DEFENSE LOGISTICS AGENCY
STRATEGIC MATERIALS
8725 JOHN J. KINGMAN ROAD
FORT BELVOIR, VIRGINIA 22060-6223

NOV 09 2011

DLA Strategic Materials

MEMORANDUM FOR ALL MATERIALS MANAGEMENT PERSONNEL

SUBJECT: Waste Tracking

On January 28, 2010, the Defense Logistics Agency issued DLAI 4102 entitled "Environmental Compliance"; its Enclosure 4 provides guidance on reporting waste disposal quantities, noting the manner in which the data is reported (attachment 1).

To comply with responsibilities of this Instruction, complete tracking of waste disposal by the depots is essential. The spreadsheet at <Q:\DNSC-M\Waste Tracking> will be used to accomplish this task on a monthly basis (a copy is provided as attachment 2). Monitors at the depots must input the required information. The following individuals will be responsible for this reporting:

a. Hammond Depot- Eric Deal

b. Scotia Depot- Dewey Blair

c. Warren Depot- Rob Skruck

This tracking tool will help us achieve our environmental compliance goals; our headquarters POC for this tool is Mike Pecullan (707-767-7620).

STEPHEN SURFACE
Director, Materials Management

Attachments:
1. DLAI 4102
2. Waste Tracking Spreadsheet

Cc: Administrator, Strategic Materials

Defense Logistics Agency Instruction

DLAI 4102
January 28, 2010
DES-E

Environmental Compliance

References: Refer to Enclosure 1.

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1. PURPOSE. This instruction establishes agency-wide policy and directives for maintaining compliance with all environmental laws, regulations, directives, executive orders, international treaties and standards, and other controlling legal authorities; for complying with Department of Defense (DOD) policy, procedures and reporting requirements and for monitoring DLA compliance status through training, auditing and corrective action. Failure to comply with environmental laws and other controlling legal authorities may lead to criminal and civil enforcement actions against DLA activities by regulatory agencies. Enforcement actions for failure to do so could include mission shutdown, fines, and imprisonment of commanders and operators.

2. APPLICABILITY. This Instruction applies to Headquarters (HQ) DLA and Primary Level Field Activities (PLFAs), as appropriate, as well as DLA contractors tasked with carrying out environmental management duties at DLA activities. The term Primary Level Field Activities (PLFAs) will be used throughout this Instruction to represent DES Installations Management (DES-I) (e.g. Headquarters Complex McNamara and enterprise-wide initiatives), Business Units, and Service Activities. The Business Units include DLA's permitted sites (i.e. Richmond, Columbus, Susquehanna, Sharpe and Tracy).

3. POLICY. DLA PLFAs shall comply with applicable environmental laws, regulations, and other controlling legal authorities (see Enclosure 2 for Principal Environmental Laws and Enclosure 3 for Associated Outputs). PLFAs shall request sufficient funds for compliance with applicable environmental laws in their PBR cycles. PLFAs must be cognizant of the laws, regulations, and other controlling legal authorities that are applicable to their operations. PLFAs shall integrate, as required, environmental management systems, green procurement, global climate change policy and procedures, and energy policies and principles, and National Environmental Policy Act (NEPA) evaluation into all DLA mission processes and procedures, including but not limited to, acquisition, procurement, and maintenance. PLFAs shall actively protect and preserve the environment. When required, DLA shall restore and enhance the environment at DLA-managed sites.

a. PLFAs shall plan, program, and budget to achieve, maintain, and monitor compliance with applicable environmental requirements. PLFAs shall ensure that environmental budgets are based upon best available budget data and costs.

b. PLFAs shall cooperate with DLA HQ, DES-E, Federal, state, and local environmental agencies, and provide proper access to any facility and all information that is relevant as determined by DLA HQ, DES-E, Federal, state and local environmental agencies to determine status of environmental compliance. Information concerning DLA-regulated activities and environmental initiatives shall be made available to appropriate Federal, state, Indian Nation, local officials and public stakeholders after review by DLA Office of General Counsel (DG) and in consultation with DLA HQ DES-E and DLA Strategic Communications. DLA PLFAs shall notify DLA HQ DES-E within 24 hours of notification of any visit by a regulatory agency and shall report all preliminary findings within 24 hours after notification by said agency.

c. PLFAs shall manage materials that meet the definitions of Hazardous Waste/Hazardous Materials and other regulated property in a manner that is both safe and compliant with Federal, state, and local regulations. It is DOD and DLA policy that PLFAs use the Defense Reutilization and Marketing Service (DRMS) as the principal agent for their hazardous waste (and other regulated property such as Universal Waste (UW), polychlorinated biphenyls [PCBs] and

asbestos) disposal actions in accordance with the criteria in DoD Defense Materiel Disposition Manual (M) 4160.21-M, August 18, 1997. This is consistent with the objective of accurate hazardous property data collection and reporting. A decision not to use DRMS for hazardous waste (and other regulated hazardous property) disposal that is generated by DLA requires prior approval by DES-E with coordination involving DRMS and DLA J-3. The minimum contractual criteria for hazardous waste disposal are defined in DoD 4160.21-M

d. Although exceptions to the use of DRMS for hazardous waste disposal are permitted (e.g. restoration/clean-up contracts), DoD 4160.21-M requires that a minimum set of automated records be maintained and specifies that the case for cost savings be documented when cost is the basis for not using DRMS.

e. The criteria for all contracts include provisions for 100% manifest tracking to maintain a “cradle to grave” audit trail of documentation for hazardous waste disposal (e.g., from original turn-in to final disposition), and for maintaining automated records of hazardous waste disposal transactions. This documentation shall include generation, disposal costs and budget data.

f. PLFAs that are hosts or those that have mission responsibilities subject to significant environmental regulatory concerns shall establish an environmental auditing program for the purpose of monitoring and inspecting all operations on a routine basis, and taking such measures necessary to ensure environmental compliance. Compliance self-assessments, or internals, shall be conducted at least annually. These can be performed by the PLFA (e.g. DRMS uses their own staff) or outside consultant, either Federal Government (e.g. CHPPM) or private company. External compliance assessments shall be conducted by the higher command (DLA HQ DES-E) every two years and on occasion a “no notice” visit may be planned. In years when DLA HQ DES-E performs the evaluation, the PLFA is encouraged to cooperate in a joint evaluation. In addition, these audits shall be conducted along with the Environmental Management System (EMS) audits when practicable. Copies of draft and final reports shall be forwarded to DLA HQ DES-E upon completion or made available such as DRMS does with their Compliance Assistance Management System (CAMS). Findings shall be closed out in an expedient manner (e.g. 30 days) and if DLA HQ DES-E asks for verification, applicable paperwork shall be provided in a reasonable timeframe (e.g. 15 days).

g. DLA components that manage real property (currently Richmond, Columbus, Susquehanna, Tracy, Sharpe and HQs) or those who have mission responsibilities subject to significant regulatory concern, shall establish environmental coordination committees. These committees will serve to identify activities that are subject to environmental regulations and ensure that necessary coordination occurs. These committees will also review new or pending environmental regulations or DLA policy issuances which will affect PLFA operations. These committees will be chaired by the installation environmental officer and will consist of representatives of major staff elements.

h. Membership on environmental coordination committees will also include the installation legal counsel, public affairs officer, and Defense Reutilization and Marketing Office (DRMO) representative, if applicable. Union representatives will be invited to attend. Meetings should be scheduled at least quarterly. Environmental Coordination Committees may also serve in the capacity of Hazardous Waste Minimization Committee, Green Procurement Committee, Integrated Solid Waste Management Committee, NEPA Committee, Emergency Planning and Community Right-to-Know Committee, and others as applicable.

i. PLFAs that manage/operate real property, to include Underground and Aboveground Storage Tanks, shall evaluate the environmental condition of the property through the use of an Environmental Baseline Survey (EBS) in accordance with DLA Instruction, Acquisition and Disposal of Real Estate, and prepare National Environmental Policy Act (NEPA) analysis, as appropriate, in accordance with DLAR 1000.22 or supersession.

j.DoD real property shall not be used for the storage, treatment, or disposal of non-DoD-owned toxic or hazardous materials, including but not limited to hazardous waste, without a written formal agreement approved by HQ DLA. Such storage, treatment or disposal is prohibited by U.S. Code, with few narrow exceptions, so DLA personnel should contact DES-E as soon as they believe that any DLA action may result in such storage, treatment, or disposal.

k. PLFAs that are tenants shall cooperate with the environmental programs of their hosts. This includes complying with local environmental procedures, providing access to installation environmental inspectors, serving on installation environmental committees, and providing information requested by host environmental offices.

l. PLFAs are authorized to pay all legitimate environmental fees and service charges to which Federal agencies are subject upon written approval from DLA Office of General Counsel. Charges that are determined to be a state or local tax will not be paid.

m. PLFAs shall notify DLA HQ DES-E and Office of General Counsel on any Notice of Violation (NOV), Notice of Non-Compliance, warning letter, warning notice, deficient inspection report, consent order, or similar written notification from environmental regulatory authorities within 24 hours of initial notification. The PLFA shall take prompt action to correct the environmental deficiency and, if unable to correct the deficiency in its entirety immediately, then, the PLFA shall develop a corrective action plan to be submitted and approved to and by DLA HQ DES-E within 30 days of the initial notification.

n. PLFAs shall promptly notify environmental authorities and DLA HQ DES-E of all reportable incidents such as failure to meet conditions of an environmental permit, or an accidental release of reportable quantities of oil or hazardous substances or an undocumented shipment of either hazardous materials or hazardous waste. Notification to regulatory authorities shall comply with applicable laws. DLA HQ DES-E shall be notified within 24 hours of the spill or incident and all applicable documentation shall be provided. DLA commands and directorates shall forward such documentation even when it appears that the failure or release or shipment occurs due to actions of a contractor providing goods or services or both on behalf of DLA.

o. When PLFAs are asked to provide environmental data to an outside agency (e.g. non-profit organization, professional society, federal agencies outside Department of Defense and Office of Secretary of Defense representatives, to include working groups and steering committees), notification shall be coordinated through DLA HQ DES-E which will then determine the appropriate level of coordination/approval, to include coordinating with PAO and Office of General Counsel.

p. PLFAs shall initiate an environmental review for major Federal actions that significantly affect the environment at the earliest possible time in the planning phase in accordance with DLAR 1000.22 or supersession.

q. PLFAs that are hosts or those which have mission responsibilities subject to significant environmental regulatory concerns shall coordinate Comprehensive Environmental Compliance Program In-process Reviews with DES-E bi-annually. These reviews shall be managed in the most economically means practicable. Additional reviews may be required at the direction of DES.

r. PLFAs shall prepare, maintain, and comply with all applicable environmental management permits and plans. The plans will include, but not be limited to program areas such as air, land, water, spills, pollution prevention, cultural and natural resources.

s. When conducting operations overseas, PLFAs shall comply with Final Governing Standards issued for the host nation (where issued); the criteria in the OEBGD http://www.dtic.mil/whs/directives/corres/pdf/471505g.pdf and other DoD policy guidance (and directives), as applicable.

t. DLA HQ DES-E will share PLFA performance data and coordinate policy development with Logistics Operations (J-3) whenever the proposed policy or data potentially impacts field operations. Additionally, J-3 will be informed of other matters such as NOV's etc.

u. DLA activities occasionally receive requests from communities, military bases, regulatory agencies, and others for assistance in dealing with abandoned or illegally dumped Department of Defense (DOD) hazardous property, including low level radioactive waste (LLRW). These situations are usually time sensitive and require immediate response.

v. DLA HQ DES-E has contract arrangements with the US Army Corps of Engineers, Omaha District, to handle emergency responses involving DoD abandoned hazardous property or LLRW reported to DLA. The Corps will respond within 24 hours after contact by Battle Creek. Omaha District will provide a contractor and a government representative for initial response to stabilize the situation and determine additional actions. Additionally, the Corps

will coordinate any LLRW actions with the Army at Rock Island Arsenal. DES-WRI Battle Creek will manage the response activities and will work directly with the Corps.

w. The intent of the contact arrangement with Omaha District is to solve the problem of delays due to movement of funds and contracting actions, and be responsive to immediate environmental and community concerns associated with such incidents. It will also solve the problem of having to immediately determine which DoD entity is responsible. If appropriate, DES will seek reimbursement from the responsible party.

x. For information concerning the program contact Mr. Barton McFarlane, DLA HQ DES-E, DSN 427-1567, (703) 767-1567, or e-mail: barton.mcfarlane@dla.mil. For assistance with an incident or to report an incident, contact Mr. Bruce Noble, DES Battle Creek, DSN 661-7412, (269) 961-7412, or e-mail: bruce.noble@dla.mil.

y. On occasion, the DoD Non-Explosive Hazardous Material Hotline, which is manned by the DES Richmond Fire Department, receives reports of abandoned hazardous material. These reports should be forwarded to DES Battle Creek.

4. RESPONSIBILITIES.

DLA PLFAs are responsible for input to the PBR, BES, and PB exhibits and updates on budget execution status for submission to DUSD (I&E) per request from DLA Financial Operations (J-8) and DOD through DES-E. DES-E consolidates the agency PB28 exhibit for J-8 input to the Select and Native Programming Data Input System (SNaP), per J-8 guidance, for submission to OSD and Congress, as appropriate. DES-E participates in budget reviews, disseminates DoD policies etc and issues guidance as applicable. They also represent DLA on various DoD committees etc that are involved in environmental policy development. Furthermore, site visits to DLA PLFAs (or field locations) to include program evaluations and external compliance assessments are conducted by DES-E. A database is maintained to track program evaluations, NOV's etc. Data management details are provided in Enclosure 4. DG and PAO are consulted when controversial issues arise (e.g. assistance with overseas activities, politically-charged items, actions originating from the DOD Inspector General and Government Accountability Office [GAO]). Additionally they participate in preparation of Federal Facility Compliance Agreements (FFCAs) negotiated with EPA, compliance agreements with state and local authorities that involve budgetary requirements, fines and penalties and precedent-setting decisions and agreements.

5. PROCEDURES. Procedures for PFLAs are identified in Enclosure 5 regarding the processes and procedures they must develop and maintain.

6. EFFECTIVE DATE. January 28, 2010.

Director, DLA Enterprise Support

Enclosure 1
References

1. DLA One Book Process Chapter, Environmental Compliance, May 19, 2003, superseded.

2. Chapter 1 of the Defense Logistics Agency (DLA) Manual (DLAM) 6050.1, DLA Environmental Protection Manual, July 16, 1991, superseded.

3. Policy Guidance for Maintaining and Reporting Hazardous Waste Quantity, Cost, and Budget Data, December 26, 2000, superseded.

4. DoD Defense Materiel Disposition Manual (M) 4160.21-M, August 18, 1997, http://www.dla.mil/dlaps/DoD/416021m/guide.asp

Enclosure 2
Principal Environmental Laws

a.Clean Water Act – Federal Water Pollution Control Act
http://www4.law.cornell.edu/uscode/33/ch26.html

b. Safe Drinking Water Act – Public Health Service Act
http://www4.law.cornell.edu/uscode/42/usc_sup_01_42_10_6A_20_xll.html

c. Clean Air Act
http://www4.law.cornell.edu/uscode/42/ch85.html

d. Resource Conservation and Recovery Act (RCRA) of 1976
http://www4.law.cornell.edu/uscode/42/ch82.html.

e. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
http://www4.law.cornell.edu/uscode/42/ch103.html

f. Toxic Substances Control Act
http://www4.law.cornell.edu/uscode/15/usc_sup_01_15_10_53_20_l.html.

g. Oil Pollution Act of 1990
http://www4.law.cornell.edu/uscode/33/ch40.html

h. Emergency Planning and Community Right-to-Know Act of 1986
http://www4.law.cornell.edu/uscode/42/ch116.html

i. Endangered Species Act
http://www4.law.cornell.edu/uscode/16/ch35.html

j. Energy Policy Act of 2005
http://www.doi.gov/iepa/EnergyPolicyActof2005.pdf

k. National Environmental Policy Act of 1969
http://ceq.hss.doe.gov/Nepa/regs/nepa/nepaeqia.htm

l. Executive Order 12088, Federal Compliance with Pollution Control Standards,
http://www.archives.gov/federal-register/codification/executive-order/12088.html

m. The Overseas Environmental Baseline Guidance Document (OEBGD), Status of Forces Agreements, other applicable international standards, and Final Governing Standards issued by the DoD Executive Agent for individual countries apply to outside the continental United States (U.S.) activities unless they are part of the Alaska, Hawaii, or U.S. territories.

Enclosure 3
Outputs for Compliance

a. Reports to the Office of the Deputy Under Secretary of Defense (DUSD) (Installations and Environment [I&E]) and regulators, which are explained in a separate DLA Instruction, Environmental Quality Reporting.

b. Program evaluation and audit recommendations.

c. Program evaluation and audit corrective-action requests.

d. Briefings to the DLA Executive Board.

e. DLA submission for DoD Environmental Quality Annual Report to Congress and reports to DUSD (I&E).

f. DLA Program Budget Requirement (PBR) Exhibit 28.

g. Comprehensive Environmental Training Requirements that are identified in the DLA Instruction, Environmental Training.

h. Agency-level metrics are used to evaluate the status of compliance with applicable environmental regulations and standards. Success in complying with environmental laws and regulations minimizes environmental risks while augmenting regulator and customer confidence in our management of the hazardous material mission.

Enclosure 4
Data Management and Reporting

a. DLA HQ DES-E maintains the official data base of record for information required to prepare the bi-annual Environmental Program Review (EPR) for OSD. DLA HQ DES-E receives, reviews, and consolidates environmental data from FAs for preparation of the EPR. This data includes, but is not limited to hazardous waste disposal, integrated solid waste, air quality, and green procurement data from PLFAs. As part of the DOD Environmental Quality Program Review, DLA-managed installations must document and report annual hazardous waste disposal quantities, solid waste disposal quantities, solid waste disposal avoided quantity (reused or recycled) measured in pounds, and air emissions or criteria and toxic pollutants in pounds to DLA HQ DES-E.

b. DLA HQ DES-E prepares periodic requests for site data, environmental or transportation or energy-related data and requests for PLFA site visits by HQ personnel or designates, to include contractor personnel in response to requests from DES, HQ DLA, OSD, Congress and outside agencies. Requests are coordinated with PAO and OGC as appropriate. Freedom of Information Act (FOIA) requests made to DLA HQ DES-E will follow DLA FOIA policy and procedures.

c. DES-E requests information, progress reports and other data from DLA PLFAs and prepares the Environmental Quality Annual Report to Congress. (See DLA Instruction, Environmental Quality Reporting). Reports associated with the PFLA's are also reviewed and recommendations for corrective actions are noted if required concerning DES-E program reviews/compliance assessments of the PLFAs.

d. DLA HQ DES-E requests updates from DLA PLFAs on environmental program progress and success stories for publication and award package submissions.

e. DES-E is responsible for verification of data from Environmental Reporting Logistics System (ERLS), the hazardous material reporting and tracking system in place within DLA; Knowledge-Based Corporate Reporting System (KBCRS), the integrated solid waste reporting and tracking system within DLA and the DLA HQ DES-E suspense report tracking system.

f. DLA HQ DES-E requests semi-annual updates on reporting information associated with Federal Facility Compliance Agreements (FFCAs) negotiated with EPA for use in the DOD EPR Report and for briefings to management.

g. DLA HQ DES-E requests data from the FAs related to greenhouse gas emissions including, but not limited to, fuel usage, electricity usage, SF6 usage, HFC and PFC usage, and vehicle miles traveled, including contracted vehicles. These data must be collected and reported by DLA PLFAs in a manner that is consistent, verifiable, and auditable. PLFA Environmental Coordinators will review and certify the greenhouse gas-related data before submitting it to HQ DLA.

Enclosure 5
PLFA Procedures & Reporting Requirements

a. Commanders shall designate an Environmental Coordinator at each installation (e.g., supply center, distribution center, depot, government-owned, contractor-operated [GOCO] fuel terminal). For non-host facilities, the DLA Environmental Coordinator shall represent DLA on the host Installation Environmental Control Committee. The Environmental Coordinator shall be the single POC at the host installations for environmental data collection, reporting, and record keeping. Ultimately, the host installation is responsible for environmental reporting. DRMS can support but not supplant this responsibility in the area of hazardous property and hazardous waste. The DLA PLFA Environmental Coordinator shall review, certify, and, as appropriate, consolidate the EPR, budget and other environmental data before submitting it to the hosts or HQ DLA.

b. When applicable, PLFAs shall develop procedures to ensure compliance with environmental laws, regulations, executive orders, and DOD and DLA guidance documents and this Instruction. Procedures are developed by PLFAs based upon policy developed and disseminated by DLA HQ DES-E should be coordinated with HQ DES-E.

c. When applicable, PLFAs shall establish environmental auditing programs for the purpose of monitoring and inspecting all operations on a routine basis and taking such measures, as necessary, to ensure environmental compliance. PLFAs shall coordinate compliance audits (externals) of their installations once every two years by DLA headquarters and internal compliance audits annually. DLA HQ DES-E will use US Army Center for Health Promotion and Preventative Medicine (USACHPPM) for the audits and the PLFAs are encouraged to do so as well. If another option is selected, the effort and report must be comparable so that findings can be monitored and trends examined. It will also allow for a standardized approach to auditing while utilizing their expertise and familiarity with DLA and their PLFA's. DRMS is exempt from using USACHPPM as they have their own unique protocols and database and are supported by their internal compliance group. DLA HQ DES-E staff members will participate in the FA audit program and will integrate Environmental Management audit procedures to the maximum extent practicable. DLA PLFAs that are tenants on Military Service installations must make sure that they are also included in their host's environmental audit program. This should be specified in the support agreement with the host.

d. PLFAs shall notify DLA HQ DES-E and legal counsel of all preliminary findings associated with environmental regulatory inspections and visits at PLFAs as well as Notices of Violations (NOVs) and Enforcements Actions (EAs) issued by Federal, state, and local regulatory agencies within 24 hours of initial notification. Email is acceptable that includes a copy of documentation received from the regulatory agency. All follow-up documentation should be forwarded within 24 hours upon receipt as well.

e. PLFAs prepare corrective action plans to address noncompliance issues identified in regulatory agency inspections, NOVs, self-inspections, or environmental audits within 30 days of initial notification. PLFAs shall promptly address compliance issues identified in regulatory agency inspections, self-inspections, or environmental program reviews through Corrective Action Plans. DLA HQ DES-E will provide guidance to PLFAs when requested. DLA HQ DES-E tracks corrective actions through program evaluations, in-progress reviews, and EPR data calls.

f. DRMS is the responsible agent for the disposal of hazardous waste within DOD, as outlined in DOD 4160.21-M. DRMS will ensure that systems and safeguards are in place to support the maintenance of required HW data, and ensure compliant disposal. DLA PLFAs shall use DRMS as the first choice for hazardous waste disposal. If there is a requirement that DRMS cannot support, a waiver may be granted by the DRMS Director. To receive the waiver, a written request from the PLFA commander to the DRMS Director is required. A copy of the request and a copy of the waiver must be furnished to DLA HQ DES-E and the Distribution Management Division, Regulated Programs (J-3, Disposition, Management, and Regulated Programs Division. Any locally issued contracts for hazardous waste disposal must provide all the required environmental safeguards as outlined in DOD 4160.21-M.

g. Items or materials that are munitions list items (MLI) requiring mutilation or demilitarization, and munitions list items/commerce control list items (MLI/CCLI) requiring DOD Trade Security Controls must be processed (if possible) through Defense Reutilization and Marketing Service (DRMS). DRMS, by delegation of Defense Logistics Agency (DLA), is the responsible agent for this type of property per the Defense Materiel Disposition Manual, DOD 4160.21-

M. Servicing Defense Reutilization and Marketing Offices (DRMOs) are responsible for evaluating all materials turned in by DOD Military Service activities and ensuring proper demilitarization is accomplished per the Defense Demilitarization Manual, DOD 4160.21-M-1 and DoD Trade Security Controls per DoDI 2030.08. The only allowable exception to this requirement, due to nonconformance with DoD Trade Security Controls, is small arms firing range expended brass .50 cal/12.7mm and below and mixed metals gleaned from firing range cleanup, which if crushed/deformed can be directly sold with Command approval by Qualified Recycling Programs (QRP). Items or materials that are turned into DRMOs and eligible for QRP reimbursement will be processed and credited appropriately per the DOD Financial Management Regulation (FMR) 7000.14-R.

h. PLFAs may design environmental projects to address compliance issues. DLA HQ DES-E staff provides consultation and guidance to PLFAs on environmental projects, as needed or requested. DLA HQ DES-E staff reviews and provides feedback on PLFA annual budget requests. Once in agreement, DLA HQ DES-E validates the requests with the financial office to ensure that adequate funds are available to address environmental projects throughout the year. PLFAs are responsible for initiating, contracting, and implementing environmental projects.

i. PLFAs shall ensure contract provisions comply with the Federal Acquisition Regulation and applicable Federal, state, and local safety, environmental, and transportation regulations.

j. PLFAs shall prepare notifications to legal counsel and DLA HQ DES-E within 24 hours of all reportable spills/releases at PLFAs. This is in addition to any legally required notifications of regulators.

k. PLFAs shall respond to Notices of Violation (NOVs) or compliance issues identified as the result of environmental regulatory agency inspections. PLFAs shall notify their legal counsel and DLA HQ DES-E within 24 hours of notification of any written NOV, Notice of Non-Compliance, warning letter, warning notice, consent order, or similar written notification from environmental regulatory authorities. Copies of NOVs or similar notices shall be forwarded to DLA HQ DES-E 24 hours upon receipt. The PLFA shall take prompt action to correct deficiencies and close out NOVs. If the problem can not be corrected completely within 24 hours, a corrective action plan shall be forwarded to DLA HQ DES-E within 30 days of receipt of the notification of non-compliance. To close out the NOV or other official non-compliance notification, a letter shall be sent to the regulator. The letter must describe the corrective actions taken, and state that conditions have been abated and the issue is considered closed unless the regulator disagrees within 60 days. All correspondence to regulatory agencies shall be coordinated with legal counsel and DLA HQ DES-E. When notifying the regulator, correspondence should be sent via certified mail. A non-compliance notification is also considered closed when the regulatory agency revokes the non-compliance notice, agrees in writing that the PLFA has taken sufficient corrective action, or when a compliance agreement has been signed. DLA HQ DES-E shall track all open non-compliance notifications and ask for updated status reports quarterly. Notification to DLA HQ DES-E is due no later than close of business on the last working day of each month of each quarter. Closed non-compliance data shall be maintained by the FA and DLA HQ DES-E for at least 10 years.

l. PLFAs shall prepare responses to DLA HQ DES-E requests updates for environmental program progress data and success stories for input to the DOD Environmental Quality Report to Congress, and briefings to management. (See DLA Instruction, Environmental Quality Reporting.)

m. PLFAs that are hosts or those which have mission responsibilities subject to significant environmental regulatory concern shall provide a semi-annual in-progress review at HQ DLA to provide DLA HQ DES-E with an update on compliance with environmental laws, significant aspects of their environmental program, EPR data, and success stories. All means to economize costs shall be employed. The use of Video Teleconferences and Telephone Conference calls is encouraged if applicable.

Waste Disposal Spreadsheet - FY 12

		Solid Waste (lbs)	Hazardous Waste (lbs)	Universal Waste (lbs)		Used Oil (lbs)		Recycled Waste (lbs)
				Batteries	Fluorescent Bulbs	Oil	Filters	
HAMMOND								
October	units							
	cost							
November	units							
	cost							
December	units							
	cost							
January	units							
	cost							
February	units							
	cost							
March	units							
	cost							
April	units							
	cost							
May	units							
	cost							
June	units							
	cost							
July	units							
	cost							
August	units							
	cost							
September	units							
	cost							
Total	units	0	0	0	0	0	0	0
	cost	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00

Waste Disposal Spreadsheet - FY 12

		Solid Waste (lbs)	Hazardous Waste (lbs)	Universal Waste (lbs)		Used Oil (lbs)		Recycled Waste (lbs)
				Batteries	Fluorescent Bulbs	Oil	Filters	
SCOTIA								
October	units							
	cost							
November	units							
	cost							
December	units							
	cost							
January	units							
	cost							
February	units							
	cost							
March	units							
	cost							
April	units							
	cost							
May	units							
	cost							
June	units							
	cost							
July	units							
	cost							
August	units							
	cost							
September	units							
	cost							
Total	units	0	0	0	0	0	0	0
	cost	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00

Waste Disposal Spreadsheet - FY 12

		Solid Waste (lbs)	Hazardous Waste (lbs)	Universal Waste (lbs)		Used Oil (lbs)		Recycled Waste (lbs)
				Batteries	Fluorescent Bulbs	Oil	Filters	
WARREN								
October	units							
	cost							
November	units							
	cost							
December	units							
	cost							
January	units							
	cost							
February	units							
	cost							
March	units							
	cost							
April	units							
	cost							
May	units							
	cost							
June	units							
	cost							
July	units							
	cost							
August	units							
	cost							
September	units							
	cost							
Total	units	0	0	0	0	0	0	0
	cost	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00

Waste Disposal Spreadsheet - FY 12

		Solid Waste (lbs)	Hazardous Waste (lbs)	Universal Waste (lbs)		Used Oil (lbs)		Recycled Waste (lbs)
				Batteries	Fluorescent Bulbs	Oil	Filters	
TOTALS								
Hammond (Annual)	units	0	0	0	0	0	0	0
	cost	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
Scotia (Annual)	units	0	0	0	0	0	0	0
	cost	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
Warren (Annual)	units	0	0	0	0	0	0	0
	cost	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
Total (Annual)	units	0	0	0	0	0	0	0
	cost	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00