

FedFacs

An environmental bulletin for federal facilities

AGENCIES PLEDGE TO POLLUTION PREVENTION, ENERGY EFFICIENCY GOALS AT WHITE HOUSE CEREMONY

In a White House ceremony on September 12, top environmental and energy officials highlighted outstanding examples of individual leadership and accomplishments under the President's executive orders to increase federal recycling, energy efficiency, and pollution prevention. Hosted by Council on Environmental Quality Chair Kathleen McGinty, the event, called "Environmental Excellence in Government," also featured Energy Secretary Hazel O'Leary, EPA Administrator Carol Browner, OMB Office of Federal Procurement Policy Administrator Steven Kelman, Federal Environmental Executive Fran McPoland, and North Carolina Assistant Secretary for the Environment Linda Rimer.

During the ceremony, fifteen federal agencies signed a formal charter under Executive Order 12856, "Federal Compliance with Right-to-Know and Pollution Prevention Requirements." Signed by federal agency members of the Executive Order Interagency Pollution Prevention Task Force, the Charter reaffirms the federal commitment to demonstrate leadership in pollution prevention and community right-to-know and to achieve the goals established in the Executive Order.

The first annual White House "Closing the Circle" awards were given to 23 individuals and groups from federal communities across the nation who have demonstrated a commitment to environmental excellence in the areas of recycling, waste prevention, model demonstration projects, procurement, environmental innovation, and lifetime achievement. (See list on page 12.)



At the awards ceremony: EPA Administrator Carol Browner (left) with Sherril Goodman, DOD Deputy Under Secretary for Environmental Security, and Steven Herman, EPA Assistant Administrator for Enforcement and Compliance Assurance.

In addition, 22 federal agencies signed the "Energy Efficiency and Resource Conservation Challenge," pledging to purchase "best practice" products which are practicable, cost-effective, and in the upper 25 percent of energy and water efficiency.

Director's Word

BARRY BREEN

Dear Reader:

Many readers of *FedFacs* work on federal facilities issues full time. Some of us are regulators at agencies such as EPA, and some are program managers and implementers at agencies that operate federal facilities. Virtually all of us feel a deep commitment to a common goal: improving the federal facility environment. Why do we feel our work is so important?

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The Hammer

Case Highlights:

• **Region 2 Assesses \$190,700 in RCRA Penalties against USDA's Plum Island Facility** — EPA Region 2 has issued two complaints against the Department of Agriculture's Plum Island Animal Disease Center at Greenport, NY and against a USDA contractor for illegal storage and disposal of hazardous waste. The orders carry proposed civil penalties of \$111,100 and \$79,600, respectively.

• **Region 2 Orders Seneca Army Depot to Comply with SDWA** — On Feb. 3, 1995, EPA Region 2 issued a proposed administrative order requiring a New York Army facility to comply with rules under the Safe Drinking Water Act (SDWA) for installing filtration systems. The unsigned order, issued to Seneca Army Depot in Romulus, NY, finds the facility is a public water supplier and is in violation of 40 CFR Part 141, Subpart H. The facility failed to install filtration by Dec. 25, 1994, the deadline set by an EPA determination, which found, with state input, that such filtration was required under the regulations.

• **State of Washington Department of Ecology Fines National Oceanic and Atmospheric Administration for Illegally Transporting and Storing Dangerous Mixture of Chemical Wastes** — NOAA has been fined \$120,000 for illegally transporting hazardous wastes and storing them improperly. The wastes, which included reactive and potentially explosive materials from NOAA's laboratories, were transported through residential neighborhoods and commercial areas near the University of Washington in Seattle. The Department of Ecology also cited violations for improper segregation of over 3,000 containers of waste chemicals and lack of identification of wastes.

GuestSpot

FRAN McPOLAND

Federal Environmental Executive



Having recently celebrated the 25th anniversary of the first Earth Day, I thought it would be appropriate in this space to reflect on the Federal Gov-

ernment's role in promoting recycling and related activities during the past quarter century.

Despite our success in recycling, the policies of the last 25 years must be viewed against a backdrop of overarching government policies promoting the extraction and use of virgin materials. As you may recall, within six months of the first Earth Day in 1970, some 3000 Community Recycling Centers had been established. But by the time of the economic slowdown in the mid-1970s, most of these had failed. These programs failed for a number of reasons, not the least of which is the fact that both federal policy and human inclination has long favored "new and improved" over "recycled and old." We did very little to educate consumers about buying recycling products. We forgot basic economics. We created the 'supply' of collected products—but there wasn't enough 'demand' to keep the programs working.

In 1976 Congress realized that it had a role to play and directed EPA to develop guidelines on recycled content products that the Federal Government itself would purchase. However, as a result of budget cuts, various controversies, and the urgency of the hazardous waste and Superfund programs, very little was done by EPA to actually develop this guidance until the mid to late 1980s.

By 1989, EPA had finally issued guidelines for five items: retread tires; paper and paper products; re-refined lubricating oil; cement and concrete containing fly

ash; and building insulation. As of June 1989, all federal agencies (as well as state and local governments receiving federal funds) were obligated, if they purchased more than \$10,000 of any of these items, to procure products which conformed to the EPA Guidelines.

However, the law gave the agencies an "out"—and they took it! The law allowed agencies to avoid purchasing these products if the products (1) were not cost competitive; (2) were not readily available; or (3) did not meet their requirements. Thus, for the past six years we have seen agencies create lube oil specifications that effectively mandated use of virgin lube oil, and tire tread specifications that retread tires couldn't meet. While complaining that recycled content products were too costly or unavailable, these same agencies were taking steps to cut these recycled products off from being developed. Some agencies, such as GSA, had even written manuals prohibiting the use of re-refined oil and retread tires. And, since GSA manages most of the federal civilian fleet of vehicles, its guidelines are generally followed by other agencies. With barriers like these, it has been almost impossible for federal purchasers who wanted to do the right thing, to get their agencies to purchase those products.

Let me tell you what the President has directed me to do and what our overall plan is to turn around the federal recycling record. On October 20, 1993, President Clinton signed Executive Order #12873 on Federal Acquisition, Recycling and Waste Prevention—a unique and historically significant commitment to dramatically increase federal action on source reduction, pollution prevention, recycling, and procurement of recycled and energy efficient materials. As the first Federal Environmental Executive, I have

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BRAC CLEANUP TEAM . . . SETTING A PRECEDENT AT NAVAL BASE CHARLESTON

by WT1 Linda L. Helmig
Editor, *The Bow Hook*

They came together with one common goal, to quickly and safely manage the environmental cleanup of Naval Base Charleston. They are the BRAC Cleanup Team (BCT) and they are comprised of representatives from the Department of Defense, U.S. Environmental Protection Agency, and South Carolina's environmental agency. But what they do is far from routine.

Together, the environmental agencies are breaking new ground by creating a partnership with the U.S. Navy to solve environmental problems at the Naval Base. "I think that we have gotten more actual environmental work done here in the last two years than in the ten years before the BRAC Cleanup Team was established," stated Doyle Brittain, Senior Remedial Project Manager for EPA.

What is taking place is unprecedented and a sharp departure from business as usual. Teamwork among the BCT members is the key to this process that began over two years ago. Since its establishment in 1993, the BCT has identified all potential hazardous waste sites at Naval Base Charleston and developed a five-volume master work plan to investigate those sites. Because Naval Base Charleston is large and spread out over several square miles, the BCT divided the base property into 12 zones, to allow for the environmental investigation of the base in an efficient and timely manner. At this point, investigation of one full zone has been completed and two other zones are in the final stage of investigation.

Once each zone investigation is completed and reviewed, a Corrective Measures Study will be performed to determine the most efficient method of cleanup. Public hearings will be held to give community members the opportuni-

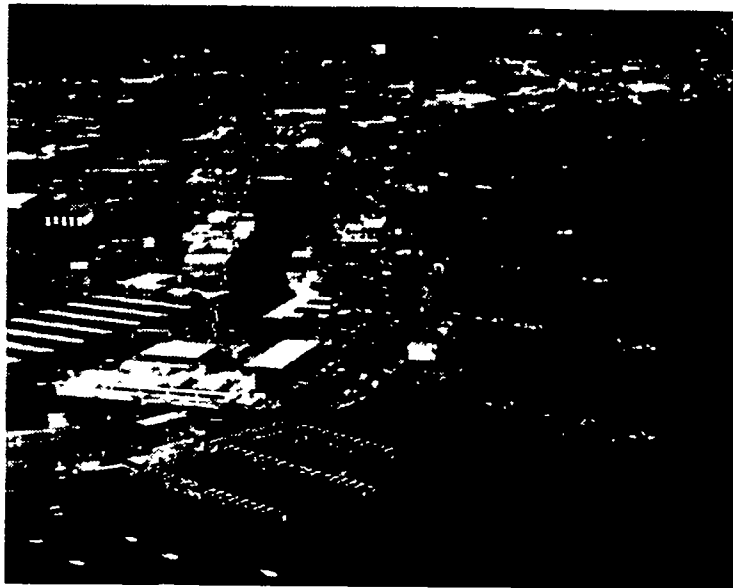
ty to be part of the decision-making process.

Another issue being dealt with by the BCT is how future reuse of the base would affect the environment. The Navy, through the BCT, has drawn up an Environmental Impact Statement which considers the closure of the Naval Base and implementation of the community's Reuse Plan. The Reuse Plan outlines the community's concept of how the property at the base would be reused.

While the base property cannot be turned over to the area's Redevelopment Authority (RDA) until full environmental remediation has been accomplished, property can be temporarily turned over to the RDA for leasing to other groups. The BCT conducts smaller investigations to ensure the property is suitable for leasing.

The good news is that most of the property at the Naval Base can be leased today without significant environmental concerns. Two pieces of property that have already been leased to the community are the marina complex and the new building by McMillan Gate. There is no part of the base that presents an immediate health hazard and there are no sites so contaminated that they cannot eventually be reused.

The roots of the BCT come from President Clinton's Five Part Program for revitalizing communities affected by the Base Realignment and Closure Acts (BRAC). One of those parts involved Fast Track



Aerial view of Naval Base Charleston

Cleanup to speed the reuse of environmentally contaminated sites. From that has come the BRAC Cleanup Team and a proactive, cooperative approach to managing cleanup efforts.



Environmental investigators collect soil samples for lab analysis.

NewsResources

FAVORABLE RULING FOR EPA ON MILITARY MUNITIONS AS HAZARDOUS WASTES

A significant ruling was handed down earlier this year in a test case involving enforcement of the Federal Facility Compliance Act (FFCA). The FFCA ends the immunity to penalties that had been previously been available to federal facilities violating the provisions of RCRA. On May 12, 1995, Administrative Law Judge Spencer Nissen ruled on motions in the Lackland Training Annex case (Docket No. RCRA VI-311-H.) EPA Region 6 had initiated an administrative enforcement action against Lackland for unauthorized disposal of military ordnance by open burning and open detonation (OB/OD). The RCRA violations were: (1) failure to obtain interim status for operating the Site 7 thermal treatment unit for OB/OD, and (2) operating a hazardous waste management unit without interim status or a permit.

In his rulings on prehearing motions, Judge Nissen analyzed earlier decisions and the law. He ruled that military ordnance is considered hazardous waste under RCRA. Furthermore, he ruled that EPA was not estopped from enforcing because Lackland had relied on a letter from the state regulator incorrectly advising the installation that it had interim status. Judge Nissen also ruled that even though Lackland had not disposed of additional hazardous waste at the Site 7 disposal facility after the effective date of FFCA, the failure to obtain a permit was a continuing violation. Site 7 remained in active status and Lackland was liable for penalties for operation of the unpermitted unit until Lackland completed the RCRA hazardous waste unit closure procedure. EPA could assess a penalty for each day of violation after the enactment of the FFCA for failure to close an unauthorized hazardous waste management unit.

The case is expected to be appealed.

For more information, contact Patrick Larkin, Office of Regional Counsel, Dallas, TX, 214-665-2156.

USING EPA'S FEDERAL FACILITIES TRACKING SYSTEM

The Federal Facilities Tracking System, or FFTS, is an EPA database maintained by FFEO that offers a multi-media view of compliance activities at over 15,000 federal facilities. EPA Headquarters and Regional Offices are currently using DOS version 2.01 of FFTS. The Windows version of FFTS is in the final stages of development and should be in use in early fall. The Windows version, with new programming features, will allow for easier retrieval of data and provide more sophisticated graphics capabilities.

FFTS data includes relevant federal

facility information from seven existing EPA databases. They are:

- NCDB, the National Compliance DataBase, run by the Office of Pollution Prevention and Toxic Substances
- PCS, the Permit Compliance System, run by the Office of Water Enforcement and Compliance
- RCRIS, the RCRA Information System, run by the Office of Solid Waste
- CERCLIS, the CERCLA Information System, run by the Office of Emergency and Remedial Response
- FFIS, the Federal Facility Information System, run by the Office of Federal Activities
- FINDS, the Facility Index System, run by the Office of Information Resources Management.

FFTS links information for a single facility that is stored in various program and media-specific offices. This information includes:

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ENVVEST GETS UNDERWAY

In one of the 25 High Priority Actions unveiled in the Clinton Administration's Reinventing Environmental Regulation Initiative, EPA will work with other federal agencies to ensure that their programs achieve environmental results in the most cost-effective manner, while eliminating needless bureaucratic procedures. The initial pilot for this project, called ENVVEST, is a joint EPA/Department of Defense initiative which will test new approaches to environmental management at three to five DOD installations. ENVVEST falls under the framework of Project XL, part of a package of initiatives unveiled by the President for reinventing environmental regulation. The goals are to produce overall environmental results beyond what would be achieved with existing regulations, and to improve the cost-effectiveness of DOD environmental investments. The initiative will serve as a national model for performance-based environmental management systems. EPA and DOD are currently negotiating an umbrella Memorandum of Agreement to help guide development of site-specific agreements.

DOD's Deputy Under Secretary for Environmental Security, Sherri Goodman, has tentatively identified Florida, California, and Alaska (in EPA Regions 4, 9, and 10, respectively) as states that have expressed interest in supporting pilot projects at federal facilities within their borders. Once proposals are reviewed and pilot installations selected, EPA and DOD will develop performance standards, implementation plans, and site-specific compliance agreements for each participating pilot facility.

FEDERAL TRACKING SYSTEM

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- facility location
- points-of-contact
- status information
- permits
- cleanup activities
- inspections
- enforcement activities.

Other facility linking and data cleanup activities are needed before FFTS development is completed. Some civilian federal agencies will be asked to participate in facility identification exercises to assess the need for further data cleanup. When data linking and cleanup are concluded, FFTS reports for federal agencies and federal facilities will be made available. Federal agency reports will be designed by EPA Headquarters and packaged for release to individual agencies. Reports for individual federal facilities will be prepared and distributed by EPA's Regional Offices. These reports are expected to be available by mid-FY 1996.

NEW EXECUTIVE ORDER ISSUED ON POLLUTION DISCLOSURE

On August 8, 1995, President Clinton issued Executive Order 12969, "Federal Acquisition and Community Right-to-Know," which requires manufacturing facilities doing business with the federal government to comply with TRI reporting requirements, i.e., to disclose to the public information on their emissions of 651 chemicals (including the 286 recently added to the TRI list). The Executive Order does not apply to contracts below \$100,000 and uses the simplified right-to-know reporting requirements recently adopted for small businesses.

Also announced at the same time was the President's directive to EPA to expand the right-to-know program to include information on chemical use, and to expand the number and types of facili-

P2/FINANCE SOFTWARE AVAILABLE

P2/FINANCE is a spreadsheet software tool that helps organizations collect and analyze data essential to a clearer financial evaluation of product/process costs and pollution prevention costs. **P2/FINANCE** is available free of charge for any federal, state or local government employee. The software offers a valuable starting point for introducing a Total Cost Assessment (TCA) approach to cost accounting.

The TCA approach differs from conventional practices in four key ways: a broader inventory of costs and savings; allocation of all costs and savings to specific process and product lines rather than to overhead accounts; expanded time horizons for the capture of long term benefits; and the use of profitability indicators which incorporate the time value of money. Users input capital and operating costs for product/process and an alternative product/process, and the program outputs a fifteen year cash flow analysis and a profitability analysis. The analysis calculates three financial factors: net present value; internal rate of return; and simple payback. **P2/FINANCE** comes with a user manual and free access to a user hotline.

For information on how to obtain P2/FINANCE, contact EPA's Pollution Prevention Information Clearinghouse at 202-260-1023.

ties required to report. The President also took aim at Republican proposals to severely limit EPA's ability to expand the TRI reporting requirements beyond those initially enacted, threatening to issue a second executive order that would secure the public's right-to-know through executive action.

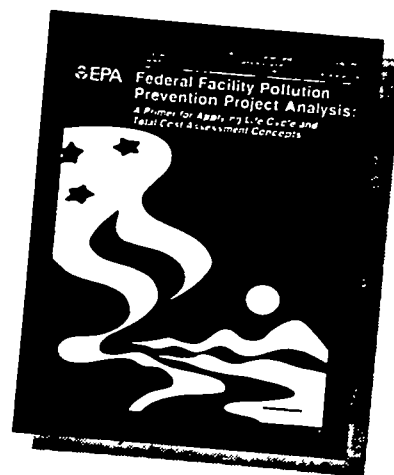
APPLYING LIFE CYCLE AND TOTAL COST ASSESSMENT CONCEPTS

In order to assist federal facilities in complying with Executive Order 12856, FFEO recently published *Federal Facility Pollution Prevention Project Analysis: A Primer for Applying Life Cycle and Total Cost Assessment Concepts*. Section 4-404 of the Executive Order requires that federal agencies apply total cost accounting (TCA) and life cycle analysis (LCA), to the greatest extent practicable, when evaluating pollution prevention opportunities.

The manual is written to help decision-makers and those who evaluate and recommend projects understand and implement life cycle and total cost assess-

ment. In addition to explaining the primary concepts of LCA and TCA, the guide provides step-by-step worksheets for performing cost assessments and life cycle assessments. The guide also provides references for those needing additional information.

Contact: Rick Brenner, 202-260-6177. To obtain a copy of the guide, contact EPA's Pollution Prevention Information Clearinghouse at 202-260-1023. Electronic formats of the guide and worksheets are also available on EPA's Enviro\$en\$e bulletin board.



A STRATEGY FOR IMPROVING CIVILIAN FEDERAL AGENCY ENVIRONMENTAL PERFORMANCE

EPA has prepared a *Strategy for Improving Environmental Management Programs at Civilian Federal Agencies* (EPA 300-B-95-006) which is scheduled for release in September 1995. The strategy is a product of the Task Force of Civilian Federal Agencies (CFAs) convened by EPA in October 1992 to address the unique environmental compliance/management problems of non-military agencies. (CFAs include all federal departments and offices other than the Departments of Defense and Energy.)

The Task Force's goals were to identify deficiencies in CFA environmental management and compliance programs, determine their causes, and make recommendations for improvements. The effort is directed at assisting CFA compliance and management programs in evolving to higher levels of performance by providing increased access to resources and a more

active partnership with EPA.

Civilian federal agencies often lack the infrastructure, budget, and technical expertise to effectively manage environmental problems. In a survey of 28 CFAs conducted in January 1993, for example, over 80% of the CFAs reported having no formal compliance training program at either the regional or installation level for employees charged with ensuring agency compliance. Only one agency reported having an agency-wide system or database to ensure that proper records are maintained and updated.

SIX AREAS OF NEED

The CFA Task Force identified six areas of need for CFA environmental management:

1. Inadequate or duplicative environmental management training.
2. Difficulty in finding timely and reliable information on regulations, technologies, and management strategies.
3. Absence of centralized data management systems to alert federal agencies to changes in facility compliance status.
4. Need for EPA assistance on specific compliance issues and needs, such as environmental auditing.
5. Insufficient staffing to provide adequate technical services and support.
6. Poor communications among EPA headquarters and regions, and between EPA and other federal agencies.

Recommendations were made in each area indicating where improvements can be accomplished through technical assistance

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Enviro\$ense UPDATE

Help is on the way! Enviro\$ense is EPA's new full-service, computerized environmental information system. "Help" instructions are now available from the Federal Facilities Enforcement Office, for modem users of the electronic bulletin board system (BBS) platform of Enviro\$ense. The instructions address how to connect to the system, register, search and view documents, compress, uncompress, convert to ASCII text, and download and upload documents. When the EPA HQ LAN "ALS Communication" is upgraded, similar instructions will be completed for EPA LAN users. FFEO will also package Enviro\$ense help instructions in an Enviro\$ense BBS User's Guide, to be completed this Fall. For information, call Isabelle Lacayo (202-260-3035) or download the instructions from the BBS Utilities Directory.

Calls and Customers: In its first five months of operation, Enviro\$ense has already received over 2,000 documents, and routinely gets 150-200 calls per day.

FFLEX: The Federal Facilities Environmental Leadership Exchange system is now accessible as a directory on the Enviro\$ense system.

Access Information: Following is the access information for reaching Enviro\$ense:

Via modem: Use a personal computer with a modem (up to



14,400) and communications software set to the following specifications: 8, N, 1, Emulation: ANSI, BBS, or VT-100.

Telephone Number: 703-908-2092

BBS Hotline: 703-908-2007

Via the Internet: You need to have access to the Internet and use World Wide Web access software such as Mosaic. Use the following address:

<http://wastenot.inel.gov/envirosense/> (Note: Corrected address from last issue of FedFacs)

WWW Hotline: 208-526-6956

For more information, contact Isabelle Lacayo, 202-260-3025, or Louis Paley, 202-260-4640.

In the Regions

EPA-NEW ENGLAND "STEPS UP" ENFORCEMENT OF PUBLIC AGENCIES

On July 5, EPA-New England unveiled its overhaul of the region's enforcement policy, bringing another round of enforcement actions against two federal facilities, nine municipalities, two state facilities, and one municipal airport for violations of federal environmental laws, totaling \$184,000 in penalties. The new enforcement policy, called STEP-UP, the Strong, Targeted Enforcement Program targets public agencies, the urban environment, sensitive coastal resources, and high-risk sources of pollution. Up to 80 percent of EPA-New England's enforcement resources are being dedicated to the target areas. Since the initiative began last fall, the region has brought 52 cases against public agencies.

The two cases brought in July against federal facilities were as follows:

- **The Vermont Air National Guard in South Burlington, VT** faces a fine of \$81,300 for numerous violations of federal waste management laws. The facility was cited for failing to properly mark, inspect, and store hazardous wastes, and failing to maintain adequate records of hazardous wastes generated at the site.
- **The U.S. Army Natick Research, Development and Engineering Center Facility in Natick, MA**, which was recently listed on the National Priorities List, will pay a

\$49,700 penalty for violations of hazardous waste management laws. EPA inspectors found the Army had failed to properly identify hazardous wastes at its facility, failed to label and mark accumulated containers of wastes, failed to keep containers closed in storage, and failed to clearly mark hazardous waste storage areas.

In the next stage of STEP-UP, EPA-New England will target specific geographic areas for inspection, such as Narragansett Bay (R.I.) and Casco Bay (Maine).

For more information, contact Alice Kaufman, 617-565-4592.

ENVIRONMENTAL PERFORMANCE

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from EPA or other outside sources. The recommendations are a result of a collaborative effort of EPA and federal agencies to establish a greater sense of partnership and to further the common goal of improving environmental performance.

FUTURE TASK FORCE ACTIVITIES

The CFA Task Force is expected to become a permanent partnership group and serve as the primary conduit of communication between EPA and CFAs. Periodic informal meetings will be held to review the progress of CFAs and EPA in implementing the actions called for in the CFA Strategy document and to identify and resolve new issues as they arise.

For more information, contact Rich Satterfield, 202-260-9759. For a copy of the strategy document, see ordering information on p. 11.

Regional Round-Up

- In May 1995, EPA Region 1 and the Army signed a Federal Facility Agreement (FFA) for the Army Materials Technology Lab (AMTL) in Watertown, MA. AMTL is a BRAC 1, fast track base, slated for closure in September 1995. AMTL was placed on the National Priorities List in May 1994. The Army and EPA agreed to language in the FFA that addresses EPA's concern with protecting the ongoing cleanup and ensuring that activities of subsequent transferees do not interfere with the cleanup efforts. The FFA is accompanied by a side letter from the Army reinforcing the Army's commitment to ensure that the substance of protective language worked out with EPA is actually included in the appropriate land transfer documents.
- During April and May 1995, EPA Region 3 conducted a number of inspections of federal facilities in Washington, D.C. as part of the Region's Anacostia River cleanup initiative. EPA and District of Columbia representatives inspected the Bureau of Engraving and Printing, Washington Naval Shipyard, and the Southeast Federal Center. The primary focus of these inspections was to determine the facilities' compliance history while examining whether their operations have had any impact on environmental problems in southern Washington, D.C. Region 3 anticipates receiving drafts of the inspection reports by the end of the fiscal year and will decide whether additional facilities in D.C. may need to be inspected.

GENERIC PROTOCOL AVAILABLE IN ELECTRONIC FORMAT FOR CUSTOMIZING

A revised *Generic Protocol for Conducting Environmental Audits of Federal Facilities* (released in February 1995) is available for use by federal agencies. Prepared as a collaborative effort by the member agencies of the Federal Audit Protocol Workgroup for the Federal Community (EPA, DOE, DOD, USPS, NASA, DOI, USDA, and FAA), the protocol is meant to assist in the conduct of environmental audits and environmental management assessments. The protocol focuses on determining compliance with environmental requirements and adherence to good management practices. Because of its size — over 1,800 pages — the protocol is being made available to federal agencies on computer diskette as well as online.

The Generic Protocol contains three separate auditing sections or "phases" intended to provide both a micro and macro view of environmental management and help identify root causes for problems found.

- **Phase I** provides for a review of facility conditions in regard to specific media areas (e.g. air, water, and solid and hazardous waste) with a focus on compliance with Federal environmental requirements. Phase I may be used as a starting point for agencies that have just begun new programs.
- **Phase II** of the protocol examines cross-cutting issues, provides an assessment of pollution prevention initiatives for each environmental discipline, and evaluates seven management systems that are relevant to each environmental area. These are: organizational structure, environmental commitment; formality of environmental programs; internal and external communications; staff, resources, training, and development; program evaluation, reporting, and corrective action; and environmental planning and risk management.
- **Phase III** examines the facility's management of all environmental

programs to help establish compliance as the starting point rather than the endpoint of environmental performance.

A companion document to the protocol, *Environmental Audit Program Design Guidelines for Federal Agencies*, is currently undergoing revision. The guidelines are tailored to federal agency organizational and budgetary contexts, and will help federal agencies design environmental audit programs for facilities that they own or operate.

CUSTOMIZING THE PROTOCOL

Federal agencies are encouraged to customize the protocol to their own needs before issuing it to auditors. To facilitate that customizing, the protocol is available in a packet of seven diskettes (Diskettes 1-5 cover Phase I; Diskette 6 covers Phase 2; and Diskette 7 covers Phase III) in IBM compatible, Wordperfect format. Call 202-260-9801 to obtain a packet.

Accessing the Generic Protocol on Enviro\$en\$e

To download the document from Enviro\$en\$e using a modem, follow these directions.

1. Using a modem, call 703-908-2092.
2. Set the modem and communications software at: 2400, 8, N, 1, and VT-100 or ANSI emulation. Consult your communications software manual for specific details, including how to set up a path and directory. For setup questions, you may call the BBS Hotline (703-908-2007) for help.
3. Follow instructions to register. You may immediately use the BBS after registering, for up to 2 hours per day.
4. From the Enviro\$en\$e System Menu, search for the Generic Protocol by typing "S," press ENTER; type "D" to search by directories (this searches abstracts and titles of documents; text searches will search text only). Type "generic;" press ENTER; type "A" (for ALL); press ENTER; scroll through the documents until you find the three files (representing Phases I, II, and III) of the Protocol.
5. Once the search results are displayed on-screen, select each document by typing "F" (to flag it for later download) and follow the prompts. You must also download a utility program called PKZ204G.EXE to uncompress the Generic Protocol files for use on your PC. This utility file can be found in the Utilities Directory.
6. When you are ready to download, go to Enviro\$en\$e's System Menu, select "D" and follow the prompts. After the download is completed, use the PKUNZIP file from the PKZ204G.EXE file to uncompress your document.

For more information, contact Isabelle Lacayo, 202-260-3025, or Lou Paley, 202-260-4640.

MEET... EPA'S OFFICE OF FEDERAL ACTIVITIES

EPA's Office of Federal Activities (OFA) is a "sister office" to the Federal Facilities Enforcement Office within OECA. OFA houses three major national programs:

- Review of federal agencies' environmental impact statements (EISs) and other major action under the authority of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act;
- Review of EPA's own compliance with NEPA and related laws, directives, and Executive Orders concerning special environmental areas and cultural resources; and
- Coordination of OECA's international enforcement and compliance, and environmental impact assessment programs.

OFA provides a central point of information for EPA, other government agencies, and the public on environmental impact assessment techniques and methodologies. OFA works with the Council on Environmental Quality on NEPA program administration, and administers the filing and information system for all federal EISs under agreement with CEQ. For the international community, OFA is EPA's focal point on the conduct of environmental enforcement and compliance assurance.

OFA is organized into the NEPA Compliance Division and the International Enforcement and Compliance Division.

NEPA Compliance Division. Last year, over 500 EISs were

filed with OFA under delegation from CEQ. EPA commented on about 200 draft EISs and 200 final EISs, and a number of proposed regulations, legislation, environmental assessments, and scoping notices. In addition to coordinating EIS reviews, this division is active in a number of areas ranging from DOD base closure to endangered species management. The NEPA Compliance Division is currently working closely with EPA's regional offices and other agencies to implement Section 2001 of Public Law 104-19; this section, Emergency Salvage Timber Sales, was enacted on July 27, 1995. On August 1, 1995, the White House issued a letter implementing timber-related provisions of the law. A Memorandum of Agreement was signed by EPA and the Departments of Agriculture, Commerce, and Interior to coordinate the sale of 1.6 billion board feet of salvage timber.

International Enforcement and Compliance Division. This division has ongoing coordination responsibilities with Mexico, Canada, Russia, the United Nations Conference on Environment and Development, and other international concerns. In Mexican relations, for example, OFA, in conjunction with EPA Regions 6 and 9, has begun efforts to encourage U.S. parent companies to take leadership roles in promoting compliance and pollution prevention among their Mexican operations. Technical assistance in targeting enforcement efforts, and a training video have been made available to Mexico as well.

DIRECTOR'S WORD

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I can think of at least three reasons. *First, federal facilities have a dramatic, direct physical effect on the environment.* The federal judge handling the Army's Rocky Mountain Arsenal case called it "the worst hazardous and toxic waste site in America." The Energy Department observes that DOE "faces one of the largest environmental challenges in the world." The General Accounting Office concluded that "with close to 730 million acres of land, federal civilian agencies' inventory of possible hazardous waste sites could be enormous." Both the breadth of the federal government's activities and the inherent danger in many of them lead to an enterprise that requires direction to ensure its harmony with the environment.

The second reason our work is so

important is that it sets an example for the rest of the nation. President Lyndon Johnson summarized it when he wrote "The Federal Government is rightly expected to provide an example to the nation in pollution control. We cannot make new demands on State and local governments or on private industry without putting the federal house in order." President Clinton carried forward this thought when he called on federal facilities to "set the example for the rest of the country and become the leader in applying pollution prevention." Federal facility compliance isn't a side event in environmental policy, it's a demonstration of federal commitment.

The third reason we work so hard on federal facilities environmental issues is that they are a matter of trust between the American people and the federal government. "Public officers are servants and

agents of the people," President Grover Cleveland said. As public servants, whether as regulators or federal facility personnel, we are trustees for this generation and America's future generations. Our part of the public trust is the federal environment, and when we manage it well we set the example not only for environmental policy, but for all of government.

Our work is of the highest importance, and given the magnitude of it, we need help from all quarters. We look forward to working with you.



Barry Breen, Director, FFEO

16 FEDERAL AGENCIES COMMIT TO POLLUTION PREVENTION STRATEGIES

Sixteen federal agencies have submitted pollution prevention strategies to implement Executive Order 12856. The 16 strategies cover implementation activities at over 2,500 covered federal facilities. Executive Order 12856 was signed by President Clinton in August 1993, directing federal agencies to comply with the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) and Pollution Prevention Act of 1990. The Order sets a new standard for federal environmental excellence by extending this compliance requirement to many activities not currently monitored in private industry.

Agencies submitting strategies include the Central Intelligence Agency, the Departments of Agriculture, Defense, Energy, Health and Human Services, Interior, Justice, Transportation, Treasury, and Veterans Affairs, Environmental Protection Agency, General Services Administration, National Aeronautics and Space Administration, Smithsonian Institution, Tennessee Valley Authority, and U.S. Postal Service. (The Smithsonian, VA, and Postal Service were not strictly required to submit strategies, but did so nonetheless.)

POLLUTION PREVENTION GOALS

The Executive Order directs that each federal agency develop voluntary goals to reduce the agency's total releases and transfers of toxic chemicals by 50 percent by the end of calendar year 1999. A majority of federal agencies explicitly committed in their pollution prevention strategies to the 50% reduction goal by the end of 1999.

Some federal agencies went beyond the chemicals covered by EPCRA. For example, USDA's strategy allows the various USDA services to set their 50 percent reduction goal for toxic pollutants rather than toxic chemicals, thereby expanding the number of chemicals

that will be reported as well as identifying opportunities for source and release reductions at USDA facilities.

The CIA's pollution prevention strategy includes a commitment expanding the 50 percent reduction goal to include releases of extremely hazardous substances.

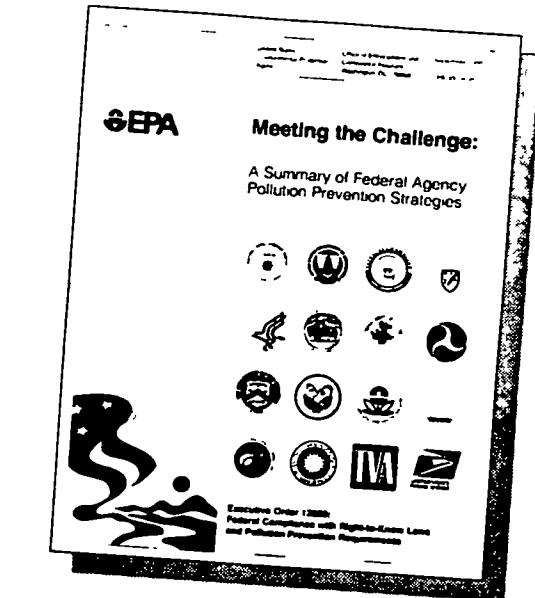
ACQUISITION AND PROCUREMENT

All of the federal agency pollution prevention strategies contain a commitment to pollution prevention in both facility management and acquisition. For example:

- DOD's strategy requires the integration of pollution prevention and other environmental concerns into the entire life-cycle of acquisition programs.
- The General Services Administration commits to reduce or eliminate products that contain hazardous chemicals from the inventory of products purchased for the federal supply system.
- The pollution prevention strategy for the Department of Health and Human Services commits to revisions of standard internal administrative and policy manuals to ensure those documents embrace pollution prevention and reflect the Executive Order.
- The Tennessee Valley Authority strategy calls for a review of agency standardized documents to identify opportunities to eliminate or reduce use of extremely hazardous substances or toxic chemicals and ultimate revision of those documents to reflect goals of the Executive Order.

FACILITY SPECIFIC PLANS

The Executive Order directs that the head of each agency will ensure that its covered facilities develop a written pollu-



tion plan that sets forth the facility's contribution toward the agency 50 percent reduction goal. Nearly all of the federal agency pollution prevention strategies include an agency commitment to ensure development of facility specific pollution prevention plans for covered facilities. Most of the strategies direct facilities to conduct formal facility pollution prevention opportunity assessments to enhance the effectiveness of the plan.

Each of the federal agency strategies also includes a specific commitment to pollution prevention as the primary means of achieving and maintaining compliance with environmental requirements. Over half of the federal pollution prevention strategies contain specific commitments endorsing the development, testing and support of innovative pollution prevention technologies and programs.

EPA's Federal Facilities Enforcement Office has prepared a document outlining the collective federal commitment to pollution prevention and community right-to-know, with summaries and full text of each federal agency strategy. *For a copy of the document, "Meeting the Challenge", see ordering information on p. 11.*

To Receive FedFacs in the Mail or to Order Documents Mentioned in the Newsletter:

- ☐ Please include me on the FedFacs mailing list (no charge).
- ☐ Please send one copy of the following documents (no charge):
 - ☐ **Strategy for Improving Environmental Management Programs at Civilian Federal Agencies** (EPA 300-B-95-006, September 1995).
 - ☐ **Meeting the Challenge: A Summary of Federal Agency Pollution Prevention Strategies** (EPA 300-R-95-014, September, 1995).
 - ☐ **Federal Facility Pollution Prevention Project Analysis: A Primer for Applying Life Cycle and Total Cost Assessment Concepts** (EPA 300-B-95-008, July 1995).

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LIST OF ACRONYMS

BRAC	Base Realignment and Closure Act
CFA	Civilian Federal Agency
DOD	Department of Defense
EPA	Environmental Protection Agency
FFCA	Federal Facility Compliance Act
FFEO	Federal Facilities Enforcement Office (EPA)
FFLEX	Federal Facilities Environmental Leadership Exchange
GSA	General Services Administration
OECA	Office of Enforcement and Compliance Assurance (EPA)
OMB	Office of Management and Budget
RCRA	Resource Conservation and Recovery Act
TSCA	Toxic Substances Control Act
SDWA	Safe Drinking Water Act

GUESTSPOT

Continued from page 2

been tasked by the President to come up with ways to make that happen—quickly.

Each Department has named an Agency Environmental Executive to work with both me and their own Departments to assure complete and rapid implementation. Over the past year, we have made important strides.

One of the first things we did was to look at barriers in the federal government that limit demand for, or prevent procurement of, recycled items. For example, we have worked to convince GSA to allow the use of re-refined oil in government vehicles. We have also worked with EPA to identify 19 more items subject to affirmative procurement by federal agencies and governments receiving federal-funding. The leadership challenge we face will be to purchase and track an expanded number of items better than we did for the first five. My office has brought together members from several large

agencies to look at new ways of compiling purchase information using the upcoming electronic commerce system that will significantly ease the burden of tracking and reporting by the agencies.

There is more positive change on the horizon. A recent law (PL 103-329) allows the proceeds from recycling efforts to go to federal agencies, rather than the U.S. Treasury, to offset at least some operating costs of recycling and pollution prevention programs.

EPA's Office of Pollution Prevention has been developing guidance for environmentally preferable products which will begin to move the Federal Government towards purchases of less environmentally harmful and more environmentally friendly products, through a series of pilot projects in various sectors of the government. The first pilot project is already underway: an EPA/GSA Cleaners Project.

In closing, I want to assure you that the President and Vice President are as committed to the success of the govern-

ment's recycling challenge as I am. But while the Agency Environmental Executives and I help to establish the overall battle plan, it is the front line troops in acquisitions offices, the people using those materials, and the people charged with final disposition who, by thinking "outside the box" of narrow responsibility, will make this process a success. We know what happens when facility managers and staff take on this responsibility wholeheartedly—we saw the outstanding record of results compiled by the recent winners of the "Closing the Circle" awards for federal facilities. It is their efforts—and yours—that will make the Federal Government a leader, not a follower, in the recycling arena.

FedFacs

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CALENDAR

October 30-November 3, 1995

**GOVERNMENT INSTITUTES - THE DEFENSE ENVIRONMENTAL
MANAGEMENT INSTITUTE**

Alexandria, VA

Five days of intensive compliance training sessions for DOD environmental professionals. A team of experts from the armed services and the civilian community conduct lectures and workshops on special issues of concern to DOD environmental personnel, including NEPA, BRAC, and other laws and regulations. \$1,899, 40 credits, Level 1. Contact: Government Institutes, Inc., Suite 200, 4 Research Place, Rockville, MD 20850, Tel: 301-921-2345, Fax: 301-921-0373.

December 6-8

NATIONAL POLLUTION PREVENTION ROUNDTABLE

Miami Beach, FL

Topics for federal facilities include painting, depainting, cleaning, and degreasing; and voluntary and innovative initiatives.

Co-sponsored with the Florida DEP and Dade County Pollution Prevention Program. Contact NPPR at 202-466-P2P2.

January 16-18, 1996

**1996 HAZARDOUS MATERIALS AND WASTE MANAGEMENT
CONFERENCE & EXHIBITION**

Alexandria, VA

Sponsored by the Defense Logistics Agency and the Military Services, the theme of this year's conference is "Resource Conservation and Recovery into the 21st Century." Contact: American Defense Preparedness Assn. at 703-247-2557.

March 18-21, 1996

22nd ENVIRONMENTAL SYMPOSIUM & EXHIBITION

Orlando, FL

Sponsored by the American Defense Preparedness Association, this year's event is titled: "Investing in Our Future: Reinventing Environmental Protection for Improved Readiness." For more information, fax ADPA at 703-522-1885.

CONGRATULATIONS TO THIS YEAR'S CLOSING THE CIRCLE AWARD WINNERS!

Life-Time Achievement: John Stanberry, GSA.

Affirmative Procurement: Beth Law, National Naval Medical Center, Bethesda, MD. Paula Ure, GSA and Paul Ruesch, EPA, Region V. U.S. Postal Service Headquarters, Washington, D.C.

Model Facility Demonstration: U.S. Coast Guard Support

Center, Governors' Island, NY. U.S. Postal Service Hartford Vehicle Maintenance Facility, Hartford, CT.

Recycling: Scott J. Ammon, Whiteman Air Force Base, MO. Brent Glezentanner, Aransas National Wildlife Refuge, TX. Chip Britting, Blue River Ranger Station, Willamette National Forest, OR. Fort Sill, OK. Marine Corps Air Sta-

tion, Cherry Point, NC. Department of Housing and Urban Development Headquarters, Building, Washington, D.C. Lake City Army Ammunition Plant, Independence, MO.

Waste Prevention: U.S. Postal Service, Vehicle Maintenance Facilities in New Orleans, LA; Edison, NJ; Anchorage, AK; Houston, TX and other sites in CT, RI, NY, MA, ME, NH.

Kennedy Space Center, FL. Y-12 Site Management Services, Oak Ridge, TN.

Environmental Innovation: Captain Gordon Matthews, Washington Army National Guard, Tacoma, WA. Army National Guard, Arlington, VA. Savannah River Site, Aiken, SC.

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