



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON DC

15 APR 1999

MEMORANDUM FOR ALMAJCOM/CEV
HQ USAFA/CEV

FROM: HQ USAF/ILEV
1260 Air Force Pentagon
Washington DC 20330-1260

SUBJECT: Compliance Through Pollution Prevention (P2) Implementation Guidance (Our Memo, 8 Jan 99)

The 29 Mar 99 MAJCOM/CEV meeting at the National Defense Industrial Association (NDIA) Conference achieved consensus on the underlying foundation for the Air Force's new Compliance Assurance and Pollution Prevention Program and the compliance through P2 process pivotal to implementing this initiative. However, there were questions concerning the time necessary to provide a comprehensive and consistent compliance site inventory as well as a prioritized listing of the sites identified.

We understand funding and manpower limitations directly influence the time frame in which each MAJCOM can execute this program. To the fullest extent possible, please use the 8 Jan 99 guidance (and attached compliance site definition) to develop and provide Phase One; Compliance Site Inventory by 30 Jul 99. We are planning to convene an Environmental Quality Workshop in Aug 99 to review MAJCOM inventory submissions. Workshop members will determine if, and to what degree, MAJCOM inventories require adjustment. During this process, please keep working to develop and provide Phase Two; Compliance Site Prioritization by 29 Oct 99.

The Air Force's Compliance Assurance and Pollution Prevention Program and its compliance through P2 process is an industry-leading initiative. Exploiting this opportunity will solidify our position as DoD's flagship environmental program. If members of your staff have any questions, please have them contact our POC, Major Joe Wilson, HQ USAF/ILEVQ, DSN 327-0194, e-mail: Joseph.Wilson@pentagon.af.mil.

A handwritten signature in black ink, appearing to read "Teresa R. Pohlman".

TERESA R. POHLMAN
Chief, Environmental Division
DCS/Installations & Logistics

Attachment:
Compliance Site Definition

cc:
SAF/MIQ
HQ AFCEE/CC/EQ

Compliance Site Definition

OVERVIEW. The compliance site definition and examples illustrated below are not designed to be all inclusive. Installations may need to add regulated sites particular to a given location. Installations and MAJCOMs may choose to collect data outside the parameters of the compliance site definition in anticipation of new regulatory requirements. However, the inventory should only include compliance sites that are currently regulated. **DO NOT** report sites that are not regulated.

The inventory of individual compliance sites will be maintained in a consolidated electronic database using existing software resources. Reporting of this information will be accomplished via the AFCEE/CCR-D automated reporting system. For each compliance site on an installation, the consolidated compliance site inventory will include, at a minimum, the information listed in Table 4.1, Compliance Site Inventory Data Requirements, of the Compliance Through P2 Implementation Guidance, dated 8 Jan 99. AFCEE/CCR-D has developed a spreadsheet (with pull-down menus and pick lists) to facilitate population of the database.

While developing the compliance site inventory, installations will provide a rough order of magnitude estimate of annual compliance costs, considering all aspects of compliance. Compliance costs include, but are not limited to, permit, disposal, control equipment, training, energy, as well as other operational and ESOH costs.

COMPLIANCE SITE DEFINITION. A compliance site is any regulated facility, regulated process, or a discharge to a regulated facility or process. This includes any discrete location under Air Force control wherein activity occurs that is subject to current or known future (resulting in known consequences) federal, state, and local statutes and regulations; E.O.s; DoD and Air Force polices; and the OEBGD, FGSS and international agreements.

A single process may generate multiple compliance sites. For example, an industrial process may discharge air pollutants, wastewater, and HAZWASTE--with each point of discharge or generation constituting a separate compliance site.

Multiple compliance sites may discharge into another compliance site. For example, a HAZWASTE accumulation point is a compliance site in which multiple HAZWASTE generation compliance sites terminate.

Compliance sites include, but are not limited to:

Air Sources: Include individual regulated sources accounted for under a Title V permit (whether major, minor, or insignificant sources) or by individual permit or registration that must be periodically accounted for to ensure compliance. Does not include fugitive dust permits.

For example, each permitted or registered stack in an multiple stack system/plant is considered a compliance site.

HAZWASTE Management Sites: Include all regulated areas where hazardous waste is stored or generated.

Examples include initial accumulation points; 90-day accumulation sites; and treatment, storage, and disposal facilities (RCRA Part B permitted or interim status sites). Does not include sites governed only by OSHA or the installation restoration program (IRP).

RCRA Cleanup Sites: Include confirmed SW Management Units (SWMUs) subject to a regulatory (RCRA) compliance agreement or a Part B permit.

Examples include sites that are still under the long-term monitoring phase of cleanup and UST cleanup sites. Does not include IRP sites or areas of concern.

USTs: Include all regulated USTs and connected piping to include regulated hydrant systems.

Hydrant systems are not federally regulated. Only include hydrant systems that are state regulated (e.g. California).

ASTs: Applies to tanks with a capacity of 660 gallons or larger.

Do not include ASTs with a capacity of less than 660 gallons, unless they are regulated.

Drinking water: Include potable water system components such as Air Force managed water sources (e.g. production wells or surface reservoirs), treatment systems (e.g. chlorination, air stripper, filtration, or a system with multiple unit processes), major storage sites (such as water towers), and distribution system(s).

Do not include cross-connections or backflow preventers.

Wastewater and Storm water: Include National Pollutant Discharge Elimination System and/or permitted storm water outfalls; permitted regional connections; other permitted discharges (e.g., treatment plants discharging to evaporation ponds or land application); oil/water separators and other pretreatment systems which feed to regulated discharge points and sewage sludge land application sites. Does not include storm water permits resulting from construction activities.

Emergency Planning and Community Right-to-Know Act (EPCRA) Sites, 42 U.S.C. 11001-11050: Includes HAZMAT storage sites exceeding reporting thresholds defined under EPCRA, Section 11022.

Pesticides: Includes all storage and mixing facilities operated by certified pesticide applicators.

Landfills: Includes on-installation SW permitted landfills.

Does not include unauthorized disposal sites discovered on the installation (e.g., cans of paint found in dumpster and unauthorized construction demolition dumping).

Open Burn/Open Detonation: Includes RCRA Subpart X permitted or interim status sites.

Major Joseph Wilson/AF/ILEVQ/DSN 327-0194/12 Apr 99

ATCH (2 OF 3)

SOURCES OF INFORMATION. The initial inventory of compliance sites should be a consolidation of information from existing sources, not the generation of new information. Existing sources of information include, but are not limited to, MAP/OAs; component plans developed in accordance with AFI 32-7062, *Air Force Comprehensive Planning*; EPCRA documentation; media plans (air, water, SW, etc.); environmental permits; Environmental Compliance Assessment and Management Program (ECAMP) findings; safety (SE) inspections; bioenvironmental engineer (BE) activity evaluations; National Environmental Policy Act (NEPA) documentation, 42 U.S.C. 4321-4370d; notice of violations (NOV); environmental impact analysis process (EIAP) and Host Nation Open Enforcement Actions; RMP; PSM; and applicable environmental databases.

New or modified regulatory requirements may create or eliminate compliance sites. In addition, new or changed activities or processes may also create or eliminate compliance sites. The process described in AFI 32-7061, *The Environmental Impact Analysis Process* identifies compliance sites potentially created or eliminated by new or changed activities or processes. It is important to review new installation NEPA documents for changes to the compliance site inventory. Installations should add compliance sites to the inventory, as necessary. **Note:** Though a compliance requirement may be eliminated, the affected compliance sites should remain in the inventory for record keeping purposes.