



Combined CCAD/NASCC Environmental Quality Control Committee (EQCC)/Management Review

Full Spectrum Support for the Warfighter

Polly Gustafson
Chief, CCAD Environmental Division

CDR Amanda Brooks
NASCC PWD, NAVFAC SE



EQCC Agenda

Management Review (AR 200-1, ISO 4.6)

- Last EQCC Meeting (Oct 2013)
 - Navy Environmental Training (CECOS) – Completed – Action Item – Closed
 - Environmental Policy (ISO 4.2) – Signed – Action Item - Closed
- Environmental Metrics Charts – End of Year Review
 - Hazardous Waste Generation/Materials Usage
 - Energy/Water Consumption
 - CY13 Environmental Management System (EMS) Audit Performance/Improvements
 - AMCOM G4 – Internal Environmental Performance Assessment System (EPAS), 22-24 July 2013 – Findings Closed – Comparison/Chart – Action Item – Closed
- New Developments:
 - CCAD/NASCC Qualified Recycling Program (QRP)
 - Texas Commission On Environmental Quality (TCEQ), Inspection 19-25 Feb 2014
- NASCC Environmental Brief – CDR Amanda Brooks



CCAD's Environmental Policy



DEPARTMENT OF THE ARMY
CORPUS CHRISTI ARMY DEPOT
308 CRECY STREET
CORPUS CHRISTI TX 78419-5260

FEB 24 2014

AMCC-CO

MEMORANDUM FOR All Employees

SUBJECT: Environmental Policy-Commander's Policy Memorandum NO. 11

1. As the CCAD Commander, I am responsible for applicable environmental programs resulting from our industrial activities, products, and services supporting our Mission to the Soldier. I expect all Depot employees and contractors to demonstrate a commitment to environmental stewardship responsibilities to protect and conserve the environment during the performance of our daily work requirements.
2. I expect everyone at CCAD to adhere to this policy and CCAD's Environmental Management System (EMS) program which conforms to the International Organization for Standardization (ISO) 14001:2004, EMS. The Army has adopted the ISO EMS standard as the model for Army EMS programs.
3. CCAD's EMS program was established to meet the objectives of Executive Order 13423, Strengthening Federal Environmental, Energy, and Transportation Management and Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance. Both Executive Orders mandate reduction in Water, Energy, Hazardous Materials consumption, and Hazardous Waste generation through pollution prevention initiatives.
4. The Directorate of Infrastructure Operations S4, Environmental Programs Compliance Division, will act on behalf of the Depot in implementing and overseeing the EMS program. Tenant activities may choose to implement their own EMS; however, all tenant(s) must coordinate their EMS program with CCAD's Environmental Programs Compliance Division.
5. Together we can continuously improve the Depot's environmental performance, meet our environmental objectives and support the Army's Strategy for the Environment which is "Sustain the Mission - Secure the Future".


BILLINGSLEY G. POGUE III
Colonel, Aviation
Commanding

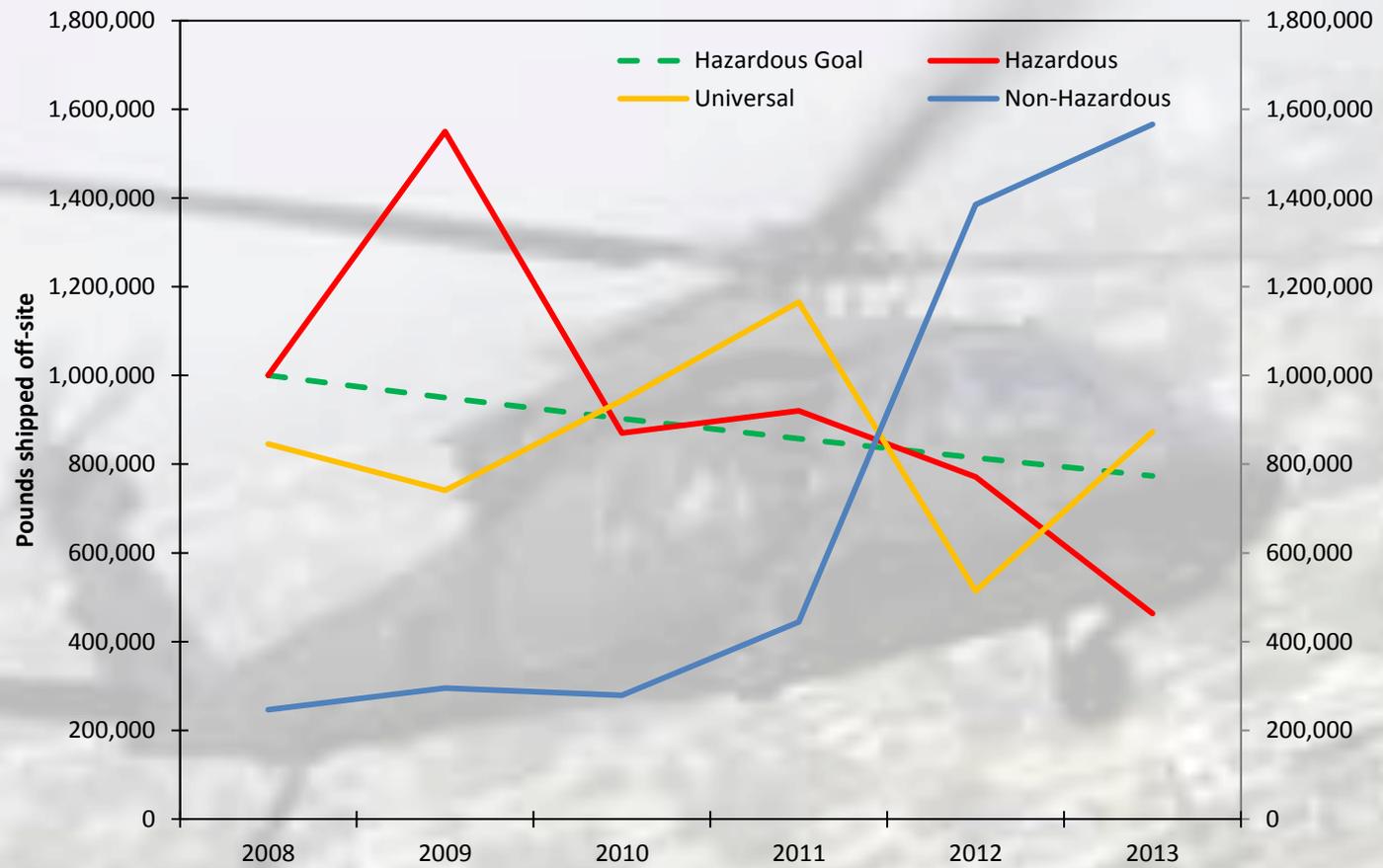


CCAD's Significant Aspects - Goals, Objectives, & Targets

Hazardous Waste Reduction – 5% Annually

-40%

Exceeding Goal



Hazardous Goal		1,000,048	950,046	902,543	857,416	814,545	773,818
Hazardous		1,000,048	1,549,775	870,531	920,213	771,131	463,305
Universal		845,775	741,350	943,985	1,165,533	514,269	873,111
Non-Hazardous		246,838	295,387	279,275	444,138	1,385,137	1,565,931

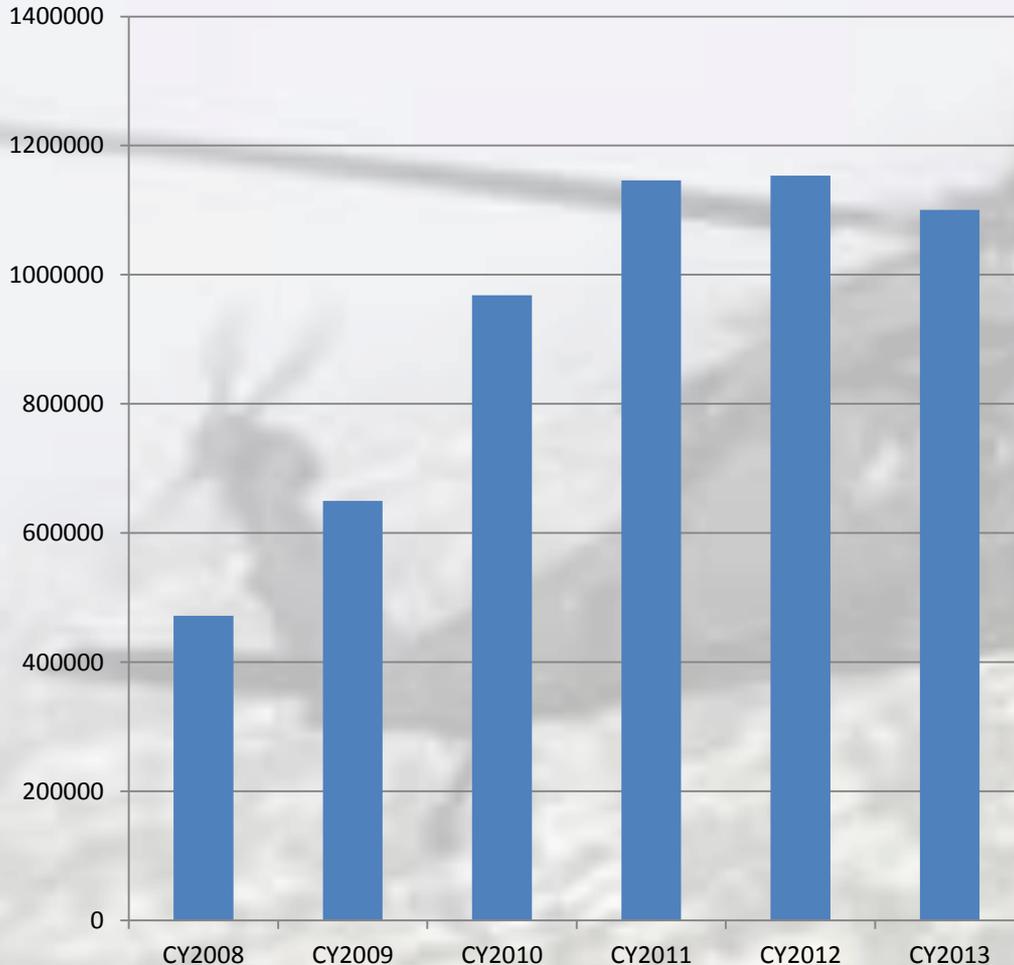
≤ -5%

-5% < ≤ 0%

> 0%



Metric Chart - CYs HazMat Transactions



-4.6%

% of HazMat Usage

- DLA Contract/Contractor – ATS
18 Issue Points @ CCAD
- HMMS Database Contractor – IHS
- Customers:
Production Directorates
S4 Infrastructure
- Users: Artisans, Maintenance
Teams, and Contractors

Totals	471,815	649,835	968,169	1,146,229	1,153,705	1,100,603
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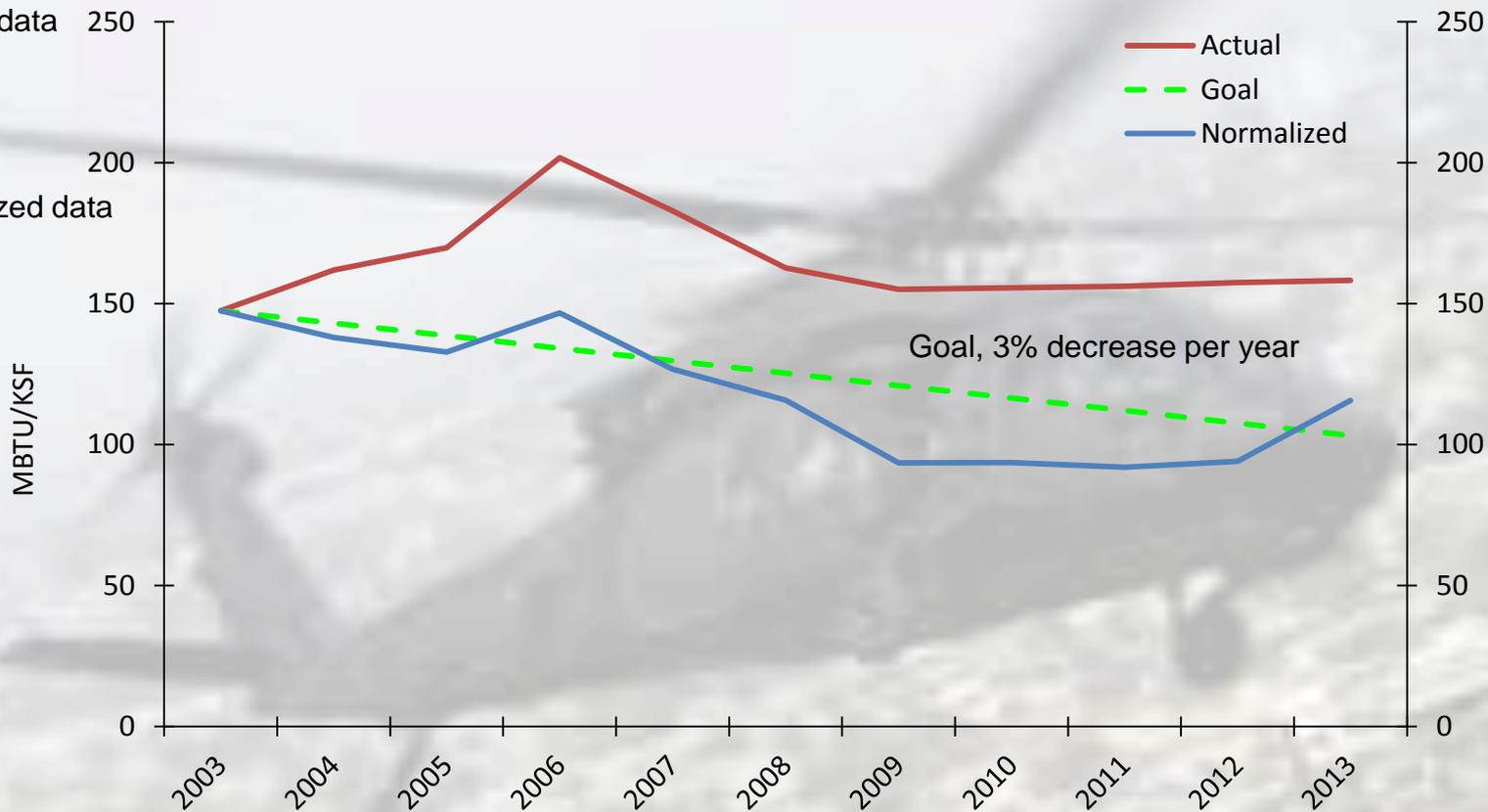
CCAD's Significant Aspects - Goals Objectives & Targets

Reduce Energy Intensity By 3% Annually

+53% Actual data metric

+13% Normalized data metric

Not meeting goals!!



Actual		147	162	170	202	183	163	155	156	156	157	158
(MBTU/KSF)												
Goal		147	143	139	134	130	125	121	116	112	108	103
Normalized		147	138	133	147	127	116	93	94	92	94	116





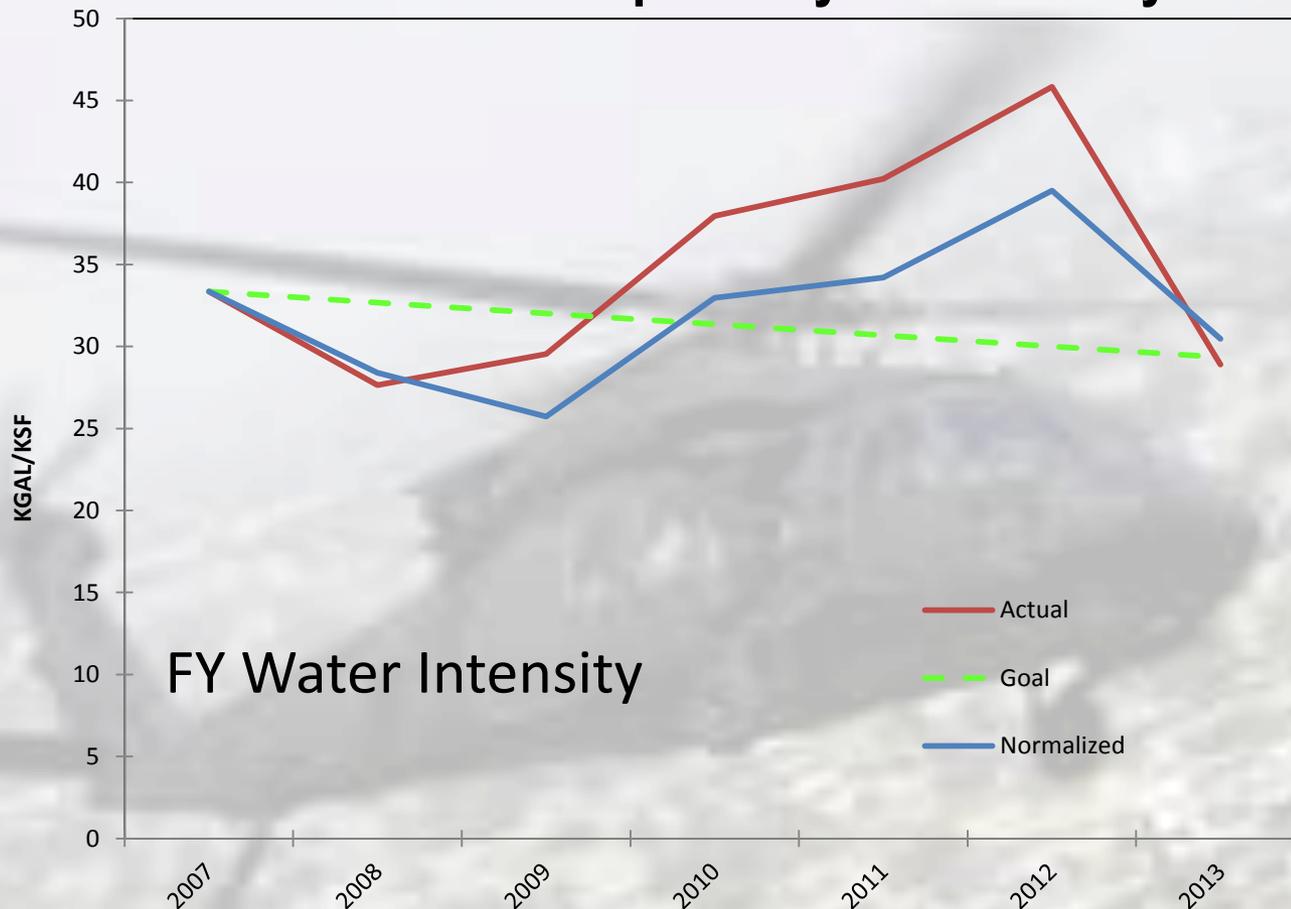
CCAD's Significant Aspects - Goals Objectives & Targets

Reduce Water Consumption By 2% Annually

-1% Actual data metric

+3% Normalized data metric

Meeting H₂O goal



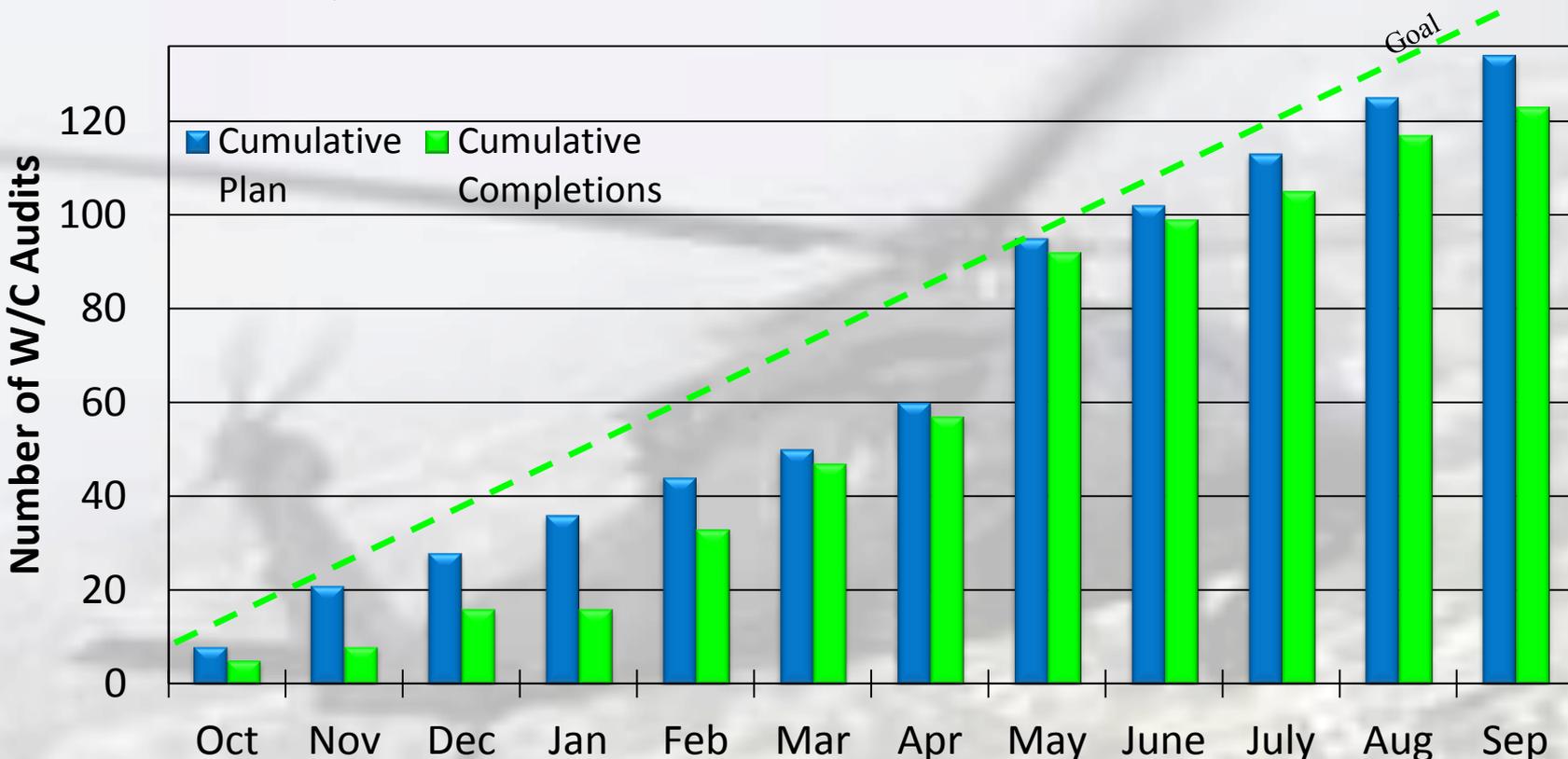
Actual		33.35	27.64	29.55	37.96	40.22	45.84	28.9
(KGAL/KSF)								
Goal		33.35	32.68	32.01	31.35	30.68	30.01	29.35
Normalized		33.35	28.41	25.72	32.96	34.2	39.51	30.48





Metric Chart - FY 13 EMS Audit Performance

92%
↓
% of Schedule Met



	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	July	Aug	Sep
Monthly Completions	5	3	8	0	17	14	10	35	7	6	12	6
Monthly Plan	8	13	7	8	8	6	10	35	7	11	12	9
Cumulative Completions	5	8	16	16	33	47	57	92	99	105	117	123
Cumulative Plan	8	21	28	36	44	50	60	95	102	113	125	134
Cumulative Completions %	63%	38%	57%	44%	75%	94%	95%	97%	97%	93%	94%	92%

≥ 90%

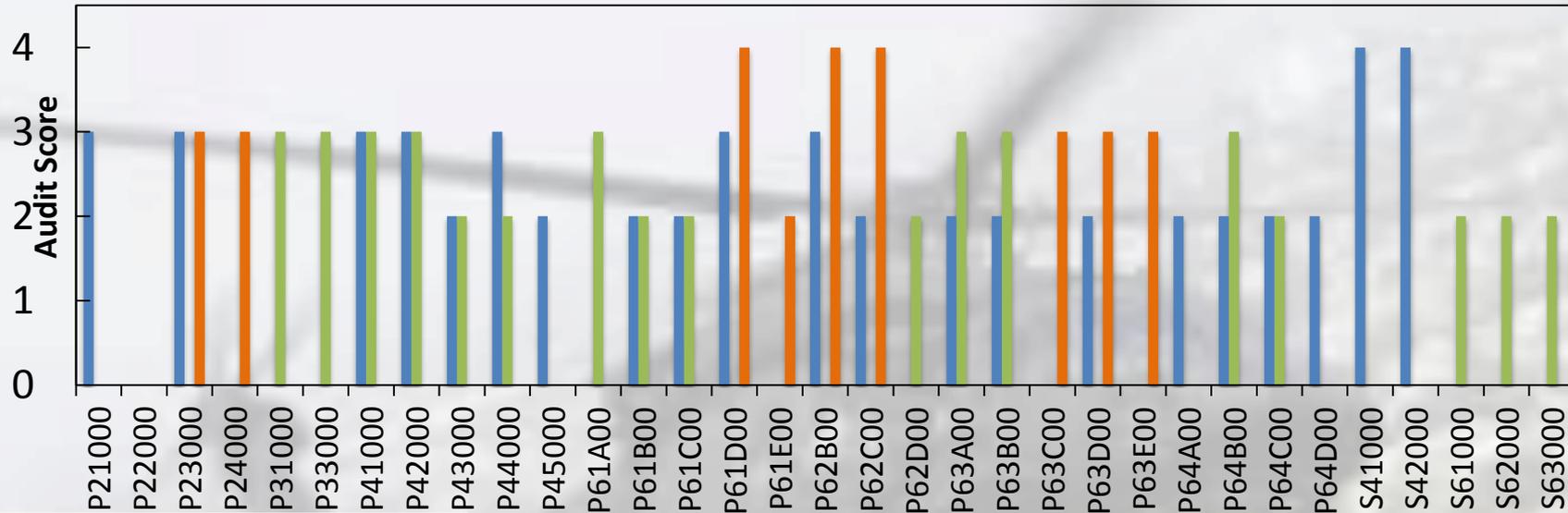
90% > > 25%

≤ 25%



Divisions EMS Audit Scores - Improvements

FY12 FY13 FY14



Directorates
Aircraft Production
Accessories & Rotor Blade Production
Engines Production
Manufacturing/Process Production
Production Engineering
Powertrain Production
Quality Management
S4-Infrastructure Operations
S6-Information Technologies

Score	Definition
4	ISO 14001 standard conformance
3	Generally in accordance with ISO 14001 standard
2	Needs improvements for ISO 14001 standard compliance
1	Not in ISO 14001 standard compliance



Action Item

Environmental Performance Assessment System (EPAS) – Audits 2010 & 2013 - Comparison

EPAS Inspections	2010	2013							
Total Findngs	25	14	<i>All Findings have been closed</i>						
Environmental Program	Total No. of Findings / Class						EPAS Root Cause Codes		
	Class I	Class II	Class III				2010	2013	
Air Emissions	3	2	0	0	1	2	CM02, II03, RR03, IP01	II01, II03, RR03	
Hazardous Waste	11	3	0	0	3	2	CM01, II02, II03, II04, IP01	II02, II03	
Hazardous Materials	0	0	0	0	0	1		OO03	
Wastewater	2	0	0	0	1	1	II03, CM03	RR03	
Aboveground Tanks	0	0	2	0	0	0	IP01, RR03		
Env Impact/NEPA	0	0	0	0	1	0	CM02		
Solid Waste	0	0	0	0	1	0	CP02		
POLs	0	2	0	0	0	1		RR03	

Class I - Non Compliance, Class II - Compliance in future, Class III - Recommended

Notes: EPAS Root Cause Codes

CP02 - ISO 4.2 - Formal policies are not issued from an appropriate level of authority

CM01 - 4.3.2 - Management is not aware of or has misinterpreted the regulations

CM02 - 4.4.6, 4.5.1, 4.6 - Management review process supporting, controlling, or improving daily/contract operations is absent or inadequate

CM03 - 4.4.1 - Environmental responsibilities are not clearly defined in position standards or understood by personnel

IP01 - 4.4.4, 4.4.6 - Plans/Procedures Not in Place

II01 - 4.4.5, 4.5.4 - Document control or retention for reporting and tracking is absent or inadequate

II02 - 4.4.4, 4.4.6 - Personnel ignore and are not held accountable for established environmental plans, policies, or procedures

II03 - 4.4.1, 4.4.6 - Personnel do not consistently follow established environmental plans, policies, or procedures

II04 - 4.5.3 - Review and follow-up of assessments, insoection programs, and/or identified environmental problems are not conducted or are inadequate

RR03 - 4.4.6 - Inadequate design or failure in equipment or material selection

OO03 - Compliance is dependent upon external entity

CCAD
CORPUS CHRISTI ARMY DEPOT



BETTER . FASTER . COST EFFECTIVE

Full Spectrum Support for the Warfighter

Qualified Recycle Program (QRP) Update

Derrick Born

Completed Actions:

- Procurement of inside recycling containers and limited placement of containers based on current outside dumpster capacity.
- Established baseline generation quantities to assist in obtaining best market value for materials generated on Station.
- Held 1st CCAD Recycling Event (E-Recycling)
- Outreach for Recycle Program (Directorate Newsletters, Marquee, Screensavers, Trainings)





QRP Update

CCAD NOW HAS A RECYCLING PROGRAM! AND WE NEED YOUR HELP TO MAKE IT SUCCESSFUL.

RECYCLING BINS ARE COMING TO YOUR AREA.
LET'S TURN OUR TRASH INTO DEPOT CASH!

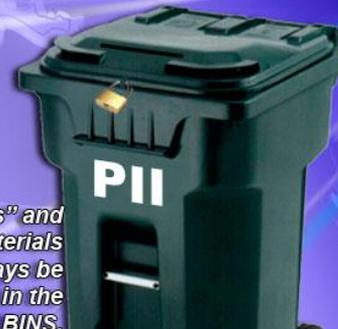


Items Accepted:

- Cardboard
- Plastic Bottles
- Aluminum Cans
- Steel Cans
- Newspapers
- Plastic Wrap
- Bubble Wrap

NOT Accepted:

- Hazardous Materials
- Bulbs
- Food Scraps
- Styrofoam
- Glass



"White Papers" and all PII materials should always be disposed in the LOCKING BINS.



Future Timeline:

- Jan – Feb 14: Identify and include stakeholders/agency POCs to establish Recycle Advisory Committee (RAC).
- Mar – Apr 14: Develop budgetary requirements; initiate contact with state and national recyclers for Request For Quotes (RFQs). Initial kickoff meeting of RAC.
- Sept 14: Implement operational QRP.





QRP Update

RAC:

Meets at least quarterly.

Acts as Board of Directors for Recycle Program.

Oversees the Recycle Program, policies and fund disbursement.

Explores and encourages new and innovative methods of recycling.

Recycle Operations Manager briefs RAC minutes at quarterly EQCC.

Committee Composition:

Voting Members

NASCC Public Works Officer (PWO)

Director, Morale, Welfare, and Recreation (MWR)

Director, S-4, Infrastructure Operations

Chief, Resource Management (RM)

Non-Voting Members

Installation Commander, Chairman of RAC

Staff Judge Advocate (Legal)

Inspector General (IG)

Public Affairs Office (PAO)

Defense Logistics Agency, Disposition Services (DLA-DS)



QRP Update

Questions ????





TCEQ INSPECTION UPDATE

- TCEQ Out-Brief 25 Feb 2014 - Mr. Tom Mason, TCEQ Investigator
- Bldg 2 NASCC CO's Office
- NASCC will brief on the preliminary Findings

CCAD Areas Inspected:

Bldg 340, Plating Shop	Machine Shop
Engine Cleaning	Engine Welding
Airframes Cleaning	Metal Spray
General Paint	Hydraulics
Composite Shop	T700 Engines
Cowling Shop	T55 Dssy Transmission
All CCAD Hangars	Scrap Yard <90 Day Facilities

CCAD information provided/actions.

- Plating Shop's Process Tanks' Chemical Make-up Listing provided to Navy
- Scrap Yard – Obsolete <90-Day Facility – NAS to remove from Waste Permit
- Machine Shop - Suggestion: scrap metal containers be labeled as "Notice of Intent to Recycle".
- CCAD Site Maps/SAP Listing

- Good Job by all. AS9110 prep was beneficial to the TCEQ inspection.

HOOAH!



NASCC Environmental Management

CDR Amanda Brooks

NASCC Public Works Officer

27 February 2014

Topics

- EPA inspection (MAR 2013) follow-up
- TCEQ inspection (FEB 2014) outbrief
- Resolved issues with explosive HAZWASTE
- Radiation hazard protocol

Inspection History

- EPA (federal) inspection every 3 years
- TCEQ (state) inspections conducted annually
- Last EPA inspection was March 3-7, 2013
- EPA requested TCEQ to participate as liaison
- TCEQ provided 2 state regulators for EPA inspection

MAR 2013 EPA Inspection Findings

1. Training lapses for hazardous waste handlers at CCAD. – **Corrected on-the-spot**
2. Recordkeeping for hazardous waste determinations for CCAD lab packs were not readily available.
3. Gas cylinders were not properly secured at laboratory. – **Corrected/Safety issue**
4. CCAD Composite Shop lacked permanent engineering controls for filtration system. – **Self-contained systems procured – ECD Oct14**

EPA Inspection Findings (continued)

5. CCAD Metal Spray Shop lacked permanent engineering controls for exhaust duct work. – Duct work replaced/seams sealed –Dec 14 all new system
6. Bldg. 1808 - Potential release of CARC paint from spray booths. - ACCF Groundbreaking Oct 13
7. Integrity of industrial line from Bldg. 1839 Lift Station to Waste Water Treatment Plant.
 - Navy is pursuing recapitalization of water and wastewater lines and will replace this.

MAR 2013 Inspection Bravo Zulu

1. Waste tracking
2. Waste determination expertise
3. Container storage at permitted & 90 day
4. No orphan drums or containers
5. In-house inspections & oversight

Exit Interview Take Aways

Inspector stated:

- Findings were not final.
- More findings are possible after further review of records.
- Additional records request may be necessary.
- Final report has been repeatedly delayed – no current firm deadline.

FEB 2014 TCEQ Inspection Findings

1. HAZWASTE tracking is “extraordinary” and checks and balance are some of the best the inspector had seen. Both CCAD and PWD Environmental are doing a great job.
2. Areas of Concern:
 - Improper disposal of light bulbs and other minor issues that were immediately remediated – no NOV’s
 - Permitted storage facility #20 does not have daily inspections on weekends and holidays – new interpretation of the requirement. Several possible solution COA’s.

Lord Accelerant

Problem:

- Disposal contractor would not accept containers with visible crystals due to potential explosive hazard.
- CCPD bomb squad had to come remove containers

Solution:

- NAVFAC SE provided direction to neutralize hazard by immersion in olive oil
- CCAD improved storage measures (refrigeration, smaller orders) to minimize potential for crystals forming
- **Shop Environmental Instruction (SEI) – Instructions on proper cleaning/handling to reduce potential for crystal formation; include pictogram.**
- **Expired Material SOP – For immediate removal of material.**
- **Hotline Call to AMCOM – No substitute material available.**

Radiation in Construction Debris

- On 7 FEB 2014, the HWCB was processing a roll off box of construction debris from BLDG 49 renovation that was contaminated with hexavalent chrome.
- Radiation alarm at DLA scales tripped.
- Prelim investigation found LLRM source of building materials (cinder block, sheetrock).
- NAVSEA RASO notified.
- NAVSEA RASO approved local disposal at a regulated landfill for NORM.

Radiation Issues

BLUF: All Station tenant commands need SOP for radiation issues. PWD Environmental will:

1. Develop station Radiation SOP.
2. Identify roles and responsibilities (RSO, Fire Dept, Navy & CCAD Safety, Environmental HWCB, Base Security).
3. Disseminate at Command Staff meeting.

Questions?

