



FedFacs

an environmental bulletin for federal facilities

Working Toward Environmental Compliance and Sustainability in the Federal Government

The U.S. Environmental Protection Agency's Federal Facilities Enforcement Office (FFEO) is responsible for ensuring that federal facilities comply with environmental laws and take actions to prevent, control and abate environmental pollution. Over the years, the ways in which FFEO performs this task have evolved from reliance on traditional EPA tools, such as enforcement and compliance monitoring, to include newer, more innovative approaches to more completely address the complexities of environmental problems facing government agencies.

This issue profiles FFEO and its program. We will look briefly at the U.S. government sector and its compliance record with environmental laws. In this and related articles, we will look at EPA's federal facility program and its efforts to develop and integrate a range of tools and strategies to ensure facility compliance with environmental laws, and foster greater environmental stewardship within government agencies.

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Environmental Compliance Challenge

The U.S. government owns over 674 million acres of land – nearly one third of the United States, and owns or leases over 480,000 buildings.¹ Federal facilities are buildings, installations, structures, land, public works, equipment, aircraft, vessels, and other vehicles and property owned by or constructed or manufactured for the federal government. The government's approximately 30 agencies, bureaus and departments control over 32,000 facilities, over 7,800 of which are engaged in a broad range of activities regulated under U.S. environmental laws.² Collectively, the U.S. government is the nation's largest consumer of natural resources and power, and generates significant amounts of pollution and harmful wastes. Federal agencies, like private parties, are required to comply with all federal environmental requirements, including those of states, localities and tribes. U.S. government agencies must also comply with additional requirements set out in Presidential Executive Orders.

Since 1993, FFEO has monitored federal agency progress in meeting statutory and regulatory requirements. In its most recent report on compliance, which covers fiscal years 2001 and 2002, FFEO reports compliance rates for *Continued on page 5*

Environmental Spotlight

NEW ENFORCEMENT CHIEF ENCOURAGES GOOD STEWARDSHIP BY FEDERAL FACILITIES

By Tom Skinner
*Acting Assistant Administrator,
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I am pleased to have this opportunity to introduce myself, and also share with you some thoughts about the future direction of OECA's federal facility program.

As EPA's chief enforcement and compliance assurance officer, I want to improve the federal government's environmental performance through facility compliance with environmental requirements, pollution prevention, and environmental stewardship.

This is especially important for the U.S. government. Government facilities must not only comply with regulatory requirements, but I believe they can also be role models and mentors for innovation, sustainability and environmental stewardship.

The strategies for achieving these goals, first outlined by my predecessor J.P. Suarez as "Smart Enforcement," embrace a "common sense" approach, and are the foundation for the program managed by OECA's Federal *Continued on page 2*

ABOUT THIS ISSUE...

In this issue, we spotlight the U.S. EPA's federal facility enforcement and compliance assurance program, and its changing approach to achieving environmental compliance and stewardship in the federal government. Traditional core program functions, like enforcement and compliance monitoring are discussed, and also new strategies and tools designed to address the complex and changing nature of environmental protection throughout the government.

P2 and Sustainability Programs at Fort Bliss

Hazardous Waste Curbside Service

Fort Bliss, Texas, implemented a service unique to the Army – one that revolutionized hazardous waste management at the installation. The *Hazardous Waste Curbside Service* (Curbside) saves Fort Bliss hundreds of thousands of dollars each year, and minimizes accidents, exposure to hazardous substances and non-compliance.

This program is the brainchild of Environmental Engineer, Ismael Delgado and began as a pilot program in 2000. Curbside now serves customers at 127 waste accumulation points in Texas and New Mexico. Curbside is a reimbursable service for soldiers, civilians, and tenants, protects human health and the environment, and returns soldiers to the military mission.

The program includes paperwork (waste profile and Material Safety Data Sheets, requests for sampling/analysis, etc.), pickup and transport of wastes to the hazardous waste storage facility, container replacement, and courtesy inspections. Customers are served by appointment within 72 hours by a team of hazardous waste professionals.

Without Curbside about 250 people would be tasked, in addition to their other duties, with the waste management activities listed above. Curbside also includes a tracking database that provides customers with reports of items recycled, wastes processed, and disposal costs. The reports are produced annually or at the customer's request.

As a large-quantity generator and the owner of a RCRA-permitted storage facility, Fort Bliss is required to reduce the volume and toxicity of hazardous waste it generates. To that end, the Directorate of Environment combined Curbside with pollution prevention initiatives to launch the Installation's Sustainability Center.

In 2003, the following processes were implemented at the Sustainability Center: parts-washer solvent distillation and

maintenance; antifreeze recycling; oily rag compaction; soil consolidation contaminated soil; fluorescent bulb crushing; oil and fuel filter crushing/recycling; aerosol can puncturing; spill kit specification and assembly; and drum washing and reuse.

These processes save disposal costs and are beneficial to the environment. The parts-washer solvent distillation process alone saves Fort Bliss about \$250,000 a year for disposal of old solvent and purchase of new solvent for the Installation's 135 parts washers.

At the beginning of the calendar year, commanders and directors receive a detailed report of the wastes turned in by each of their waste-generating activities. Curbside costs for the new year are based on quantities of waste generated during the previous year.

The popularity of Curbside is evident: 100 percent of Fort Bliss waste generators voluntarily subscribe to the service, and speak favorably about the service they receive.

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Oil Water Separator Maintenance Program

In an effort to save precious water resources, minimize waste, maintain compliance, and support the military mission, Fort Bliss implemented its Oil Water Separator (OWS) maintenance program.

Fort Bliss initiated its OWS maintenance contract with Enviremedial Services Inc. (ESI) to correct a long history of poor OWS maintenance, preclude future Environmental Performance Assessment System wastewater deficiencies, and promote pollution prevention, water conservation and waste minimization.

ESI's on-site treatment technology uses a package plant on "wheels" which separates oil from water through a centrifugal gravitational and inertial force

process. Oil separation is achieved through a five-stage process and reusable filters made from the ash of burned sugar cane stalks are used. The unit can handle 100,000 gallons of contaminated water in an eight-hour day. The treatment process also includes a wash cycle for OWS collected sediments which are used as land-fill daily cover.

Clean treated water is returned to the OWS, instead of recharging the OWS with fresh water and disposing of this dirty waste water and sludge off-site. This contributes directly toward the DoD Measure of Merit for the continuous reduction of waste. Moreover, it allows for inspection of each OWS during the treatment process, where problem areas can be identified and addressed quickly.

The contractor is also piloting a program which uses clean sediments in adobe pavers. Combined with cement materials, sediment is formed into adobe bricks, further reducing waste. These pavers may soon be used in xeriscape landscaping and post beautification projects at Fort Bliss.

Among the other benefits of the OWS process are that industrial pre-treatment standards are maintained thereby avoiding exceedances fixing the cost for OWS cleaning. Also the volumes of waste removed, recycled, treated and disposed are measured and reported to the environmental office and waste disposal off-site is reduced. Transportation and disposal liabilities are also reduced.

From May 2002 through October 2003, Fort Bliss calculates it minimized this waste by 99.9 percent. The OSW treated 15,785,200 pounds of water (previously sent as waste), recycled 66,800 pounds oil/fuel (previously sent as waste) and cleaned 8,158,426 pounds of sediment (previously sent as waste). The amount of oil sludge sent as waste was 2250 pounds.

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