

CHAPTER 7: EQA TOOLS

This chapter covers the various tools and resources available to assist Navy activities in the implementation of the EQA Program:

- EQA Roll-out and Lessons Learned
- EQA Training
- Navy Environmental Protection Support Services (NEPSS)
- Automated Compliance Evaluation (ACE) Software

7.1 EQA Roll-Out and Lessons Learned

Many of the concepts and methods addressed in this Guide are new to Navy environmental personnel. Comments received on the draft Guide from early reviewers indicate support for the EQA program and interest in contributing to its development and implementation. As a result, CNO (N45) intends to play an active roll in involving EQA program participants in program improvement. CNO (N45) plans to collect lessons learned by Major Claimants and installations during program implementation and to subsequently incorporate those lessons into a revised EQA Guide or supplement to the Guide.

In order to introduce the new EQA Program and obtain effective feedback on the Guide from Major Claimants and installations, and to begin planning for EQA program implementation, CNO (N45) plans to conduct several one-day meetings throughout CONUS and in Hawaii after the EQA Guide is distributed.

Comments on the initial draft versions of the Guide suggested a model for EQA program implementation based on the formation of EQA Implementation Teams by Major Claimants. Each EQA Implementation Team, in the concept under development, would include personnel from several offices that have interests in the Major Claimants' EQA programs. Each Team would select one or more installations where Internal Assessment Plans would be developed and implemented. After a period of implementation, lessons learned would be shared among Teams and would be applied in internal assessment planning and implementation at all other installations. CNO (N45) will work with the Major Claimants to organize EQA Implementation Teams and to coordinate sharing of lessons learned. Lessons learned will be documented in a revised EQA Guide or supplement.

7.2 EQA Training Courses

7.2.1 *Environmental Compliance Assessment*

The Air Force Institute of Technology (AFIT) has developed the course, "Environmental Compliance Assessment, ENV-020." It is an Interservice Environmental Education Review Board (ISEERB) approved course. This means that the course has been reviewed by subject matter experts from the DOD Components and found to have a common content suitable for use by more than one Component. Navy personnel participated in a Technical Course Review in January 1999 and offered specific comments to AFIT, which is working to address our needs in a revised course to be offered beginning in Fiscal Year 2000. This course will be broadcast from Dayton, Ohio by satellite to reach DOD training classrooms CONUS and OCONUS.

U.S. Navy Environmental Quality Assessment Guide

The objective of this course is for each student to comprehend the objectives, principles, and mechanics of an environmental assessment. The course offers the student case studies and practical exercises to develop skills in planning a compliance assessment, interviewing, problem solving including root cause analysis, and writing good finding and recommended corrective action statements. At the end of the course, the student should have the knowledge to successfully plan and execute a comprehensive compliance assessment.

AFIT recently announced the course schedule for Fiscal Year 2000. The course dates are:

- 29 Nov–2 Dec 99
- 10–13 Apr 00
- 7–10 Aug 00

The Naval School, Civil Engineer Corps Officers (CECOS) is working to reserve satellite classrooms in Navy concentration areas. Information on these offerings will be available in the Navy Environmental Training Catalog and at the CECOS web page:

<http://www.cnet.navy.mil/cecos/cecos.htm>.

7.2.2 Conducting Environmental Management System Reviews

The CECOS is developing a new course, “Conducting Environmental Management Systems Reviews” and is working towards delivering the first offering in early Spring 2000. Information on the course schedule will be available in the Navy Environmental Training Catalog and at the CECOS web page: <http://www.cnet.navy.mil/cecos/cecos.htm>.

This course will train Navy civilian and military personnel representing shore installations, major claimants, and Naval Facilities Engineering Command Engineering Field Divisions/Activities to conduct EMS reviews at Navy shore installations. EMS Reviews are one aspect of the Environmental Quality Assessment (EQA) Program established in OPNAVINST 5090.1 (series) and described in this Guide.

In this course, students will learn to:

- Identify strengths and weaknesses of environmental management systems and programs;
- Identify underlying causal factors that may contribute to the occurrence of observed compliance deficiencies; and
- Evaluate each of the individual components of an EMS and provide feedback on the effectiveness of the system and identify opportunities for improvement.

The curriculum will cover:

- Planning and Preparing
- Gathering Information
- Analyzing Information Gathered- Problem Solving Techniques
- Documenting and Communicating Results

This course is intended for personnel from Navy shore installations, regional complexes, Major Claimants, Regional Environmental Coordinators offices, Naval Facilities Engineering

Command Engineering Field Divisions/Activities, and specialty officers who serve on Navy Environmental Quality Assessment internal and external assessment teams.

7.3 NEPSS Support

The Navy Environmental Protection Support Services (NEPSS) is a network of organizations established to provide environmental support to all the claimants and installations in the Navy. The NEPSS includes offices in various commands designated to provide environmental technical, legal, data management, and information exchange support to Navy organizations. The NEPSS organizations are NAVFACENGCOM Headquarters, the Engineering Field Divisions, NAVFACENGCOM Field Production Units, the Naval Facilities Engineering Service Center (NFESC), the Ordnance Environmental Support Office (OESO), the Aircraft Environmental Support Office (AESO), the Ships Environmental Support Office (SESO) and the Marine Environmental Support Office (MESO). NEPSS is centrally funded through NAVFACENGCOM. Because NEPSS is a limited resource, priorities may need to be negotiated to meet the requirements of the many different customers that NEPSS serves. NEPSS supports the claimants, installations, and Regional Environmental Coordinators as follows:

7.3.1 Technical/Legal Consultation

Upon request, provide Navy customers correct, timely, cost-effective responses to inquiries and requests for environmental engineering assistance. Research, as necessary, to fully understand the compliance problem and provide the assistance required to develop a workable solution. Communicate results in a timely manner via appropriate media. Perform appropriate reporting of results (phone, fax, email, letter, personal briefing, etc). Resources are available to respond to near term, quick answer situations and longer term project-oriented solutions. Longer-term project assistance is described in Section 7.3.2 below. Technical/Legal Consultation means:

1. Review activity operations, processes and procedures for conformance with environmental requirements, recommend appropriate solutions and course of action, and assist with project definition and development as needed.
2. Conduct site visits and meetings with activity, claimant, regional commander, and/or REC personnel to acquire technical information and discuss alternate ways of defining and solving compliance problems.
3. Provide legal assistance; review proposed and enacted laws, regulations, and policy; and provide an analysis of what needs to be done to comply.
4. Provide consultation or guidance to customers in the preparation of forms, permits, reports, etc.
5. Assist customers in working with regulatory agencies, including responding to and resolving Notices of Violation, Notices of Non-Compliance, and other enforcement actions.

7.3.2 Environmental Quality Project Assistance

Follow-up on Technical/Legal Consultation described above; longer-term project assistance may be needed. Environmental Quality Project Assistance means:

U.S. Navy Environmental Quality Assessment Guide

1. Support project preparation, develop the scope and government estimate, and assist the activity by providing technical information needed for budget and programming documentation. (Note: Project management and after statement of work contract administration effort are not covered by NEPSS).
2. Conduct acquisition planning and provide appropriate contracting vehicles to ensure ability and capacity to execute obligation of environmental projects. The goal of obligation of funding for properly planned project request(s) within 180 days of receipt from the Claimant or Regional Commander or by the end of second quarter of the fiscal year, whichever comes later.

7.3.3 Long Range Planning

NEPSS supports Claimant's development and implementation of comprehensive planning and budgeting process that ensures early analysis of compliance requirements and supports cost-effective long-range compliance strategies. Upon request, NEPSS resources provide support in predicting future compliance requirements, and in developing the documentation required for the programming and budgeting process. Specifically:

1. Maintain knowledge of new and proposed laws and regulations and their impact on compliance at Navy facilities.
2. Assess future requirements and identify solutions to address those requirements, including the cost of conventional or proven innovative technologies.
3. Coordinate the update and review of the Environmental Requirements Cookbook to maintain current guidance for activities in planning their environmental compliance program budgets.
4. As requested, participate in the evaluation of an activity's environmental program Baseline Assessment Memorandum (BAM), including but not limited to reviewing existing Environmental Program Requirements (EPR) exhibits and providing pertinent data for the EPR exhibit development.
5. As requested, evaluate activities' environmental quality program for pollution prevention opportunities. Provide research and technical assistance implementing pollution prevention opportunities.
6. Identify cost saving alternatives for environmental quality projects or requirements.

7.3.4 Environmental Quality Assessment (EQA) Program Assistance

NEPSS generally does not cover internal assessments. However, support regarding applicability and how to address specific environmental requirements, as well as how to correct environmental deficiencies, is available to activities as Environmental Consultation/Project Assistance described in 1) and 2) above. NEPSS support for the EQA Program is available to:

1. Provide support to claimants and activities in the use of the ACE software.
2. Provide instructors to support CECOS in providing Claimant, Regional Commander, REC, and activity personnel with training on the EQA Program, including internal and external assessment, root cause analysis, corrective actions, identification of process improvements and pollution prevention opportunities, EMS reviews, program management reviews, reporting, and available tools.

3. Assist Claimants, as requested, in conducting and preparing reports on external assessments that are primarily program management analysis and process reviews to identify and correct root causes and implement program improvements.
4. At CNO’s direction, prepare and update guidance documents and training materials for conducting internal and external assessments, including root cause analyses.

7.3.5 Technical/Regulatory Information Transfer

Disseminate technical and regulatory information to Navy customers and establish mechanisms and procedures that assist customers. For example:

1. Provide assistance in development and conduct of environmental training courses.
2. Advise customers on new or emerging technologies (including lessons learned).

7.3.6 Support to the REC

Support the Navy and DoD REC in meeting the environmental coordination requirements of OPNAVINST 5090.1B and DoD Instruction 4715.2.

7.4 Automated Compliance Evaluation Software

The Department of the Navy Automated Compliance Evaluation (ACE) software was developed by the U.S. Marine Corps to document their ECEs and to provide their installations a convenient automated process to submit required Plans of Action and Milestones (POA&Ms) to higher headquarters for review and comment. The U.S. Navy recently adopted ACE as the preferred software to document both internal and external assessments conducted under the EQA program.

ACE provides Federal, state, and regional compliance requirements, Navy policy requirements, requirements under the Final Governing Standards (FGS), and requirements of Status of Forces Agreements and the Overseas Environmental Baseline Guidance Document. Table 7-1 is a list of ACE state, regional, and overseas checklists available:

Table 7-1: State, Regional, and Overseas ACE Checklists as of August 1999			
<u>STATES, TERRITORIES</u>		<u>CA AIR DISTRICTS</u>	<u>FGSs</u>
Alabama	Missouri	CA Kern	Greece
Arizona	New Hampshire	CA Great Basin/Mono County	Iceland
California	New Jersey	CA South Coast/Orange County	Italy
Connecticut	Nevada	CA Mojave/San Bernadino County	Japan
District of Columbia	New York	CA San Diego	United Kingdom
Florida	North Carolina		
Georgia	Ohio		
Guam	Puerto Rico		
Hawaii	Rhode Island		
Illinois	South Carolina		
Indiana	Tennessee		
Louisiana	Texas		
Massachusetts	Virginia		
Maryland	Washington		
Maine	West Virginia		
Mississippi			

U.S. Navy Environmental Quality Assessment Guide

Table 7-2 is the list of ACE checklist program/media areas that are available:

Table 7-2: ACE Checklist Program/Media Areas	
Program/Media	Checklist Code
Air Pollution—General	AIR-GEN
Asbestos	AIR-ASB
Radon	AIR-RAD
Oil and Hazardous Substance Spill Contingency Plan	EPR-SCP
OPA 90 Facility Response Plan	EPR-FRP
RCRA Contingency Plan	EPR-RCP
EPCRA/SARA Title III/E.O. 12856	EPR-ESE
Air Risk Management Plan	EPR-ARM
Spill Prevention, Control and Countermeasures (SPCC) Plan	EPR-SPC
Historical Resources	CUL-HIS
Archeological Resources	CUL-ARC
Native American Graves Protection and Repatriation Act (NAGPRA)	CUL-NAG
Hazardous Materials Management	HZM-HMM
Hazardous Waste—General	HZW-GEN
Hazardous Waste Generator	HZW-HWG
Hazardous Waste TSDF	HZW-TSD
Hazardous Materials/Waste Transporter	HZW-TRA
Hazardous Waste Munitions	HZW-MUN
Installation Restoration CERCLA	INS-GEN
Natural Resources Management—General	NAT-GEN
Multi Land Use Management	NAT-MLU
NEPA	NEP-GEN
Noise Management	NOI-GEN
Pesticide Management	PES-GEN
Pollution Prevention—General	POL-GEN
E.O. 12856/EPCRA TRI Reporting	POL-EOP
Recycling	POL-REC
Used Oil Management	POL-OIL
Potable Water Treatment	POT-GEN
Solid Waste Management	SOL-GEN
Medical/Infectious Waste	SOL-INF
Underground Storage Tanks (USTs)	STO-UST
Aboveground Storage Tanks (ASTs)	STO-AST
PCB and Lead Paint Management/TSCA	PCB-GEN
Wastewater Management	WAT-GEN

7.4.1 ACE Features

The Evaluation module of ACE contains a series of user-friendly screens that allow activity personnel to answer checklist questions about selected environmental program areas (e.g., asbestos, hazardous waste, solid waste, etc.). Checklist questions can be answered “yes” to indicate compliance with the requirements described by the checklist question, “no” to indicate noncompliance, “not applicable,” or “not reviewed.” A comment field allows notes to be entered for each “yes,” “not applicable,” or “not reviewed” response.

When a question is answered “no,” a separate series of screens is used to identify the non-compliant command/tenant and to document site-specific deficiency information, recommended corrective actions, and root cause categories.

The POA&M module allows users to indicate the status of their implementation of a recommended corrective action and to document their problem solving efforts and corrective actions. This module also allows Major Claimants or other higher headquarters to review and comment on the installation’s POA&M entries.

ACE provides the options of either selecting individual questions or groups of applicable questions from detailed, ECE-type checklists for Federal, State, and Navy requirements or of entering installation-specific checklists into the program to be used during the assessment.

Other features of ACE include:

- Providing a brief statistical summary of the questions answered during an assessment;
- Performing trend analysis across multiple assessments to identify questions that have been assigned multiple deficiencies;
- Sorting and printing numerous output reports using multiple data fields as sort criteria; and
- Allowing the export and import of data to facilitate the consolidation of information generated by multiple staff using laptop computers during assessments.

7.4.2 ACE System Requirements

ACE Version 4.0 requires a Pentium computer running Windows 95, 98, or NT with approximately 25 MB of free hard disk space.

7.4.3 ACE Training and Support

CNO/N45 maintains contract support from Potomac-Hudson Engineering, Inc. (PHE), developers of ACE, to maintain ACE for Navy uses and to train Navy personnel in the use of ACE. PHE can provide initial and refresher training at Navy facilities in the use of ACE. Request training through CNO/N45, Crystal Plaza 5, 2211 South Clark Place Room 680, Arlington, VA 22202-3735 or mcvey.tami@hq.navy.mil.

PHE also maintains a help desk to support Navy users of ACE over the phone at (888) 834-7732 or via e-mail at ace@phe.com. PHE’s staff has extensive experience performing compliance assessments as well as developing software and is thus prepared to address the entire range of issues that may arise during the Navy’s use of ACE.

7.4.4 How to Obtain a Copy of ACE Software

Submit requests for the ACE software to ace@phe.com.

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