys to substantiate or fully define suspected or actual noncompliance conditions
- Sampling expenses, including sampling equipment and associated maintenance, sampling supplies and containers, sample transportation, and laboratory analysis

What's not valid for environmental funding

- Projects which can be classified as system infrastructure maintenance, upgrade, or expansion, specifically including installation of new or repair of existing backflow preventers, unless mandated by state or local environmental statutes, or are required to close an open regulatory enforcement action
- Design and construction of new water treatment plants, water wells, and water distribution systems
- Expenses of connection to municipal water systems and related design fees
- Water treatment plant or water distribution system operator training or backflow prevention inspection training
- State water system operator or backflow preventer inspector certification fees
- Computers and software
- Equipment which is not dedicated to storm water permit compliance activities
- Projects or services related to MFH

2.21.4 Calculation

- Use historic information to develop projected costs of sampling and analysis. Contact HQ AETC/CEVQ for information on contractor rates and expenses of similar projects, or use comparable historic information. Equipment should be priced by vendor quote or use catalog price

2.21.5 Standard A-106/EPN Entries

- EEIC: First 3 digits: 683 (permits); 534 (contract services); 609, 619 (supplies); 529 (minor construction projects) Second 2 digits: 70 (other environmental compliance)
- Fund Type: O&M

SDWA Compliance

- Compliance Class: 1
- Regulatory Driver: (Statutory Authority) SD
- Pollutant Category: ANAL (sampling & analysis); PRMT (permit fees); OTHR (other - supplies, non-training TDY); PLTS (plant operations)
- Recurring expenses are to be programmed as operations and services (OS). Specific corrective action projects are to be programmed as Class 1, and must be thoroughly justified, including project need and evaluation of alternatives, in the project narrative
- Compliance Status: O&S

| | | |
|--|--|-----------------|
| Maxwell | Environmental Program Narrative | Date: 21 Dec 98 |
| FY00 Project Number: ABCE00123 | Project Title: Sampling/Test Drinking Water | |
| Category: Drinking and Wastewater | Compliance Date: 10 Jun 99 | |
| Estimated Cost: \$5,000 | Class: 0 | |
| Estimated RTA Date: 10 Jun 99 | Service Center: Base Contracting | |

Requirement: **To sample drinking water distribution systems on base and at the Lake Martin Recreational Area. Costs include: recreational water monitoring (\$1,000 - required by ADEM), membership with the American Water Works Association (AWWA) (\$500), and customer service water related complaints/investigations for Air Force owned drinking water distribution systems (\$2,500).**

Legal Citation: **40 CFR 147, Lead Contamination and Control Act, Total Coliform Rule, Phase II-VI Contaminants, and State Regulation ADEM 335-7**

History: **The collection of samples from the drinking water systems at Maxwell AFB, Gunter Annex, and the Lake Martin Recreational area are required to meet Air Force requirements and state and federal requirements. Air Force owned and maintained water distribution systems must comply with Safe Drinking Water Act (SDWA), even if the water is purchased from other sources.**

Impacts if Not Funded: **Cannot investigate customer complaints concerning the quality of the drinking water. Recreational water monitoring is required by the state; the base would be in non-compliance if this monitoring is not completed.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.22 Sampling, Analysis, and Monitoring

2.22.1 Program Strategy

- To ensure all AETC bases comply with federal, state, and local environmental sampling requirements
- To assess environmental conditions that have could have a detrimental impact upon human health and well-being
- Future requirements for drinking water may involve the analysis of more contaminants beyond the primary, the Phase 2, and the Phase 5 elements and compounds
- Anticipate the aging infrastructure of drinking water distribution systems may impact the color, taste, and palatability of base drinking water
- Plan and program support of new mission beddowns
- Prepare for future Environmental Protection Agency non-point source requirements
- Strive to reduce SAM monitoring requirements and costs while ensuring compliance

2.22.2 Policy and Regulatory Guidance

- AFI 32-7001, 9 May 94, Environmental Budgeting, paragraph A.4.1.14, page 15; paragraph A5.1, page 17
- AFI 48-119, 25 Jul 94, Medical Service Environmental Quality Programs
- HQ USAF/CEV Programming And Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs, Draft 3, page 1
- HQ USAF/SG Letter, 12 Aug 94, Funding for Environmental Compliance (EC) Sampling, Analysis, and Monitoring (SAM)
- HQ AETC/SG Letter, 11 Nov 94, Bioenvironmental Engineering (BE) Management of Environmental Compliance (EC) Sampling, Analysis, and Monitoring (SAM), Pollution Prevention, and Preventive Medicine Funds
- HQ AETC/SGPB Letter, 31 Dec 97, AETC Sampling and Analysis Funding Policy (BE 97-46)
- Service Level Agreement for ECSAM Services between HQ AETC/CEV/SGPB and Det 1, HSC (currently known as IERA), 9 Feb 98

2.22.3 Validation

What's valid for environmental funding

- Analytical services and fees for compliance sampling in support of an environmental regulation (e.g., Clean Water Act (CWA); Clean Air Act (CAA); RCRA; the Comprehensive, Environmental Response, Compensation Liability Act (CERCLA); Safe Drinking Water Act (SDWA); Toxic Substances Control Act (TSCA); and the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). This includes samples for hazardous waste characterization, toxic substances, pesticides, waste water, storm water samples, Installation Restoration Program (IRP) site samples, and stack sampling in support of air emissions. Drinking water samples collected and analyzed in support of federal, state, or local state requirements, whichever have primacy
- EC funds may be used for asbestos and lead only in the event of emergency response actions necessary to protect health. O&M or Housing funds should be used for analyses of samples associated with building renovation, remodeling, construction, or demolition
- Shipping samples to meet analytical holding time requirements, and the shipment of supplies and equipment to support a specific AETC sampling effort.
- Collection equipment purchase and maintenance
- All bottles, containers, preservation chemicals, and environmental sampling supplies
- Point and non-point source pollution monitoring
- Contracted sampling and monitoring
- LBP sampling and analysis at non-MFH facilities that could pose a health hazard to children age 7 or under
- Air monitoring of asbestos removal activities not associated with a renovation. National Emission Standards for Hazardous Air Pollutants (NESHAPS) and Asbestos Hazardous Emergency Response Act (AHERA) sampling are covered based on fiber release to the public or the environment
- Long-term monitoring and recurring expenses of long-term clean up operations, not covered by the Environmental Restoration Account (ERA)
- Accreditation fees for on-base "environmental" laboratories
- Costs associated with travel to support EC consulting and sampling efforts
- Consulting hours in support of EC site visits as approved by HQ AETC/CEV
- Development of database systems to develop and track valid sampling requirements and results
- Training that directly supports the environmental program (see Training Matrix in Section 2.26)

What's not valid for environmental funding

- Environmental certifications and licenses
- Other training which doesn't directly support the environmental program
- SAM required under the Occupational Safety and Health Act (OSHA)
- Sampling and analysis associated with or in anticipation of repair, renovation, demolition, or construction
- Sampling and analysis supplies, personal protective equipment, and laboratory preservatives associated with demolition, construction, repair, or renovation not required by environmental regulations, ERA, MFH, OSHA
- Sampling supplies and equipment plus analytical costs associated for asbestos or LBP that are not certified as a health hazard by the BEE
- Sampling and analysis costs associated with ERA eligible projects.
- Radioactive waste disposal

2.22.5 Calculation

- Use historic costs to estimate sampling and analysis costs
- Use the waste analysis plan to determine required waste stream sampling and analysis frequencies
- Use historic costs to estimate supplies and equipment costs

2.22.6 Standard A-106/EPN Entries

- EEIC for all Contracts – 534.XXX
- SAM CWA and SDWA (Supplies-EEIC 604/609/619; Equipment-EEIC 619/624/628)
- SAM RCRA, TSCA, and FIFRA (Supplies - EEIC 604/609/619; Equipment – EEIC 619/624/628)
- SAM CAA (Supplies - EEIC 604/609/619; Equipment – EEIC 619/624/628)
- SAM SARA Title III (Supplies - EEIC 604/609/619; Equipment – EEIC 619/624/628)
- SAM Asbestos (Supplies - EEIC 604/609/619; Equipment – EEIC 619/624/628).
- SAM Lead Based Paint (Supplies - EEIC 604/609/619; Equipment – EEIC 619/624/628)
- SAM Radon (Supplies - EEIC 604/609/619; Equipment – EEIC 619/624/628)
- SAM Contract Analytical/Supplies Support other than IERA (Analytical/Supplies and Shipping Costs - EEIC 469, 619, AF Form 9, 534.XX)
- SAM IERA Analytical/Supplies Support (Analytical/Supplies and Shipping Costs- -AF Form 85, AF Form 616)

Little Rock Environmental Program Narrative Date: 22 May 97
Project Number: OS005320

| | |
|---|---------------------------------------|
| FY99 Project Number: OS005320 | Project Title: SAM, Wastewater |
| Category: Environmental Compliance | Compliance Date: 1999 |
| Estimated Cost: \$17,220 | Class: OSM |
| Estimated RTA Date: 31 Aug 99 | Service Center: CWA |

Requirement: **Costs of storm water sampling include \$860/month for a total of \$11,000/year. Waste water sampling includes monthly sampling @ \$4,800/year (\$400/month), semi-annual testing @ \$600 (2 x \$300), and annual testing @ \$60, for a total of \$5,460. Sanitary sewer overflow includes 12 samples @ \$60/sample for a total of \$720. The grand total comes to \$17,220.**

Legal Citation: **State water regulations and POTW waste order permit #87-80-12; CFR 122, 42 CFR 136.3, SDWA, CWA**

History: **Storm water permit requires monthly sampling at each of four out-falls and analysis for BOD, COD, TSS, and oil/grease from each sample. POTW permit requires monthly sampling at one location and monthly analysis for BOD, TSS, metals, and oil/grease. Semiannual analyses for Cr, cyanide, and phenol are required and annual analyses for mercury and arsenic are required. Sanitary sewer overflows require BOD and TSS testing for reporting to POTW. The base will be using a contract lab to perform most of the sampling and analysis.**

Impacts if not Funded: **NOVs, fines, or penalties because Little Rock AFB cannot meet permit requirements.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.23 Solid Waste (SW)

2.23.1 Program Strategy

- Ensuring compliance with solid waste regulations while reducing the volume of SW generated at the source
- Reusing SW where practical, recycling when reduction or reuse is not feasible and disposing only as a last resort
- Achieving Compliance through Pollution Prevention Initiatives
 - Equipment for SW recycling/reclamation will be considered for validation
 - Contracts for recycling SW will be considered for validation if more cost effective than disposal as shown in a MAJCOM-approved cost analysis

2.23.2 Policy and Regulatory Guidance

- AFI 32-7042, 12 May 94, Solid and Hazardous Waste Management
- AETC Supplement to AFI 32-7042, 16 Feb 96
- AFI 32-7001, 9 May 94, Environmental Budgeting
- Instructions for the Environmental FY 99-03 APOM Submittal (undated)
- AFI 32-7080, 12 May 94, Pollution Prevention
- AETC Supplement to AFI 32-7080, 6 Jan 95
- Public Law 97-214, 10 USC Section 2577, Disposal of Recyclable Materials
- Public Law 99-580, 42 USC Sections 6901-6987, Resource Conservation Recovery Act of 1976, as amended
- Executive Order 13101, Federal Acquisition, Recycling and waste Prevention, 14 Sep 98
- 40 CFR Parts 243-253
- 32 CFR Part 172
- AETC 94-003 Qualified Recycling Program Implementation Guidance, 30 Aug 94
- USAF Resource Recovery and Recycling Program Guidance, May 95

2.23.3 Validation

What's valid for environmental funding

- Investigation and cleanup or closure of non-ERA SW promiscuous dumps, interim permitted or permitted disposal units (i.e., landfills)
- Design of permitted SW facilities
- SW management plan and SW analysis plan updates
- SW Opportunity Assessments (every 3 years with annual in-house updates)
- Permits and fees associated with SW management
- Training required by law
- Equipment required by law for environmental compliance
- Clean up of soil and water contamination from non-ERA closed disposal units
- Publications required by law

What's not valid for environmental funding

- Transportation and disposal of municipal solid waste
- ERA eligible projects
- Vehicles
- Computers and software
- Publications not required by law
- Household HW disposal

2.23.4 Calculation

- Funds authorized for training should be limited to personnel responsible for SW management in the Environmental Flight. Required SW training for personnel in organizations outside the Environmental Flight should be developed and provided in-house. Use historic costs to estimate SW disposal unit cleanup or site closure

2.23.5 Standard A-106/EPN Entries

- EEIC: 534.90
- PEC: xxx54
- Class: 1 (initial SWMP), 0 for annual updates
- Pollution Category: PRVN
- Statute Authority: RCRA

Maxwell **Environmental Program Narrative** Date: 21 Dec 98

FY00 Project Number: **OS-006068** Project Title: **Plan, OA for Solid Waste**
Category: **Solid Waste** Compliance Date: **10 Apr 01**
Estimated Cost: **\$50,000** Class: **1**
Estimated RTA Date: **10 Sep 00** Service Center: **Base Contracting**

Requirement: **To ensure compliance with federal and state Solid Waste Management Plan (SWMP) requirements, AF SWMPs must contain:**

- Inventory and analysis of solid waste disposal technologies and methods;
- **Inventory of solid waste streams and management methods;**
- **Analysis of solid waste recovery, conservation, and recycling;**
- **Evaluation of any on-base operating landfills; an implementation plan**

Legal Citation: **RCRA, 40 CFR 245, 246, AFI 31-7042**

***History:** All AF installations must have a complete SWMP*

Impacts if Not Funded:

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.24 Storm Water Point Source Discharge Permit Compliance

2.24.1 Program Strategy

- The storm water program must provide for the identification of all storm water discharge points and sources, and the development of appropriate best management practices of a structural or procedural nature to ensure that all storm water leaving the base is as nearly free of pollutants as possible
- The program success depends on a constant emphasis of training, education, and community outreach: assessment of need, development and implementation of best management practices; and performance of inspections and compliance audits to discover and correct program deficiencies
- All requirements of the applicable storm water discharge permit shall be met at all times through proper management of the program

2.24.2 Policy and Regulatory Guidance

- 33 USC 1311
- 40 CFR 122, NPDES Program
- 40 CFR 401, 402, Federal Water Pollution Control Act, AKA Clean Water Act
- 57 FR 41236 et seq., 9 Sep 92, EPA Baseline General Discharge Permit
- 60 FR 50802 et seq., 29 Sep 95, EPA Multi-sector General Discharge Permit
- 62 FR 37748 et seq., 11 Jul 97, EPA Multi-sector permit additions
- AFI 32-7041, 13 May 94, Water Quality Compliance, Section 2.12
- Air Force Installation Storm Water Program Management Guide, Aug 97
- Applicable federal, state and/or local storm water statutes and discharge permits

2.24.3 Validation

What's valid for environmental funding

- Initial Storm Water Pollution Prevention Plan (SWPPP) preparation
- Extensive revisions to an existing SWPPP (i.e., if a permit type change is made which will result in major SWPPP modifications)
- Requirements needed to implement the SWPPP, as identified within the SWPPP

- Fees associated with administration of state storm water permit programs and state permit application fees, plus the cost of permit application preparation
- Expenses of fully justified structural best management practices projects identified in the SWPPP as being necessary to achieve base compliance to the discharge permit
- Surveys to substantiate or fully define suspected or actual non-compliance conditions (e.g., cross-connection surveys, watershed surveys)
- Projects or activities required to close specific open regulatory enforcement actions; to meet a regulatory deadline; or, to achieve compliance with specific Federal, state and/or local storm water discharge permit requirements
 - Air Staff allows **total** environmental funding of infrastructure **repair** projects that are 51% compliance driven. Obviously, if you can dual source the construction aspects of the project with regular O&M funds, do so. Program **repair** projects in MILCON when they exceed \$5M
- Sampling expenses, including remote sampling equipment (if applicable) and associated maintenance, sampling supplies and containers, sample transportation, and laboratory analysis costs

What's not valid for environmental funding

- Annual updates of the SWPPP by contractors (to be done in-house, if needed)
- Performance of annual comprehensive site compliance evaluation (to be done in-house)
- Projects which can be classified as infrastructure maintenance, repair, upgrade, or capacity expansion
- Erosion control projects, without specific approval of HQ AETC/CEV
- Projects or services related to MFH
- Equipment which is not dedicated to storm water permit compliance activities
- Computers and software
- Worker and management training in storm water pollution prevention, as required by permit (must be provided in-house by designated base personnel).
- Projects or services related to MFH

2.24.4 Calculation

- Use historic information to develop projected costs of sampling and analysis. Contact HQ AETC/CEVQ for information on contractor rates and expenses of similar projects, or use comparable historic information. Equipment should be priced by vendor quote or use catalog price

2.24.5 Standard A-106/EPN Entries

- EEIC: First 3 digits: 683 (permits); 534 (contract services); 609, 619 (supplies); 529 (minor construction projects) Second 2 digits: 70 (other environmental compliance)
- Fund Type: O&M
- Compliance Class: 1
- Regulatory Driver (Statutory Authority): CW
- Pollutant Category: ANAL (sampling & analysis); PRMT (permit fees); TRNG (training); OTHR (other - supplies, non-training TDY)
- Compliance Status: O&S
- Recurring expenses are to be programmed as operations and services (OS). Specific corrective action projects are to be programmed as Class 1 and must be thoroughly justified, including project need and evaluation of alternatives, in the project narrative.

Keesler

Environmental Program Narrative

Date: 21 Dec 98

FY00 Project Number: **ABCE00123** Project Title: **Stormwater Plan Development**
Category: **Drinking & Wastewater** Compliance Date: **10 Apr 00**
Estimated Cost: **\$15,000** Class: **1**
Estimated RTA Date: **10 Apr 00** Service Center: **AETC Contract**

Requirement: **To prepare the Stormwater Pollution Prevention Plan.**

Legal Citation: **40 CFR§122.26, 122.28**

History: **The base has been operating under a continuation of an individual National Pollutant Discharge Elimination System (NPDES) permit which expired in 1989 and has not been renewed. The base has a plan document, but it is outdated and must be revised to incorporate present EPA requirements and base conditions. This will be the equivalent of developing a new plan. An application will be resubmitted to the EPA in FY97. To ensure compliance, a pollution prevention plan will be necessary.**

Impacts if Not Funded: **Plan must be developed and implemented in order to comply with EPA individual NPDES permit requirements.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.25 Supplies, Publications, Equipment and Maintenance

2.25.1 Program Strategy

- To provide the bases with sufficient resources to “keep the base gates open”

2.25.2 Policy and Regulatory Guidance

- AFI 32-7001, 9 May 94, Environmental Budgeting, paragraphs A4.1.14 and A6.1.10, page 15
- HQ USAF/CEV Programming And Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs, Draft 3, pages 4, 6, and 7-8

2.25.3 Validation

What’s valid for environmental funding

- Supplies for sampling, analysis and monitoring activities for either the Environmental Flight or the Bioenvironmental Engineer in their **direct** support of the Environmental Flight (as opposed to routine occupational health workloads)
- Spill response supplies for spills to which the Environmental Flight will respond (again, as opposed to buying spill supplies for the designated emergency spill response team)
- The minimum amount of office supplies to support those individuals in the Environmental Flight
- Publications and regulations required to support the environmental compliance, conservation and pollution prevention programs
- Equipment under \$100K to meet valid compliance, pollution prevention or conservation requirements
- Equipment maintenance to meet valid compliance, pollution prevention or conservation requirements
- A cellular telephone, pager, or two-way radio for the Civil Engineer Environmental Flight Chief (limited to one device)

- A two-way radio for the Civil Engineer Hazardous Waste Manager
- Requests for reimbursement for General Services Administration (GSA) vehicle rental should be forwarded to MAJCOM for approval. Each request will be evaluated on its own merit after all other means of acquiring a vehicle have been exhausted

What's not valid for environmental funding

- Spill supplies for other base activities
- Office supplies for other than the Environmental Flight
- Trade magazines and newspapers
- Office furniture
- Equipment \$100K and over--use the base 3080 equipment purchase process
- Maintenance of real property facilities and equipment to include cathodic protection and leak detection systems for USTs and ASTs.
- Real property maintenance of grounds
- Tree-trimming, grass cutting, grading, weed control and seeding
- Repair and maintenance of roads and walks
- Wastewater treatment plant cleaning, maintenance or operations
- Drinking water plant cleaning, maintenance, or operation
- Oil/water separator cleaning, maintenance or operations
- Routine maintenance for air emissions control equipment
- Lining of sanitary/storm pipes

2.25.4 Calculation

- Equipment purchases are considered to be one-time buys and should be programmed accordingly. Each time a request for equipment funding is submitted for validation, it should identify specifically what equipment purchases are being made and what/who those purchases support
- Spill response supplies in excess of \$10K per flight per year are questionable
- Simple office supplies in excess of \$2K per flight per year are questionable

2.25.5 Standard A-106/EPN Entries

- Office supplies, EEIC 609
- Office supplies not available in base supply (i.e., IMPAC purchases), EEIC 619
- Environmental equipment, EEIC 628
- Computer purchases, EEIC 637

Keesler Environmental Program Narrative Date: 6 Feb 97
Project Number: OS005054 Revision: 1

FY98 Project Number: **OS005043** Project Title: **Supplies, Equipment**
Category: **Environmental Compliance** Compliance Date: **1998**
Estimated Cost: **\$12,500** Class: **OSS**
Estimated RTA: **1998** Service Center:

Requirement: **Equipment is required IAW the oil pollution act in direct support of the hazardous materials response team. Replacement and new equipment is a recurring requirement for some items due to the harsh environments they are exposed to. Six out-falls with two boom per out-fall. Booms must be changed after every large rainfall which is about six times/year. 6x2x6=72 booms 72 booms x \$140/each=\$10,080. Other supplies necessary with the booms are \$2,420. The overall sum is \$12,500/year.**

Legal Citation: **Oil Pollution Act of 1990, 40 CFR 112**

History: **The purpose of this equipment is to clean up accidental hazardous materials spills. Booms are permanently located at six out falls in case of accidental spills into this storm drainage system. Hazardous materials are used and stored on Keesler AFB. These materials have the potential to be spilled and must be cleaned out. Spilled material entering the storm drain must be prevented from entering the Back Bay.**

Impacts if not Funded: **Hazardous materials will not be properly cleaned up and materials spilled to the storm drainage system will enter the Back Bay, resulting in notices of violation.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

Chief, Environmental Flight

Approved / Disapproved

Commander, Civil Engineer Squadron

Section 2.26 Temporary Duty Assignments (TDY) Education and Training

2.26.1 Program Strategy

- Although education and training is a critical aspect of successful environmental program management, budget constraints limit our capability to fund 100% of the requirements. Based on these limitations our education and training goal is to keep education and training costs at or below the FY98 levels. In order to accomplish this goal, recommend applying the following strategies
 - Utilize the AFCEE Environmental Education and Training Requirement web site <http://www.afcee.brooks.af.mil/eq/eqform.htm> to develop solid education and training requirements cross-functionally
 - Apply the Training Assessment Code Decision Matrix in Section 2.26.2.
 - Those seeking environmental education and training must explore other funding avenues such as the AFIT Environmental Education Center (EEC) (www.afit.af.mil) and local training funds. Submit EEC request forms no later than 1 October to ensure adequate funding is available
 - Alternative education and training sources such as long distance education courses, video teleconferencing, computer-based interactive training, and web-based training; joint-service/MAJCOM training; and tuition free federal/state regulator training courses can maximize your training dollars. As more of these sources become available, our dependence on high cost education and training should lessen, leading to a reduction in the training budget
 - To encourage best business practices, utilize training opportunities to accomplish tasks otherwise contracted out
 - Consult with base Civilian Personnel Careers Program personnel as an avenue for funding

2.26.2 Policies and Regulatory Guidance

- AFI 32-7001, 9 May 94, Environmental Budgeting
- HQ USAF/CEV Programming And Budgeting Environmental Compliance, Pollution Prevention, and Conservation Programs, Draft

This Training Assessment Code Decision Matrix is designed to prioritize education and training requirements and assess the potential consequences if required training is not accomplished.

| Requirement ↓ | Risk and Regulatory Vulnerability | | | |
|------------------|-----------------------------------|---|---|---|
| | A | B | C | D |
| I | 1 | 2 | 3 | 5 |
| II | 2 | 3 | 4 | 5 |
| III | 3 | 4 | 5 | 5 |

Requirement.

The categories below include regulatory-driven training (I), training that improves efficiency and/or effectiveness (II), and skill replacement and AFI directed training (III):

I – Explicit Training. Training specified by environmental laws or implementing regulations to prepare military and civilian employees to perform with a level of competency sufficient to be in compliance with existing environmental laws and regulations.

II – Training:

(a) That will reduce other specific expenses, e.g., completing a legally mandated plan or document in-house rather than by contract (storm water pollution prevention plan, air emission inventory, etc.); or

(b) Required by program managers, technical and legal advisors, or supervisory personnel that directly support environmental programs.

III - Training required for replacement of skilled employees through career work force development programs, and training directed by AF Instructions/policy directives. Deferment would have an adverse impact over an intermediate term.

Probability of Regulatory Vulnerability or Direct Cost Savings.

An assessment of the training mandate which is directly tied to the likelihood of an increased risk/vulnerability of regulatory enforcement, or direct cost savings. The requirement categories are:

A – Likely to occur.

B – Probable to occur.

C – Possible to occur.

D – Unlikely to occur.

Overall Training Assessment Code Description:

1 – Imminent Mission Impact

2 – Serious Mission Impact

3 – Moderate Mission Impact

4 – Minor Mission Impact

5 – Negligible Mission Impact

2.26.3 Validation

Below are examples of **Requirement I** training requirements that HQ AETC/CEV will support with funding:

RCRA

- Hazardous Waste Generator (40 CFR§265.16)
- Permitted TSD Facility Personnel (40 CFR§264.16)
- Interim Status TSD Facility Personnel (40 CFR§265.16)

DOT

- Transportation of Hazardous Materials (49 CFR§172.700)

CAA

- **Ozone Deleting Chemical Mechanic (40 CFR§82.161)**
- **Asbestos Removal Worker (40 CFR§61.145)**
- Asbestos Inspector/Risk Assessor (40 CFR§763)
- Asbestos Contract/Supervisor (40 CFR§763)
- Asbestos Project Designer (40 CFR§763)
- Asbestos Air Monitor (Texas Only)

LBP

- LBP Inspector (40 CFR§745)
- LBP Abatement Worker (40 CFR§745)

OSHA

- HAZWOPER (29 CFR§1910.120) – CEV or designated representative only (required to enter CERCLA site)

The following are examples of **Requirement IIA** that HQ AETC/CEV will support with limited funding based on budgetary constraints:

- Environmental Impact Analysis Process Training
- NESHAP Training
- Stormwater Pollution Prevention Plan Training
- State-sponsored environmental workshops

Remaining education and training requirements are considered valid, but MAJCOM funds are not available to support (**Local funds may be used or training can be performed in-house to supplement your training requirements**).

Other

- HQ AETC/CEV will centrally fund all MAJCOM Program Management Reviews (PMRs), Joint Environmental Training Conferences, non-CE functionals at Joint Service Pollution Prevention Conference, and initial ACES Training (subsequent ACES training will be accomplished using “train the trainer”)
- ECAMP Training will be funded by HQ AETC/CEV as part of the annual ECAMP contract. Additional ECAMP training can be obtained through AFIT

2.26.4 Calculation

- Using the **Requirement II(b)** category in the Training Assessment Code Decision Matrix, provide a cost analysis that would support funding a course. For example, a typical air emissions inventory (AEI) may cost \$40K to accomplish via contract. However, if sending an individual to a course to learn how to conduct an AEI costs \$2K, you’ve saved \$38K.

2.26.5 Standard A-106/EPN Entries

- Use Class 0, EEIC 409.00
- **Submit a maximum of six (6) EPNs (2 per EC, P2, CN pillar) per base – One is for explicit or regulatory-driven training (IA/B), and the other for Mission Support (IIA)**
- Use “Education and Training” as the category for each EPN entry
- Include in the “Requirement Section” of each EPN:
 - Overall Training Assessment Code category (IA1, IB2, IIA2) from the matrix
 - Number of personnel attending, course name (initial/refresher),
 - Course cost and per diem/travel in each entry, but itemize costs (tuition or registration and TDY) separately
 - Base training priority for both regulatory and mission support requirements
- Attach cost benefit analysis calculations for all **Requirement II(a)**’s

Tyndall Environmental Program Narrative Date: 21 Dec 98

FY00 Project Number: **OS-001234** Project Title: **Explicit Training (EC)**
 Category: **Education and Training** Compliance Date: **10 Apr 00**
 Estimated Cost: **\$11,800** Class: **0**

Estimated RTA Date: **10 Apr 00** Service Center: **AETC Contract**

Requirement:

| Training Code | Personnel | Course | Cost (Tuition + TDY) | Total Cost | Base Priority |
|----------------------|------------------|--|-----------------------------|-------------------|----------------------|
| IA1 | 8 | Asbestos Worker (refresher) | \$350 + \$650 | \$8,000 | 1 |
| IA1 | 2 | Transportation of HAZMAT (refresher every 3 years) | \$1,000 + \$500 | \$3,000 | 2 |

Legal citation: **N/A since these are assumed regulatory-driven requirements from Section 2.26.3.**

History: **N/A**

Impacts if Not Funded: **Base personnel cannot perform asbestos abatement and transport hazardous materials.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

 Chief, Environmental Flight

Approved / Disapproved

 Commander, Civil Engineer Squadron

Tyndall Environmental Program Narrative Date: 21 Dec 98

FY00 Project Number: **OS-001234** Project Title: **Mission Support Training (EC)**
 Category: **Education and Training** Compliance Date: **10 Apr 00**
 Estimated Cost: **\$1,150** Class: **0**
 Estimated RTA Date: **10 Apr 00** Service Center: **AETC Contract**

Requirement:

| Training Code | Personnel | Course | Cost (Tuition + TDY) | Total Cost | Base Priority |
|---------------|-----------|--|----------------------|------------|---------------|
| IIB2 | 1 | State Air Emission Inventory Training (see attached cost benefit analysis) | \$500+\$300 | \$800 | 3 |
| IIB2 | 1 | JA personnel to negotiate Title V permit status | \$350 | \$350 | 4 |

Legal citation: **N/A since these are not regulatory-driven requirements, but directly support the environmental program.**

History: **N/A**

Impacts if Not Funded: **Base personnel cannot accomplish air emissions inventory at a cost savings to the AF (see attached cost benefit analysis). AF legal representation is requested by State regulators.**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

 Chief, Environmental Flight

Approved / Disapproved

 Commander, Civil Engineer Squadron

Section 2.27 Wastewater Discharge Permit Compliance

2.27.1 Program Strategy

- The wastewater program must ensure that all base wastewaters are known and characterized and that appropriate treatment or pre-treatment is performed prior to discharge to the environment, in accordance with the terms of the permit or other legal requirements.
- The wastewater collection system must be free of illegal cross-connections and maintained and managed in a manner to prevent pollutant levels from exceeding maximum permissible levels.
- The wastewater treatment and collection system will have operators who are adequately trained and certified according to regulatory requirements.

2.27.2 Policy and Regulatory Guidance

- 40 CFR 122 (NPDES Program)
- 40 CFR 401, 402, 405 (Federal Water Pollution Control Act, aka "Clean Water Act")
- MIL-HDBK-1138 Operations and Maintenance of Wastewater Treatment Systems (plus supplemental University of California training materials)
- AFI 32-7041, 13 May 94, Water Quality Compliance Section 2.4 and 2.5
- AFI 48-119, 25 Jul 94, Medical Service Environmental Quality Program
- AFM 91-32
- Applicable federal, state and/or local wastewater statutes and discharge permits

2.27.3 Validation

What's valid for environmental funding

- Fees associated with administration of state or local wastewater permit programs and state and/or local permit fees, permit application fees, plus cost of permit application preparation
- Upgrade or repair projects required to comply with specific regulatory enforcement actions brought against the base to meet a regulatory deadline or achieve compliance with specific federal, state and/or local discharge permit

requirements. It also includes actions by Publicly Owned Treatment Works (POTW)

- Air Staff allows **total** environmental funding of infrastructure **repair** projects that are 51% compliance driven. Obviously, if you can dual source the construction aspects of the project with regular O&M funds, do so. Program **repair** projects in MILCON when they exceed \$5M
- Sampling and analysis expenses, including sampling equipment and associated maintenance, sampling supplies and containers, sample transportation, and laboratory analysis costs
- Surveys to substantiate or fully define suspected or actual non-compliance conditions (e.g., sewer inflow/infiltration and cross-connection surveys)
- Projects to consolidate multiple oil/water separators, or to remove oil/water separators that have been determined to represent a potential, actual, or immediate risk of, regulatory enforcement action, or to meet an environmental regulatory deadline, or removal as a Pollution Prevention project
- Plugging of building floor drains in conjunction with oil/water separator removal
- Design and construction of wastewater pretreatment facilities and purchase of pretreatment equipment necessary to meet federal, state or local regulatory pretreatment requirements, or which can otherwise be cost justified (such as through avoidance of excessive hazardous waste disposal expense)
- Wash rack recycling equipment procurement and installation. Such projects require specific HQ AETC/CEV approval. Aircraft corrosion control requirements and operational economics must be fully addressed before approval will be granted

What's not valid for environmental funding

- Projects which can be classified as system infrastructure maintenance, technology upgrade or capacity expansion, including wastewater treatment plant, pre-treatment facilities, collection system, and lift stations
- Connection of a base to a POTW and related design expenses
- Design and construction of new wastewater treatment plants
- Wastewater treatment plant or wastewater collection system operator training
- State operator certification fees
- Installation, replacement, modification, or routine maintenance and repair of oil/water separators and associated collection systems
- Sewage sludge disposal
- Computers and software
- Equipment not dedicated to wastewater permit compliance activities
- Projects or services associated with MFH

2.27.4 Calculation

- Use historic information to develop projected costs of sampling and analysis. Contact HQ AETC/CEVQ for information on contractor rates and expenses of similar projects, or use comparable historic information. Equipment should be priced by vendor quote or use catalog price

2.27.5 Standard A-106/EPN Entries

- EEIC: First 3 digits: 683 (permits); 534 (contract services); 609, 619 (supplies); 529 (minor construction projects) Second 2 digits: 70 (other environmental compliance)
- Fund Type: O&M
- Compliance Class: 1
- Regulatory Driver (Statutory Authority): CW
- Pollutant Category: ANAL (sampling & analysis); PRMT (permit fees); OTHR (other - supplies, non-training TDY); PLTS (plant operations)
- Compliance Status: O&S
- Recurring expenses are to be programmed as operations and services (OS). Specific corrective action projects are to be programmed as Class 1 and must be thoroughly justified, including project need and evaluation of alternatives, in the project narrative
- Oil/water separator removal should be programmed as a Class 1 pollution prevention requirement

Sheppard **Environmental Program Narrative** Date: 21 Dec 98

FY00 Project Number: **ABCE00123** Project Title: **Permits & Fees, Wastewater**
 Category: **Drinking & Wastewater** Compliance Date: **10 Apr 00**
 Estimated Cost: **\$1800** Class: **0**
 Estimated RTA Date: **10 Apr 00** Service Center: **Base Contracting**

Requirement: **The State of Texas requires operators of wastewater (WW) treatment plants (Lake Texoma Annex) to pay inspection fees. In addition, all WW contributing systems are assessed water quality fees. Furthermore, the City of Wichita Falls requires permit fees from SAFB. These fees are required as conditions of the Sheppard AFB Wastewater permits (96-S08(NS)) and (96-S09(RR)) and the Lake Texoma Recreational Annex Permit #12512-01.**

Legal Citation: **Texas Title 30, Part I, Chapter 290 and City of Wichita Falls Ordinance 156-93**

History: **SAFB discharges its wastewater to two treatment plants operated by the City of Wichita Falls. Each location requires a permit and is therefore subject to fees. Lake Texoma Recreational Annex operates a wastewater treatment plant and is subject to state inspection fees. Both SAFB and Lake Texoma are also subject to water quality assessment fees by the State.**

Impacts if Not Funded: **Failure to pay these fees will result in non-compliance with both state and local (City of WF) laws and ordinances; fines of up to \$2500 per day and penalties will result**

Certification: I have reviewed this requirement and certify it meets the eligibility criteria for use of environmental funds.

 Chief, Environmental Flight

Approved / Disapproved

 Commander, Civil Engineer Squadron

End of Chapter

Appendix 1 Definitions and Acronyms

A.1.1 Air Force Sources of Funds (Appropriations)(Partial List)

- 3400, Operations and Maintenance (O&M)
 - Current Mission
 - Environmental
 - Civilian Pay
 - Jet Fuel
 - Supplies
- 3300, Military Construction (MILCON)
 - Current Mission
 - Environmental
- 3080, Other Procurement
 - Equipment Over \$100,000
- 7040/45, Military Family Housing

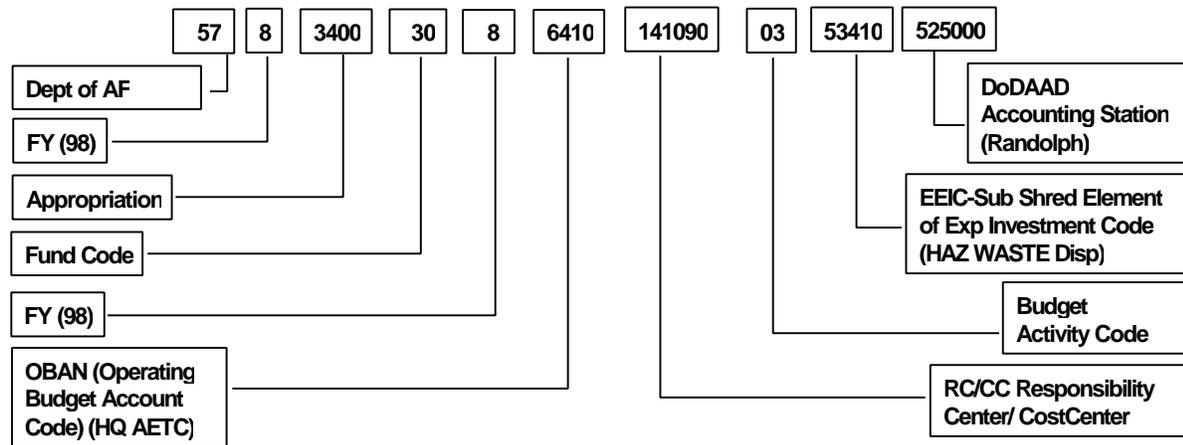
A.1.2 Breakout of Appropriation 3400

- Operations and Maintenance
 - Construction Projects
 - Civilian Pay
 - TDY, Training, Supplies, etc
- Environmental Compliance (EC)
 - Permits and Fees, Sampling and Analysis, Hazardous Waste Disposal
 - Construction Projects
 - Civilian Pay
 - Regulated Petroleum Storage Tank Removal
 - TDY and Training
 - Plans and Studies
 - Supplies
- Pollution Prevention (P2)
 - Construction Projects
 - TDY and Training
 - Plans, Studies and Opportunity Assessments
- Environmental Conservation (CR)
 - EIAP

Appendix 1 - Definitions and Acronyms

- TDY and Training
- Natural and Cultural Resources Plans and Studies
- Environmental Restoration Account (ERA) -- For the Installation Restoration Program, Construction Projects, Studies

A.1.3 The Components of a Fund Cite



A.1.4 Type of Funds

| | |
|--------|---|
| A/CPRO | Aircraft Procurement |
| AAFES | Army and Air Force Exchange System |
| BCL | Base Closure |
| BRAC | Base Realignment and Closure |
| ERA | Environmental Restoration Account |
| FISHWL | Fish and Wildlife |
| GOCO | Government-Owned Contractor-Operated |
| LEGACY | Legacy |
| MFH | Military Family Housing |
| MILCON | Military Construction |
| MISPRO | Missile Procurement |
| MWR | Morale, Welfare and Recreation |
| NATO | North Atlantic Treaty Organization |
| O&M | Operations and Maintenance |
| OTHER | Other Agency Funded Account |
| OTHPRO | Other Procurement |
| RDT&E | Research, Development, Testing and Evaluation |

A.1.5 Program Element Codes (PEC)

| | |
|-------|---|
| 85756 | EC for AETC (except Luke, Tyndall, Little Rock and Altus) |
| 85753 | CR for AETC (except Luke, Tyndall, Little Rock and Altus) |
| 85754 | P2 for AETC (except Luke, Tyndall, Little Rock and Altus) |
| 27456 | EC for Luke and Tyndall |
| 28853 | CR for Luke and Tyndall |
| 28854 | P2 for Luke and Tyndall |
| 41856 | EC for Altus and Little Rock |
| 41853 | CR for Altus and Little Rock |
| 41854 | P2 for Altus and Little Rock |

A.1.6 Acronyms

| | |
|---------------|---|
| A&E | Architect and Engineer |
| AAFES | Army and Air Force Exchange Services |
| ACM | Asbestos-Containing Material |
| AFB | Air Force Base |
| AFAA | Air Force Audit Agency |
| AFCEE | Air Force Center for Environmental Excellence |
| AFCEE/ESS-REO | Air Force Regional Environmental Offices |
| AFCESA | Air Force Civil Engineering Support Agency |
| AFI | Air Force Instruction |
| AFIA | Air Force Inspection Agency |
| AFIT | Air Force Institute of Technology |
| AFMAN | Air Force Manual |
| AFPD | Air Force Policy Directive |
| AFV | Alternative Fueled Vehicle |
| AFRL | Air Force Research Laboratory |
| AFV | Alternative Fueled Vehicle |
| AST | Aboveground Storage Tank |
| AHERA | Asbestos Hazardous Emergency Response Act |
| AICUZ | Air Installation Compatible Use Zones |
| AOC | Area of Concern |
| APOM | Amended Program Objective Memorandum |
| AST | Aboveground Storage Tank |
| BCE | Base Civil Engineer or Civil Engineer |
| BCP | Base Comprehensive Plan |
| BE | Bioenvironmental Engineer |
| BER | Budget Execution Report |
| BRAC | Base Realignment and Closure |
| CAA | Clean Air Act |
| CAD | Computer-Aided Design |
| CAPP | Compliance Assurance and Pollution Prevention |
| CAR | Corrective Action Report |
| CE | Civil Engineering |

Appendix 1 - Definitions and Acronyms

| | |
|----------|---|
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CFR | Code of Federal Regulations |
| CO | Contracting Officer |
| COE | Corps of Engineers |
| CR | Environmental Conversation |
| CRM | Cultural Resources Management |
| CTP2 | Compliance Through Pollution Prevention |
| CWA | Clean Water Act |
| CWE | Current Working Estimate |
| CY | Calendar Year |
| C&D | Construction and Demolition |
| | |
| DBOF | Defense Business Operating Funds |
| DCMC | Defense Contract Management Command |
| DERA | Defense Environmental Restoration Act |
| DESCIM | Defense Environmental Security Corporate Information Management |
| DLA | Defense Logistics Agency |
| DoD | Department of Defense |
| DoDD | Department of Defense Directive |
| DODI | Department of Defense Instruction |
| DP | Development Plan |
| DRU | Direct Reporting Unit |
| DUSD(ES) | Deputy Under Secretary of Defense for Environmental Security |
| | |
| EA | Environmental Assessment |
| EBS | Environmental Baseline Survey |
| ECAMP | Environmental Compliance Assessment and Management Program |
| ECP | Environmental Compliance Program |
| EE/CA | Engineering Evaluation/Cost Analysis |
| EEIC | Element of Expense Investment Code |
| EIAP | Environmental Impact Analysis Process |
| EIS | Environmental Impact Statement |
| EMS | Environmental Management System |
| EO | Executive Order |
| EPA | Environmental Protection Agency |
| EPACT | Energy Policy Act |
| EPC | Environmental Protection Committee |
| EPN | Environmental Program Narrative |
| EPCRA | Emergency Planning and Community Right-to-Know Act |
| EPRM | Environmental Project Reporting Module |
| ERA | Environmental Restoration Account |
| ERA | Executive Review Adjustment (Air Staff funding withhold) |
| ESOHC | Environment, Safety, and Occupational Health Committee |

| | |
|---------------|--|
| FAC | Facility |
| FINPLAN | Financial Plan |
| FFCA | Federal Facilities Compliance Agreement |
| FGS | Final Governing Standards |
| FOA | Field Operating Agency |
| FWPCA | Federal Water Pollution Control Act |
| FR | Federal Register |
| FY | Fiscal Year |
| GIS | Graphical Information System |
| GSA | General Services Administration |
| HAP | Hazardous Air Pollutant |
| HAZMAT | Hazardous Material |
| HAZWASTE | Hazardous Waste |
| HAZWRAP | Hazardous Waste Remedial Action Program |
| HMP | Hazardous Material Pharmacy |
| HMMP | Hazardous Materials Management Process |
| HMRPP | Hazardous Material Reduction Prioritization Process |
| HQ | Headquarters |
| HQ AETC | Headquarters Air Education and Training Command |
| HQ AFMC | Headquarters Air Force Materiel Command |
| HQ USAF | Headquarters United States Air Force |
| HQ USAF/CVA | Assistant Vice Chief of Staff |
| HQ USAF/IL | Deputy Chief of Staff for Installations and Logistics |
| HQ USAF/ILE | Civil Engineer |
| HQ USAF/ILEV | Deputy Chief of Staff for Installations and Logistics, Environmental Division |
| HQ USAF/ILEVQ | Headquarters US Air Force Division of Environmental Quality |
| HQ USAF/ILM | Director of Maintenance |
| HQ USAF/ILS | Director of Supply |
| HQ USAF/SE | Chief of Safety |
| HQ USAF/SG | Surgeon General |
| HQ USAF/XO | Deputy Chief of Staff for Operations |
| HQ USAF/XP | Deputy Chief of Staff for Plans |
| HSW/XRE | 311 th Human Systems Wing/Development Planning/ESOH TPIPT |
| HSWA | Hazardous and Solid Waste Amendments |
| HW | Hazardous Waste |
| HWMP | Hazardous Waste Management Plan |
| IAG | Interagency Agreement |
| IG | Inspector General |
| INRM | Integrated Natural Resources Management |
| IPT | Integrated Process Team |
| IRP | Installation Restoration Program |
| ISO | International Organization for Standardization |

Appendix 1 - Definitions and Acronyms

| | |
|-----------------|---|
| JA | Staff Judge Advocate |
| JLC | Joint Logistics Commanders |
| LBP | Lead-Based Paint |
| LCC | Life Cycle Cost |
| LG | Logistics Group |
| LGC | Contracting Squadron |
| LTM | Long-Term Monitoring |
| LTO | Long-Term Operation |
| MAJCOM | Major Command |
| MAJCOM/CE | Major Command Civil Engineer |
| MAJCOM/CEV | Major Command Civil Engineer Environmental Division |
| MAP | Management Action Plan |
| MCL | Maximum Contaminant Level |
| MFH | Military Family Housing |
| MILCON | Military Construction |
| MILSPEC | Military Specification |
| MILSTD | Military Standard |
| MNS | Mission Needs Statement |
| MOU | Memorandum of Understanding |
| MPP | Modernization Planning Process |
| MSW | Municipal Solid Waste |
| NAS | Need Assessment Survey |
| NAVLAB | Naval Laboratory |
| NAF | Non-appropriated Funds |
| NEPA | National Environmental Policy Act |
| NESHAP | National Emissions Standards for Hazardous Pollutants |
| NFRAP | No Further Remedial Action Planned |
| NO _x | Nitrogen Oxides |
| NOV | Notice of Violation |
| NPDES | National Pollutant Discharge Elimination System |
| NPL | National Priorities List |
| NPV | Net Present Value |
| OA | Opportunity Assessment |
| ODS | Ozone Depleting Substance |
| OBAN | Operating Budget Account Code |
| OEBGD | Overseas Environmental Baseline Guidance Document |
| ORD | Operation Requirements Documents |
| ORM | Operational Risk Management |
| OSD | Office of the Secretary of Defense |
| OSHA | Occupational Safety and Health Association |
| O&M | Operations and Maintenance |
| ONEE | Office of Nonresident Environmental Education |

| | |
|---------|---|
| O&S | Operations and Services |
| PA | Public Affairs |
| PAFB | Peterson Air Force Base |
| PAO | Public Affairs Office |
| PCB | Polychlorinated Biphenyl |
| PE | Program Elements |
| PEC | Program Element Code |
| PMR | Program Management Review |
| POC | Point of Contact |
| POL | Petroleum, Oils and Lubricants |
| POM | Program Objective Memorandum |
| POTW | Publicly-Owned Treatment Works |
| PPBS | Planning, Programming, and Budgeting System |
| PSM | Process Safety Management |
| PST | Petroleum Storage Tank |
| PV | Present Value |
| P2 | Pollution Prevention |
| P2 MAP | Pollution Prevention Management Action Plan |
| QAE | Quality Assurance Evaluator |
| QA/QC | Quality Assurance/Quality Control |
| QRP | Quality Recycling Program |
| RACERS | Remedial Action Cost Engineering and Requirements System |
| RC/CC | Responsibility Center/CC |
| RCRA | Resource Conservation and Recovery Act |
| R&D | Research and Development |
| RD&A | Research Development and Acquisition |
| REO | Regional Environmental Office |
| RFP | Request for Proposal |
| RMP | Risk Management Plan |
| ROD | Record of Decision |
| RRRP | Resource Recovery and Recycling Program |
| SAF/AQ | Assistant Secretary of the Air Force for Acquisition |
| SAF/AQC | Deputy Secretary of the Air Force for Contracting |
| SAF/AQR | Deputy Secretary of the Air Force for Science, Technology, and Engineering |
| SAF/FM | Assistant Secretary of the Air Force for Financial Management and Comptroller |
| SAF/MI | Deputy Assistant Secretary of the Air Force for Manpower, Reserve Affairs, Installations, and Environment |
| SAF/MIQ | Deputy Assistant Secretary of the Air Force for Environment, Safety and Occupational Health |
| SAF/PA | Assistant Secretary of the Air Force, Office of Public Affairs |
| SAM | Surface to Air Missile |
| SAP | Sampling and Analysis Plan |

Appendix 1 - Definitions and Acronyms

| | |
|-----------------|--|
| SARA | Superfund Amendments and Reauthorization Act |
| SDWA | Safe Drinking Water Act |
| SE | Safety |
| SEP | Supplemental Environmental Project |
| SG | Surgeon General |
| SM | Single Manager |
| SGPB | Bioenvironmental Engineering |
| SO _x | Sulphur Oxides |
| SOW | Statement of Work |
| SW | Solid Waste |
| SWMU | Solid Waste Management Unit |
| SWPPP | Storm Water Pollution Prevention Plan |
| | |
| TO | Technical Order |
| TOC | Total Ownership Costs |
| TNS | Technology Needs Survey |
| TPIPT | Technical Planning Integrated Process Team |
| TRC | Technical Review Committee |
| TRI | Toxic Release Inventory |
| | |
| UOT | Used Oil Tank |
| USACE | US Army Corps of Engineers |
| USAF | United States Air Force |
| USC | United States Code |
| USFWS | US Fish and Wildlife Service |
| USGS | US Geological Survey |
| UST | Underground Storage Tank |
| | |
| VOC | Volatile Organic Compound |
| | |
| WIMS-ES | Work Information Management System - Environmental Subsystem |
| WS | Weapon System |
| WS HMRPP | Weapon System Hazardous Material Reduction Prioritization Process |

Appendix 2 Environmental Guidance Document Reference List

A.2.1 DoD and Federal References

- A Guide to Buying Recycled: The Air Force Affirmative Procurement Program
- Air Force Environmentally Responsible Facilities Guide
- Air Force Installation P2 Program Guide
- HQ USAF/CEV Programming and Budgeting Guidance, Draft 3 25 Aug 95
- AFMAN 10-401, Operational Plan and Concept Plan Development and Implementation
- AFI 23-502, Recoverable and Unusable Liquid Petroleum Products
- AFI 24-301, Vehicle Operations
- AFI 32-1002, Facilities Lead-Based Paint Hazard Management
- AFI 32-1021, Planning and Programming of Facility Construction Projects
- AFI 32-1045, Snow and Ice Control
- AFI 32-1052, Facility Asbestos Management
- AFI 32-1053, Pest Management Program
- AFI 32-1067, Water Systems
- AFI 32-7001, Environmental Budgeting
- AFI 32-7005, Environmental Protection Committees
- AFI 32-7006, Environmental Program in Foreign Countries
- AFI 32-7020, The Environmental Restoration Program
- AFI 32-7040, Air Quality Compliance
- AFI 32-7041, Water Quality Compliance
- AFI 32-7042, Solid and Hazardous Waste Compliance
- AFI 32-7044, Storage Tank Compliance
- AFI 32-7045, Environmental Compliance Assessment and Management Program (ECAMP)
- AFI 32-7047, Compliance Tracking and Reporting
- AFI 32-7060, Interagency and Intergovernmental Coordination for Environmental Planning
- AFI 32-7061, The Environmental Impact Analysis Process
- AFI 32-7062, Air Force Comprehensive Planning
- AFI 32-7063, Air Installation Compatible Use Zone Program
- AFI 32-7064, Integrated Natural Resources Management
- AFI 32-7065, Cultural Resources Management
- AFI 32-7066, Environmental Baseline Surveys in Real Estate Transactions
- AFI 32-7080, Pollution Prevention Program
- AFI 32-7086, Hazardous Materials Management

Appendix 2 – Environmental Guidance Document List

- AFI 36-2817, Civil Engineer Awards Program
- AFI 48-119, Medical Service Environmental Quality Programs
- AFI 63-118, Civil Engineer Research, Development, and Acquisition
- AFI 91-213, Operational Risk Management (ORM) Program
- AFOSH Standard 91-119, Process Safety Management (PSM) of Highly Hazardous Chemicals
- AF Pamphlet 91-215, Operational Risk Management (ORM) Guidelines and Tools
- AFPD 10-14, Modernization Planning
- AFPD 23-3, Energy Management
- AFPD 32-70, Environmental Quality
- AFPAM 32-7043, Hazardous Waste Management Guide
- Alternative Motor Fuels Act of 1988
- Clean Air Act Amendments of 1990
- DoD Instruction 4160.21-M, Defense Reutilization and Marketing Manual, Mar 90
- DoD Instruction 4715.4, Pollution Prevention, 18 Jun 96
- DoD Regulation 5000.2-R, Mandatory Procedures for Major Defense Acquisition Programs (MDAPs) and Major Automated Information Systems (MAIS) Acquisition Programs, 23 Mar 98
- Emergency Planning and Community Right-to-Know Act of 1986
- Energy Policy Act of 1992
- Executive Order 12843, Procurement Requirements and Policies for Federal Agencies for Ozone-Depleting Substances, 21 Apr 93
- Executive Order 12902, Energy Efficiency and Water Conservation at Federal Facilities, 8 Mar 94
- Executive Order 13031, Federal Alternative Fueled Vehicle Leadership, 13 Dec 96
- Executive Order 13101, Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition, 14 Sep 98
- Federal Water Pollution Control Act
- International Organization for Standardization (ISO) 14001
- Major Source Determinations for Military Installations, 2 Aug 96
- MIL-STD-882C, System Safety Program Requirements, 19 Jan 93
- National Environmental Policy Act
- Policy Memorandum, HQ USAF/CEV FY99-03 Amended Program Objective Memorandum Submittals, 30 Dec 96
- Resource Conservation and Recovery Act
- HQ USAF/ILEV Reimbursement Policy to EPA for Inspection of RCRA TSDFs Memo, 17 Mar 98

A.2.2 AETC Environmental Policy Memorandums/Letters

- Flammable Storage Lockers for Satellite Accumulation Points (SAPs) 15 Dec 93
- Qualified Recycling Program Implementation Guidance 30 Aug 94
- Asbestos Program Management Guide, 94-001 1 Sep 94
- Changes to Aircraft Operations and Compliance with the National Environmental Policy Act of 1969 30 Sep 94
- Environmental Impact Analysis Process (EIAP)--Conducting Cumulative Impact Analysis 15 Nov 94
- Lead-Based Paint (LBP) Policy Review Update and Implementation Guidance, 94-002 1 Dec 94
- Compliance with the National Environmental Policy Act of 1969, EIAP 17 Jan 95
- Approval Level for EIAP Documents 26 Apr 95
- AETC Environmental Enforcement Action Policy 24 Jul 95
- Coordination of EIAP Documents 30 Aug 95
- Supplemental EIAP Guidance 29 Sep 95
- LBP Guidance and Study 10 Oct 95
- EIAP Documentation and Air Conformity 1 Nov 95
- Format for Environmental Assessments (EAs) and Environmental Impact Statements (EISs) 14 Mar 96
- Clean Air Act (CAA) Compliance for Vehicles Operated on Federal Installations 18 Jun 96
- Tree Conservation Policy 8 Jul 96
- Policy and Guidance on LBP Final Disclosure Rule 3 Sep 96
- Contracting Pest Management Services 23 Oct 96
- Tree Conservation Policy 10 Sep 97
- AETC Internal Operating Procedure Policy for Reporting EAs 3 Feb 98
- AETC Policies on Sheppard AFB Environmental Management Systems (EMS) Pilot Study 10 Jun 98
- Installation Restoration Program (IRP) Sampling Data Policy 28 Sep 98
- IRP Program Project Cost Estimates Guidance 28 Sep 98
- IRP Air Force Restoration Management System (AFRIMS) Guidance 28 Sep 98

A.2.3 Other Important Environmental Reference Documents

- AETC Installation Restoration Program Guide, Jan 99
- ACC Environmental Compliance Handbook, 1 Jun 96
- Environmental Impact Analysis Process Desk Reference, May 1995

Appendix 3 Air Force Environmental Element of Expense Investment Codes (EEICs)

EEIC FIRST THREE DIGITS FOR A-106 ENTRIES

| <u>EEIC</u> | <u>DESCRIPTION</u> |
|-------------|---|
| 39X | Civilian Pay |
| 409 | TDY-Travel and Per Diem |
| 433 | Rental of Vehicles |
| 469 | Miscellaneous Charges for Transportation of Property |
| 47X | Rents |
| 473 | Rental of Other Equipment |
| 502 | Printing |
| 52X | Facility Projects by Contract |
| 521 | Maintenance of Real Property (facility project) |
| 522 | Repair of Real Property (facility project) |
| 528 | In-house CE Minor Construction |
| 529 | Minor Construction (facility project) |
| 531 | Custodial Services |
| 532 | Engineering Services, including A&E for Facility Projects |
| 534 | Environmental Contract Services |
| 535XX | Environmental Restoration Account (ERA) |
| 536 | Building Demolition Debris Removal |
| 537 | Other Hazardous Waste |
| 553 | Training |
| 568 | Purchased Maintenance of Air Force-owned IPE |
| 569 | Purchased Maintenance of Other Equipment |
| 570 | Contract Operated Installation |
| 592XX | Other Contract Services, includes Demolition |
| 609 | GSD-General Support Supplies AFSF |
| 618 | Non-AFSF Clothing/Textiles |
| 619 | Non-AFSF Supplies/Materials |
| 627 | GSD-ADPE Equipment AFSF |
| 628 | GSD-Equipment AFSF |
| 637 | Non-AFSF Information Processing Equipment |
| 64X | AFSF Issue/Turn-in of Supply/Materials |
| 641 | Vehicle Fuels |
| 683 | Environmental Permits and Fees |
| 684 | Environmental Monetary Assessments, Fines, and Penalties |

LAST TWO DIGITS OF EEIC FOR A-106 ENTRIES

| <u>SHRED</u> | <u>DESCRIPTION</u> |
|--------------------------------|---|
| 01 | Officer Pay |
| 02 | Enlisted Pay |
| 10 | Hazardous Waste Treatment, Storage Facility |
| 12 | Hazardous Material Pharmacies |
| 14 | EPA 17 Reduction Initiatives |
| 15 | Solid Waste Reduction (Recycling) |
| 16 | Hazardous Waste Reduction |
| 20 | UST Compliance |
| 30 | Air Pollution Control Compliance |
| 31 | ODC Compliance |
| 32 | Air Emissions Prevention |
| 40 | Environmental Restoration Account (ERA) |
| 41 | ERA for LBP |
| 50 | Waste Water Treatment and Facilities and Storm Water |
| 60 | Environmental Compliance with Asbestos |
| 70 | Other, including Drinking Water and Long-term Groundwater Monitoring |
| 71 | Dealing with Pesticides |
| 72 | Dealing with Radiation |
| 73 | Dealing with Noise |
| 74 | Dealing with Toxics - PCBs |
| 75 | Miscellaneous Environmental Requirements, including Cultural/Natural Resources and Land Management. Also for LBP if used with EEIC 522 or 529 |
| 76 | LBP |
| 80 | Compliance with Host Nation Environmental Protection Criteria (overseas) |
| 90 | Waste Minimization |
| 92 | Cross-cutting Commercial Application for Reducing Waste in Military Operations |
| 96 | Contract Environmental Services (Impact and Compliance Assessment) Dealing with NEPA |
| BJ | Environmental Assessments and ECAMP |
| ERA Shreds for EEIC 535 | |
| 01 | Preliminary Assessment/Site Inspection |
| 02 | Remedial Investigatory/Feasibility Study |
| 03 | Interim Remedial Action |
| 04 | Remedial Design |
| 05 | Remedial Action |
| 06 | Management |
| 07 | Potentially Responsible Party |

Appendix 4. Valid Pollution Prevention Investment Strategies HQ USAF/ILEV, 12 Sep 97

| TOPIC | VALID | | NOT VALID |
|-----------------------------------|--|---|--|
| | O&S | Non-Recurring | |
| A-E Design | | <ul style="list-style-type: none"> • Design cost for valid Pollution Prevention projects | |
| Acquisition Projects | | <ul style="list-style-type: none"> • Projects not associated with any one acquisition program, but support the infrastructure of many programs. Projects will not be accomplished by program offices | <ul style="list-style-type: none"> • Acquisition projects singularly associated with one current acquisition program. |
| Alternative Fueled Vehicles (AFV) | <ul style="list-style-type: none"> • Temporary vehicle leases in accordance with AFM 24-307 | <ul style="list-style-type: none"> • AFV infrastructure and vehicle conversion projects to meet established Air Force or DOD goals Note: Coordinate closely with the LG community; they are the lead in the determining how the Air Force will meet Energy Policy Act and Executive Order AFV requirements | <ul style="list-style-type: none"> • Purchase vehicles |

| TOPIC | VALID | | NOT VALID |
|------------------|---|---|---|
| | O&S | Non-Recurring | |
| Asbestos | | <ul style="list-style-type: none"> • Asbestos encapsulation or other projects to prevent releases or avoid disposal requirement • Projects using innovative technologies to reduce handling or disposal costs of asbestos | <ul style="list-style-type: none"> • Asbestos disposal or removal project to correct an immediate hazard • Air monitoring of asbestos removal activities for emergency response activities • Sampling, analysis to respond to a release • Asbestos surveys, removal, and disposal that is in anticipation of, or a direct result of, renovation, repair, construction or demolition project. • Costs in housing areas, medical facilities. • Asbestos activities where OSHA compliance is the regulatory driver • Facilities funded from other appropriations (e.g. DODDS, DBOF, etc.) |
| Baseline Surveys | <ul style="list-style-type: none"> • Updates to baseline surveys required to support Pollution Prevention policy, goals, metrics, and initiatives • Updates from new or changing base mission | <ul style="list-style-type: none"> • Completing initial baseline surveys required to support the Pollution Prevention Program and established goals and metrics | |

| TOPIC | VALID | | NOT VALID |
|--------------|---|---------------|---|
| | O&S | Non-Recurring | |
| Civilian Pay | <ul style="list-style-type: none"> Personnel performing pollution prevention functions over 50% of the time. Permanent positions must be coded with pollution prevention program element code (**54f) exception: HQ and Command personnel retain the XXX98 program element code with the suffix "X" to identify pollution prevention personnel | | <ul style="list-style-type: none"> Overhires or any contracts that exceed command work-year end strength. Interns not performing environmental functions over 50% of the time, and after internship will not be absorbed within the MAJCOM work-year end strength and assigned against an authorized position on the UMD. Personnel associated with wastewater treatment, drinking water treatment, or sampling and analysis Personnel paid from an industrial-funded account, ERA, or reimbursed funds (forestry, agriculture outlease, fish and wildlife) |

| TOPIC | VALID | | NOT VALID |
|--------------------|-------|---|---|
| | O&S | Non-Recurring | |
| Clean Air Act | | <ul style="list-style-type: none"> • Projects to reduce air compliance requirements. Examples include: <ul style="list-style-type: none"> • Clean fuel conversion (e.g. coal to natural gas) • Low NOx burner installation • Low VOC paint operations • Installation of degreaser tank covers • Improve efficiencies of boilers and internal combustion engines • Contract studies to apply Major Source Guidance to installation (i.e. segregate base by source industrial code for Title V Permit purposes) | <ul style="list-style-type: none"> • Air emissions control (end of pipe) projects |
| Contractor Support | | <ul style="list-style-type: none"> • Contractor support for specific actions, not normal management functions and operations. Project should be identified as the actual action being accomplished, not just "Contractor Support" | <ul style="list-style-type: none"> • Contractor support to accomplish the normal day-to-day management functions and operations unless the environmental section is a contract operation |
| Drinking Water | | <ul style="list-style-type: none"> • Potable water system projects to prevent contamination or degradation (e.g. Well Head Protection Plan and implementation, backflow prevention if not a compliance requirement) | <ul style="list-style-type: none"> • Backflow prevention required by local or state regulations • Upgrade or repair to meet drinking water standards |

| TOPIC | VALID | | NOT VALID |
|-------------------------------|---|---|---|
| | O&S | Non-Recurring | |
| Energy and Water Conservation | | <ul style="list-style-type: none"> • Funding of Energy Conservation Investment Program (ECIP) or Federal Energy Management Program (FEMP) approved projects or activities for energy or water conservation when cost effective and have significant pollution prevention benefit (valid only if adequate funding not available through ECIP or FEMP) | |
| EPCRA | <ul style="list-style-type: none"> • Updates of studies to reduce releases and off-site transfers of toxic chemicals | <ul style="list-style-type: none"> • Equipment, studies, and process changes to reduce releases and off-site transfers of toxic chemicals • Activities to reduce or improve efficiency of EPCRA reporting requirements | <ul style="list-style-type: none"> • Costs for Form R preparation and submission |

| TOPIC | VALID | | NOT VALID |
|--------------------------|--|---|--|
| | O&S | Non-Recurring | |
| Equipment (Non-pharmacy) | <ul style="list-style-type: none"> • Operation, maintenance, and repair of equipment for municipal solid waste (MSW) recycling and composting programs • Computers and software in direct support of pollution prevention programs (NOTE: will be centrally managed at MAJCOM) | <ul style="list-style-type: none"> • Equipment to start up MSW recycling and/or composting programs • Equipment primarily justified to convert from an environmentally unfriendly process or material to a more environmentally friendly process or material (e.g. purchase of deicing vacuum trucks, purchase of low VOC paint equipment, recirculating plating or cleaning tanks) • Initial purchase of equipment to support reusing/recycling hazardous waste instead of disposal if there is no viable source reduction alternative • Requirements to validate prototype applications or equipment for wide scale use or full scale production • Depot level equipment (AFMC procedures apply) | <ul style="list-style-type: none"> • Recurring operations, maintenance, and replacement of equipment (other than MSW recycling and composting programs) • Equipment solely for grounds maintenance |

| TOPIC | VALID | | NOT VALID |
|--------------------------------|--|--|---|
| | O&S | Non-Recurring | |
| Fees and Permits | | <ul style="list-style-type: none"> • Pollution prevention projects or activities that reduce or eliminate environmental permits and fees associated with activities such as: <ul style="list-style-type: none"> • UST • Drinking water • Wastewater • National Pollutant Discharge Elimination System (NPDES) • Resource Conservation and Recovery Act • Solid waste landfill • Air operating permit • Permit application fee • Projects identified through regulatory agency partnering agreements which reduce compliance burdens | <ul style="list-style-type: none"> • Payments of fees and permits |
| Fire Training Facilities | | <ul style="list-style-type: none"> • Projects for existing fire training facilities which will enhance source reduction and waste minimization of fuel and reduction of water runoff | <ul style="list-style-type: none"> • If facility is being built for a new mission or to support a realigned mission • If no fire training facility existed |
| Geographic Information Systems | <ul style="list-style-type: none"> • Software, hardware and data updates, when in exclusive support of pollution prevention | <ul style="list-style-type: none"> • Initial purchase of software, hardware and data, when in exclusive support of pollution prevention | <ul style="list-style-type: none"> • Material not in exclusive support of pollution prevention/hazardous waste reduction • If requirement can be adequately managed using other existing data systems |

| TOPIC | VALID | | NOT VALID |
|---|--|--|---|
| | O&S | Non-Recurring | |
| Hazardous Material (Including EPA 17 and TRI) | | <ul style="list-style-type: none"> • Initial cost to implement source reduction efforts • Projects to meet established goals to reduce the purchases of EPA-17 and TRI chemicals • Requirements to validate prototype applications or equipment for wide scale use or full scale production • Initial cost to implement source reduction efforts necessary to meet established pollution prevention hazardous waste minimization goals • Initial purchase of equipment to support reusing/recycling hazardous material instead of disposal if there is no viable source reduction alternative | |
| Hazardous Material Pharmacy | <ul style="list-style-type: none"> • Upgrades and maintenance of required data tracking systems and necessary operating support • Computers and software (NOTE: will be centrally managed at MAJCOM) | <ul style="list-style-type: none"> • Non-recurring costs to establish and upgrade hazardous material pharmacy, including facilities and equipment | <ul style="list-style-type: none"> • Recurring operating costs (including recurring personnel costs) of hazardous material pharmacy • Hazardous material response training, equipment, and supplies |

| TOPIC | VALID | | NOT VALID |
|-----------------|--|--|--|
| | O&S | Non-Recurring | |
| Hazardous Waste | <ul style="list-style-type: none"> • Hazardous waste recycling when more cost effective than disposal • Periodic review and modification of HW Management Plan and HW Analysis Plan to address latest pollution prevention initiatives • Rag cleaning contracts/processes | <ul style="list-style-type: none"> • Initial cost to study and implement hazardous waste reduction efforts necessary to meet pollution prevention minimization goals • Initial projects to study and implement reuse/recycling of hazardous waste if there is no viable source reduction alternative • Constructing or modifying small arms range backstops which capture lead for reuse, recycling, or disposal • Pollution prevention projects or activities that reduce or eliminate hazardous waste management. Examples include: <ul style="list-style-type: none"> • Projects to ensure that all hazardous waste is moved off base in less than 90 days (valid if it leads to reduced handling of hazardous waste and/or reduction in Part B Permit requirements) • New initiatives which incorporate reduced sampling and analysis of recurring waste streams • Projects to implement new treatment and/or disposal methods which reduce the quantity disposed or allows reuse or recycling | <ul style="list-style-type: none"> • Facilities, supplies, equipment not solely for hazardous waste • Recurring cleanup and disposal of lead from shooting ranges • Design of permitted hazardous waste facilities • Initial accumulation point construction and required supplies |

| TOPIC | VALID | | NOT VALID |
|------------------------|---|--|--|
| | O&S | Non-Recurring | |
| Lead-Based Paint (LBP) | | <ul style="list-style-type: none"> • Development and implementation of more environmentally friendly LBP abatement projects or processes | <ul style="list-style-type: none"> • Costs in housing areas • Project costs for maintenance (includes painting and surface preparation, repair, construction or demolition). • Sampling, analysis, disposal and OSHA requirements |
| Maintenance | <ul style="list-style-type: none"> • Equipment maintenance costs for MSW recycling and composting programs | | <ul style="list-style-type: none"> • Equipment maintenance costs, other than MSW recycling and composting programs • Facility maintenance costs • Projects to remedy poor infrastructure maintenance |
| Miscellaneous | | <ul style="list-style-type: none"> • Projects to correct ECAMP-identified deficiencies using pollution prevention approaches • ENVVEST or other projects which eliminate requirements for emissions control projects • Projects to reduce biohazardous waste streams and associated compliance and disposal costs • Projects to reduce ambient noise levels adversely affecting base/community populations | |

| TOPIC | VALID | | NOT VALID |
|-------------------------------|---|--|---|
| | O&S | Non-Recurring | |
| Monitoring | | <ul style="list-style-type: none"> • Pollution prevention projects or activities that reduce or eliminate environmental monitoring requirements such as: <ul style="list-style-type: none"> • UST • Drinking water • Wastewater • National Pollutant Discharge Elimination System (NPDES) • Resource Conservation and Recovery Act • Solid waste landfill • Air quality • Projects identified through regulatory agency partnering initiatives which reduce compliance burdens | <ul style="list-style-type: none"> • Long-term monitoring and recurring expenses of long-term cleanup operations, eligible for ERA |
| Opportunity Assessments (OAs) | <ul style="list-style-type: none"> • Updating OA and roadmaps on periodic basis (e.g. once every third year) or when significant mission change warrants. (Note: Periodic reviews and updates of OA should be accomplished in-house unless there are sufficient changes to warrant the cost to accomplish this work via contract.) | <ul style="list-style-type: none"> • Initial costs to develop an OA • Initial costs to develop hazardous material reduction roadmaps | <ul style="list-style-type: none"> • Frequent (e.g. annual) updates of OA by contract |

| TOPIC | VALID | | NOT VALID |
|---|--|--|---|
| | O&S | Non-Recurring | |
| Ozone Depleting Substances (ODSs) | <ul style="list-style-type: none"> • Activities to recycle ODSs in order to meet established AF goals | <ul style="list-style-type: none"> • Projects to reduce or eliminate the need and use of ODSs to meet established Air Force goals | <ul style="list-style-type: none"> • Projects to replace halon fire protection systems with nonhalon systems • Projects to replace hand-held halon fire extinguishers • Replacing or retrofitting air conditioning systems unless cost effective, no ozone depleting chemical inventory exists, and no recyclable ozone depleting chemical market exists |
| Pesticides and Herbicides | | <ul style="list-style-type: none"> • Source reduction projects to meet established Air Force goals for reduced application of pesticides and herbicides | <ul style="list-style-type: none"> • Preparation of Pest Management Plans |
| Pollution Prevention Management Action Plans (MAPs) | <ul style="list-style-type: none"> • Updating MAP on periodic basis (e.g. once every third year) or when significant mission change warrants. (Note: Periodic reviews and updates of MAP should be accomplished in-house unless there are sufficient changes to warrant the cost to accomplish this work via contract.) | <ul style="list-style-type: none"> • Initial cost to develop a MAP | <ul style="list-style-type: none"> • Frequent (i.e. annual) updates of MAP by contract |

| TOPIC | VALID | | NOT VALID |
|----------------------------------|---|---|--|
| | O&S | Non-Recurring | |
| Polychlorinated Biphenyls (PCBs) | | <ul style="list-style-type: none"> • Removal and disposal of non-leaking PCB items | <ul style="list-style-type: none"> • Disposal of small capacitors of less than 1.36 kg (3lb) of dielectric fluid per unit (Unless a specific state law requires disposal as a PCB waste) • Items in MFH and National Guard areas • Repair/replacement or cleanup of leaking regulated items • Sample and analysis of organizational equipment to meet DRMO turn-in requirements. |
| Publications | <ul style="list-style-type: none"> • Publications and regulatory guidance required to support the pollution prevention program | | <ul style="list-style-type: none"> • Trade magazines • Newspapers |

| TOPIC | VALID | | NOT VALID |
|---------------------------------------|-------|--|---|
| | O&S | Non-Recurring | |
| Sampling, Analysis & Monitoring (SAM) | | <ul style="list-style-type: none"> • Pollution prevention projects or activities that reduce or eliminate sampling and analysis requirements such as: <ul style="list-style-type: none"> • Sampling and analysis requirements to maintain compliance • Lab services for: Wastewater, storm water, RCRA, asbestos, air emissions, ground water, drinking water, LBP. • Shipping costs • Equipment purchase and maintenance • Non point source pollution monitoring • Contracted sampling and monitoring | <ul style="list-style-type: none"> • Personnel • Training • Sampling and analysis associated with OSHA |

| TOPIC | VALID | | NOT VALID |
|--|---|---|--|
| | O&S | Non-Recurring | |
| Solid Waste (including recycling and composting) | <ul style="list-style-type: none"> • Recurring costs to operate Qualified Recycling Programs (QRPs) and composting programs. Note: PP funds should only be used to cover the difference between program expenses and program proceeds. Proceeds from recycling operations MUST first be used to cover program expenses, to include reimbursing any appropriated funds (such as PP funds) | <ul style="list-style-type: none"> • Initial purchase of equipment required to support and maintain municipal solid waste recycling programs and composting programs • Initial costs to implement source reduction of solid waste, non-regulated waste, and waste specially regulated by states | <ul style="list-style-type: none"> • Equipment solely for grounds maintenance |

| TOPIC | VALID | | NOT VALID |
|--|---|---|---|
| | O&S | Non-Recurring | |
| Storage Containers (USTs, ASTs, etc.) | | <ul style="list-style-type: none"> • Storage tank projects to meet leak detection, corrosion protection, and spill/overfill prevention requirements • Projects to eliminate requirements for ASTs and USTs • Projects to reduce potential for leaks and spills | <ul style="list-style-type: none"> • Environmental Restoration Account eligible projects • Modernization and upgrades to systems. Projects that increase the size, quantity, or efficiency • Repair/cleanup of DFSC eligible leaking hydrant fueling system or USTs or systems containing DFSC fuels • CONUS AAFES tanks installed after 30 Sep 88 • UST and AST systems holding DFSC fuels • Heating Oil Tanks for on the premises consumption • Reading and recording of periodic Volumetric gauge reading for leak detection (Ref AFI 23-201) |
| Supplemental Environmental Projects (SEPS) | <ul style="list-style-type: none"> • Funds spent on SEPS should be moved into the Pollution Prevention account for accounting purposes | | <ul style="list-style-type: none"> • Fines, penalties, and supplemental projects (in lieu of fines) will not be paid out of environmental funds • Taxes or payments for which no service is received |
| Supplies - Office | <ul style="list-style-type: none"> • Office supplies used in support of pollution prevention | | <ul style="list-style-type: none"> • Office furniture |

| TOPIC | VALID | | NOT VALID |
|----------------------------|--|--|---|
| | O&S | Non-Recurring | |
| Surveys, Studies and Plans | <ul style="list-style-type: none"> • Updates to surveys or plans required by environmental law or Air Force policy | <ul style="list-style-type: none"> • Initial studies and plan preparation | |
| Training and Awareness | <ul style="list-style-type: none"> • Training and attendant certification required by law • Pollution prevention awareness training for hazardous waste personnel • Non-specific TDY training to support pollution prevention program objectives • Community pollution prevention outreach and awareness efforts | | <ul style="list-style-type: none"> • Training for sewage treatment plant or drinking water well operators • Training for bioenvironmental Engineers to learn sampling and analysis, or occupational health and industrial hygiene • Training to meet OSHA requirements |

| TOPIC | VALID | | NOT VALID |
|---------------|-------|--|---|
| | O&S | Non-Recurring | |
| Water Quality | | <ul style="list-style-type: none"> • Wastewater treatment systems projects (e.g. WWTP processes, oil water separators, and collection systems) to reduce the potential release of pollutants to the environment (e.g. reduce sludge, reduce constituents in sludge, reduce sampling and permit requirements, reduction of hazardous materials used in treatment) • Inflow/infiltration studies in support of projects to improve wastewater treatment plant performance • Studies and projects to assess and eliminate sewer and stormwater (SW) cross-connections (resulting in reduced permit requirements or exceedances due to SW infiltration) • Preparation and implementation of SW Pollution Prevention Plan (including BMP) • Erosion control projects to reduce SW permit and control requirements • Oil water separator consolidation and elimination projects and studies which decrease the potential for releases to the environment • Wash rack recycling projects • Pretreatment facilities or projects which more efficiently eliminate contaminants in the waste stream than the final treatment process • Projects for beneficial reuse of biosolids and/or wastewater effluent | <ul style="list-style-type: none"> • Correction of water system deficiencies not associated with identified environmental issues • Cleanup of contaminated soils associated with oil water separator removal • Projects needed to satisfy an immediate/existing non-compliance situation • Upgrade of WWTPs to meet discharge standards |

Appendix 5 The Environmental Team

A.5.1 Roles and Responsibilities

Successful execution of the environmental program requires individuals with various functional backgrounds to work as a team. Ideally, the team is composed of members with backgrounds in geology, engineering, architecture, law, resources, chemistry and other sciences, as well as installation and flight line operations.

The organizational framework of the environmental team, Figure A.5.1 illustrates the environmental chain of command and the lines of communication. Table A.5.1 describes the roles and responsibilities of the team members.

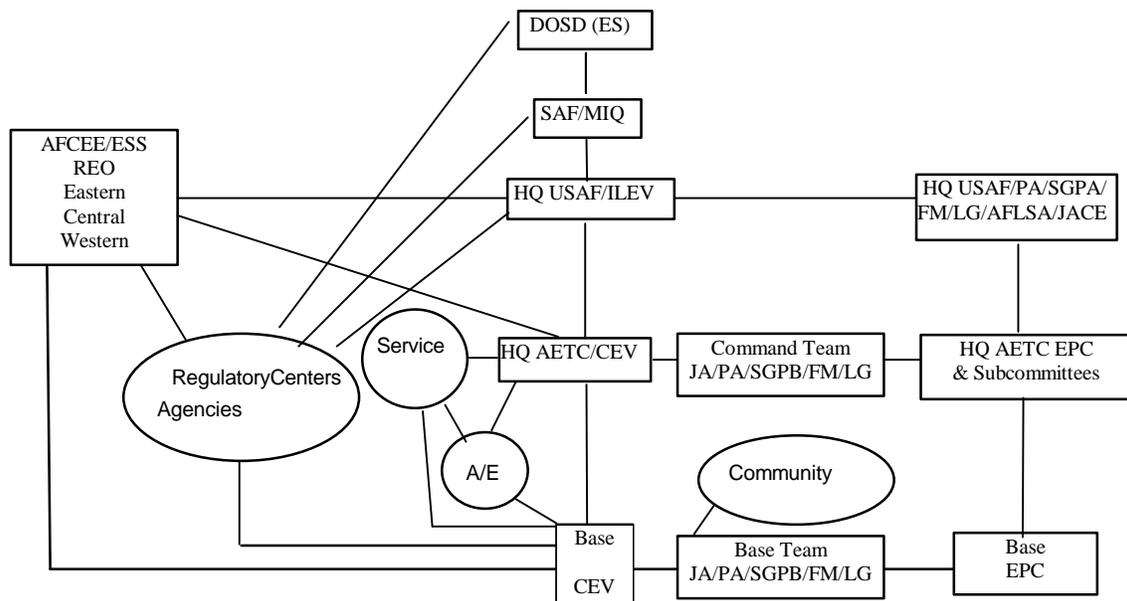


Figure A.5.1 The Environmental Team Organization Structure

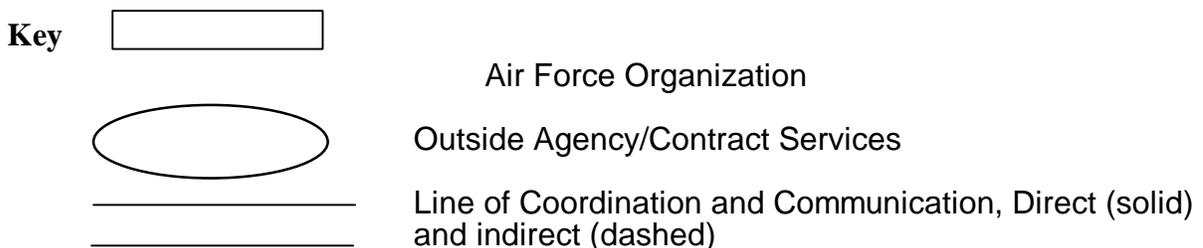


Table A.5.1 Roles and Responsibilities

| ORGANIZATION | ROLES AND RESPONSIBILITIES |
|--|---|
| DUSD (ES) Deputy Under Secretary of Defense for Environmental Security | <ul style="list-style-type: none"> • Promulgate DOD policy • DOD-wide implementation of environmental programs |
| SAF/MIQ Deputy Assistant Secretary of the Air Force for Environment, Safety, and Occupational Health | <ul style="list-style-type: none"> • Represents and reports AF program to DUSD (ES), Regulators, and Congress • Develops and promulgates AF policy • Validates budget to DUSD (ES) • Senior AF representative in dispute resolution |
| HQ USAF/ILEV HQ USAF Environmental Division | <ul style="list-style-type: none"> • Represents and reports AF environmental programs to SAF/MIQ • Develops policy for commands • Validates budget, Allocates funds to commands |
| AFCEE Air Force Center for Environmental Excellence REO Regional Environmental Office | <ul style="list-style-type: none"> • Technical review and assistance • Service Center for Projects • AF liaison between base and regulators, upon Base's request |
| HQ AETC/CEV Headquarters Air Education and Training Command Environmental Division | <ul style="list-style-type: none"> • Represents and reports command program to HQ USAF/ILEV • Develops command policy for bases • Allocates funds to bases • Validates base's fiscal requirements • Integrates and prioritizes all environmental requirements into command budget POM, FINPLAN and Spend Plan • Tracks expenditures and progress • Reports programs to command EPC via subcommittees |
| JA Staff Judge Advocate, All levels | <ul style="list-style-type: none"> • AFLSA/JACE Coordinates policy and program execution matters, provides legal representation and negotiation • Command/JA advises command EPC and CEV as well as Wing JA on legal matters • Provides legal representation and negotiation • Wing JA advises Wing EPC and other functionals on legal matters • Provides legal representation and negotiation |

Table A.5.1 Roles and Responsibilities (cont.)

| ORGANIZATION | ROLES AND RESPONSIBILITIES |
|--|--|
| PA Public Affairs Office | <ul style="list-style-type: none"> • HQ USAF/PA coordinates on policy and program execution matters • command/PA advises command/CEV and WING/PA on public affairs matters • WING/PA advises the base Environmental Manager and other functionals on Public Affairs matters • Reviews, documents, provides community relations support (newsletters, press releases) relating to funding matters |
| BEE Bioenvironmental Engineer | <ul style="list-style-type: none"> • HQ AFMOA/SGOE coordinates policy and program execution matters • command/SGPB advises command/CEV and base BEEs (sampling and analysis, risk assessments, health and safety) • Base BEE reviews documentation (sampling and analysis plan, health and safety plan). Advises on industrial hygiene and other human health/safety issues |
| Mission, Logistics and other Support Activities (Environmental Team Members) | <ul style="list-style-type: none"> • Operates within environmental rules and regulations • Identifies requirements for environmental funding |
| CEV Base Environmental Manager | <ul style="list-style-type: none"> • Ensures compliance with regulations • Develops program requirements for the POM, FINPLAN, Spend Plans and BER • Reviews documentation • Coordinates with Air Force, regulatory, community and other involved agencies • Oversees field activities • Evaluates environmental base activities |
| Service Centers Such as the Corps of Engineers AFCEE Navy Facilities Command | <ul style="list-style-type: none"> • Provides A/E contract acquisition and technical support to bases and commands • Maintains status of expenditures • Ensures quality control and quality assurance of activities (field work, chemical analysis, and document submittals) • Ensures contractors comply with regulations |
| Regulatory Agencies US EPA, State, County, Local | <ul style="list-style-type: none"> • Enforces compliance • Reviews planning (A-106) and investigation reports |
| Community | <ul style="list-style-type: none"> • Ensures community interests are addressed by the installation |