



DEFENSE LOGISTICS AGENCY

INTEGRATED ENVIRONMENTAL PERFORMANCE REVIEW

23 - 24 AUGUST 2012

**DEFENSE LOGISTICS AGENCY,
STRATEGIC MATERIALS SCOTIA DEPOT
SCOTIA, NEW YORK**

DRAFT FINAL REPORT

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EXECUTIVE SUMMARY

This Integrated Environmental Performance Review (EPR) assessed the environmental regulatory compliance of the DLA Strategic Materials Scotia Depot, including their conformance to the DLA Strategic Materials Scotia Depot Environmental Management System (EMS).

This report identifies strengths in environmental performance as well as regulatory noncompliance issues and management system nonconformances. Two regulatory noncompliances (Class I's) were identified. Three EMS minor nonconformances, and four EMS observations were also identified. Finding specifics are contained in this report.

PURPOSE AND GOALS OF THE REVIEW

This DLA Integrated EPR (the Review) is a structured review of specific environmental media areas and the current business practices of the installation and/or field activity, to verify the compliance posture at the time of the assessment and to determine if the EMS is implemented and effective in ensuring compliance to regulations and in reducing the environmental impact of the activities. This review meets the DLA requirement for an external assessment of environmental compliance and the requirement of Executive Order 13423 for an external assessment of EMS implementation and improvement.

During the assessment the Review Team interviewed personnel, observed activities and operations, and collected various types of objective evidence to determine compliance to applicable regulations and conformance to the DLA Strategic Materials Scotia Depot environmental management system.

The regulatory noncompliance issues and EMS nonconformance findings are summarized in the body of this report, and are explained in detail in Appendix A. Suggested corrections, and in some cases corrective actions, for the noncompliance findings are included. This information is designed to support timely correction, corrective action, and continual improvement of the environmental performance of the installation and/or field activity.

INTEGRATED EPR TEAM

The DLA Integrated EPR Team was made up of DLA approved lead reviewers, DLA approved EMS reviewers, and DLA approved environmental compliance reviewers. (See Table 1.)

Table 1. Integrated EPR Team

Reviewer	Organization	Role
Darrel Sisk	Parsons	EMS Lead Reviewer
Dennis Poyer	USAPHC	Media Compliance Reviewer

The DLA Representative, Bart McFarlane, was on-site and participated in this Integrated EPR. Several DLA employees, who attended the closing meeting via telephone, are identified on the Sign-In Sheet, at the end of this Report.

INTEGRATED ENVIRONMENTAL PERFORMANCE REVIEW PROCESS

Review Planning

The Integrated EPR Lead Reviewer worked with DLA Strategic Materials Scotia Depot personnel to identify activities associated with the EMS elements and environmental media in order to develop the schedule and to obtain required documentation. The Lead Reviewer held a planning conference call with the Review Team to discuss the Review and available data. The EMS documentation and compliance information were provided to the Review Team in advance of the Review, in order to maximize efficiency of the on-site time. The Review Team used the following references in conducting the Integrated EPR: ISO 14001:2004 EMS Standard; The Environmental Assessment and Management (TEAM) Guide, March 2012; New York supplement to the TEAM Guide, April 2012; DLA Environmental Compliance Instruction, January 2010; and DLAI 4145.11 (Storage and Handling of Hazardous Materials).

On-site Assessment

During the Integrated EPR, the Review Team completed the Review per the schedule that was developed with and coordinated by DLA Strategic Materials Scotia Depot. During the scheduled times, Reviewers inspected various activities, reviewed records, and interviewed personnel to assess the environmental regulatory compliance at DLA Strategic Materials Scotia Depot, including their conformance to the DLA Strategic Materials Scotia Depot EMS. During daily debriefs, each Review Team member briefed DLA Strategic Materials Scotia Depot on their specific findings. The Lead Reviewer provided a summary of findings during the final out-brief.

IDENTIFIED AREAS OF STRENGTH

During the Integrated EPR, several practices were identified as particularly strong. These practices are identified below to highlight environmental performance best practices for potential use by other DLA activities.

- The housekeeping in the warehouses and surrounding areas appeared to be exceptional; and
- Personnel were exceptionally supportive and appeared very eager to learn how to improve their operations based upon the results of the audit.

SUMMARY OF NONCOMPLIANCE REQUIRING CORRECTIVE ACTION

The compliance rating system is defined in Table 2. Noncompliances, by media type, are shown in Table 3, and further defined in Table 4. The details and recommended corrections (and in some cases, corrective actions) are provided in Appendix A. These issues may reflect a single oversight observed during the snap shot in time of this Review, or could indicate a breakdown in the management of the media issue. In

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addition to the corrections, which should be taken immediately, it is recommended that any regulatory noncompliances be assessed for corrective action to determine if steps can be taken to prevent this issue from recurring.

Table 2. Compliance Rating System

Rating	Definition
I	Noncompliance of an existing Federal, State, or local regulation or potential noncompliance with future regulatory requirement (within next 6 months)
II	Potential noncompliance with future regulatory requirement or deadline (6 months to 2 years)
III	Indicates noncompliance with a Defense Logistics Agency/Department of Defense environmental regulation
MP	Indicates current practice does not follow a "Management Practice" associated with the media area

Table 3. DLA Strategic Materials Scotia Depot – Noncompliance Type

MEDIA	I	II	III	MP	TOTAL	Repeat
Air Emissions	0	0	0	0	0	0
Asbestos	0	0	0	0	0	0
Hazardous Materials	1	0	0	0	1	0
Hazardous Waste	1	0	0	0	1	0
NEPA	0	0	0	0	0	0
PCBs	0	0	0	0	0	0
POL	0	0	0	0	0	0
Storage Tanks	0	0	0	0	0	0
Water Quality	0	0	0	0	0	0
Wastewater	0	0	0	0	0	0
Solid Waste	0	0	0	0	0	0
Totals	2	0	0	0	2	0

Table 4. DLA Strategic Materials Scotia Depot – Noncompliance Summary

Finding #	Media	Criteria	Finding	Class
1	HM	Chemical manufacturers and importers shall obtain or develop a material safety data sheet for each hazardous chemical they produce or import. Employers shall have a material safety data sheet in the workplace for each hazardous chemical which they use.” [29 CFR1910.1200(g)(1)]	It could not be determined if all material safety data sheets (MSDSs) for all chemicals observed in use or in storage on the facility were available on-site.	I
2	HM-HW	A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by: (i) placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;...” [6 NYCRR 374-3.2(f)(3)(i)]	Universal waste batteries are being collected in a container, located in the Administration Building (Bldg 12), which has no visible means of determining how long the batteries have been accumulating.	I

SUMMARY OF NONCONFORMANCE

Table 5 defines the EMS conformance rating system. Some current practices did not fully conform to the DLA Strategic Materials Scotia Depot’s EMS Documentation; ISO 14001:2004; and/or DLA Environmental Program requirements. The nonconformances in Table 6 should be seen as opportunities for improvements to the DLA Strategic Materials Scotia Depot implementation of the EMS.

Table 5. Conformance Rating System

Rating	Definition
NC	Minor Nonconformance - Objective evidence showed that the Activity did not conform to the reviewed requirement. A minor nonconformance is a temporary or isolated instance, or a small number of instances, of not complying with a requirement.
MNC	Major Nonconformance - Objective evidence showed that the Activity had a serious deficiency that could adversely affect or undermine their EMS. For example, an entire EMS component was not in evidence such as the implementation of a Corrective Action procedure or numerous instances of nonconformance were evidenced in one component such as Document Control.
OBS	Observation - Objective evidence identified practices that, while conforming to the requirement, presented opportunities for continual improvement that may also help prevent future nonconformances (e.g., unnecessarily complicated procedures).

Table 6. DLA Strategic Materials Scotia Depot – Nonconformance Summary

Finding #	Criteria	Finding	MNC or NC
EMS-1	IGD 1011: Operational Controls and ISO 14001:2004, 4.4.6, Operational Controls	Defense Logistics Agency, Strategic Materials Memo dated Nov 16, 2010, Depot Recycling Procedures, Para 6 does not appear to clearly require conformance with DLA-I 4102 requirements associated with obtaining DLA approval prior to using non-Disposition Services-approved disposal methods and locations. DLA Strategic Materials Scotia Depot was using a non-approved recycler for some of their disposal services.	NC
EMS-2	IGD 1011: Operational Controls	Defense Logistics Agency, Strategic Materials inclusion of controls in the contracts for organizations performing services on their behalf does not appear consistent and several contracts lacked clauses requiring the contractor to conform to the organizations management system.	NC
EMS-3	ESOHMS IGD 1013, Monitoring and Measuring	Paragraph 2.4 or IGD 1013 requires that all monitoring equipment shall be calibrated and maintained according to the manufacturer's specifications or procedures as applicable. During the EPR, evidence indicates that the single scale used at the facility had an expired calibration certifications during 2012.	NC

EMS OBSERVATIONS

Table 7 summarizes the observations made by the Review Team regarding one or more portions of the DLA Strategic Materials Scotia Depot implementation of the EMS. Unless a reason is provided stating why action is not required, corrective actions are required for these observations, as part of DLA /DLA Field Activity’s continual improvement process.

Table 7. DLA Strategic Materials Scotia Depot – EMS Observations

Reference	Observation
OBS-1	ESOHMS reference materials include a note in the footer of printed hardcopies that remarks, the most current version of management system documents are located on the “I Am The Key” web-site. Several documents identified during the audit also include a note concerning where the document was located on the “I Am The Key” web-site. This additional note made checking for the most current version of the document much faster.
OBS-2	DLA-I 4102 requires activities to inform DLA Headquarters each time a site is inspected by federal, state or local regulatory authorities. The process for Defense Logistics Agency, Strategic Materials Scotia Depot to notify Defense Logistics Agency, Strategic Materials, and Defense Logistics Agency, Strategic Materials to notify DLA Headquarters does not appear to be a documented operational control.
OBS-3	The DLA legal staff has requested that the Integrated Environmental Program Review Reports and the Out-Brief Report remain in draft (versus final) revision. Defense Logistics Agency, Strategic Materials may want to consider adapting a similar approach for their Environmental Performance (internal and external) Reviews.
OBS-4	The Defense Logistics Agency, Strategic Materials Scotia Depot Spill Prevention and Counter Measures Control Plan, table 2, page 2 of 21 shows the On Scene Coordinator (OSC) as an individual that is not present at Defense Logistics Agency, Strategic Materials Scotia Depot on a daily basis. The study lists the Facilities Manager who is also the primary manager at a different location, and commuting between the two locations.

FOLLOW-UP ACTIONS

DLA Strategic Materials Scotia Depot will provide the Lead Reviewer with a corrective action plan that details actions to address the root causes of each of the findings. The forms in Appendix A of this report were left on-site by the Review Team so that the site could immediately begin documenting their corrective actions and plans for corrective actions. The Lead Reviewer will coordinate approval of these corrective actions with the Integrated EPR Team. Upon approval by the Review Team, DLA Strategic Materials Scotia Depot will provide DLA Installation Support Environmental Management with the corrective action plan within 30 days from the date of the Draft

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Final Report email transmittal, and with updates on the status of corrective actions by the end of each quarter thereafter until all findings are closed.

As corrective actions are implemented, DLA Strategic Materials Scotia Depot will verify the effectiveness of the corrective action and record the method used to determine effectiveness. This record should be maintained on-site and will be objective evidence for corrective actions taken on future reviews.

APPENDIX A-DETAILED FINDINGS

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PART 1 Completed by DLA Auditor					
Complete all sections in Part 1					
Reviewer Name(s)	Dennis Poyer	Location / Date	DLA Strategic Materials Scotia Depot 23-24 Aug 2012	Finding No.	1
Reference Standard/ Protocol / CFR	29 CFR1910.1200(g)(1)	Media / Referenced Clause	Hazardous Materials	Type (I, II, III, MP, NC, MNC)	I
Noncompliance or Nonconformity					
<p>Requirement Stated / Criteria: “Chemical manufacturers and importers shall obtain or develop a material safety data sheet for each hazardous chemical they produce or import. Employers shall have a material safety data sheet in the workplace for each hazardous chemical which they use.” [29 CFR1910.1200(g)(1)]</p> <p>Noncompliance / Nonconformity Statement (Finding): It could not be determined if all material safety data sheets (MSDSs) for all chemicals observed in use or in storage on the facility were available on-site.</p> <p>Reviewer’s Comments: The main MSDS binder located in the Administrative Building (Bldg 12) in some cases had multiple MSDSs for the same chemical (e.g., CP Industrial Products Ajax Oxygen Bleach Cleanser); MSDSs are listed alphabetically, but in some cases by product name and in other cases by manufacturer name; and the binder retained MSDSs for chemicals no longer used/stored on the facility (e.g., Kodak developer). This slowed the process of looking for specific MSDSs.</p> <p>Recommended Action (for Media Noncompliances only): Because the MSDSs should be readily available to the employees, not only for helping to determine compatibility for storage and performing waste characterizations for disposal, but also for emergencies such as a spill or accidental exposure to a chemical, it is recommended the MSDSs be reviewed in order to improve finding them in a timely manner within the binder. This would include updating the chemical inventory listed in the front of the binder to reflect all chemicals currently stored and in use on the Depot; removal of obsolete MSDSs no longer in the inventory; removal of redundant MSDSs; and consistently alphabetizing them (preferably by product name as it is identified on the container). Additionally, while the contract janitorial cleaning staff currently maintains separate MSDS binders located in their supply storage areas for their cleaning supplies, consider including their chemicals in the Depot-wide inventory and ensure all their MSDSs are included in the main MSDS binder, or maintain a separate binder for the janitorial supplies in the same location as the main binder. Finally, it was noted that some chemicals currently in storage may no longer be needed or are in excess of the Depot’s needs. This may be an opportune time to evaluate these chemicals and properly dispose of those no longer needed, thus removing them from the inventory and further reducing the number of MSDSs maintained on-site.</p>					
PART 2 Completed by the Organization -Organization’s Planned Actions					
Complete this section and submit to DLA Installation Support Environmental Management when required. May also be completed using the organization's own forms.					
Immediate Containment Actions and Correction Taken					
					Planned completion date:
Root Cause Analysis ('how/why did this happen?')					
Corrective Action(s) (to prevent recurrence) with planned completion date					
					Planned completion date:

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Organization's Representative		Date:
PART 3 Completed by the Organization The organization's verification of corrective actions implementation must be completed in this section prior to the next scheduled audit.		
Organization's Representative		Date:
PART 4 Verification/Closure Of The Implemented Corrective Action by DLA Installation Support Environmental Management		
Date:	Accepted: Yes <input type="checkbox"/> No <input type="checkbox"/>	Name:
Details of Verification and Effectiveness		

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PART 1 Completed by DLA Auditor					
Complete all sections in Part 1					
Reviewer Name(s)	Dennis Poyer	Location / Date	DLA Strategic Materials Scotia Depot 23-24 Aug 2012	Finding No.	2
Reference Standard/ Protocol / CFR	6 NYCRR 374-3.2(f)(3)(i)	Media / Referenced Clause	Hazardous Waste	Type (I, II, III, MP, NC, MNC)	I
Noncompliance or Nonconformity					
<p>Requirement Stated / Criteria: “A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by: (i) placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;...” [6 NYCRR 374-3.2(f)(3)(i)]</p> <p>Noncompliance / Nonconformity Statement (Finding): Universal waste batteries are being collected in a container, located in the Administration Building (Bldg 12), which has no visible means of determining how long the batteries have been accumulating.</p> <p>Reviewer’s Comments: The citation includes multiple suggestions on how to demonstrate the accumulation date for universal waste, such that the Depot is not limited to just one method. This finding was corrected while the audit team was on-site by placing an accumulation start date on the container.</p> <p>Recommended Action (for Media Noncompliances only): Continue to ensure personnel know the requirements for collecting, storing, and labeling universal wastes during one of the monthly training sessions.</p>					
PART 2 Completed by the Organization -Organization’s Planned Actions					
Complete this section and submit to DLA Installation Support Environmental Management when required. May also be completed using the organization’s own forms.					
Immediate Containment Actions and Correction Taken					
					Planned completion date:
Root Cause Analysis ('how/why did this happen?')					
Corrective Action(s) (to prevent recurrence) with planned completion date					
					Planned completion date:
Organization’s Representative					Date:
PART 3 Completed by the Organization					
The organization’s verification of corrective actions implementation must be completed in this section prior to the next scheduled audit.					
Organization’s Representative					Date:

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PART 4 Verification/Closure Of The Implemented Corrective Action by DLA Installation Support Environmental Management		
Date:	Accepted: Yes <input type="checkbox"/> No <input type="checkbox"/>	Name:
Details of Verification and Effectiveness		

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PART 1 Completed by DLA Auditor					
Complete all sections in Part 1					
Reviewer Name(s)	Darrel Sisk	Location / Date	DLA Strategic Materials Scotia Depot 23-24 Aug 2012	Finding No.	EMS-1
Reference Standard/ Protocol / CFR	IGD 1011: Operational	Media / Referenced	Operational Controls	Type (I, II, III,	NC
Noncompliance or Nonconformity					
<p>Requirement Stated / Criteria: The organization shall identify and plan those operations that are associated with the identified significant environmental aspects consistent with its environmental policy, objectives and targets, in order to ensure that they are carried out under specified conditions, by establishing, implementing and maintaining a documented procedure(s) to control situations where their absence could lead to deviation from the environmental policy, objectives and targets.</p> <p>Noncompliance / Nonconformity Statement (Finding): Defense Logistics Agency, Strategic Materials Memo dated Nov 16, 2010, Depot Recycling Procedures, Para 6 does not appear to clearly require conformance with DLA-I 4102 requirements associated with obtaining DLA approval prior to using a non Defense Logistics Agency, Disposition Services approved disposal contractor, method or locations.</p> <p>Reviewer's Comments: DLA Strategic Materials Scotia Depot was using a non-approved recycler for some of their disposal services; and this could lead to issues if the disposal services are not provided by a reputable vender.</p> <p>Recommended Action (for Media Noncompliances only):</p>					
PART 2 Completed by the Organization -Organization's Planned Actions					
Complete this section and submit to DLA Installation Support Environmental Management when required. May also be completed using the organization's own forms.					
Immediate Containment Actions and Correction Taken					
					Planned completion date:
Root Cause Analysis ('how/why did this happen?')					
Corrective Action(s) (to prevent recurrence) with planned completion date					
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Organization's Representative					Date:
PART 3 Completed by the Organization					
The organization's verification of corrective actions implementation must be completed in this section prior to the next scheduled audit.					
Organization's Representative					Date:
PART 4 Verification/Closure Of The Implemented Corrective Action by DLA Installation Support Environmental Management					

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Date:	Accepted: Yes <input type="checkbox"/> No <input type="checkbox"/>	Name:
Details of Verification and Effectiveness		

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PART 1 Completed by DLA Auditor Complete all sections in Part 1					
Reviewer Name(s)	Darrel Sisk	Location / Date	DLA Strategic Materials Scotia Depot 23-24 Aug 2012	Finding No.	EMS-2
Reference Standard / Protocol / CFR	IGD 1011: Operational Controls	Media / Referenced Clause	Operational Controls	Type (I, II, III, MP, NC, MNC)	NC
Noncompliance or Nonconformity					
<p>Requirement Stated / Criteria: The organization shall identify and plan those operations that are associated with the identified significant environmental aspects consistent with its environmental policy, objectives and targets, in order to ensure that they are carried out under specified conditions, by establishing, implementing and maintaining a documented procedure(s) to control situations where their absence could lead to deviation from the environmental policy, objectives and targets.</p> <p>Noncompliance / Nonconformity Statement (Finding): Defense Logistics Agency, Strategic Materials inclusion of controls in the contracts for organizations performing services on behalf of the organization does did not appear consistent and several contracts lacked clauses requiring the contractor to conform to the organizations management system, use affirmative procurement procedures, or properly handle hazardous materials and wastes.</p> <p>Reviewer's Comments: DLA Strategic Materials Scotia Depot did not have a consistent approach when including applicable contract requirements into the contracts for those organizations working on their behalf. Based upon information reviewed during this environmental program review: SP8000-12-M-0006 (Equipment Maintenance) appeared to have applicable clauses for: Affirmative/Green Procurement; Ozone Depleting Substances; Safety; Hazardous Materials and Wastes; and conformance with the organizations ESOHMS. Contract SP8000-12-F-0002 (Janitorial Services) lacked a clause concerning conformance with the organizations ESOH MS but had the other clauses. Contract SP8000-11-C-0507 (Facility Maintenance) lacked clauses associated with Affirmative/Green Procurement, conformance with the organizations ESOHMS and Hazardous Materials/Waste Management. Operational controls should include appropriate clauses are included in all contracts.</p> <p>Recommended Action (for Media Noncompliances only):</p>					
PART 2 Completed by the Organization -Organization's Planned Actions Complete this section and submit to DLA Installation Support Environmental Management when required. May also be completed using the organization's own forms.					
Immediate Containment Actions and Correction Taken					
					Planned completion date:
Root Cause Analysis ('how/why did this happen?')					
Corrective Action(s) (to prevent recurrence) with planned completion date					
					Planned completion date:
Organization's Representative					Date:
PART 3 Completed by the Organization The organization's verification of corrective actions implementation must be completed in this section prior to the next scheduled audit.					

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Organization's Representative		Date:
PART 4 Verification/Closure Of The Implemented Corrective Action by DLA Installation Support Environmental Management		
Date:	Accepted: Yes <input type="checkbox"/> No <input type="checkbox"/>	Name:
Details of Verification and Effectiveness		

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PART 1 Completed by DLA Auditor Complete all sections in Part 1					
Reviewer Name(s)	Darrel Sisk	Location / Date	DLA Strategic Materials Scotia Depot 23-24 Aug 2012	Finding No.	EMS-3
Reference Standard/ Protocol / CFR	IGD 1013 Monitoring and Measurement	Media / Referenced Clause	Monitoring and Measurement	Type (I, II, III, MP, NC, MNC)	NC
Noncompliance or Nonconformity					
Requirement Stated / Criteria: Paragraph 2.4 or IGD 1013 requires that all monitoring equipment shall be calibrated and maintained according to the manufacturer's specifications or procedures as applicable.					
Noncompliance / Nonconformity Statement (Finding): During the EPR, evidence indicates that the single scale used at the facility had an expired calibration certifications during 2012.					
Reviewer's Comments: DLA Strategic Materials Scotia Depot did not follow their internal procedures for ensuring that identified calibration equipment was maintenance in accordance with calibration requirements and timeframes.					
Recommended Action (for Media Noncompliances only):					
PART 2 Completed by the Organization -Organization's Planned Actions Complete this section and submit to DLA Installation Support Environmental Management when required. May also be completed using the organization's own forms.					
Immediate Containment Actions and Correction Taken					
					Planned completion date:
Root Cause Analysis ('how/why did this happen?')					
Corrective Action(s) (to prevent recurrence) with planned completion date					
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Organization's Representative					Date:
PART 3 Completed by the Organization The organization's verification of corrective actions implementation must be completed in this section prior to the next scheduled audit.					
Organization's Representative					Date:
PART 4 Verification/Closure Of The Implemented Corrective Action by DLA Installation Support Environmental Management					
Date:	Accepted: Yes <input type="checkbox"/> No <input type="checkbox"/>	Name:			
Details of Verification and Effectiveness					

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PART 1 Completed by DLA Auditor Complete all sections in Part 1					
Reviewer Name(s)	Darrel Sisk	Location / Date	DLA Strategic Materials Scotia Depot 23-24 Aug 2012	Finding No.	OBS-1
Reference Standard/ Protocol / CFR	IGD 1000 General Requirements	Media / Referenced Clause	General Requirements	Type (I, II, III, MP, NC, MNC)	OBS
Noncompliance or Nonconformity					
Requirement Stated / Criteria: Paragraph 4.0 of IGD 1000 General Requirements, requires that all Hard copies of the IGD shall be controlled; and the controlled copy (current version) of the Manual will be maintained on the organization's Web Pages. All copies or reproductions of the IGD shall be marked with the following statement to ensure document control of this Manual. Hardcopies of the manual may not be the current version. Refer to the "I Am The Key" to verify the current version of the IGD.					
Noncompliance / Nonconformity Statement (Finding): Some ESOHMS reference materials at Defense Logistics Agency, Strategic Materials Scotia Depot also included a note concerning where on the "I Am The Key" web-site the current version of the document could be found.					
Reviewer's Comments: This additional note made checking for the most current version of the document much faster and easier.					
Recommended Action (for Media Noncompliances only):					
PART 2 Completed by the Organization -Organization's Planned Actions Complete this section and submit to DLA Installation Support Environmental Management when required. May also be completed using the organization's own forms.					
Immediate Containment Actions and Correction Taken					
					Planned completion date:
Root Cause Analysis ('how/why did this happen?')					
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Organization's Representative					Date:
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Organization's Representative					Date:
PART 4 Verification/Closure Of The Implemented Corrective Action by DLA Installation Support Environmental Management					
Date:	Accepted: Yes <input type="checkbox"/> No <input type="checkbox"/>	Name:			

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Details of Verification and Effectiveness	
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PART 1 Completed by DLA Auditor Complete all sections in Part 1					
Reviewer Name(s)	Darrel Sisk	Location / Date	DLA Strategic Materials Scotia Depot 23-24 Aug 2012	Finding No.	OBS-2
Reference Standard/ Protocol / CFR	IGD 1011: Operational Controls	Media / Referenced Clause	Operational Controls	Type (I, II, III, MP, NC, MNC)	OBS
Noncompliance or Nonconformity					
<p>Requirement Stated / Criteria: The organization shall identify and plan those operations that are associated with the identified significant environmental aspects consistent with its environmental policy, objectives and targets, in order to ensure that they are carried out under specified conditions, by establishing, implementing and maintaining a documented procedure(s) to control situations where their absence could lead to deviation from the environmental policy, objectives and targets.</p> <p>Noncompliance / Nonconformity Statement (Finding): DLA-I 4102 requires activities to inform DLA Headquarters each time a site is inspected by federal, state or local regulatory authorities. The process for Defense Logistics Agency, Strategic Materials Scotia Depot to notify Defense Logistics Agency, Strategic Materials, and Defense Logistics Agency, Strategic Materials to notify DLA Headquarters does not appear to be a documented operational control.</p> <p>Reviewer's Comments:</p> <p>Recommended Action (for Media Noncompliances only):</p>					
PART 2 Completed by the Organization -Organization's Planned Actions Complete this section and submit to DLA Installation Support Environmental Management when required. May also be completed using the organization's own forms.					
Immediate Containment Actions and Correction Taken					
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Root Cause Analysis ('how/why did this happen?')					
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Organization's Representative					Date:
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Date:	Accepted: Yes <input type="checkbox"/> No <input type="checkbox"/>	Name:			

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PART 1 Completed by DLA Auditor Complete all sections in Part 1					
Reviewer Name(s)	Darrel Sisk	Location / Date	DLA Strategic Materials Scotia Depot 23-24 Aug 2012	Finding No.	OBS-3
Reference Standard/ Protocol / CFR	IGD 1010: Control of Documents	Media / Referenced Clause	Control of Documents	Type (I, II, III, MP, NC, MNC)	OBS
Noncompliance or Nonconformity					
<p>Requirement Stated / Criteria: IGD 1010 provides guidance for controlling all documents, internal and external, and procedures required by the Standard as it pertains to the ESOHMS at each installation. This document applies to all employees of DLA Strategic Materials and those working on behalf of the government within DLA Strategic Materials, who are required to establish, utilize and maintain environmental documents in accordance with the requirements of the ESOHMS. This IGD provides guidance for controlling all documents, internal and external, and procedures required by the Standard as it pertains to the ESOHMS at each installation. This document applies to all employees of DLA Strategic Materials and those working on behalf of the government within DLA Strategic Materials, who are required to establish, utilize and maintain environmental documents in accordance with the requirements of the ESOHMS.</p> <p>Noncompliance / Nonconformity Statement (Finding): The DLA legal staff has requested that the Integrated Environmental Program Review Reports and the Out-Brief Report remain in draft (versus final) revision. Defense Logistics Agency, Strategic Materials may want to consider doing the same approach for their Environmental Performance (internal and external) Reviews.</p> <p>Reviewer's Comments:</p> <p>Recommended Action (for Media Noncompliances only):</p>					
PART 2 Completed by the Organization -Organization's Planned Actions Complete this section and submit to DLA Installation Support Environmental Management when required. May also be completed using the organization's own forms.					
Immediate Containment Actions and Correction Taken					
					Planned completion date:
Root Cause Analysis ('how/why did this happen?')					
Corrective Action(s) (to prevent recurrence) with planned completion date					
					Planned completion date:
Organization's Representative					Date:
PART 3 Completed by the Organization The organization's verification of corrective actions implementation must be completed in this section prior to the next scheduled audit.					
Organization's Representative					Date:

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PART 4 Verification/Closure Of The Implemented Corrective Action by DLA Installation Support Environmental Management		
Date:	Accepted: Yes <input type="checkbox"/> No <input type="checkbox"/>	Name:
Details of Verification and Effectiveness		

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PART 1 Completed by DLA Auditor Complete all sections in Part 1					
Reviewer Name(s)	Darrel Sisk	Location / Date	DLA Strategic Materials Scotia Depot 23-24 Aug 2012	Finding No.	OBS-4
Reference Standard/ Protocol / CFR	IGD 1012: Emergency Procedures	Media / Referenced Clause	Emergency Procedures	Type (I, II, III, MP, NC, MNC)	OBS
Noncompliance or Nonconformity					
<p>Requirement Stated / Criteria: IGD 1012 provides guidance for emergency procedures; Emergency preparedness and response plans and procedures shall be reviewed and revised as necessary after the occurrence of emergency situations or as delineated within said documents. The plans are exercised when practical, minimizing disruptions of operations.</p> <p>Noncompliance / Nonconformity Statement (Finding): The Defense Logistics Agency, Strategic Materials Scotia Depot Spill Prevention and Counter Measures Control Plan, table 2, page 2 of 21 shows the On Scene Coordinator (OSC) as an individual that is not present at Defense Logistics Agency, Strategic Materials Scotia Depot on a daily basis. The study lists the Facilities Manager who is also the primary manager at a different location, and commuting between the two locations.</p> <p>Reviewer's Comments:</p> <p>Recommended Action (for Media Noncompliances only):</p>					
PART 2 Completed by the Organization -Organization's Planned Actions Complete this section and submit to DLA Installation Support Environmental Management when required. May also be completed using the organization's own forms.					
Immediate Containment Actions and Correction Taken					
					Planned completion date:
Root Cause Analysis ('how/why did this happen?')					
Corrective Action(s) (to prevent recurrence) with planned completion date					
					Planned completion date:
Organization's Representative					Date:
PART 3 Completed by the Organization The organization's verification of corrective actions implementation must be completed in this section prior to the next scheduled audit.					
Organization's Representative					Date:
PART 4 Verification/Closure Of The Implemented Corrective Action by DLA Installation Support Environmental Management					
Date:	Accepted: Yes <input type="checkbox"/> No <input type="checkbox"/>	Name:			

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Details of Verification and Effectiveness	
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APPENDIX B – ENTRANCE AND EXIT BRIEFING SIGN-IN SHEET

DLA Strategic Materials Scotia Depot, 22 - 24 August 2012 Integrated Environmental Performance Review Entrance and Exit Briefing Sign In Sheet					
Printed Name	Organization	Title	Email Address	Entrance Briefing Signature	Exit Briefing Signature
Dennis Poyer	USAPHC	Physical Scientist	dennis.poyer@us.army.mil	DP	DP
Dewey Blair	DLA/SM	General Supply SIA	dewey.blair@dla.mil	DB	DB
Mike Pecullan	DLA/SM	Environmental	Michael.Pecullan@dla.mil	MP	MP
BART McFarlane	DLA DSE	EPS	barton.mcfarlane@dla.mil	B+H	B+H
DARREL SISK	PARSONS	Auditor	DARREL.SISK@PARSONS.COM	DS	DS