DEPARTMENT OF THE ARMY
INSTALLATION MANAGEMENT COMMAND PACIFIC REGION
HEADQUARTERS, UNITED STATES ARMY GARRISON HUMPHREYS
UNIT #15228
APO AP 96271-5228

IMHM-PWE

10 August 2015

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: U.S. Army Garrison Humphreys Policy Letter #23, Environmental Compliance Inspection Program

1. References.

a. Army Regulation 200-1, Environmental Protection and Enhancement, 13 December 2007.

b. United States Forces Korea Regulation 201-1, Environmental Governing Standards, 18 June 2012.

2. This policy letter supersedes United States Army Garrison Humphreys Policy Letter #23, 22 July 2013.

3. The proponent for this policy is the Directorate of Public Works (DPW).

4. Applicability. This policy applies to all directorates, units, tenant activities, and contractors within USAG Humphreys.

5. Purpose. To establish a standardized environmental compliance Inspection program that assures compliance with all applicable environmental laws and regulations.

6. Roles and Responsibilities.

a. Environmental Division, DPW will:

(1) Conduct environmental compliance inspections on an as needed basis by using compliance inspection checklist (enclosed).

(2) Conduct annual internal Environmental Performance Assessment System (EPAS) inspections by using internal EPAS checklist and coordinate external Environmental Performance Assessment and Assistance System (EPAAS) inspections every three years.

(3) Prepare a report of findings observed during compliance inspections and annual internal EPAS inspections. The report of findings will be coordinated with unit Environmental Officer (EO) to ensure effective and prevention actions will be implemented.

(4) Prepare Installation Corrective Action Plan (ICAP) to correct the findings reported in both internal EPAS and external EPAAS inspections.

(5) Provide assistance and technical expertise to units in correcting deficiencies observed during all inspections and assessments.

b. Unit Commanders and Organization Supervisors will:

(1) Appoint a primary and alternate unit or organizational EO and ensure they attend the EO certification course and successfully complete it prior to assuming the duties.

(2) Implement this policy and correct identified deficiencies as scheduled in ICAP/ unit corrective action plan (UCAP).

(3) Provide an EO to accompany all environmental inspectors and assessors during all environmental inspections and assessments.

(4) Ensure Environmental Division, DPW is notified of anyone entering any unit or organizational facility to conduct an environmental inspection, assessment, audit, etc.

c. Unit and Organization EOs will:

(1) Ensure the unit or organization is in compliance with all environmental requirements.

(2) Accompany inspectors and assessors during all environmental inspections and assessments.

(3) Prepare UCAP for the findings reported during compliance inspections by using froms provided by Environmental Division, DPW .

(4) Monitor, correct, and manage all identified deficiencies and submit work orders to the DPW for corrective actions as needed.

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7. Point of contact for this policy is the Chief, Environmental Division, DPW, 753-7964.

JOSEPH C. HOLLAND
COL, AR
Commanding

Encl
as

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USAG-Humphreys Website

Environmental Compliance Inspection Checklist

USAG Humphreys

Unit:_____ **Building No:**_____ **Date:** _____

Commander:_____ **EO:** _____

Inspector: _____

	General	C	NC	N/A
1	Are the primary and alternate Environmental Officers (EOs) appointed in writing? (AR 200-1, Chap 1, para 1-28f)			
2	Are the EOs trained properly? (AR 200-1, Chap 1, para 1-28f)			
3	Is unit level environmental awareness training being conducted? (AR 200-1,Chap 15, para 15-3)			
4	Is a current copy of the unit spill contingency plan maintained at the site? {USFK Reg 201-1, Chap 6, para 6-3g(2)(a)}			
5	Is the spill contingency plan available in both English and Korean? {USFK Reg 201-1, Chap 6, para 6-3g(2)(b)}			
	Hazardous Material	**C**	**NC**	**N/A**
6	Are hazardous material dispensing areas and hazardous materials maintained properly? (USFK Reg 201-1, Chap 5, para 5-3b)			
7	Are Drums/containers not leaking? (USFK Reg 201-1, Chap 5, para 5-3b)			
8	Are drip pans/absorbent materials placed under containers as necessary to collect drips or spills? (USFK Reg 201-1, Chap 5, para 5-3b)			
9	Are container contents clearly marked? (USFK Reg 201-1, Chap 5, para 5-3b)			
10	Are dispensing areas located as far as practical away from catch basins and floor/storm drains? (USFK Reg 201-1, Chap 5, para 5-3b)			
11	Does every HM container or package have labels that convey information about the characteristics of the material using standard international pictograph, language, and symbols? {USFK Reg 201-1, Chap 5, para 5-3c(6)}			
12	Does each work center maintain a file of MSDSs and Korean language summary for each HM procured, stored or used? (USFK Reg 201-1, Chap 5, para 5-3f)			
13	Are personnel who use, handle, or store HM trained properly? (USFK Reg 201-1, Chap 5, para 5-3j)			
14	Do all HMs have the barcode affixed? {DA PAM 710-7, Chap 2, para 2-4d(2)(d))			
	Hazardous Waste Accumulation Points	**C**	**NC**	**N/A**
15	Are hazardous wastes properly segregated for different waste streams including those that are chemically incompatible? {USFK Reg 201-1, para 6-3c(1)}			
16	Does each HWAP have warning signs (National Fire Protection Association or appropriate international sign) appropriate for the waste being accumulated at that site? {USFK Reg 201-1, para 6-3c(1)}			

17	Does the HWAP accumulate no more than 208 liters (55 gallons) of hazardous waste, or 0.95 liter (one quart) of acute hazardous waste, from each waste stream? {USFK Reg 201-1, para 6-3c(2)}			
18	Are wastes intended to be recycled or used for energy recovery (for example, used oil or antifreeze) exempt from the 208 liter (55 gallons)/0.95 liter (one quart) volume accumulation limits, but transported off-site to a final destination facility within one year? {USFK Reg 201-1, para 6-3c(2)}			
19	Is water reactive waste not stored with flammable and combustible liquid? {USFK Reg 201-1, para 6-3d(11)(b)}			
20	Are containers holding hazardous waste in good condition, free from severe rusting, bulging or structural defects? {USFK Reg 201-1, para 6-3e(1)(a)}			
21	Are containers holding hazardous wastes always closed during storage, except when it is necessary to add or remove waste? {USFK Reg 201-1, para 6-3e(2)(a)}			
22	Are containers of flammable liquids grounded when transferring flammable liquids from one container to the other and at other times whenever practical? {USFK Reg 201-1, para 6-3e(2)(c)}			
23	Are containers holding hazardous waste marked with a hazardous waste marking and a label indicating the hazard class of the waste contained? {USFK Reg 201-1, para 6-3e(2)(d)}			
24	Do container storage areas have a secondary containment system which has sufficient capacity to contain 10% of the volume of stored containers or the volume of the largest container, whichever is greater? {USFK Reg 201-1, para 6-3e(3)}			
25	Are areas that store containers holding ignitable or reactive waste located at least 15 meters (50 feet) inside the installation's boundary? {USFK Reg 201-1, para 6-3e(4)}			
26	Are turn-in documents, DD Form 1348-1(A) or manifests maintained for at least three years? (USFK Reg 201-1, para 6-3f)			
27	Is the HWAP at or near the point of generation and under the control of the operator? (USFK Reg 201-1, para 6-2h)			
28	Does personnel assigned HW duty complete appropriate initial and annual refresher HW training? {USFK Reg 201-1, para 6-3k(1) & (2)}			
29	Are training records retained for at least three years after termination of duty of these personnel? {USFK Reg 201-1, para 6-3k(4)}			
	POL	**C**	**NC**	**N/A**
30	Do POL storage containers have a secondary containment systems? {USFK Reg 201-1, para 9-3b(1)}			
31	Is a double wall POL storage container equipped with adequate technical spill and leak prevention options such as overfill alarms and flow shutoff or restrictor devices with interstitial monitoring? {USFK Reg 201-1, para 9-3b(1)}			
32	Are all personnel handling POL trained annually in the operation and maintenance of equipment, discharge procedure protocols, general facility operations, and applicable contents of the facility spill plan? (USFK Reg 201-1, para 9-3i)			
	Compressed Gas Cylinder	**C**	**NC**	**N/A**
33	Are cylinders stored in upright positions and immobilized by chains or other means to prevent them from being knocked over? (AR 700-68, para 5-9G1)			

34	Are cylinders stored away from electrical connections, gas flames, or other sources of ignition, and substances such as flammable solvents and combustible waste material? (AR 700-68, para 5-7A)			
35	Are flammable gases separated from oxidizing gases in storage areas? (AR 700-68, para 5-7A)			
36	Are oxygen and fuel gas cylinders separated by a minimum of 20 feet when in storage? (AR 700-68, para 5-8A)			
37	Are storage rooms for cylinders dry, cool, and well- ventilated? (AR 700-68, para 5-9B) Note: Cylinders should be stored in secure areas at temperatures below 125ºF, away from radiators or other sources of heat.			
38	Are cylinders stored away from incompatibles, excessive heat, continuous dampness, salt or other corrosive chemicals, and any areas that may subject them to damage? (AR 700-68, para 5-7A, 5-9B, & 5-9F)			
39	Is the storage area permanently posted with the names of the gases stored in the cylinders? (TM 38-410, para 4.19D)			
40	Do all compressed gas cylinders have their contents and precautionary labeling clearly marked on their exteriors? (TM 38-410, para 4.14C2 & 3)			
41	Are all compressed gas cylinder valve covers in place when cylinders are not in use? (AR 700-68, para 5-9g(6))			
	Solid Waste	**C**	**NC**	**N/A**
42	Are trash bins/receptacles free from HW? (USFK Reg 201-1, para 7-3e)			
43	Are storage containers leak proof, waterproof, and vermin-proof, including sides, seams and bottoms, and durable enough to withstand anticipated usage and environmental conditions without rusting, cracking or deforming in a manner that would impair serviceability? (USFK Reg 201-1, para 7-3g)			
44	Are SW containers stored on a firm, level, well-drained surface that is large enough to accommodate all of the containers? (USFK Reg 201-1, para 7-3h)			
	Wash-Rack	**C**	**NC**	**N/A**
45	Are vehicle and aircraft washing operations conducted only on wash-racks with oil water separators connected into sanitary sewer? (USFK Reg 201-1, Table 4-8)			
46	Is the unit or organization using the effective and compatible cleaning agents with their respective oil water separators? (MS OWS GD, para 10.3)			
47	Has the unit avoided dumping oil or fuel into wash rack drainage trench or oil water separator? (AR 420-1, para 23-24e)			
48	Is there no oil sheen from effluent of oil water separator? {USFK Reg 201-1, para 4-3c(5)}			

Additional Observations/Comments