

1. Keywords
2. Start Date: FY 96
End Date: FY 96
3. HQ Division:
4. Phase:
5. Program NO: 37
6. Survey Type:
7. INSTALLATION OR SOURCE OF INFORMATION (CITY & STATE OR COUNTY ARE ESSENTIAL)
MC - US ARMY MEDICAL COMMAND
8. Authors:
9. ARLOC/Activity: 11933 001 - WALTER REED AMC
Location: WASHINGTON
State: DC
10. Project Control Number: 37-NE-4062-96
11. Title: ECAS WRAMC, 9 FEBRUARY 1996
12. DSA:



DEPARTMENT OF THE ARMY
U.S. ARMY CENTER FOR HEALTH PROMOTION AND PREVENTIVE MEDICINE
DIRECT SUPPORT ACTIVITY - NORTH
FORT GEORGE G. MEADE, MARYLAND 20755-5225



REPLY TO
ATTENTION OF:

MCHB-AN-EH (5f)


187 APR 1996

MEMORANDUM FOR Commander, Walter Reed Army Medical Center, ATTN: Planning and
Environmental Division, DPW, 6825, 16th Street N.W., Building 1,
Room F005-F008, Washington, DC 20307-5001

SUBJECT: Environmental Compliance Assessment System (ECAS), Environmental
Compliance Assessment Report No. 37-NE-4062-96, Walter Reed Army Medical Center,
Washington, DC, 22 January-9 February 1996

Five copies of the subject report are enclosed. The Executive Summary is provided as Chapter 1
of the report. The point of contact for this report is Mr. William Sproul, the team leader for the
assessment. He may be reached at DSN 923-6205 ext. 228, or commercial (301) 677-6205 ext.
228. Additional comments or concerns may be directed to the undersigned at DSN 923-7403.

Encl


ROBERT J. LANDRY
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U.S. Army Center for Health Promotion and Preventive Medicine



ENVIRONMENTAL COMPLIANCE ASSESSMENT REPORT

NO. 37-NE-4062-96

WALTER REED ARMY MEDICAL CENTER

WASHINGTON, DC

22 JANUARY - 9 FEBRUARY 1996

Distribution limited to U.S. Government agencies only; protection of privileged information evaluating another command; Mar 96. Requests for this document must be referred to Commander, Walter Reed Army Medical Center, Washington, DC 20307-5001

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U.S. ARMY CENTER FOR HEALTH PROMOTION AND PREVENTIVE MEDICINE

The U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM) lineage can be traced back over a half century to the Army Industrial Hygiene Laboratory which was established at the beginning of World War II under the direct jurisdiction of The Army Surgeon General. It was originally located at the Johns Hopkins School of Hygiene and Public Health with a staff of three and an annual budget not to exceed three thousand dollars. Its mission was to conduct occupational health surveys of Army-operated industrial plants, arsenals, and depots. These surveys were aimed at identifying and eliminating occupational health hazards within the Department of Defense's (DOD) industrial production base and proved to be extremely beneficial to the Nation's war effort.

Most recently, the organization has been nationally and internationally known as the U.S. Army Environmental Hygiene Agency (AEHA) and is located on the Edgewood area of Aberdeen Proving Ground, Maryland. Its mission had been expanded to support the worldwide preventive medicine programs of the Army, DOD and other Federal agencies through consultations, supportive services, investigations and training.

On 1 August 1994, the organization was officially redesignated the U.S. Army Center for Health Promotion and Preventive Medicine and is affectionately referred to as the CHPPM. As always, our mission focus is centered upon the Army Imperatives to that we are optimizing soldier effectiveness by minimizing health risk. The CHPPM's mission is to provide worldwide scientific expertise and services in the areas of:

- Clinical and field preventive medicine
- Environmental and occupational health
- Health promotion and wellness
- Epidemiology and disease surveillance
- Related laboratory services

The Center's quest has always been one of customer satisfaction, technical excellence and continuous quality improvement. Our vision is to be a world-class center of excellence for enhancing military readiness by integrating health promotion and preventive medicine into America's Army. To achieve that end, CHPPM holds everfast to its core values which are steeped in our rich heritage:

- Integrity is our foundation
- Excellence is our standard
- Customer satisfaction is our focus
- Our people are our most valuable resource
- Continuous quality improvement is our pathway

Once again, the organization stands on the threshold of even greater challenges and responsibilities. The CHPPM structure has been reengineered to include General Officer leadership in order to support the Army of the future. The professional disciplines represented at the Center have been expanded to include a wide array of medical, scientific, engineering, and administrative support personnel.

As the CHPPM moves into the next century, we are an organization fiercely proud of our history, yet equally excited about the future. The Center is destined to continue its development as a world-class organization with expanded preventive health care services provided to the Army, DOD, other Federal agencies, the Nation, and the world community.

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CHAPTER 1

EXECUTIVE SUMMARY

1.1 SUMMARY OF FINDINGS.

The Walter Reed Army Medical Center is out of compliance with numerous Federal, District of Columbia and State of Maryland regulations. Although the majority of Class I findings were identified in the area of wastewater management, most activities using hazardous materials are mismanaging the materials and the wastes that are generated from their use.

A total of 131 findings were identified during the assessment. The Summary of Findings (Table 1-1) presents the types and classes of the findings. The findings are divided into regulatory and management findings. Regulatory findings consist of Class I and II findings. Management findings consist of Positive, Class III, and Health and Safety findings. No findings with immediate danger to the environment were found. A glossary of acronyms used in this report is located in Appendix A.

1.2 INTRODUCTION.

The Environmental Compliance Assessment System (ECAS) Program supports the "Total Army (Active Army, Army Reserves, and Army National Guard). The ECAS Program is centrally funded by Headquarters, Department of the Army (HQDA) and centrally managed by the U.S. Army Environmental Center (AEC). The HQDA established the ECAS program as a tool for assisting Army installation commanders in achieving, maintaining, and monitoring environmental compliance.

The objectives of the ECAS at Walter Reed Army Medical Center (WRAMC) were: to provide a "snapshot in time" evaluation of WRAMC's environmental compliance status; identify specific deficiencies as well as systemic weaknesses of WRAMC's environmental program; and to suggest realistic corrective actions that would help WRAMC achieve, maintain, and monitor environmental compliance. This Environmental Compliance Assessment Report (ECAR) should be used as a tool to implement WRAMC's continued commitment to improving environmental programs and complying with environmental laws and regulations.

The WRAMC ECAS was performed by a matrixed team of personnel from the U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM), the U.S. Army Medical Command (MEDCOM), and Horne Engineering and Environmental Services, a

Table 1-1. Summary of Findings

	REGULATORY			MANAGEMENT			
COMPLIANCE AREA	I	II	H/S	POS	III	H/S	TOTAL
Air Emissions Management	7	0	1	0	2	0	10
Cultural Resources Management	2	0	0	0	2	0	4
Hazardous Materials Management	0	0	30	0	0	0	30
Hazardous Waste Management	6	0	0	0	0	0	6
Natural Resources Management	2	0	0	0	2	0	4
Environmental Impacts	0	0	0	0	3	0	3
Environmental Noise	0	0	0	0	0	0	0
Installation Restoration Program	0	0	0	0	0	0	0
Pollution Prevention	0	0	0	0	0	0	0
Environmental Program Management	0	0	0	0	3	0	3
Pesticide Management	3	0	0	0	14	0	17
Petroleum, Oils, and Lubricants Management (POL)	5	0	0	0	4	0	9
Solid Waste Management	0	0	0	0	7	0	7
Storage Tank Management	3	1	0	0	1	0	5
Polychlorinated Biphenyls (PCBs)	1	0	0	0	0	0	1
Asbestos	0	0	0	0	2	0	2
Radon	0	0	0	0	2	0	2
Lead-Based Paint	0	0	0	0	0	0	0
Wastewater Management	15	0	0	0	4	0	19
Water Quality Management	0	0	0	1	8	0	9
TOTAL	44	1	31	1	54	0	131

Table 1-1 (Continued). Summary of Findings

Key to Compliance Areas:

- I: Deficiency with existing regulation.
 - II: Deficiency with future regulation.
 - III: AR/DOD/Management Practice finding.
 - H/S: Health and Safety.
 - POS: Positive.
-

contractor. Draft Findings Review (DFR) meetings were held at WRAMC on 1 and 2 February 1996 and were attended by the Director, DPW; ECAS Team Leader; Master Planner; and/or Chief, Planning and Environmental Division.

1.3 FOLLOW-UP ACTIVITIES.

WRAMC and MEDCOM must complete the Installation Corrective Action Plan (ICAP), a tracking system and funding strategy for the corrective actions contained in this Environmental Compliance Assessment Report (ECAR). The purpose of the ICAP is to serve as a planning document for WRAMC and MEDCOM to use in funding and executing the chosen corrective actions. The ICAP is a matrix format that lists findings, corrective actions, schedules, and required resources for correcting the deficiencies.

CHAPTER 2

BACKGROUND AND SCOPE

2.1 ENVIRONMENTAL COMPLIANCE ASSESSMENTS: GENERAL

2.1.1 Objectives. The ECAS Program evolved from the Department of the Army's recognition that Army installations needed assistance in complying with the vast array of environmental legislation. The objective of the ECAS Program is to assist installation commanders in achieving, maintaining, and monitoring compliance with Federal, State, local, Department of Defense (DOD), and Army environmental regulations. The ECAS process provides a framework for the installation to identify and track compliance deficiencies. As a result, an installation's overall environmental program can be developed or improved. Of great benefit to the installation is the fact that the ECAS process not only identifies deficiencies, but also provides suggested corrective actions and targets resources to implement solutions.

2.1.2 Roles and Responsibilities. The AEC manages the ECAS Program by developing budgets and the ECAS work plan, overseeing ECAS software development, providing tracking and trend analysis, and providing ECAS training. Army assessment teams, such as USACHPPM, and environmental contractors perform the onsite external assessments and produce the ECARs. In the second phase of ECAS, which began in FY 95, Major Commands (MACOMs) have an increased role in the assessment and the ICAP process. The MACOM and the installation select the corrective actions, negotiate schedules, and co-sign the ICAP.

2.2 WALTER REED ARMY MEDICAL CENTER: BACKGROUND

2.2.1 Geographical Location. Walter Reed Army Medical Center is located in Northern Washington DC between Rock Creek Park and Georgia Avenue near the Maryland and District of Columbia boundary. The installation consists of three separate areas: the Main Post located in Washington DC where patient care is provided; Forest Glen Annex located in Montgomery County, Maryland where many support activities are located; and the Glen Haven Annex a housing area for military personnel located in Montgomery County, Maryland.

2.2.2 Mission.

a. The WRAMC provides medical/surgical care and treatment for members of all branches of the Armed Forces and their dependents. The WRAMC's mission has three facets; health care, education, and research. In addition to WRAMC, there are three tenant research facilities located on the installation. These are the Walter Reed Army Institute of Research

(WRAIR), the Armed Forces Institute of Pathology (AFIP), and the U.S. Army Institute of Dental Research (USAIDR).

b. The WRAMC maintains an industrial capability to support these missions. The Directorate of Public Work's allied trade shops perform repairs and minor construction to the physical plant. Additional activities include the DPW boiler plant which provides heat to the installation, the Directorate of Logistics vehicle maintenance shop, and other installation support activities.

2.3 THE ECAS TEAM

The assessment at WRAMC was performed by a matrixed team of personnel from the U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM), the U.S. Army Medical Command (MEDCOM), and Home Engineering and Environmental Services a contractor. A list of the team members, their educational backgrounds, and their areas of responsibilities during the assessment are presented in Table 2-1.

2.4 THE ECAS PROCESS AT WRAMC

2.4.1 General. The assessment team used the following protocols to develop findings during the assessment: The Environmental Assessment Management (TEAM) Guide (September 1995), the District of Columbia Supplement to the TEAM Guide (June 1995), the Maryland Supplement to the TEAM Guide (March 1995), and the Army Supplement to the TEAM Guide (May 1995). The January 1996, Version 1.5.1, ECAS software was used throughout the survey.

2.4.2 Scoping Visit. The ECAS Team Leader conducted a scoping visit at WRAMC on 11 December 1995. The visit included meeting with the Chief, Planning and Environmental Division to discuss the scope of the onsite assessment and a briefing to members of the WRAMC Environmental Overwatch Committee.

2.4.3 Entrance Briefing. On 16 January 1996 the ECAS Team Leader provided an entrance briefing including an introduction to the ECAS process to the WRAMC Commander and staff; Director of DPW; Commander, Installation Support Activity; Tenant Activity Commanders; Chief, Planning and Environmental Division; and additional support personnel.

2.4.4 Onsite Assessment.

a. During the 2-week onsite assessment phase (22 January - 2 February 1996) team members visited and inspected various activities, reviewed records, and interviewed personnel to determine the compliance status of WRAMC. During this time, findings were developed and entered into a database using the ECAS software. The Team Leader kept the Chief, Planning and Environmental Division updated as findings were developed. Some minor findings (labeling, improper storage, etc.) were corrected within the two week period.

Table 2 -1. Walter Reed Army Medical Center, ECAS Team Members

William Sproul	B.S. Civil Engineering	Team Leader
Wilbert Moultrie	B.S. Chemical Engineering	Air Emissions Management
Julianne Mueller (Horne Engineering)	B.S. History M.A. Architectural & Historical Preservation	Cultural Resources Management
1LT Anna Palenick	B.S. Nutritional Science	Hazardous Materials Management Asbestos, Radon, Lead-Based Paint
Todd DeFelice	B.S. Biology	Hazardous Waste Management Pollution Prevention, RMW
Jennifer Lindado	B.S. Biology	Hazardous Waste Management Pollution Prevention, PCBs
Dawn Porto (Horne Engineering)	B.A. Biology	Natural Resources Management National Environmental Policy Act
Linda Baetz	B.S. Chemistry	Environmental Program Management
Alfred Lynn Hoch	B.S. Biological Science M.S. & P.H.D. Medical Entomology	Pesticide Management
Kristina Hutchison	B.S. Entomology & Applied Ecology	Pesticide Management
CPT John McConnell	B.S. Horticulture	Pesticide Management
David C. Bayha	A.B. Geology M.S. Geology	Solid Waste Management Storage Tank Management POL Management
John E. Kolivosky	B.S. Chemical Engineering	Storage Tank Management POL Management Wastewater Management
William J. Bojarski	B.S. Chemistry	Potable Water Quality Management
Towanda S. Cooper	B.S. Business Administration	Administrative Support

b. The ECAS team members met daily to exchange information, identify any problems encountered, plan the schedule for the following day, and prepare finding sheets. The Team Leader and administrative assistant performed quality control on all findings submitted by team members. Finding sheets were reviewed by the MEDCOM representative onsite where practical. Each team member briefed personnel in the Environmental staff on the specific findings in their area of responsibility prior to leaving WRAMC.

2.4.5 Draft Findings Review. Draft Findings Reviews (DFR) were held on 1 and 2 February. The DFRs were attended by the ECAS Team Leader; WRAMC Master Planner; Director, DPW; and/or the Chief, Planning and Environmental Division. Draft findings were discussed and a consensus was reached on each of the findings.

2.4.6 Exit Briefing. An exit briefing with the WRAMC Commander was held on 9 February 1996. The briefing was also attended by the Commander's staff; Director, DPW; Commander, Installation Support Activity; Chief, Preventive Medicine Service; Tenant Activity Commanders; Chief, Planning and Environmental Division, and additional support personnel. The Team Leader presented a summary of the findings, discussed results of previous audits, discussed root causes to non-compliance, and provided options to solve problems with the Environmental Program.

2.4.7 Draft Report. The Draft Report, including any substantial changes made during the DFR, was provided to WRAMC for review and comment on 9 February. Additional copies of the Draft Report were forwarded to MEDCOM and USAEC.

2.4.8 Draft Report Review and Comment Period. Personnel in the WRAMC, Planning and Environmental Division consolidated comments on the draft report from personnel at WRAMC and forwarded them within the 4-week comment period. All comments received were reviewed by the Team Leader and incorporated into the Environmental Compliance Assessment Report (ECAR).

2.4.9 Installation Corrective Action Plan. The Installation Corrective Action Plan (ICAP) framework is provided (on disk and in hard copy) as Appendix B. The ICAP is a planning document that is used as a funding identifier and tracking system for the corrective actions specified in the ECAR. It can be developed in a database management software such as DbaseIII, or IV, Foxpro, Quattro Pro, Paradox, etc. The ECAS software is capable of transferring the findings database into a generic data file that can be used by WRAMC. The MEDCOM may periodically request WRAMC to submit a report on the status of the ICAP.

2.5 SAMPLING STRATEGY AND SITES VISITED

2.5.1 Sampling Strategy.

a. Because there are a relatively small number of activities on WRAMC, the ECAS team was able to visit most of them during the site assessment. At large activities i.e.,

MEDCEN, WRAIR and AFIP only a portion of the Departments/labs were visited. The actual number and type of sites visited was based on information made available through interviews with Industrial Hygiene Technicians or Safety Officers at each of these activities, personnel in the Planning and Environmental Division, previous experience, information obtained from the 1993 ECAS, and/or other written documentation.

b. Work in the Environmental Noise Pollution area was not included as a portion of this site assessment. The decision to not perform work in this area was made based on the fact that there are no significant sources of noise pollution at WRAMC.

2.5.2 Specific Sites Evaluated. A table listing all facilities evaluated and the findings identified at each site is located in Appendix C. The table is organized by facility and includes: Facility No., which is the building no. where the finding was identified, except that in some cases the finding is coded with the term INST, which means the finding applies to the installation, or MULT which means the finding was identified in multiple locations; Location, identifies the string from directorate level down to the office name; Question No., identifies the specific question in the TEAM-Guide; Class is the type of finding based on regulatory criteria (see Chapter 3, page 3-1); Finding ID is the finding number given to that finding; and the Page No. is the page in this report where the finding is located. Activities audited where no finding was identified are located at the end of the table.

2.6 REFERENCES USED FOR COST ESTIMATES.

Lab Safety Supply, general safety Catalog, September 1994.

Pig Catalog, New Pig Corporation, 1994.

Estimating Costs of Air Pollution Control Systems, Vatauvuk, William M., and Robert Neveril, Chemical Engineering, October 10, 1980.

Cost Estimating for Major Process Equipment, Arkadie Pikulik and Hector Diaz, Chemical Engineering, October 10 1977.

OAQPS Control Cost Manual, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, North Carolina, EPA 450/3-90-006.

Means Facilities Construction Cost Data 1994, 9th Annual Edition, R.S. Means Company, Inc. Kingston, Massachusetts.

The Cost Digest: Cost Summaries of selected Environmental Control Technologies, EPA 600/8-84-010, U.S. Environmental Protection Agency, October 1984.

Environmental Health and Safety Monitoring, 1995/96 Catalog, Mitchell Instrument Co., San Marcos, California.

CHAPTER 3

ECAS FINDINGS AND CORRECTIVE ACTIONS

This chapter contains the findings developed by the ECAS team during the onsite assessment. The corrective actions listed are those agreed to during the comment period that followed the onsite assessment and DFR. Findings are listed in order by manual section number (or media) and are listed according to Class (or Category). The definitions of Classes are as follows:

Class I: Indicates current noncompliance with a Federal, State, or local environmental regulation, permit, compliance agreement, consent order, or Notice of Violation (NOV).

Class II: Indicates future noncompliance with a Federal, State, or local environmental regulation, permit, compliance agreement, or consent order. Usually used in the context of complying with a future regulatory deadline or meeting annual requirements such as testing or training.

Class III: Indicates either noncompliance with Army regulations or DOD Directives, or a recommended good management practice in the absence of specific Federal, State, or local regulatory requirements.

Health/Safety: Regulatory criteria cited was an Occupational Safety and Health Act (OSHA) regulation, a National Fire Protection Act (NFPA) requirement, a Department of Transportation (DOT) regulation, or a State of Maryland, Department of the Environment (COMAR), Health regulation. These findings are not generally eligible for environmental funding under the 1383 process.

Positive: Indicates that the installation has surpassed the regulatory requirements or that the installation is proactive in meeting requirements or improving environmental programs.

AIR EMISSIONS MANAGEMENT.

The WRAMC has an overall knowledge of the requirements of the Clean Air Act including recycling/recovery of chlorofluorocarbons with the exception of the use of some equipment not certified by EPA. The WRAMC is in the process of securing a contractor to perform the Title V Operating Permit requirements for the Main Post and Forest Glen Annex.

Some Federal, State, and Army air requirements have been overlooked in the past including: operating permits for the four boilers at the Main Post Boiler Plant; registration of air pollution sources with the Maryland Department of the Environment; updating the air emissions inventory; complying with the Maryland Vehicle Emissions and Inspection Program; and Federal requirements for labeling gasoline fuel pumps.

Personnel have developed a good working relationship with counterparts in the State and local air pollution control agencies for issues concerning noncompliance. Additionally, the WRAMC's overall management of the program to institute requirements of the Emergency Planning and Community Right-to-Know Act is being performed successfully.

A.90.2 #1 I FEDERAL CORRECTIVE ACTION Air Emissions
FINDING ID: A-WBM-01
MANUAL QUESTION NUMBER: A-090-002
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, WRAIR, HVAC SHOP
IFS FACILITY NUMBER: 00040
FACILITY TYPE: R&D LABS & TEST FACILITIES
TENANT NAME: WRAIR

FINDING DESCRIPTION: The refrigerant recovery unit used by personnel at the Heating Ventilation and Air Conditioning (HVAC) Shop is not approved for refrigerant recycling by EPA.

CRITERIA: Recycling and recovery equipment for use in the maintenance, service, or repair of appliances, except MVACs and MVAC-like appliances, or during the disposal of appliances except small appliances, MVACs, and MVAC-like appliances is required to be certified by an approved equipment testing organization (40 CFR 82.158(a)). If the recycling and recovery equipment does not have the certification by an approved equipment testing organization, the unit should prove that it is capable of meeting the standards outlined in 40 CFR 82.158(b) and (d).

FINDING COMMENTS: Although the manufacturer (Carrier) of the refrigerant recovery unit is identified as a company that produces approved refrigerant recovery units (see section 609 of the Clean Air Act Amendments of 1990), the model of the unit in the HVAC Shop is not listed. Additionally, this particular model does not have the recommended testing results or certifications by an approved equipment testing organization e.g., Underwriters Laboratories (UL); Air-conditioning and Refrigeration Institute (ARI), ETL Testing Laboratories, Inc. Lists of certified equipment may be obtained by contacting ARI at 703-524-8800 and UL at 708-272-8800 ext 42371.

STATUS OF CORRECTION:

CORRECTIVE ACTION: This equipment must be tested and meet the requirements outlined in 40 CFR 82.158(b) or (d), or new equipment must be purchased. The requirements include 1) determining the level of evacuation which must be achieved by recovery or recycling equipment intended for use with appliances or 2) determining if the equipment can meet the standards outlined by an EPA-approved organization as they pertain to the equipment's compressor usage and achieving a vacuum. Estimated cost of meeting requirements: Coordinate with an approved testing facility.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 3500

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

A.55.2 #1 I FEDERAL CORRECTIVE ACTION Air Emissions

FINDING ID: A-WBM-02

MANUAL QUESTION NUMBER: A-055-002

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: FOREST GLEN, MULT

IFS FACILITY NUMBER: MULT

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: The gasoline fuel pumps are not labeled with the word "UNLEADED".

CRITERIA: Fuel pumps are required to display specific signs (40 CFR 80.22(d) and 80.22(e)).

FINDING COMMENTS: This finding was identified at the DOL, Motor pool, Building 605; and the DPW, maintenance area, Buildings 602 and 603. The fuel pumps have all the other required labels described in 40 CFR 80.22. Moving the existing labels to a more visible position and placing signs stating "NO SMOKING" at different areas around the fuel pumping areas are a good management practice.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Add the word "UNLEADED" to the gasoline fuel pumps. Raise all of the existing placards on the side of the pumps up higher to a more visible area on the pump.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 200

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

Air Emissions

FINDING ID: A-WBM-03

MANUAL QUESTION NUMBER: A-003-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, BOILER PLANT

IFS FACILITY NUMBER: 00015

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The four boilers at the Main Post Boiler Plant have not been permitted; and there is little documentation from the D.C. Air Resources Management Division (ARMD) stating that the current status is acceptable.

CRITERIA: Installations/CW facilities are required to comply with state and local air quality regulations (CAAA90, 42 USC 7418(a))[February 1995]. Under the District of Columbia Municipal Regulations, Title 20, Sections 200.1 and 200.2, the installation is required to obtain an operating permit for any stationary source of fuel burning equipment, that uses only gaseous fuels or distillate oils, with a capacity greater than 5 million BTU.

FINDING COMMENTS: Some action has been taken to provide the ARMD information about the boilers and the continuous emissions monitoring (CEM) equipment. The CEM results for all boilers are submitted to the ARMD on a quarterly basis and the ARMD has determined that boilers # 1 and 2 are in compliance. All of the required information has never been submitted to obtain the operating permit. The WRAMC has not been issued a NOV for their boilers being unpermitted. The ARMD and WRAMC have had numerous telephone conversations and face-to-face meetings to discuss the progress of permitting the boilers and have come to a general understanding that boilers # 3 and 4 will be in compliance after boiler # 3 is operational and the CEM certification is completed.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Identify and provide all permit requirements including: applications, fees, monitoring results, the agreed upon repairs to Boiler No. 3, etc., to the D.C. ARMD. Include tests results required to certify the continuous emissions monitoring (CEM) based on D.C. standards. If necessary, retain a contractor to augment the DPW, Planning and Environmental (P&E) Division with the CEM certification tests, permit assistance and opacity monitoring requirements.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

A.90.2 #2 I FEDERAL CORRECTIVE ACTION Air Emissions
FINDING ID: A-WBM-04
MANUAL QUESTION NUMBER: A-090-002
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW, HVAC SHOP
IFS FACILITY NUMBER: 00001
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Two of the refrigerant recovery units at the DPW Heating and Ventilation and Air Conditioning (HVAC) Shop are not approved for refrigerant recycling by EPA.

CRITERIA: Recycling and recovery equipment for use in the maintenance, service, or repair of appliances, except MVACs and MVAC-like appliances, or during the disposal of appliances except small appliances, MVACs, and MVAC-like appliances are required to be certified by an approved equipment testing organization (40 CFR 82.158(a)). If the recycling and recovery equipment does not have the certification by an approved equipment testing organization, the unit should prove that it is capable of meeting the standards outlined in 40 CFR 82.158(b) and (d).

FINDING COMMENTS: Two of the four refrigerant recycle units used by this shop are approved by EPA. Of the two unapproved units, the HVAC shop personnel are aware that one of the units is not approved for refrigerant recycling and no longer use it. The other non-approved unit is also not used at this time because the shop does not have the operating instructions. Additionally, neither unit has the recommended testing results or certifications by an approved equipment testing organization e.g., Underwriters Laboratories (UL), Air-conditioning and Refrigerant Institute (ARI), or ETL Testing Laboratories, Inc. Lists of certified equipment may be obtained by contacting ARI at 703-524-8800 and UL at 708-272-8800 ext 42371.

STATUS OF CORRECTION:

CORRECTIVE ACTION: This equipment must be tested and meet the requirements outlined in 40 CFR 82.158(b) or (d), or new equipment must be purchased. The requirements include 1) determining the level of evacuation which must be achieved by recovery or recycling equipment intended for use with appliances or 2) determining if the equipment can meet the standards outlined by an EPA-approved organization as they pertain to the equipment's compressor usage and achieving a vacuum. Estimated cost of meeting the requirements: Coordinate with an approved testing facility.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 3500

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

A.3.1 #2 I FEDERAL CORRECTIVE ACTION Air Emissions
FINDING ID: A-WBM-05
MANUAL QUESTION NUMBER: A-003-001
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW, P&E DIVISION
IFS FACILITY NUMBER: 00001
FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: WRAMC military personnel with privately owned vehicles registered out-of-state are not complying with Washington, D.C./Maryland vehicle inspection and emissions testing requirements.

CRITERIA: Installations/CW facilities are required to comply with state and local air quality regulations (CAAA90, 42 USC 7418(a))[February 1995]. Under 42 USC 7418(c) and (d), each installation is required to comply with valid vehicle inspection and maintenance programs, except for vehicles that are considered military tactical vehicles. All employees operating vehicles on property over which the Federal Government has jurisdiction are required to furnish proof of compliance with applicable requirements of any valid vehicle inspection and maintenance programs.

FINDING COMMENTS: Reference: MEMORANDUM FOR Chairman, Environmental Oversight Committee, 19 January 1996. The referenced memorandum states that the Maryland VEIP will provide unscheduled inspections for soldiers with out-of-state tags. In addition, WRAMC has revised its policy to require all registered vehicles on the installation to show proof of successfully passing VEIP testing.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Formalize a written agreement with the State of Maryland Vehicle Emissions Inspection Program (VEIP) through further coordination with Mr. Bruce Diehl, Director, VEIP. The Maryland VEIP could assist by identifying "one" VEIP test center closest to WRAMC that all personnel would be required to use. Using one test center would eliminate further coordination efforts with other centers.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

A.90.1 #1 I FEDERAL CORRECTIVE ACTION Air Emissions

FINDING ID: A-WBM-06

MANUAL QUESTION NUMBER: A-090-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPCA, AUTOCRAFT SHOP

IFS FACILITY NUMBER: 00082

FACILITY TYPE: HOUSING & COMMUNITY FACILITIES

FINDING DESCRIPTION: Personnel who are not EPA-certified to operate equipment related to recharging air conditioning systems have access to and use the equipment on their personal vehicles.

CRITERIA: To protect the ozone, no person repairing or servicing motor vehicles for payment can service a MVAC in any way that affects the refrigerant unless they have been trained and certified and are using approved equipment (40 CFR 82.34(a), 82.42(a), (b)(1), (b)(2), and (b)(4)).

FINDING COMMENTS: The foreman of the Autocraft Shop is the only person certified to recharge air conditioning (A/C) systems at the facility. No other shop employees have the required EPA-certified training required to recharge A/C systems.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Do not allow military, civilian or WRAMC contract personnel to service air conditioning units on their POVs at the Autocraft Shop unless the patron can verify that they are certified by the EPA. Have the Autocraft Shop foreman maintain the equipment in a restricted area and limit equipment access to only those partons who are certified by the EPA.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

A.5.20.MD #1 I STATE CORRECTIVE ACTION Air Emissions
FINDING ID: A-WBM-07
MANUAL QUESTION NUMBER: A-005-020-MD
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DPW, P&E DIVISION
IFS FACILITY NUMBER: MULT
FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: Numerous sources of air pollution at the Forest Glen Annex have not been registered with Maryland Department of the Environment.

CRITERIA: Existing sources of air pollution must be registered with the Department (COMAR 26.11.02.02).

FINDING COMMENTS: This finding was identified at the following locations: DPCA, Building 163, cyclone collector used to control the emissions of particulate (sawdust); DPW, Building 601, cyclone collector used to control the emissions of particulate (sawdust); WRAIR, Building 511, two generators used to provide emergency power to WRAIR facilities in Buildings 511 and 512; WRAIR, Building 511, boiler used at the WRAIR facility.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Obtain all the applications required or information necessary to register the air pollution sources with the Maryland Department of the Environment.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 1800

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

A.1.3.A #1 III ARMY/DOD CORRECTIVE ACTION Air Emissions

FINDING ID: A-WBM-08

MANUAL QUESTION NUMBER: A-001-003-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, P&E DIVISION

IFS FACILITY NUMBER: MULT

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The air emissions inventory (EI) is not up-to-date.

CRITERIA: Installation environmental staff responsible for addressing air pollution sources at each installation are required to conduct and maintain an up-to-date emissions inventory listing all stationary sources of air pollution and inspect stationary air pollution sources periodically to assess compliance with applicable standards (AR 40-5, para 11-4b and 200-1, para 1-25c(1)).

FINDING COMMENTS: The most recent inventory, performed under contract, was published in September 1994 using data collected in calendar year 1992. Some of the information in this report is incorrect (e.g., location and size of boilers and generators). Some air pollution sources have been decommissioned since 1992 e.g., woodworking and incinerator operations at WRAIR, Building 40; AAFES gasoline fuel dispensing, Building 164; and incinerator operations at AFIP, Building 54. Air pollution sources have also been added since 1992 e.g., DOL diesel and gasoline dispensing operations, Building 605. Personnel in the Planning and Environmental (P&E) Division are aware of the situation and are in the process of retaining a contractor to update the 1994 EI and complete the Title V applications for both Main Post and Forest Glen.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Update the EI as changes take place and at a minimum perform an annual review and maintain compliance with Title V of the Clean Air Act Amendments of 1990.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 5000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

A.1.2.A #1 III ARMY/DOD CORRECTIVE ACTION Air Emissions
FINDING ID: A-WBM-09
MANUAL QUESTION NUMBER: A-001-002-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW, P&E DIVISION
IFS FACILITY NUMBER: 00001
FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: Very little documentation of verbal agreements, concerning compliance issues relating to air pollution, established between the DPW, Planning and Environmental (P&E) Division and the State of Maryland Department of Environment (MDE) and the D.C. Air Resources Management Division (ARMD) is available.

CRITERIA: Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).

FINDING COMMENTS: The WRAMC environmental office has copies of letters sent to ARMD concerning boilers at the Boiler Plant, Building 15. However, the ARMD has made little to no written correspondence with the WRAMC environmental office concerning this issue.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Generate memoranda for record (MFRs), conversation records or letters of agreement with the MDE and ARMD for all verbal agreements that have been established. Obtain documentation from MD and/or DC to support the agreements established for: operation of boilers at the Boiler Plant, Building 15; the unregistered air pollution sources at Forest Glen; the Maryland Vehicle Emissions Inspection Program; and any other environmental non-compliance issue.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

A.5.17.MD #1 HS STATE CORRECTIVE ACTION **Air Emissions**
FINDING ID: A-WBM-10
MANUAL QUESTION NUMBER: A-005-017-MD
FINDING CATEGORY: HEALTH/SAFETY
FINDING TYPE: Negative **EXISTING NOV: NO**
LOCATION: FOREST GLEN, WRAIR
IFS FACILITY NUMBER: MULT
FACILITY TYPE: R&D LABS & TEST FACILITIES
TENANT NAME: WRAIR

FINDING DESCRIPTION: Construction related activities e.g., movement of heavy equipment, paving operations, and wind action on exposed soils are generating fugitive dust, particulates, and volatile emissions.

CRITERIA: Installations/CW facilities must meet specific requirements for particulate matter emissions from materials handling and construction activities (COMAR 26.11.03.D).

FINDING COMMENTS: At the time of this survey, there was no construction taking place at location for the WRAIR laboratory, however some activities at the WRAIR parking facility were generating fugitive dust.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Cover soil piles with tarps and spray water on soil and new asphalt to control particulate and volatile emissions.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

CULTURAL RESOURCES MANAGEMENT.

Although the installation Cultural Resources Manager is expending a great deal of time and effort on Section 106 compliance related issues, the Main Post of WRAMC is not in compliance with basic, Federal and Army historic preservation regulations. There is no Historic Preservation Plan (HPP, also known as a Cultural Resources Management Plan) and, consequently, no Programmatic Agreement (PA) governing routine maintenance procedures. Army regulations require the development of a HPP which is necessary to identify the stipulations to be negotiated in the PA. By having a signed PA, the Cultural Resources Manager's time would be greatly freed up, allowing him to concentrate on larger, rather than routine, historic preservation issues. For instance, an identified historic district on Main Post has not been nominated to the National Register, as required by federal law, because the Cultural Resources Manager has not had enough time to prepare the application. Furthermore, a PA could reduce the amount of communication between the Cultural Resources Manager and the DPW offices responsible for the upkeep of historic structures and with state and Federal historic preservation review agencies. To the Cultural Resource Manager's credit, he has been very diligent in trying to keep track of all actions which could affect historic buildings, and in meeting the heavy load of Section 106 requirements which could be alleviated with the signing of a PA.

C.5.2 #1 I FEDERAL CORRECTIVE ACTION Cultural Resources

FINDING ID: CR-JAM-01

MANUAL QUESTION NUMBER: C-005-002

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, P&E DIVISION

IFS FACILITY NUMBER: 00001

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: Walter Reed Army Medical Center is violating Section 106 of the National Historic Preservation Act by not always initiating and completing Section 106 for projects effecting historic properties e.g. renovations to the lobby, and the water fountain in front of Building 1.

CRITERIA: Prior to the start of a new undertaking, installations/CW facilities are required to take into account the effects of the undertaking on property included in or eligible for the National Register of Historic Places (36 CFR 800.1)(May 1995).

FINDING COMMENTS: Programmatic Agreements (PA) expedite work orders and significantly reduce the amount of paperwork and time expended by the installation's Master Planner (Cultural Resources Manager), as well as by state and Federal historic preservation review agencies. A PA would free up time to do other cultural resources work without compromising the historic integrity of the significant structures at the Main Post.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Master Planner (Cultural Resources Manager) must negotiate a Programmatic Agreement (PA) among the Army, the D.C. State Historic Preservation Office (SHPO), and the Advisory Council on Historic Preservation. Such an agreement would include a description of the routine maintenance procedures which would no longer require Section 106 review because the procedures would be agreed to by all involved agencies.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 10000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Personnel at AEC recommend identifying specific project that "did not receive" Section 106 consideration (see finding description section above).

C.5.1 #1 I FEDERAL CORRECTIVE ACTION Cultural Resources

FINDING ID: CR-JAM-02

MANUAL QUESTION NUMBER: C-005-001

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, P&E DIVISION

IFS FACILITY NUMBER: 00001

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: The Walter Reed Army Medical Center has not submitted a National Register nomination for the historic district on Main Post.

CRITERIA: All Federal agencies are required to establish a program to locate, inventory, and nominate all properties under the agency's ownership or control that appear to qualify for inclusion on the National Register of Historic Places (Executive Order 11593).

FINDING COMMENTS: A National Register nomination is currently being prepared by the installation's Master Planner (Cultural Resources Manager). It is expected to be ready for DA review by the end of June 1996. Once the DA has approved the text, it will be submitted to the D.C. State Historic Preservation Office (SHPO) for their review.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Write and submit a National Register nomination to the D.C. State Historic Preservation Office for review.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 5000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Personnel at AEC concur and cite EO 11593 as the basis for the finding.

C.5.1.A #1 III ARMY/DOD CORRECTIVE ACTION Cultural Resources

FINDING ID: CR-JAM-03

MANUAL QUESTION NUMBER: C-005-001-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, P&E DIVISION

IFS FACILITY NUMBER: 00001

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: There is no Historic Preservation Plan (HPP) to assist the Directorate of Public Works in its management of historic standing structures on Main Post.

CRITERIA: Installations with historic properties are required to prepare and implement a Historic Preservation Plan (Cultural Resources Management Plan) to guide their management (AR 420-40).

FINDING COMMENTS: Completion of the HPP will alleviate the current work load on the installation's Master Planner (Cultural Resources Manager) and will provide necessary information to the various offices which are involved in the maintenance of historic structures. The Cultural Resources Manager and the Chief, P&E Division are aware of the need to complete a HPP and will take action.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Complete an HPP as soon as possible to expedite the many Section 106 issues which arise at Walter Reed. To be effective, the HPP must include a separate, "pull-out" section that contains specific guidelines for the maintenance and stabilization of historic buildings. This section must be distributed to all relevant offices to ensure compliance with Section 106 and any programmatic agreements between the installation and the D.C. State Historic Preservation Office.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 25000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Personnel with AEC recommend referring to this plan as a "Historic Preservation Plan" because this is the Army's approved language.

C.1.2.A #1 III ARMY/DOD CORRECTIVE ACTION Cultural Resources
FINDING ID: CR-JAM-04
MANUAL QUESTION NUMBER: C-001-002-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW
IFS FACILITY NUMBER: 00001
FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: There are breakdowns in communication between offices within the Directorate of Public Works (DPW) which allow work orders involving historic structures to be undertaken without proper review by the Chief, Planning and Environmental (P&E) Division and/or the installation's Master Planner (Cultural Resources Manager) to see if those work orders require Section 106 Review.

CRITERIA: Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).

FINDING COMMENTS: Most staff members of DPW who are involved with the maintenance of historic structures have received some cultural resources training. However, it is apparent that some refresher courses may be useful to broaden the understanding of the federal laws and Army regulations and the need for in-house coordination.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Chief, Work Order Coordination Branch must ensure that all work orders for historic structures are reviewed by the installation's Master Planner (Cultural Resources Manager) until the Historic Preservation Plan and Programmatic Agreement (PA) are in place and the routine maintenance procedures agreed to in the PA are, in fact, being completed as agreed upon. After that all work orders which do not fall under the PA should continue to be reviewed by the Cultural Resources Manager to ensure compliance with Section 106.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HAZARDOUS MATERIALS MANAGEMENT.

The Installation Safety Office (ISO) has oversight for the installation's Hazard Communication (HAZCOM) Program. The ISO has a written HAZCOM program in place and conducts initial HAZCOM training at the Newcomer's Orientation and at periodic intervals. However, several activities did not have a written HAZCOM program and several personnel have not received this training. There were several findings including: improper labeling of containers, no MSDSs, incorrect storage of flammable liquids, incompatible storage of chemicals, poor housekeeping, inadequate emergency eyewash devices, and unsecured compressed gas cylinders. The hazardous material management program is inadequate and warrants assistance from Industrial Hygiene Technicians and Preventive Medicine Service personnel.

HM.2.1 #3 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-01

MANUAL QUESTION NUMBER: HM-002-001

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INST WIDE

IFS FACILITY NUMBER: MULT

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Several facilities/shops lack required permanent eyewash/shower devices, some existing units are blocked or not functioning, and are not tested weekly.

CRITERIA: The installation must provide within the work area suitable facilities for quick drenching or flushing of eyes and body for immediate emergency use where persons may be exposed to injurious corrosive materials. Emergency eyewash/shower devices should be accessible (not more than 10 seconds to reach or 100 feet travel distance) and serviceable at all times. To keep the lines free from stagnant water and bacteria, the devices should be activated weekly for at least three minutes. [29 CFR 1910.151(c) & ANSI Z358.1-1990].

FINDING COMMENTS: Unapproved eyewash devices, such as bottles or portable wall mounted units, were found in: Photo Branch, Building 1; DOL Motor pool, Building 605; Sheetmetal/Welding Shop, Building 601; WRAMC Department of Radiology, Material Distribution Branch, and Morgue, Building 2; and DPALS, Pathology Supply, Building T2. There were no eyewash devices in the DPW HVAC Shop, Building 1; and in the Boiler Plant, Building 15, near a tank containing caustic materials. The eyewash in the area of the Boiler Plant's sulfuric acid outdoor storage tank was inoperable and was not clearly identified with signs. The eyewash devices were blocked in the following areas: DOL Motor pool, Building 605; and the DPW Maintenance Garage, Building 602.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Facility supervisors/department chiefs must submit the required paperwork to install or replace unapproved eyewash/shower devices with ANSI Z358.1-1990 approved devices in the vicinity of corrosive chemical use. The eyewash device must be accessible at all times. Post a sign that indicates the location of the eyewash in the immediate area of the device. Flush the eyewash device weekly to ensure proper operation and document.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 8000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.2.1 #1 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-02

MANUAL QUESTION NUMBER: HM-002-001

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INST WIDE

IFS FACILITY NUMBER: MULT

FACILITY TYPE: SUPPLY & STORAGE FACILITIES, LOGISTICS

FINDING DESCRIPTION: Emergency eyewash and shower devices are not tested each week.

CRITERIA: The installation must provide within the work area suitable facilities for quick drenching or flushing of eyes and body for immediate emergency use where persons may be exposed to injurious corrosive materials. Emergency eyewash/shower devices should be accessible and serviceable at all times. To keep the lines free from stagnant water and bacteria, the devices should be activated weekly for at least three minutes and the tests documented. [29 CFR 1910.151(c) & ANSI Z358.1-1990].

FINDING COMMENTS: This finding was identified at the following locations: Hazardous Waste Storage Facility, Building 54; Boiler Plants, Buildings 15 and 120; DOL Warehouse, Building 178; and the Department of Hematology/Oncology and Central Material Supply of WRAMC.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The facility manager/department chief is required to test emergency eyewash and shower devices weekly and document these tests. Allow the water to run for at least three minutes to remove stagnant water and bacteria from the water lines and to ensure proper operation.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.45.1 #1 HS FEDERAL CORRECTIVE ACTION Hazardous Materials
FINDING ID: HM-AMP-03
MANUAL QUESTION NUMBER: HM-045-001
FINDING CATEGORY: HEALTH/SAFETY
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW, BOILER PLANT
IFS FACILITY NUMBER: 00015
FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Five unlabeled, rusty compressed gas cylinders were found lying on the ground near the chiller behind the Boiler Plant; and one rusty compressed gas cylinder labeled acetylene was found in the corner of the yard.

CRITERIA: The in-plant storage, handling, and utilization of all compressed gases in cylinders, portable tanks, rail tankers, or motor vehicles must be done according to the Compressed Gas Association Pamphlet P-1-11965 (29 CFR 1910.101). At a minimum, compressed gas cylinder disposal must follow the requirements established in AR 700-68, Storage and Handling of Compressed Gases and Gas Cylinders.

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The supervisor must gather the compressed gas cylinders from behind the Boiler Plant and complete the appropriate paperwork for proper disposal. Coordinate paperwork and disposal through the DPW, Planning and Environmental Division.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 1000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.45.1 #2 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-04

MANUAL QUESTION NUMBER: HM-045-001

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INST WIDE

IFS FACILITY NUMBER: MULT

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: Compressed gas cylinders are not secured while in storage and use; and oxygen and acetylene gas cylinders are being stored together.

CRITERIA: The in-plant storage, handling, and utilization of all compressed gases in cylinders, portable tanks, rail tankers, or motor vehicles must be done according to the Compressed Gas Association Pamphlet P-1-11965 (29 CFR 1910.101). All compressed gas cylinders, empty and full, must be secured to prevent them from falling over. Acetylene and oxygen must be separated by distance (20 feet) or construction (5 foot high barrier having a fire resistance rating of at least ½ hour).

FINDING COMMENTS: Unsecured compressed gas cylinders were found in the following locations: DPALS, Microbiology Sterilization, Room 2B62, (corrected on the spot); and Reference Chemistry Lab, Room 155; WRAMC Loading Dock, Building 2; DOL Warehouse, Building 178; DPW, HVAC and Electrical Shops, Building 1; and the Sheetmetal Shop, Building 601. Oxygen and acetylene compressed gas cylinders were stored together in a flammable storage cabinet at the DPW, HVAC Shop, Building 1.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Secure all compressed gas cylinders to prevent them from falling over. Separate the oxygen and acetylene gas cylinders by a minimum of 20 feet.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.35.9 #2 HS FEDERAL CORRECTIVE ACTION Hazardous Materials
FINDING ID: HM-AMP-05
MANUAL QUESTION NUMBER: HM-035-009
FINDING CATEGORY: HEALTH/SAFETY
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW, HVAC SHOP
IFS FACILITY NUMBER: 00001
FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The portable fire extinguisher in the DPW HVAC Shop was not fully charged.

CRITERIA: Areas where flammable/combustibles are stored must meet certain fire protection standards (29 CFR 1910.106 (d)(7)) [April 1995]. Portable fire extinguishers must be checked at least every 30 days to ensure that they are present, fully charged, and functional (NFPA 10).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Establish a program to check portable fire extinguishers at least every 30 days to ensure that they are present, fully charged, and functional. Replace or exchange the portable fire extinguisher in the DPW HVAC Shop with a fully charged extinguisher.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.35.4 #2 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-06

MANUAL QUESTION NUMBER: HM-035-004

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative EXISTING NOV: NO

LOCATION: MAIN POST, DPW, HVAC SHOP

IFS FACILITY NUMBER: 00001

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The flammable storage cabinet in the DPW HVAC Shop did not have bungs covering the two ventilation ports.

CRITERIA: Storage cabinets used for the storage of flammable/combustible liquids must meet specific requirements (29 CFR 1910.106(d)(3)) [April 1995]. When flammable storage cabinets are stored indoors, both ventilation ports must be closed or the cabinet must be vented to the outdoors.

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Obtain bungs and insert them into the ventilation ports on each side of the flammable storage cabinet.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.2.1 #2 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-07

MANUAL QUESTION NUMBER: HM-002-001

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INST WIDE

IFS FACILITY NUMBER: MULT

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: Incompatible materials were being stored together.

CRITERIA: Installations must not store incompatible material in the same location unless they separate the material to prevent contact. Installations must provide a workplace that is reasonably free of potential health hazards that can cause serious injury or death. (Occupational Safety and Health Act, section 5(a)(1).

FINDING COMMENTS: This finding was identified at the following locations: Diagnostic Immunology Lab, Room 2B81C (corrected on the spot); and DPALS, Reference Chemistry Lab, Building T2, Room 155, in the corrosive storage cabinet.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The facility supervisor must ensure that personnel separate incompatible materials by distance or by utilizing secondary containment so that contact, in the event of a spill, does not occur.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.35.4 #1 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-08

MANUAL QUESTION NUMBER: HM-035-004

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, BOILER PLANT

IFS FACILITY NUMBER: 00015

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The cabinet used for the storage of flammable liquids does not meet the requirements for a flammable material storage cabinet.

CRITERIA: Storage cabinets used for the storage of flammable/combustible liquids must meet specific requirements (29 CFR 1910.106(d)(3)), April 1995; and NFPA 30, Section 4-6.

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Replace the existing cabinet with an NFPA approved flammable storage cabinet.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 750

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.40.2 #1 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-09

MANUAL QUESTION NUMBER: HM-040-002

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INST WIDE

IFS FACILITY NUMBER: MULT

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Greater than a 10 day supply of flammable liquids were being stored outside of an NFPA-approved flammable storage cabinet.

CRITERIA: Incidental storage of flammable/combustible liquids in industrial areas must conform to certain requirements (29 CFR 1910.106 (e)(2)).

FINDING COMMENTS: This finding was identified at the following locations: DPW, Boiler Plant, Building 15; DPW, HVAC Shop, Building 1; and the DPW, Maintenance Garage, Building 602.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Store flammable liquids in NFPA-approved flammable storage cabinets.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 2250

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.35.6 #2 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-10

MANUAL QUESTION NUMBER: HM-035-006

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative EXISTING NOV: NO

LOCATION: MAIN POST, DPW, PAINT SHOP

IFS FACILITY NUMBER: 00001

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: The indoor flammable storage room at the DPW Paint Shop does not meet storage room requirements including: berm, fire rated self closing doors, and explosion proof lighting.

CRITERIA: Flammable/combustible storage rooms inside of buildings must meet certain specifications. The doorway must be protected with a 4 inch raised sill or ramp or an open grated trench that drains to a safe area. The room must be equipped with explosion proof lighting and self-closing fire rated doors. (29 CFR 1910.106(d)(4)), April 1995; and NFPA 30

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Equip the indoor flammable storage room with: a four inch berm (threshold at the door), fire rated self-closing doors, and explosion proof lighting to bring the room into compliance with regulations; or secure the flammable liquids stored in this room in NFPA-approved flammable storage cabinets. (Note that no more than three flammable storage cabinets are permitted in a fire area (NFPA 30, Section 4-3.1).

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 2250

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.35.6 #1 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-11

MANUAL QUESTION NUMBER: HM-035-006

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative EXISTING NOV: NO

LOCATION: MAIN POST, HOSPITAL, DPALS

IFS FACILITY NUMBER: 000T2

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: The indoor flammable storage room in Pathology Supply is not equipped with a 4-inch threshold (berm) under the doorway to contain spills.

CRITERIA: Flammable/combustible storage rooms inside of buildings must meet certain specifications. The doorway must be protected with a 4 inch raised sill or ramp or an open grated trench that drains to a safe area. (29 CFR 1910.106(d)(4)), April 1995; and NFPA 30.

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Construct a 4 inch berm by the doorway to bring the indoor flammable storage room into compliance with regulations.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 500

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.10.1 #1 HS FEDERAL CORRECTIVE ACTION Hazardous Materials
FINDING ID: HM-AMP-12
MANUAL QUESTION NUMBER: HM-010-001
FINDING CATEGORY: HEALTH/SAFETY
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: INST WIDE
IFS FACILITY NUMBER: MULT
FACILITY TYPE: HOUSING & COMMUNITY FACILITIES

FINDING DESCRIPTION: Facilities where hazardous materials are stored and used do not have a written hazard communication (HAZCOM) program.

CRITERIA: Installations/CW facilities are required to have a written hazard communication program that is designed to provide all employees with information about the hazardous chemicals to which they are exposed (29 CFR 1910.1200(b)(1) and 1910.1200(e)(1)) [February 1995]. The written HAZCOM program shall describe the labels and other forms of warning used at the workplace; describe how MSDSs and the hazardous chemical inventory are maintained and where they are located; and describe the employee training program. The written program must also be accessible to the employees.

FINDING COMMENTS: This finding was identified at the following locations: DOIM Photo Branch, Building 1; Autocraft Shop, Building 82; Boiler Plant, Building 120, DOL Warehouse, Building 178; AAFES/PX Facility; Radiology, Material Distribution Branch (MDB), and Emergency Room, Building 2.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Develop and implement a written hazard communication (HAZCOM) program or adopt the Installation Safety Office's program.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.10.2 #1 HS FEDERAL CORRECTIVE ACTION Hazardous Materials
FINDING ID: HM-AMP-13
MANUAL QUESTION NUMBER: HM-010-002
FINDING CATEGORY: HEALTH/SAFETY
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: INST WIDE
IFS FACILITY NUMBER: MULT
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Some employees have not received the required initial and annual refresher HAZCOM training.

CRITERIA: Personnel working with hazardous materials are required to be trained in their use and the potential hazards of such materials (29 CFR 1910.1200(b)(3)(iii), 1910.1200(b)(4)(iii), 1910.1200(b)(6), and 1910.1200(h)).

FINDING COMMENTS: This finding was identified at the following activities: DOIM Photo Branch, Building 1; DOL Motor pool, Building 605; Autocraft Shop, Building 82; and the Boiler Plant, Building 120. The Installation Safety Office provides HAZCOM training at the Newcomer's Orientation and at periodic intervals. Activity supervisors must ensure that all employees receive this training.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Ensure that all employees receive the required initial and annual refresher HAZCOM training. Supervisors are responsible to ensure this requirement is fulfilled.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.1.2 #3 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-14

MANUAL QUESTION NUMBER: HM-001-002

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INST WIDE

IFS FACILITY NUMBER: MULT

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Material Safety Data Sheets (MSDS) were not available for every hazardous chemical used or stored at the work site.

CRITERIA: Installations/CW facilities are required to have on file an MSDS for each hazardous chemical stored and used at the installation/CW facility (29 CFR 1910.1200(b)(3)(ii), 1910.1200(b)(4)(ii), 1910.1200(b)(6), 1910.1200(g)(1), and 1910.1200(g)(8)).

FINDING COMMENTS: The following activities did not have MSDSs on file: Boiler Plants, Building 15 and 120; Photo Branch, Building 1; Autocraft Shop (DPCA), Building 82; DPW Maintenance Supply and Storage, Building 601.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Inventory all hazardous materials in the work place and obtain an MSDS for each material. MSDSs must be kept in locations that are accessible to workers on all shifts.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.1.4 #1 HS FEDERAL CORRECTIVE ACTION Hazardous Materials
FINDING ID: HM-AMP-15
MANUAL QUESTION NUMBER: HM-001-004
FINDING CATEGORY: HEALTH/SAFETY
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: DPW, BOILER PLANT
IFS FACILITY NUMBER: MULT
FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Hazardous materials in the Boiler Plant's chemical room were not properly stored or managed to prevent hazardous conditions in the work area. There was a general lack of good housekeeping to include rusting drums, open containers, and unlabeled/unidentified drums.

CRITERIA: Specific housekeeping requirements must be met in areas where hazardous materials are stored. Suggested housekeeping practices include tightly sealed, intact containers, stock rotation, and storage by compatibility. (29 CFR 1910.176(c)).

FINDING COMMENTS: This finding was identified in both Boiler Plants, Buildings 15 and 120.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Place additional emphasis on housekeeping. Require supervisors to conduct periodic inspections of their work area(s) and to take corrective action (i.e. recontainerize or turn-in materials in degraded containers, store drums on pallets to avoid rusting from water on floor, store hazardous materials by compatibility, rotate stock, etc.).

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.1.3 #2 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-16

MANUAL QUESTION NUMBER: HM-001-003

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INST WIDE

IFS FACILITY NUMBER: MULT

FACILITY TYPE: HOUSING & COMMUNITY FACILITIES

FINDING DESCRIPTION: Containers of hazardous materials are not properly labeled.

CRITERIA: Containers of hazardous chemicals in the workplace are required to be labeled, tagged, or marked with specific information (29 CFR 1910.1200(b)(3)(i), 1910.1200(b)(4)(i), 1910.1200(b)(5), and 1910.1200(f)(5) through 1910.1200(f)(7)).

FINDING COMMENTS: There were improperly labeled or unlabeled containers in the following locations: Autocraft Shop, Building 82; Boiler Plant, Building 120; and HVAC Shop, Building 1.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The shop supervisor must obtain a proper label for these products and should develop and implement a program to ensure that all containers of hazardous materials are labeled properly. The label must include the material's identity (the manufacturer's common or trade name or the chemical name) and its physical and health hazards.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.2.1 #5 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-17

MANUAL QUESTION NUMBER: HM-002-001

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INST WIDE

IFS FACILITY NUMBER: MULT

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: "Flammable Liquid/No Smoking" signs are not posted near gas pumps.

CRITERIA: Precautions shall be taken to prevent the ignition of flammable vapors [29 CFR 1910.106(g)(7)].

FINDING COMMENTS: This finding was identified at the DOL Gas Station and the DPW Maintenance/Motor pool Area.

STATUS OF CORRECTION:

CORRECTIVE ACTION: "Flammable Liquid/No Smoking" signs must be posted. The Fire Department may be able to provide required signs.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 100

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.2.1 #4 HS FEDERAL CORRECTIVE ACTION Hazardous Materials
FINDING ID: HM-AMP-18
MANUAL QUESTION NUMBER: HM-002-001
FINDING CATEGORY: HEALTH/SAFETY
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, AFIP, MULT
IFS FACILITY NUMBER: 00054
FACILITY TYPE: R&D LABS & TEST FACILITIES
TENANT NAME: AFIP

FINDING DESCRIPTION: Several facilities lack required permanent eyewash/shower devices, some existing devices are blocked, and are not being tested each week.

CRITERIA: The installation must provide within the work area suitable facilities for quick drenching or flushing of eyes and body for immediate emergency use where persons may be exposed to injurious corrosive materials. Emergency eyewash/shower devices should be accessible and serviceable at all times. To keep the lines free from stagnant water and bacteria, the devices should be activated weekly for at least three minutes and the tests documented. [29 CFR 1910.151(c) & ANSI Z358.1-1990]

FINDING COMMENTS: Unapproved eyewash devices, such as bottles or faucet mounted eyewashes, were found in the Photo Division and the Department of Environmental Toxicology, Rooms 2044 and 2048. Eyewash devices are blocked by pallets and mop buckets in the Photo Division and the Chemical Recycling Area.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Department chiefs must submit the required paperwork to replace the portable eyewash devices with ANSI Z358.1-1990 approved emergency eyewash devices. Material that blocks access to an eyewash device must be removed and the eyewash device tested weekly and documented. The eyewash should flush for at least three minutes to remove stagnant water and bacteria from the water lines and to ensure proper operation.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 2000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.35.9 #1 HS FEDERAL CORRECTIVE ACTION Hazardous Materials
FINDING ID: HM-AMP-19
MANUAL QUESTION NUMBER: HM-035-009
FINDING CATEGORY: HEALTH/SAFETY
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, AFIP,
IFS FACILITY NUMBER: 00054
FACILITY TYPE: R&D LABS & TEST FACILITIES
TENANT NAME: AFIP

FINDING DESCRIPTION: The portable fire extinguisher in the hallway of the Department of Environmental Toxicology was not fully charged.

CRITERIA: Areas where flammable/combustibles are stored must meet certain fire protection standards (29 CFR 1910.106 (d)(7)) [April 1995]. Portable fire extinguishers must be checked at least every 30 days to ensure that they are present, fully charged, and functional (NFPA 10).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Establish a program to check portable fire extinguishers at least every 30 days to ensure that they are present, fully charged, and functional. Replace or exchange the portable fire extinguisher in Environmental Toxicology with a fully charged extinguisher.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.45.1 #3 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-20

MANUAL QUESTION NUMBER: HM-045-001

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, AFIP

IFS FACILITY NUMBER: 00054

FACILITY TYPE: R&D LABS & TEST FACILITIES

TENANT NAME: AFIP

FINDING DESCRIPTION: Compressed gas cylinders are not secured while in storage and use.

CRITERIA: The in-plant storage, handling, and utilization of all compressed gases in cylinders, portable tanks, rail tankers, or motor vehicles must be done according to the Compressed Gas Association Pamphlet P-1-11965 (29 CFR 1910.101). All compressed gas cylinders, empty and full, must be secured to prevent them from falling over.

FINDING COMMENTS: This finding was identified on the loading dock.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Secure all compressed gas cylinders to prevent them from falling over.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.1.3 #3 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-21

MANUAL QUESTION NUMBER: HM-001-003

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, AFIP

IFS FACILITY NUMBER: 00054

FACILITY TYPE: R&D LABS & TEST FACILITIES

TENANT NAME: AFIP

FINDING DESCRIPTION: Five-gallon containers of hazardous materials were not properly labeled.

CRITERIA: Containers of hazardous chemicals in the workplace are required to be labeled, tagged, or marked with specific information (29 CFR 1910.1200(b)(3)(i), 1910.1200(b)(4)(i), 1910.1200(b)(5), and 1910.1200(f)(5) through 1910.1200(f)(7)).

FINDING COMMENTS: This finding was identified in the Photo Lab and the Woodworking Shop.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The shop supervisor must obtain the proper label for this product and should implement a program to ensure that all containers of hazardous materials are labeled properly. The label must include the material's identity (the manufacturer's common or trade name or the chemical name) and its physical and health hazards.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.2.2 #1 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-22

MANUAL QUESTION NUMBER: HM-002-002

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, AFIP, MICROBIOLOGY SUPPLY AND STORAGE

IFS FACILITY NUMBER: 00054

FACILITY TYPE: R&D LABS & TEST FACILITIES

TENANT NAME: AFIP

FINDING DESCRIPTION: Incompatible materials (ammonium hydroxide and several bottles of acids) were stored together.

CRITERIA: Installations must not store incompatible material in the same location unless they separate the material to prevent contact. Installations must provide a workplace that is reasonably free of potential health hazards that can cause serious injury or death. [Occupational Safety and Health Act, section 5(a)(1)].

FINDING COMMENTS: This was corrected on the spot.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The lab manager must ensure that personnel separate incompatible materials by distance or by utilizing secondary containment so that in the event of a spill, contact does not occur.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.35.1 #1 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-23

MANUAL QUESTION NUMBER: HM-035-001

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, AFIP

IFS FACILITY NUMBER: 00054

FACILITY TYPE: R&D LABS & TEST FACILITIES

TENANT NAME: AFIP

FINDING DESCRIPTION: There are four flammable storage cabinets in the Department of Forensic Toxicology, Room 4034.

CRITERIA: Specific management practices should be considered when storing and handling flammable/combustible materials (MP) [April 1995]. Not more than three cabinets shall be located in a single fire area (NFPA-30, Section 4-3.1).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Consolidate compatible flammable materials into three cabinets and move the fourth cabinet to another room.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.1.3 #1 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-24

MANUAL QUESTION NUMBER: HM-001-003

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative EXISTING NOV: NO

LOCATION: MAIN POST, DENTAL CLINIC, ROOM 1D56

IFS FACILITY NUMBER: 00002

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

TENANT NAME: DENTAL CLINIC

FINDING DESCRIPTION: There is a one-gallon bottle of bleach in the Oral Surgery Room that is not labeled with the material's identity (the manufacturer's common or trade name or the chemical name) and its physical and health hazards.

CRITERIA: Containers of hazardous chemicals in the workplace are required to be labeled, tagged, or marked with specific information (29 CFR 1910.1200(b)(3)(i), 1910.1200(b)(4)(i), 1910.1200(b)(5), and 1910.1200(f)(5) through 1910.1200(f)(7)).

FINDING COMMENTS: This was corrected on the spot.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Dentac Commander must obtain the proper label for this product and should develop and implement a program to ensure that all containers of hazardous materials are labeled properly.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.45.1 #4 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-26

MANUAL QUESTION NUMBER: HM-045-001

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INST WIDE, WRAIR

IFS FACILITY NUMBER: MULT

FACILITY TYPE: R&D LABS & TEST FACILITIES

TENANT NAME: WRAIR

FINDING DESCRIPTION: Compressed gas cylinders are not secured while in storage and use.

CRITERIA: The in-plant storage, handling, and utilization of all compressed gases in cylinders, portable tanks, rail tankers, or motor vehicles must be done according to the Compressed Gas Association Pamphlet P-1-11965 (29 CFR 1910.101). All compressed gas cylinders, empty and full, must be secured to prevent them from falling over.

FINDING COMMENTS: This finding was identified at the following locations: Loading Dock, Building 40; and Biological Research, Building 501.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Secure all compressed gas cylinders to prevent them from falling over.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.2.1 #6 HS FEDERAL CORRECTIVE ACTION Hazardous Materials
FINDING ID: HM-AMP-27
MANUAL QUESTION NUMBER: HM-002-001
FINDING CATEGORY: HEALTH/SAFETY
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, WRAIR
IFS FACILITY NUMBER: MULT
FACILITY TYPE: R&D LABS & TEST FACILITIES
TENANT NAME: WRAIR

FINDING DESCRIPTION: Emergency eyewash and shower devices are not tested each week.

CRITERIA: The installation must provide within the work area suitable facilities for quick drenching or flushing of eyes and body for immediate emergency use where persons may be exposed to injurious corrosive materials. Emergency eyewash/shower devices should be accessible and serviceable at all times. To keep the lines free from stagnant water and bacteria, the devices should be activated weekly for at least three minutes and the tests documented. [29 CFR 1910.151(c) & ANSI Z358.1-1990]

FINDING COMMENTS: This finding was noted in the Necropsy Lab, Room 4075, for the eyewash; and throughout the building for the emergency shower devices. The emergency showers were being tested on an annual and/or quarterly basis.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Flush emergency eyewash and shower devices weekly and document these tests. Allow the water to run for at least three minutes to remove stagnant water and bacteria from the water lines and to ensure proper operation.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.2.1 #7 HS FEDERAL CORRECTIVE ACTION Hazardous Materials

FINDING ID: HM-AMP-28

MANUAL QUESTION NUMBER: HM-002-001

FINDING CATEGORY: HEALTH/SAFETY

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, WRAIR

IFS FACILITY NUMBER: MULT

FACILITY TYPE: R&D LABS & TEST FACILITIES

TENANT NAME: WRAIR

FINDING DESCRIPTION: Adequate eyewash devices were not available in labs where persons may be exposed to corrosive materials.

CRITERIA: The installation must provide within the work area suitable facilities for quick drenching or flushing of eyes and body for immediate emergency use where persons may be exposed to injurious corrosive materials. Emergency eyewash/shower devices should be accessible and serviceable at all times. To keep the lines free from stagnant water and bacteria and to ensure proper operation, the devices should be activated weekly for at least three minutes and the tests documented. [29 CFR 1910.151(c) & ANSI Z358.1-1990]

FINDING COMMENTS: This finding was identified in the following areas: Histology, Neuropharmacology, Immunology, Biochemistry, and the Photo Lab. These areas have either unapproved portable wall mounted devices, eyewash bottles, faucet mounted eyewash devices connected to both hot and cold water, or no eyewash unit at all. This finding was noted in over 90% of all labs visited. The Safety Office reports that this finding is widespread; over 60% of labs have inadequate eyewash devices (either unapproved or absent).

STATUS OF CORRECTION:

CORRECTIVE ACTION: Department chiefs must submit the required paperwork to replace unapproved eyewash devices or install eyewash devices that meet ANSI Z358.1-1990. A written program should be established to check eyewash devices weekly to flush water lines and ensure devices are functional.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 15000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.1.2 #2 HS FEDERAL CORRECTIVE ACTION Hazardous Materials
FINDING ID: HM-KMH-29
MANUAL QUESTION NUMBER: HM-001-002
FINDING CATEGORY: HEALTH/SAFETY
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DPW, PEST CONTROL SHOP
IFS FACILITY NUMBER: 00602
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: The Pest Control Shop is housing pesticides, M-Pede and Kelthane EC, without the appropriate Material Safety Data Sheets.

CRITERIA: Installations are required to have on file an MSDS for each hazardous chemical stored and used at the installation/CW facility (29 CFR 1910.1200(b)(3)(ii), 1910.1200(b)(4)(ii), 1910.1200(b)(6), 1910.1200(g)(1), and 1910.1200(g)(8)).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Pest Control Shop personnel must obtain MSDS's for M-Pede and Kelthane EC. Call the manufacturer and request MSDSs via Fax/mail or ask the Greenhouse manager to supply a copy.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HM.1.2 #1 HS FEDERAL CORRECTIVE ACTION Hazardous Materials
FINDING ID: HM-KMH-30
MANUAL QUESTION NUMBER: HM-001-002
FINDING CATEGORY: HEALTH/SAFETY
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DECA, COMMISSARY
IFS FACILITY NUMBER: 00162
FACILITY TYPE: HOUSING & COMMUNITY FACILITIES
TENANT NAME: COMMISSARY

FINDING DESCRIPTION: Material Safety Data Sheets are not available for pesticides in storage for sale at the Commissary.

CRITERIA: Installations are required to have on file an MSDS for each hazardous chemical stored and used at the installation/CW facility (29 CFR 1910.1200(b)(3)(ii), 1910.1200(b)(4)(ii), 1910.1200(b)(6), 1910.1200(g)(1), and 1910.1200(g)(8)).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Commissary manager must obtain an MSDS for each pesticide sold, handled, or stored on the premises. File MSDSs in a three ring binder and locate the binder so it is accessible to employees. Contact Warehouse Supply personnel to ask if they have MSDSs on hand; if not, call each manufacturer and request them to fax/mail a copy.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HW.3.1 #1 I FEDERAL CORRECTIVE ACTION Hazardous Waste
FINDING ID: HW-JXL-02
MANUAL QUESTION NUMBER: HW-003-001
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: INST WIDE
IFS FACILITY NUMBER: MULT
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Hazardous waste containers are not properly managed to include: condition of containers i.e., containers not closed, rusting and dented; and labeling requirements i.e., words "Hazardous Waste" and the accumulation start date.

CRITERIA: Installations are required to comply with federal, state and local regulations concerning hazardous waste management (EO 12088, Section 1-1; FFCA, Section 102). If wastes are determined to be hazardous, the containers must be managed properly to include the words HAZARDOUS WASTE or other words that identify the contents, containers used to store the waste must be in good condition (not rusted or leaking) and they must be kept closed during storage except when waste is being added or removed. Satellite or accumulation point storage has not been adopted by Washington DC regulations, DC Mun Reg, Title 20, Chapter 42, Section 4202.7. (40 CFR 262.11, 262.34, 265.171, 265.173)

FINDING COMMENTS: Improper management was observed at the following locations: DOIM Photo lab, Building 1 (room G001); Radiology, Building 2 (room 1GD7); DPALS, Building 2 (Microbiology room 2B59); DPALS, Building T-2 (Pathology supply area and Histopathology lab, room 233); DOL Motor pool, Building 605; DPW Motor pool and Shops, Building 603 and 601; DPW Boiler Plant, Building 120; and behind Building 501.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Generators must properly manage all containers of hazardous waste to ensure they are labeled, in good condition, and kept closed during storage. Generators should conduct routine inspections of hazardous waste storage areas to ensure hazardous waste containers do not exceed storage limits. Identify all unknown wastes either through generator knowledge or waste characterization (to include pH, flash point, metals, etc.). Proper turn-in and disposal of all hazardous waste must be coordinated through the DPW Planning and Environmental Division. Ensure personnel generating and turning in hazardous waste receive hazardous waste awareness training which covers the management of containers and turn-in procedures.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE
COST: 10000
1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HW.10.1 #2 I FEDERAL CORRECTIVE ACTION Hazardous Waste
FINDING ID: HW-JXL-03
MANUAL QUESTION NUMBER: HW-010-001
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, HOSPITAL, DPALS
IFS FACILITY NUMBER: 00002
FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: Personnel are disposing of waste crystal violet and waste alcohol/acetone solutions which are both hazardous wastes, down the sanitary sewer.

CRITERIA: Installations that generate solid wastes must determine if the wastes are hazardous wastes (40 CFR 261.3, 261.4(b), 261.21 through 261.24, and 262.11) [June 1995]. Installations shall not introduce pollutants which create an explosion or fire hazard into a POTW (40 CFR 403.5 (b)).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Collect the waste crystal violet and waste alcohol/acetone solutions, label the containers with the date and the words "Hazardous Waste" or other words that identify the contents of the containers, and coordinate disposal through the DPW, Planning and Environmental Division. Ensure personnel handling and turning in hazardous waste have environmental awareness training that includes storage and labeling requirements, and turn-in procedures.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HW.75.1 #1 I FEDERAL CORRECTIVE ACTION Hazardous Waste
FINDING ID: HW-JXL-04
MANUAL QUESTION NUMBER: HW-075-001
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DPW, MOTOR POOL
IFS FACILITY NUMBER: 00603
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Personnel generating hazardous waste are storing more than 55 gallons of hazardous waste at the satellite accumulation area.

CRITERIA: Generators may accumulate as much as 55 gal of hazardous waste or 1 qt of acutely hazardous waste in containers at or near any point of initial generation without complying with the requirements for onsite storage if specific standards are met including labels that identify the contents of the containers, containers are closed except when adding or removing waste, and containers are in good condition [40 CFR 262.34(c) and COMAR 26.13.03.05 (E)(3)].

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Personnel generating hazardous waste must not store more than 55 gallons of hazardous waste in the satellite accumulation area. Properly label hazardous waste containers and coordinate turn-in of waste with the DPW, Planning and Environmental Division. Ensure training is provided to Motor pool personnel in hazardous waste management to include proper labeling, storage requirements, and turn-in procedures.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HW.10.1 #3 I FEDERAL CORRECTIVE ACTION Hazardous Waste
FINDING ID: HW-JXL-05
MANUAL QUESTION NUMBER: HW-010-001
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, MULT
IFS FACILITY NUMBER: MULT
FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: Washwater from photo processors throughout the installation is being discharged into the sanitary sewer without proper characterization.

CRITERIA: Installations that generate solid wastes must determine if the wastes are hazardous wastes. A solid waste exhibits the characteristics of toxicity if, using the Toxicity Characteristics Leaching Procedure, test method in 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publications SW-846, the extract from a representative sample of the waste exceeds certain limits (40 CFR 261.3, 261.4(b), 261.21 through 261.24, and 262.11). Installations must not discharge into a POTW any pollutant which would cause pass through or interference. Silver is toxic to biological treatment processes (40 CFR 403.5 (a) and 403.5 (c)(2)).

FINDING COMMENTS: This finding was identified at the following locations: DOIM Photo Shop, Building 1; Dental Clinic, Building 2; Radiology Department, Building 2; and DPALS, Building T-2.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Collect and analyze samples of washwater from photo processors that discharge washwater to the sanitary sewer without silver recovery. If silver concentrations exceed the permissible regulatory limits, the washwater must be processed through a silver recovery unit and re-analyzed or it must be collected and turned in as a hazardous waste. If silver concentrations in washwater are below the regulatory limit continue disposal into the sanitary sewer.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 250

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

HW.10.1 #1 I FEDERAL CORRECTIVE ACTION Hazardous Waste
FINDING ID: HW-JXL-06
MANUAL QUESTION NUMBER: HW-010-001
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, WRAIR, MAVS
IFS FACILITY NUMBER: 00040
FACILITY TYPE: R&D LABS & TEST FACILITIES
TENANT NAME: WRAIR

FINDING DESCRIPTION: Washwater from photo processors at WRAIR are discharged into the sanitary sewer without proper characterization.

CRITERIA: Installations that generate solid wastes must determine if the wastes are hazardous wastes. A solid waste exhibits the characteristics of toxicity if, using the Toxicity Characteristics Leaching Procedure, test method in 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publications SW-846, the extract from a representative sample of the waste exceeds certain limits (40 CFR 261.3, 261.4(b), 261.21 through 261.24, and 262.11). Installations must not discharge into a POTW any pollutant which would cause pass through or interference. Silver is toxic to biological treatment processes [40 CFR 403.5(a) and (c)(2)].

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Collect and analyze samples of wastewater from photo processors that discharge wastewater to the sanitary sewer without silver recovery. If silver concentrations exceed the permissible regulatory limits, the wastewater must be processed through a silver recovery unit and re-analyzed or it must be collected and turned in as a hazardous waste. If silver concentrations in wastewater are below the regulatory limit continue disposal into the sanitary sewer.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 200

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

NATURAL RESOURCES MANAGEMENT.

The Natural Resources Management program is currently managed by one employee who does not have any natural resources training, and is overloaded with additional responsibilities which include: Master Planning, National Environmental Policy Act (NEPA), and Cultural Resources issues. The employee is aware of Army and federal natural resource requirements and has filed the appropriate 1383's identifying needs within the Natural Resources Program. Acquiring additional, trained, natural resource personnel and training for existing personnel is necessary to support the preparation and implementation of various natural resources projects.

While Walter Reed is a relatively small installation, it still requires an Integrated Natural Resources Management Plan (INRMP), an Endangered Species Survey, a Wetlands Inventory, and outdoor natural resources / recreation programs available to the public. It is especially important to address natural resource management at Forest Glen because the federally endangered aquatic Hay's Spring amphipod or its habitat may be present on the installation.

NR.10.2 #1 I ARMY/DOD CORRECTIVE ACTION Natural Resource
FINDING ID: NR-DEP-01
MANUAL QUESTION NUMBER: NR-010-002
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW, P&E DIVISION
IFS FACILITY NUMBER: 00001
FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: A wetlands inventory of the Forest Glen Annex has not been performed in the last five years.

CRITERIA: Floodplains and wetlands should be identified and protected (MP). Inventories, agreements, plans and surveys must be revised every five years (Sikes Act).

FINDING COMMENTS: The environmental staff is aware of the requirement for a wetlands inventory and has identified this in the 1383 Report.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Chief, Planning and Environmental (P&E) Division must prepare the required paperwork and identify funding to hire a contractor to perform a wetlands inventory of the Forest Glen property.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 5000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Personnel at AEC have suggested that a wetlands "inventory" be completed in place of a wetlands "delineation" which is a more involved and definitive study required of construction projects.

NR.20.1.MD #1 I STATE CORRECTIVE ACTION Natural Resource
FINDING ID: NR-DEP-02
MANUAL QUESTION NUMBER: NR-020-001-MD
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW, P&E DIVISION
IFS FACILITY NUMBER: 00001
FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: An Endangered Species Survey has not been performed for the Forest Glen Annex in the past five years.

CRITERIA: Rare, threatened, and endangered animals and plants must be protected (COMAR 08.03, .04, .07, and .09). Inventories, agreements, plans, and surveys must be revised every five years (Sikes Act).

FINDING COMMENTS: This is of extreme importance considering the possibility of existing habitat or actual occurrence of the federally endangered aquatic insect, Hay's Spring Amphipod (*Stygobromus hayi*). Personnel in the DPW, Planning and Environmental (P&E) Division are aware of the Endangered Species Survey requirement and have entered it into the 1383 Report.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Chief, P&E Division must prepare the required paperwork to complete an Endangered Species Survey at Forest Glen.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 5000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS: Personnel at AEC agree.

NR.1.2.A #1 III ARMY/DOD CORRECTIVE ACTION Natural Resource

FINDING ID: NR-DEP-04

MANUAL QUESTION NUMBER: NR-001-002-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, P&E DIVISION

IFS FACILITY NUMBER: 00001

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: DPW, Planning and Environmental (P&E) Division staff members responsible for the Natural Resources (NR) Program have not received any formal training in NR.

CRITERIA: Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).

FINDING COMMENTS: Staff members within the P&E Division are aware of this deficiency and are eager to obtain proper training. The DoD and the Army Environmental Center provide information on training opportunities for Army personnel managing natural resource programs.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Chief, P&E Division must identify training requirements for his staff and the Director, DPW must ensure funding is provided to meet minimum program needs. The Chief, P&E Division and the Master Planner need to attend natural resources training.

CORRECTIVE ACTION TYPE: TRAINING

COST: 2000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

ENVIRONMENTAL IMPACTS.

National Environmental Policy Act (NEPA) issues are insufficiently addressed at Walter Reed. One staff member is responsible for NEPA issues as well as Natural and Cultural Resource issues. Numerous projects have been identified as needing NEPA consideration and Walter Reed does not have the staff to complete the NEPA process in a timely manner, thus increasing costs and delaying projects. Funding has been requested to hire additional staff for this purpose.

The Director, DPW and the Chief, Planning and Environmental (P&E) Division have not had NEPA training and should be trained since they are in the position to ensure that environmental consideration is given to all project proposals.

The Work Coordination Branch of the Engineer Resources Management Division is responsible for reviewing work orders. Staff members of the Work Coordination Branch check projects for possible environmental impacts when reviewing work orders. These staff members have not had any NEPA training and it is common practice for the box indicating "no environmental consideration necessary" to be routinely checked. As a result, numerous projects occur on the installation without proper review from the P&E Division. The Chief, P&E Division and staff members are aware of this problem and are anxious to address it. It is recommended that the Work Coordination Branch staff receive NEPA training so they are able to recognize environmental projects and forward them to the P&E Division for proper review.

O1.5.6.A #1 III ARMY/DOD CORRECTIVE ACTION Environmental Impacts

FINDING ID: 01-DEP-01

MANUAL QUESTION NUMBER: 01-005-006-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, P&E DIVISION

IFS FACILITY NUMBER: 00001

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The Chief, Planning and Environmental (P&E) Division did not have either a Finding of No Significant Impact (FONSI) or a Notice of Intent (NOI) on file for the Revised Master Plan for Forest Glen Environmental Assessment (EA) prepared September 1990.

CRITERIA: All EAs must prompt either the preparation of an FONSI, or an NOI to file an EIS (AR 200-2, para 5-5). This documentation must be filed and maintained with the EA.

FINDING COMMENTS: A FONSI or NOI must be prepared and maintained for and with all EAs before the proposed project can begin. The Chief, P&E Division at the time the EA in question was prepared no longer works at WRAMC, and it is unknown if a FONSI or NOI was prepared.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Chief, P&E Division must obtain a copy of the FONSI for the Revised Master Plan for Forest Glen EA.

CORRECTIVE ACTION TYPE:

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

01.5.2.A #1 III ARMY/DOD CORRECTIVE ACTION Environmental Impacts

FINDING ID: 01-DEP-02

MANUAL QUESTION NUMBER: 01-005-002-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, WORK COORDINATION BRANCH

IFS FACILITY NUMBER: 00001

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: Personnel in the Work Coordination Branch do not fully coordinate all work orders impacting on environmental concerns with the Chief, Planning and Environmental (P&E) Division prior to approving.

CRITERIA: Army units are required to integrate environmental review concurrently with other planning and decision-making actions (AR 200-2, para 2-6a). The Chief, P&E Division must be notified or otherwise provided timely project/proposal information to determine appropriate environmental documentation level based on project type [U.S. TEAM Guide Active Army Supplement, 01.1.5.A (MP)].

FINDING COMMENTS: Review of past work orders reflects that the environmental consideration box on the work order form is repeatedly signed off on as having no impacts or needed review. Personnel in the Work Coordination Branch must receive environmental training to ensure that appropriate work orders are sent to the Chief, P&E Division for environmental review. The Chief, P&E is aware of this environmental review breakdown and is supportive to finding measures to correct this problem.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Chief, Work Coordination Branch must ensure that all work orders impacting on environmental concerns are forwarded to the Chief, P&E Division for review prior to approval. The Chief, Work Coordination Branch must provide environmental/National Environmental Policy Act (NEPA) training to personnel reviewing work orders that may impact on the environment/NEPA.

CORRECTIVE ACTION TYPE: TRAINING

COST: 3000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

O1.1.2.A #1 III ARMY/DOD CORRECTIVE ACTION Environmental Impacts

FINDING ID: 01-DEP-03

MANUAL QUESTION NUMBER: O1-001-002-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, P&E DIVISION

IFS FACILITY NUMBER: 00001

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The Planning and Environmental Division is understaffed with individuals trained in National Environmental Policy Act (NEPA).

CRITERIA: Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).

FINDING COMMENTS: The Chief, P&E Division and the Director, DPW have not received NEPA training. NEPA is a major responsibility of the Environmental Office and the personnel heading this department need to be aware of NEPA concerns and requirements. Additional staff is also needed to help prepare and review necessary NEPA documentation. There are numerous projects awaiting funding and NEPA documentation including the Building 7 renovation project. This project cannot be approved until an environmental assessment is completed and a FONSI is signed. NEPA training for the Chief, P&E and the Director, DPW is necessary for proper supervision of their staff.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Director, DPW should consider hiring at least one additional staff member to review and prepare NEPA and natural resource documents. The Director, DPW and the Chief, P&E Division should attend NEPA training.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 39000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

ENVIRONMENTAL NOISE.

The Environmental Noise Program was not evaluated because activities at WRAMC do not impact on this environmental media. Therefore, there are no findings for this media area.

INSTALLATION RESTORATION PROGRAM.

Ground-water remediation is still ongoing west of Building 500 at Forest Glen, Maryland. This is a long term IRP project, which began 17 March 1994 and will probably last an additional 1-2 years. Other potential IRP sites currently under investigation include: the AAFES Gasoline Service Station, Building 164 at Forest Glen where four leaking gasoline USTs were removed in September 1995; and the area between the Community Center and Building 113, located on McMahon Road at the housing area of Glen Haven which might involve a leaking No. 2 fuel oil UST, and portions of oil-pipeline.

There are no findings for this environmental media area as all required actions were being managed in accordance with applicable regulations.

POLLUTION PREVENTION PROGRAM.

The Walter Reed Army Medical Center has a draft Pollution Prevention (P2) Plan that was being staffed through the DPW, Planning and Environmental (P&E) Division and the Preventive Medicine Service for comment. Specific initiatives such as minimization of virgin material requirements and recycling of chemicals such as alcohol and xylene are discussed in the plan. In addition to current recycling efforts, the P2 Plan discusses additional initiatives the installation can utilize. The P2 Plan replaces the Hazardous Waste Minimization (HAZMIN) Plan and HAZMIN has become a section within the P2 Plan which is more detailed. It is recommended (when P2 Plan becomes final) that P2 awareness training be incorporated into the quarterly training class to ensure P2 is understood by personnel at all levels.

There are no findings for this environmental media area as all required actions were being managed in accordance with applicable regulations.

ENVIRONMENTAL PROGRAM MANAGEMENT.

The WRAMC Planning and Environmental (P&E) Division is part of the Directorate Of Public Works (DPW) and is responsible for managing the majority of the environmental programs. Since the last ECAS, several environmental positions were filled and the overall management of the environmental program is improved. The Preventive Medicine Service (PVNTMED Svc) has been responsible for environmental training, inspecting activities, and identifying areas of noncompliance which require corrective action. As with the previous ECAS, it was apparent that WRAMC personnel were not positive about which WRAMC office the "P&E Division" or the "PVNTMED Svc" was responsible for overall management of the environmental program. Assigning overall responsibility for WRAMC's environmental program to one office is an essential step toward achieving environmental compliance.

O5.1.3.A #1 III GMP CORRECTIVE ACTION Program Management
FINDING ID: O5-LLB-01
MANUAL QUESTION NUMBER: O5-001-003-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW, P&E DIVISION
IFS FACILITY NUMBER: 00001
FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The current environmental program, although improved in the past 3 years, lacks organizational structure and does not identify clear lines of authority and responsibility. Departmental missions for Preventive Medicine Service (PVNTMED Svc) and the Environmental Office (EO) are not clearly defined and there is no comprehensive environmental policy/regulation. It appears that the EO is responsible for the program but does not have the complete authority to fulfill this mission. Personnel in PVNTMED Svc perform internal audit functions for the environmental program but also get involved in corresponding with D.C. officials concerning environmental issues, and preparing environmental plans (HWMP and HAZMIN). Many times the EO does not receive the information resulting from this work.

CRITERIA: The Environmental Office should be organizationally positioned to effectively manage the installation's environmental program needs (MP).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Designate one office as the head of the environmental program and ensure that personnel responsible for environmental management are given resources to complete their duties and are held accountable for their work. Although the internal auditing performed by preventive medicine and the team approach to dealing with environmental problems are commendable; all the results from this work should be centrally located in the EO. The preparation of environmental plans, correspondence with D.C. officials, and other installation environmental work should be directed by the chief, P&E Division. A second approach would be to investigate the establishment of a Directorate of Safety, Health, and Environment (DSHE) which would facilitate the team approach and combine limited resources.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

O5.1.7.R #1 III GMP CORRECTIVE ACTION Program Management

FINDING ID: O5-LLB-02

MANUAL QUESTION NUMBER: O5-001-007-R

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, P&E DIVISION

IFS FACILITY NUMBER: 00001

FACILITY TYPE: TRAINING BLDGS, RANGES, COURSES, TROOP OPNS

FINDING DESCRIPTION: Throughout the installation, there are numerous unlabeled, opened, corroded containers of unknown and waste-like materials. Other areas have stained surfaces from spills and leaking containers. Some of these materials may have been usable at one time but now must be handled as waste. In addition to problems with waste and material storage, these areas may impact worker health.

CRITERIA: Facility personnel involved in environmental affairs should receive the necessary environmental training (MP).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Personnel who use hazardous materials and generators of hazardous waste are responsible for the proper management of these materials. Awareness training should emphasize how to handle, store, and turn-in HM/HW and provide information on the housekeeping problems. Additionally, HM users and generators of hazardous waste and their supervisors should be held accountable for material/waste management through the use of the Total Army Performance Evaluation System (TAPES). Personnel who perform routine inspections and identify these problems must be able to provide immediate solutions.

CORRECTIVE ACTION TYPE: TRAINING

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

O5.1.5.A #1 III GMP CORRECTIVE ACTION Program Management

FINDING ID: O5-LLB-03

MANUAL QUESTION NUMBER: O5-001-005-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, P&E DIVISION

IFS FACILITY NUMBER: 00001

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The position description for the environmental protection specialist, #41320, does not include Cultural and Natural Resources Management responsibilities. These programs will be part of the employee's duties and should be included in the position description. Additionally, the position descriptions for preventive medicine personnel should accurately reflect their responsibilities.

CRITERIA: Each installation should ensure that Job Descriptions and Classifications adequately address the full range of functions and responsibilities of each position (MP).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Revise this DPW position description to include the Natural and Cultural Resources programs and update the preventive medicine personnel position descriptions to accurately reflect their responsibilities.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PESTICIDE MANAGEMENT.

The Pest Management Program at the Walter Reed Army Medical Center is lacking in coordination and communication. Approximately 50% of the noncompliance issues identified in the previous ECAS still exist; a number of which concern day-to-day operations of the Pest Control Shop, such as storage and handling practices.

Management issues include: review of pest control contracts, coordination of required DD Form 1532-1 reports with contractors and personnel at the Greenhouse and Self-Help facilities, and appointment of the Installation Pest Management Coordinator (IPMC). Additional work is needed to fully develop an effective medically important pest surveillance program at WRAMC. The program must be coordinated by personnel at Preventive Medicine Service with oversight provided by the IPMC.

The acting IPMC is eager to work with his counterparts to begin rebuilding the program, and has begun to coordinate with personnel to correct many of the program deficiencies. The Installation Commander's appointment of this individual to IPMC will enhance the effectiveness of the Pest Management Program.

PM.45.1 #1 I FEDERAL CORRECTIVE ACTION Pesticide
FINDING ID: PM-KMH-01
MANUAL QUESTION NUMBER: PM-045-001
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DPW, PEST CONTROL SHOP
IFS FACILITY NUMBER: 00602
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: One unlabeled container of an unknown pesticide was found in the pest control storage facility.

CRITERIA: Installations/CW facilities are required to store any pesticide, pesticide container, or pesticide residue according to specific restrictions (40 CFR 165.7). All pesticides will be stored in their original containers with an affixed label.

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Pest Control Shop personnel must complete the appropriate paper work, and coordinate turn-in of the waste pesticide through DPW, Planning and Environmental Division. Because the waste is an "unknown" a sample must be analyzed to determine the hazard characteristics prior to turn-in.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT
COST: 1000
1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PM.45.1 #2 I FEDERAL CORRECTIVE ACTION Pesticide
FINDING ID: PM-KMH-02
MANUAL QUESTION NUMBER: PM-045-001
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DPW, PEST CONTROL SHOP
IFS FACILITY NUMBER: 00602
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Pesticides are not separated by type (herbicides, insecticides, fungicides) or distance and are being stored with nonpesticide items.

CRITERIA: Installations are required to store any pesticide, pesticide container, or pesticide residue according to specific restrictions. Pesticides should be stored in a well ventilated, separate room, building or covered area where protection is provided. Each pesticide formulation must be segregated, separated by at least 4 feet on different shelving to insure no cross contamination, and stored under a sign containing the name of the formulation (40 CFR 165.10).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Pest Control Shop personnel must rearrange all pesticides by formulation and provide the minimum 4 foot separation distance to ensure cross contamination does not occur in the event of a spill. All items that are not pesticides must be removed.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PM.50.1.MD #1 I STATE CORRECTIVE ACTION Pesticide
FINDING ID: PM-KMH-03
MANUAL QUESTION NUMBER: PM-050-001-MD
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DPW, PEST CONTROL SHOP
IFS FACILITY NUMBER: 00602
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: A 16 ounce container of pesticide (Gentrol) was found unsecured in the back of the pest control vehicle.

CRITERIA: The transportation of pesticides must meet specific requirements (COMAR 15.05.01.06.B). During transportation, pesticide containers and application equipment are to be secured to prevent shifting or release of pesticides.

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Pest Control Shop personnel must ensure pesticides are secured in the lockable compartments of the pest control vehicle during transportation. Pest control personnel removed the Gentrol from the vehicle and placed it in the pesticide storage facility.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PM.1.6.A #1 III ARMY/DOD CORRECTIVE ACTION Pesticide
FINDING ID: PM-KMH-05
MANUAL QUESTION NUMBER: PM-001-006-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW, P&E DIVISION
IFS FACILITY NUMBER: 00001
FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The acting Installation Pest Management Coordinator (IPMC) has not submitted a DD Form 1532 to the MEDCOM Pest Management Coordinator, WRAMC Preventive Medicine Service (PVNTMED SVC), or U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM), since October 1995.

CRITERIA: DD Form 1532, Pest Management Report, must be submitted monthly (AR 420-76, para 4-4c(1) and 4-4c(3) through 4-4c(5)).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The acting IPMC must submit a completed DD Form 1532 to the MEDCOM PMC, WRAMC PVNTMED SVC, and USACHPPM on a monthly basis.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PM.1.6.A #3 III ARMY/DOD CORRECTIVE ACTION Pesticide
FINDING ID: PM-KMH-06
MANUAL QUESTION NUMBER: PM-001-006-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: INST WIDE
IFS FACILITY NUMBER: MULT
FACILITY TYPE: HOUSING & COMMUNITY FACILITIES

FINDING DESCRIPTION: The managers at Self-Help and the Greenhouse are not reporting the distribution or application of pesticides on DD Form 1532-1 and providing it to the acting Installation Pest Management Coordinator (IPMC).

CRITERIA: DD Form 1532, Pest Management Report, must be submitted monthly or according to MACOM requirements (AR 420-76, para 4-4c(1) and 4-4c(3) through 4-4c(5)). The reports will include pest control operations conducted by the following: facilities engineer, contractors, government owned, contractor-operated activities, and nonappropriated fund activities (AR 420-76, para 4-4c(3) (a-f)). Self-help programs shall include record keeping, DD Form 1532-1, if pesticides are provided to occupants (AR 420-76, para 3-13c(4)).

FINDING COMMENTS: The information provided in DD Form 1532-1 is included monthly in DD Form 1532 which summarizes pesticide distribution on the installation. This finding was identified at the following locations: Self-Help, Building 601; Greenhouse, Building 89.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The DPW, acting IPMC must coordinate with the managers of activities using pesticides to ensure proper reporting of pesticide distribution and application by submitting DD Form 1532-1 on a monthly basis.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PM.45.8.A #1 III ARMY/DOD CORRECTIVE ACTION Pesticide
FINDING ID: PM-KMH-07
MANUAL QUESTION NUMBER: PM-045-008-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DECA, COMMISSARY
IFS FACILITY NUMBER: 00162
FACILITY TYPE: HOUSING & COMMUNITY FACILITIES
TENANT NAME: COMMISSARY

FINDING DESCRIPTION: Commissary personnel do not have a spill control kit, available for use in the area where pesticides and other chemicals are being stored.

CRITERIA: A pesticide spill cleanup kit must be strategically located where pesticides are stored and mixed or sold (AR 420-76, para 4-1e(1)). Employees handling pesticides will be familiar with proper measures for the safe handling of pesticides, to include spills (AR 40-5, para 10-4h).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Commissary manager must provide a spill control kit for use at key locations where pesticide spills may occur, e.g. storage and checkout areas. Kits may be purchased from vendors or they can be constructed by Commissary personnel using the guidance found in Appendix A, Technical Information Memorandum #15 "Pesticide Spill Prevention and Management" published by the Armed Forces Pest Management Board.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 500

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PM.10.3.A #1 III ARMY/DOD CORRECTIVE ACTION Pesticide
FINDING ID: PM-KMH-08
MANUAL QUESTION NUMBER: PM-010-003-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DECA, COMMISSARY
IFS FACILITY NUMBER: 00162
FACILITY TYPE: HOUSING & COMMUNITY FACILITIES
TENANT NAME: COMMISSARY

FINDING DESCRIPTION: Commissary employees do not bag pesticides separately from food items.

CRITERIA: Post exchange and commissary personnel are required to be familiar with clean up procedures for pesticide spills. Employees handling pesticides will be familiar with proper measures for safe handling. Pesticides will be segregated from all food products in storage, during transportation, and while on display. Segregation means there will be sufficient space between pesticides and food items so that spillage or leakage will not contaminate food (AR 40-5, para 10-4h(2-3)).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Commissary manager must provide appropriate training to employees on the proper handling of pesticides. The Commissary manager should coordinate this requirement through the DPW, Planning and Environmental Division, for additional information.

CORRECTIVE ACTION TYPE: TRAINING

COST: 200

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PM.45.17.A #1 III ARMY/DOD CORRECTIVE ACTION Pesticide
FINDING ID: PM-KMH-09
MANUAL QUESTION NUMBER: PM-045-017-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: INST WIDE
IFS FACILITY NUMBER: MULT
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Signs which read "DANGER, POISON, PESTICIDE STORAGE" are not posted at the main entrance of the Pest Control Shop and on the storage cabinet in the Greenhouse.

CRITERIA: Pesticide storage or mixing facilities and equipment which contain or use pesticides are required to have signs and safety procedures posted (AR 420-76, para 4-1b(1)).

FINDING COMMENTS: This finding was identified at the following locations: Pest Control Shop, Building 602; and the Greenhouse, Building 86.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Pest Control Shop and Greenhouse personnel must obtain signs which read "DANGER, POISON, PESTICIDE STORAGE" and place them at the main entrance of the Pest Control Shop and on the storage cabinet respectively.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 200

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PM.45.5.A #1 III ARMY/DOD CORRECTIVE ACTION Pesticide
FINDING ID: PM-KMH-10
MANUAL QUESTION NUMBER: PM-045-005-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: INST WIDE
IFS FACILITY NUMBER: MULT
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Backpack sprayers, foggers, dusters, and the red Ford pick-up truck used to transport pesticides and equipment are not labeled with the words "CONTAMINATED WITH PESTICIDES".

CRITERIA: Movable equipment used for handling pesticides must be labeled and handled according to specific requirements (AR 420-76, para 4-1b(3)). Vehicles used for pesticide applications must be dedicated to pest control operations and meet specific design requirements to include labeling "CONTAMINATED WITH PESTICIDES" (DODR 4145.19-1, para 3-415a(3) and AR 420-76, para 4-1d and 4-1e(1)).

FINDING COMMENTS: This finding was identified at the following locations: Pest Control Shop, Building 602, and the Greenhouse, Building 86.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Pest Control Shop and Greenhouse personnel are required to label all pesticide transportation vehicles and application equipment with the words "CONTAMINATED WITH PESTICIDES".

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 300

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PM.1.6.A #2 III ARMY/DOD CORRECTIVE ACTION Pesticide

FINDING ID: PM-KMH-11

MANUAL QUESTION NUMBER: PM-001-006-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INST WIDE

IFS FACILITY NUMBER: MULT

FACILITY TYPE: HOUSING & COMMUNITY FACILITIES

TENANT NAME: WRAIR

FINDING DESCRIPTION: The pesticide contractor for WRAIR, Arrest-A-Pest, is not reporting the application of pesticides for WRAIR facilities on DD Form 1532-1.

CRITERIA: DD Form 1532, Pest Management Report, must be submitted monthly or according to MACOM requirements (AR 420-76, para 4-4c(1) and 4-4c(3) through 4-4c(5)). The reports will include pest control operations conducted by the following: facilities engineer, contractors, government owned/contractor-operated activities, all out grant lease holders, self-help pest control activities, and nonappropriated fund activities (AR 420-76, para 4-4c(3)(a-f)).

FINDING COMMENTS: This finding was identified at the following locations: Buildings 511, 512, and 40. The information provided in DD Form 1532-1 is included monthly in DD Form 1532 which summarizes pesticide distribution on the installation.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Arrest-A-Pest contractors must coordinate with the acting IPMC, Planning and Environmental Division, to submit DD Form 1532-1 on a monthly basis. The submission of DD Form 1532-1 must be included in all pesticide contracts.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PM.55.1.A #1 III ARMY/DOD CORRECTIVE ACTION Pesticide
FINDING ID: PM-KMH-13
MANUAL QUESTION NUMBER: PM-055-001-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DPW, PEST CONTROL SHOP
IFS FACILITY NUMBER: 00602
FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: Excess pesticides, Kelthane EC and M.A.G 3-6-10, are being stored at the pesticide storage facility.

CRITERIA: Disposal must be initiated for all excess pesticides and strict turn-in procedures followed (DOD 4160.21 M, para VI(B)(77) and AR 420-76, para 4-2b). All properly identified excess serviceable or unserviceable pesticides will be turned in to the local or servicing Defense Reutilization and Marketing Office (DRMO) for disposal in accordance with TIM No. 16 and DOD 4160.21-M.

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Pest Control Shop personnel must complete the required paperwork and coordinate turn-in of all excess, unusable products with the DPW, Planning and Environmental Division.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 100

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

Pesticide

FINDING ID: PM-KMH-16

MANUAL QUESTION NUMBER: PM-001-004-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, P&E DIVISION

IFS FACILITY NUMBER: 00001

FACILITY TYPE: ADMINISTRATIVE, COMMUNICATION FACILITIES

FINDING DESCRIPTION: The Installation Pest Management Plan (IPMP) does not address several aspects of pest control activities to include: contract pest control responsibilities, Greenhouse operations, and incomplete pesticide inventories at Self-Help and the Pest Control Shop.

CRITERIA: Each Army installation must have a comprehensive IPMP (AR 420-76, 2-5a, 3-2a, and appendix C).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Revise the existing IPMP to include all pest management activities on WRAMC including contractor responsibilities, Greenhouse operations, and pesticide inventories.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 5000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PM.45.3.A #1 III ARMY/DOD CORRECTIVE ACTION Pesticide
FINDING ID: PM-KMH-17
MANUAL QUESTION NUMBER: PM-045-003-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DPW, PEST CONTROL SHOP
IFS FACILITY NUMBER: 00602
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: The current pesticide mixing and vehicle washing site for use by personnel at Roads and Grounds and the Pest Control Shop does not meet design and construction criteria.

CRITERIA: Sites where pesticides are mixed and/or stored must meet specific requirements (AR 420-76, para 4-1b(1)). Design and construction criteria guidance and recommendations for these facilities provided in MIL-HDBK-1028/8A will be implemented to the maximum extent. Pesticides will be mixed only in facilities where due regard has been given to the hazardous nature of the pesticide, site selection, protective enclosures, and operating procedures. Adequate measures will be taken to assure personnel safety, accident prevention, and detection of potential environmental damage (40 CFR 165.10(a)).

FINDING COMMENTS: This site is located at the entrance of the facility adjacent to the Roads and Grounds building area.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Correct the structural problems with the new mixing pad, including: sealing, constructing a roof, and removing the open drain system.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 10000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

POL MANAGEMENT.

Current POL management practices, although successful in preventing significant petroleum spill incidents thus far, pose some risk of future spill events. The keys to POL management are personnel education and the active involvement of all personnel in proper POL handling procedures. A wide range of POL handling procedures were observed at WRAMC. Personnel with previous knowledge and training in material handling and spill response operated in a manner which significantly decreased spill potential, while untrained personnel operated to the best of their ability, but failed to recognize potential spill situations. POL management techniques, particularly proper handling and response methods, are addressed in the WRAMC Spill Prevention Control and Countermeasures Plan (SPCCP). Dissemination of the SPCCP to all personnel involved with the handling of POL products and annual training of these personnel will significantly reduce the potential for spill incidents. Implementation of the physical means of preventing spills as identified in the SPCCP will reduce spill potential.

PO.2.1 #1 I FEDERAL CORRECTIVE ACTION POL
FINDING ID: PO-JEK-01
MANUAL QUESTION NUMBER: PO-002-001
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: INST WIDE
IFS FACILITY NUMBER: MULT
FACILITY TYPE:

FINDING DESCRIPTION: Secondary containment and drain valve lock requirements specified in the Spill Prevention Control and Countermeasures Plan (SPCCP) have not been implemented.

CRITERIA: Installations which are required to prepare an SPCCP must implement the plan. Amendments to the plan must be implemented within 6 months of inclusion in the SPCCP (40 CFR 112.3A and 40 CFR 112.5A).

FINDING COMMENTS: Section 2.1.4 of the SPCCP states "ASTs must have secondary containment to capture the fuel if a tank fails." The following ASTs lack appropriate secondary containment: Bldg 1E, one 275-gal diesel AST; Bldg 1W, one 275-gal diesel AST and one 275-gal kerosene AST; Bldg 12, one 275-gal diesel AST; Bldg 508, two 275-gal diesel ASTs; Bldg 510, 500-gal diesel AST. Section 7.0 states "drain valves on all secondary containment are locked in a closed position." Locking mechanisms have not been provided for any drain valves.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The activity manager responsible for each aboveground storage tank (AST) must provide secondary containment and a drain valve locking mechanism.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 8000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PO.5.4 #1 I FEDERAL CORRECTIVE ACTION POL
FINDING ID: PO-JEK-02
MANUAL QUESTION NUMBER: PO-005-004
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW, P&E DIVISION
IFS FACILITY NUMBER: 00001
FACILITY TYPE:

FINDING DESCRIPTION: The listing of underground storage tanks (USTs) in the SPCCP is out-of-date.

CRITERIA: The SPCCP must be reviewed and/or amended under specific circumstances (40 CFR 112.1(d), 112.4(a), 112.4 (c), 112.4(e), 112.5(a), and 112.5(c)). The SPCCP must be amended within 6 months if there is a material change in the installation facility design, construction, operations or maintenance that alters the potential for an oil spill.

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The SPCCP must be updated to include changes in the facility design, including updating the UST list. An updated UST listing has been compiled by the storage tank program manager.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PO.5.6 #1 I FEDERAL CORRECTIVE ACTION POL
FINDING ID: PO-JEK-03
MANUAL QUESTION NUMBER: PO-005-006
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: INST WIDE
IFS FACILITY NUMBER: MULT
FACILITY TYPE:

FINDING DESCRIPTION: A copy of the Spill Prevention Control and Countermeasures Plan (SPCCP) is not available at every site where there is a potential for discharge.

CRITERIA: A copy of the SPCCP is required to be available at sites that are normally attended at least 8 hrs/day where there is a potential for a discharge (40 CFR 112.1(d) and 112.3(e)).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The DPW, Planning and Environmental Division must provide a copy of the SPCCP to each activity that is normally attended at least 8 hours per day where there is a potential for discharge.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PO.65.6 #1 I FEDERAL CORRECTIVE ACTION POL
FINDING ID: PO-JXL-04
MANUAL QUESTION NUMBER: PO-065-006
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: INST WIDE
IFS FACILITY NUMBER: MULT
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Drums of used oil are not properly managed including: inadequate labeling, open containers, and stockpiling.

CRITERIA: The label USED OIL must be clearly marked on containers used to store used oil and fill pipes used to transfer used oil into underground storage facilities (40 CFR 279.22 (c)).

FINDING COMMENTS: Improper management of used oil was observed at the following locations: DPCA, Autocraft Shop, Building 82; DOL Motor Pool, Building 605; DPW Shops, Building 601; and DPW Motor Pool, Building 603.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Facility managers must ensure containers of used oil are properly labeled with the words "USED OIL" and are kept closed during storage to prevent spills and possible contamination with water or other wastes. Arrange for used oil to be picked up by the contractor on a regular basis to prevent stockpiling.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 100

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PO.100.3.MD #1 I STATE CORRECTIVE ACTION POL
FINDING ID: PO-JXL-05
MANUAL QUESTION NUMBER: PO-100-003-MD
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW, P&E DIVISION
IFS FACILITY NUMBER: MULT
FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The installation does not have an Oil Operations Permit for Forest Glen as required by the State of Maryland.

CRITERIA: Installations must meet specific requirements to be covered by a general oil operations permit (COMAR 26.10.01.08, 26.10.01.09A, and B).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Apply to the State of Maryland for an Oil Operations Permit for Forest Glen. Ensure the permit is kept up to date.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 500

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PO.20.1 #2 III FEDERAL CORRECTIVE ACTION POL
FINDING ID: PO-JEK-06
MANUAL QUESTION NUMBER: PO-020-001
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DOL, SUPPLY WAREHOUSE
IFS FACILITY NUMBER: 00178
FACILITY TYPE: SUPPLY & STORAGE FACILITIES, LOGISTICS

FINDING DESCRIPTION: Clean-up and containment materials are not provided for the loading dock.

CRITERIA: Appropriate containment and/or diversionary structures, and cleanup equipment to prevent discharged petroleum products from reaching navigable water course should be readily available at the installation/CW facility (40 CFR 112.7(c) and 112.7(d)).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The warehouse foreman should obtain clean-up and containment materials, such as "dry sweep" and absorbent socks.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 660

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PO.1.2.A #1 III ARMY/DOD CORRECTIVE ACTION POL
FINDING ID: PO-JEK-07
MANUAL QUESTION NUMBER: PO-001-002-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DOL, MOTOR POOL
IFS FACILITY NUMBER: 00605
FACILITY TYPE:

FINDING DESCRIPTION: Five oil drums and the surrounding floor area are covered with spilled oil.

CRITERIA: Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Motor pool foreman should clean up the existing drums and floor area and manage the drums so this problem does not recur in the future (e.g. provide secondary containment for stored materials, and provide training to Motor pool personnel in proper handling and management of hazardous materials).

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 1000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PO.5.7 #1 III FEDERAL CORRECTIVE ACTION POL
FINDING ID: PO-JEK-08
MANUAL QUESTION NUMBER: PO-005-007
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: INST WIDE
IFS FACILITY NUMBER: MULT
FACILITY TYPE:

FINDING DESCRIPTION: Spill response training has not been provided for installation personnel involved with the management and handling of oil.

CRITERIA: All installation/CW facility personnel involved with the management and handling of oil should take part in periodic training in spill prevention and response (40 CFR 112.1(d) and 112.7(e)(10)).

FINDING COMMENTS: Several personnel involved with oil handling recalled having some spill training in the past, but could not provide documentation of when the training occurred or the topics covered.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Activity supervisors should ensure that spill response training, which includes notification, containment and safety practices, is provided to all employees that manage or handle oil.

CORRECTIVE ACTION TYPE: TRAINING

COST: 2000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

PO.20.1 #1 III FEDERAL CORRECTIVE ACTION POL
FINDING ID: PO-JEK-09
MANUAL QUESTION NUMBER: PO-020-001
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DPW, MOTOR POOL
IFS FACILITY NUMBER: 00603
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Spill containment and cleanup materials are not available at a storage bay containing 8 drums of used oil.

CRITERIA: Appropriate containment and/or diversionary structures, and cleanup equipment to prevent discharged petroleum products from reaching navigable water course should be readily available at the installation/CW facility (40 CFR 112.7(c) and 112.7(d)).

FINDING COMMENTS: Spill containment materials are available nearby in building 602 and in a bay adjacent to the material/waste storage bay in building 603, but are not easily accessible.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Motor Pool foreman should place spill containment materials in the used oil storage bay.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

SOLID WASTE MANAGEMENT.

The Solid Waste Management Plan for WRAMC needs to be updated to include information about recycling. Some of the Directorate/Department Divisions' recycling coordinators have not requested the various containers for recycling at the generation source. Some buildings at Forest Glen did not have recycling containers for white office paper, computer paper, newspapers, and aluminum beverage cans. Cardboard was not being recycled to its fullest extent and was observed in dumpsters at the Hospital, WRAIR, and AFIP on the Main Post. If all recyclable material were sorted at the source, the value of recyclable material recovered would be higher, and the tonnage of solid waste removed from Forest Glen and the Main Post would be reduced, thus saving money.

Throughout the Hospital, WRAIR, and AFIP non-regulated waste i.e. paper towels, empty boxes, and paper packaging material was found in the red bags. Clinic, Ward and area managers should ensure personnel have received proper training on waste segregation and monitor disposal activities through inspections. Perform in-service training sessions on proper waste segregation and where feasible reduce the number of red bags in an area and post signs above red bags listing what is allowed to be placed in a red bag. A reduction in the amount of RMW generated will reduce disposal costs and make more money available for patient care.

SO.10.3.A #1 III ARMY/DOD CORRECTIVE ACTION Solid Waste

FINDING ID: SO-DCB-02

MANUAL QUESTION NUMBER: SO-010-003-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, WRAIR

IFS FACILITY NUMBER: 00040

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

TENANT NAME: WRAIR

FINDING DESCRIPTION: An empty cardboard box marked "Regulated Medical Waste" was observed within the 30 cubic yard dumpster when it was being dumped at the Transfer Station on 25 January 1996.

CRITERIA: Installation personnel should be periodically informed about materials that are prohibited from disposal in solid waste receptacles (MP).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Do not dispose of boxes purchased for Regulated Medical Waste in the regular solid waste stream.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

SO.25.1.A #3 III ARMY/DOD CORRECTIVE ACTION Solid Waste
FINDING ID: SO-DCB-04
MANUAL QUESTION NUMBER: SO-025-001-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, HOSPITAL PX
IFS FACILITY NUMBER: 00002
FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: An individual with a cart full of cardboard and paper from the Hospital PX was folding and putting it into a dumpster by way of a metal chute on the 3rd floor of the Hospital.

CRITERIA: Army installations are required to participate in any state or local recycling programs and to reduce the volume of solid waste materials at the source whenever practical (DOD 4165.60, para V(a), V(c), and V(h), and AR 200-1, para 6-14a). The U.S. government, the State of Maryland, and the District of Columbia all have existing laws that require mandatory recycling. Code of Federal Regulations (CFR) Title 40, Part 246, require all federal agencies that generate solid waste to recycle. (WRAMC Regulation No. 420-2, 9 May 1994)

FINDING COMMENTS: The Recycling Program generates funds that are reinvested at WRAMC.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Place all clean cardboard into the cardboard compactor on the second floor near the loading dock, and place other recyclable items into their proper containers. The Building Recycling Coordinator should inform, train, and/or obtain signs or stickers to improve the performance of recycling at the Hospital. Lack of an organized team approach fosters noncompliance with the Recycling Program.

CORRECTIVE ACTION TYPE: TRAINING
COST: 0
1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

SO.110.4 #1 III ARMY/DOD CORRECTIVE ACTION Solid Waste
FINDING ID: SO-TED-05
MANUAL QUESTION NUMBER: SO-110-004
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, WRAIR, MULT
IFS FACILITY NUMBER: 00040
FACILITY TYPE: R&D LABS & TEST FACILITIES
TENANT NAME: WRAIR

FINDING DESCRIPTION: Non-regulated waste is being disposed of in red bags used for regulated medical waste within the laboratories.

CRITERIA: Regulated wastes other than sharps are required to be handled and placed in containers that meet specific standards. Regulated medical waste will be segregated from non-regulated waste at the point of generation. [29 CFR 1910.1030(d)(4)(iii)(B), HSC reg. 40-35]

FINDING COMMENTS: This finding was identified at the following laboratories: Necropsy, Room 4075; Neuropharmacology, Room 3077; Immunology, Room 1009; and Biochemistry, Room B038.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Managers of all laboratories must ensure that personnel generating regulated medical waste receive training in proper waste segregation and practice proper disposal procedures.

CORRECTIVE ACTION TYPE: TRAINING

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

SO.110.4 #2 III ARMY/DOD CORRECTIVE ACTION Solid Waste
FINDING ID: SO-TED-06
MANUAL QUESTION NUMBER: SO-110-004
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DENTAL CLINIC
IFS FACILITY NUMBER: 00002
FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES
TENANT NAME: DENTAL CLINIC

FINDING DESCRIPTION: Non-regulated waste is being disposed of in red bags used for regulated medical waste in the Sterilization Room.

CRITERIA: Regulated wastes other than sharps are required to be handled and placed in containers that meet specific standards. Regulated medical waste will be segregated from non-regulated waste at the point of generation. [29 CFR 1910.1030(d)(4)(iii)(B), HSC reg. 40-35]

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Personnel working in the Sterilization Room must receive training in proper waste segregation and practice proper disposal procedures.

CORRECTIVE ACTION TYPE: TRAINING

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

SO.110.4 #3 III ARMY/DOD CORRECTIVE ACTION Solid Waste

FINDING ID: SO-TED-07

MANUAL QUESTION NUMBER: SO-110-004

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, HOSPITAL, MULT

IFS FACILITY NUMBER: 00002

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: Non-regulated waste is being disposed of in red bags used for regulated medical waste within the Hospital.

CRITERIA: Regulated wastes other than sharps are required to be handled and placed in containers that meet specific standards. Regulated medical waste will be segregated from non-regulated waste at the point of generation. [29 CFR 1910.1030(d)(4)(iii)(B), HSC reg. 40-35]

FINDING COMMENTS: This finding was identified in the following locations: Emergency Room, Oncology, Diagnostic Immunology, Morgue, Microbiology, Histopathology, and Serology.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Managers of all laboratories, wards, and clinics, etc., throughout the Hospital must ensure that personnel receive training in proper waste segregation and practice proper disposal procedures.

CORRECTIVE ACTION TYPE: TRAINING

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

STORAGE TANK MANAGEMENT.

The current underground storage tank (UST) management program, although better than in recent years, is in need of continued work. WRAMC has taken the first step in developing a sound UST management program by identifying all USTs on post and determining their size, contents and usage. All USTs have been inspected for leaks and to determine compliance with future upgrade requirements. Contracts to provide corrosion protection system testing and automatic tank gauging for USTs are being written to provide these measures within the current year. Removal and replacement of substandard USTs has begun and will continue as necessary to comply with the 1998 upgrade requirements. The individual working in this program has displayed great initiative and an eagerness to develop a management program that will ensure future compliance for all USTs.

The management of aboveground storage tanks (ASTs) has been adequate in past years in preventing major spill incidents. However, additional AST requirements, developed in the WRAMC Spill Prevention Control and Countermeasures Plan (SPCCP), have not been communicated to AST owners. Improved communication between the SPCCP writer and personnel involved with AST management should alleviate any compliance concerns and further reduce the potential spill risks associated with AST usage.

ST.90.3.DC #1 I LOCAL CORRECTIVE ACTION Storage Tanks

FINDING ID: ST-JEK-01

MANUAL QUESTION NUMBER: ST-090-003-DC

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST

IFS FACILITY NUMBER: MULT

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The registrations for each underground storage tank (UST) at WRAMC main post expired in 1995 and have not been renewed.

CRITERIA: All USTs containing regulated substances must be registered with the Director (D.C. Mun. Reg., Title 20, Section 5601).

FINDING COMMENTS: Tank registration forms were being completed during the ECAS site visit. Forms have not been filed due to poor record keeping practices in the past.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The DPW, Planning and Environmental Division must register all Main Post USTs.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 2400

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

ST.3.1 #1 I STATE CORRECTIVE ACTION Storage Tanks
FINDING ID: ST-JEK-03
MANUAL QUESTION NUMBER: ST-003-001
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, MULT
IFS FACILITY NUMBER: MULT
FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The registration for all underground storage tanks at Forest Glen have either expired or not been filed.

CRITERIA: Installations/CW facilities are required to comply with state and local regulations concerning storage tank management (EO 12088, Section 1-1). On or before 1 July 1990, the owner, operator or person-in-charge of an underground storage tank shall register the underground storage tank with the Department (COMAR 26.10.03.03).

FINDING COMMENTS: UST registration forms were being completed during the ECAS site visit. Renewal registration forms were not completed due to poor record keeping practices in the past.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The DPW, Planning and Environmental Division must register each UST at Forest Glen.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

ST.25.1 #1 II FEDERAL CORRECTIVE ACTION Storage Tanks
FINDING ID: ST-JEK-04
MANUAL QUESTION NUMBER: ST-025-001
FINDING CATEGORY: CLASS II
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: INST WIDE
IFS FACILITY NUMBER: MULT
FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Ten underground storage tanks (UST) do not meet new UST system or upgrade requirements, including the lining and/or corrosion protection of steel tanks, the cathodic protection of underground piping which routinely contains regulated substances, and the provision of spill and overfill protection equipment.

CRITERIA: Substandard UST systems are required to be upgraded, closed, or removed from service by 22 December 1998 (40 CFR 280.10(c) and 280.21(a) through 280.21(c)).

FINDING COMMENTS: Funding has been secured to remove and replace the 5 substandard USTs (DPW numbers 2, 5, 6, 7 and 8) at Main Post. Plans are underway to remove and replace the 5 substandard USTs (DPW numbers 9, 12, 14, 16 and 20) at Forest Glen.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The DPW Planning and Environmental Division must close and remove all substandard tanks before 22 December 1998. Replace existing USTs with new tanks meeting upgrade requirements.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 500000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

ST.5.1 #1 III FEDERAL CORRECTIVE ACTION Storage Tanks

FINDING ID: ST-JEK-05

MANUAL QUESTION NUMBER: ST-005-001

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, BOILER PLANT

IFS FACILITY NUMBER: 00015

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The secondary containment around the 500-gallon gasoline aboveground storage tank outside the Boiler Plant was approximately half full of precipitation, rendering the containment structure inadequate to contain the contents of the tank. An oily sheen was visible on the surface of the precipitation.

CRITERIA: All bulk storage tanks should be provided with a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation (40 CFR 112.1(d), 112.7(d), and 112.7(e)(2)(ii)).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Boiler Plant foreman must coordinate removal of the oily sheen and precipitation from the containment structure and dispose of the oily portion as regulated waste. Uncontaminated water may be discharged to the storm sewer. The boiler plant foreman should either submit a request to cover the tank and containment structure to prevent precipitation from accumulating in the containment structure or provide procedures for handling precipitation which accumulates in the containment structure. Accumulated precipitation must be inspected for oil content and discharged if there is no visible oil sheen. Each discharge of accumulated storm water must be documented and the record retained for a period of 3 years.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 1000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

POLYCHLORINATED BIPHENYLS (PCBs).

The PCB inventory has been completed and annual document logs are maintained although several certificates of disposal are missing from the records. There are no PCB transformers on the Main Post or at Forest Glen. Light ballasts (which are not regulated under TSCA) are being collected and disposed of as PCB equipment and will help protect the installation from future liabilities associated with the Superfund law. There is a contract in place to remove and replace 13 PCB contaminated transformers but it has not been funded.

T1.2.1 #1 I FEDERAL CORRECTIVE ACTION PCB
FINDING ID: T1-JXL-01
MANUAL QUESTION NUMBER: T1-002-001
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW, P&E DIVISION
IFS FACILITY NUMBER: 00001
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Certificates of disposal for several PCB items are missing from the annual document logs as required by TSCA.

CRITERIA: Generators of PCB waste shall keep a copy of each Certificate of Disposal that they receive from disposers of PCB waste among the records they retain. [40 CFR 761.180(a)(1)(ii) and (b)(1)(ii)]

FINDING COMMENTS: Personnel in the DPW, Planning and Environmental Division are tracking the missing certificates of disposal.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Obtain copies of missing certificates of disposal and update the status of documentation for each incomplete file.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

ASBESTOS.

The Asbestos Management Program is not in compliance with AR 200-1. The installation has not completed the required "Building Survey" and does not have an "Asbestos Management Plan" with an Operations and Maintenance (O&M) Plan, Training Plan, and Abatement Plan. The DPW, Planning and Environmental Division needs to develop and enforce a policy to ensure that all maintenance, renovation, or demolition projects that may disturb asbestos are reported to the Asbestos Program Manager.

T2.900.3.G #1 III ARMY/DOD CORRECTIVE ACTION Asbestos
FINDING ID: T2-AMP-01
MANUAL QUESTION NUMBER: T2-900-003-G
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW, P&E DIVISION
IFS FACILITY NUMBER: 00001
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: The installation does not have a complete Building Survey to identify all asbestos containing materials (ACM) and does not have a program to complete annual follow-up inspections to identify damage and deterioration of ACM and increased risk of exposure to ACM.

CRITERIA: Installations are required to conduct an asbestos survey (AR 200-1, para 10-2j and 10-3b(1) through 10-3b(3)).

FINDING COMMENTS: Buildings on Forest Glen need to be surveyed. The Asbestos Program Coordinator stated that a proposal has been submitted to complete the Building Survey.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Have accredited personnel conduct an asbestos Building Survey for the remaining buildings. Implement a program to annually inspect ACM.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 100000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

RADON.

The Radon Program is not in compliance with AR 200-1, Chapter 11. There is no documentation that mitigation or post-mitigation monitoring had been done in three buildings which exceeded radon levels; and there is no policy in place to assess radon levels in new construction.

T3.1.13.A #1 III ARMY/DOD CORRECTIVE ACTION Radon

FINDING ID: T3-AMP-01

MANUAL QUESTION NUMBER: T3-001-013-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative EXISTING NOV: NO

LOCATION: MAIN POST, DPW, P&E DIVISION

IFS FACILITY NUMBER: 00001

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: There was no documentation to indicate that the required mitigation and post mitigation monitoring of three buildings was completed.

CRITERIA: Installations are required to perform post-mitigation measurement to confirm and document effectiveness of mitigation (AR 200-1, para 11-5c).

FINDING COMMENTS: A work order was submitted in FY 92 to mitigate three buildings which had radon readings higher than 4 pCi/L after Long Term Measurement (LTM) monitoring. At this time, only one building that required mitigation is occupied.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Radon Program Coordinator must ensure that radon mitigation and post mitigation monitoring is completed and documented.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 3000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

T3.1.14.A #1 III ARMY/DOD CORRECTIVE ACTION Radon
FINDING ID: T3-AMP-02
MANUAL QUESTION NUMBER: T3-001-014-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW, P&E DIVISION
IFS FACILITY NUMBER: 00001
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: There is no written policy for measuring radon levels for new construction.

CRITERIA: Installations are required to take steps to keep radon levels at or below 4 pCi/L (AR 200-1, para 11-1b(2)). In new construction, radon levels should be measured and preventive measures incorporated to reduce radon migration.

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Radon Program Coordinator should develop and implement a policy for radon assessment in new construction.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 5000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

LEAD BASED PAINT PROGRAM.

The installation has a draft Child Lead Poisoning Prevention (CLPP) program in place which needs to be updated and finalized. An "Installation Lead Hazard Management Plan" also needs to be developed and implemented.

There are no findings for this environmental media area as all required actions were being managed in accordance with applicable regulations.

WASTEWATER MANAGEMENT.

The primary goal of the wastewater management program is to achieve and maintain compliance with an industrial user pretreatment permit. Current wastewater management practices have been sufficient to keep WRAMC in compliance for all listed parameters except mercury. Mercuric compounds are used sparingly when used on the installation, indicating that the source of mercury is residual mercury in the wastewater system. An on-going program to search for and remove mercury from sink traps and piping in buildings with historic mercury usage has been implemented. Additional processes, such as use of silver recovery units, have kept all other parameters within permit limits. Improper discharges of waste and storm water, specified by the District of Columbia (D.C.) but not explicitly stated in the permit, are a concern. In some instances, waste water is discharged to the storm sewer, and storm water is discharged to sanitary sewer inlets, resulting in non-compliance with D.C. regulations. Increased personnel awareness should eliminate most improper discharges of waste and storm water. Additionally, awareness training should be provided to all personnel handling/using chemicals to inform them of what materials may be legally discharged to the sanitary sewer and which must be collected for proper disposal.

The storm water management program, generally overlooked in past years, is in need of substantial work. The initial steps in storm water compliance, including the determination of whether the facility is required to be permitted and the procurement of all necessary permits, have been completed. Currently, only Forest Glen is required to apply for, and has been issued, a storm water discharge permit. Provisions for storm water management are listed in the permit and include the requirement that a facility develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must include certain required best management practices (BMPs) as well as any additional site-specific BMPs identified at a facility. A draft SWPPP, prepared in 1993, can be used as a framework for the development of a final SWPPP. Implementation of the SWPPP should greatly reduce the number of improper discharges to and of storm water. Personnel have recently been assigned to address storm water management, and are actively seeking to bring the storm water program into compliance by fulfilling all permit conditions, including completing and implementing a SWPPP.

WA.25.2.DC #1 I LOCAL CORRECTIVE ACTION Wastewater

FINDING ID: WA-JEK-01

MANUAL QUESTION NUMBER: WA-025-002-DC

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: INST WIDE

IFS FACILITY NUMBER: MULT

FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Washrack collection drains receive parking lot storm water runoff.

CRITERIA: Discharges to specific sewers must meet specific limitations (District of Columbia Code, 6-927(c) and 6-956(d) through (f)). Storm waters shall be discharged only into those sewers specifically designated as storm or combined sewers.

FINDING COMMENTS: Washracks discharging storm water to the sanitary sewer are located at the: Autocraft Shop, Building 82; and the DPW, Motor Pool, Building 602.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Chief, Planning and Environmental Division must ensure that effluent from the oil/water separators at these washracks is re-routed to the storm sewer and obtain individual discharge permits from the Maryland Department of the Environment.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 10000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.25.1 #2 I FEDERAL CORRECTIVE ACTION Wastewater
FINDING ID: WA-JEK-02
MANUAL QUESTION NUMBER: WA-025-001
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPCA, AUTOCRAFT SHOP
IFS FACILITY NUMBER: 00082
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Soaps and solvents used in engine and vehicle exterior washing emulsify oil and grease, causing it to pass through an oil/water separator (OWS) and into the sanitary sewer.

CRITERIA: Installations/CW facilities must not discharge into a POTW/FOTW any pollutant which would cause pass through or interference. Oil and grease interfere with the normal operation of a POTW (40 CFR 403.5(a) and 403.5(c)(2)). No user shall discharge any wastewater containing oils or grease of petroleum origin (District of Columbia Code, 6-696(9)).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Autocraft Shop manager must prohibit the use of soaps/solvents for vehicle and engine washing. Provide high pressure hot water or steam cleaning as an alternative cleaning method.

CORRECTIVE ACTION TYPE: EQUIPMENT PROCUREMENT OR CHANGE

COST: 1000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.15.3.MD #3 I STATE CORRECTIVE ACTION Wastewater
FINDING ID: WA-JEK-03
MANUAL QUESTION NUMBER: WA-015-003-MD
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: INST WIDE
IFS FACILITY NUMBER: MULT
FACILITY TYPE:

FINDING DESCRIPTION: Records of the frequency and estimated volume of discharges of storm water from secondary containment structures are not maintained as required in section E.2.e(3) of Maryland General Discharge Permit No. 92-GP-0001.

CRITERIA: Specific discharges to waters of the state must have a general permit (COMAR 26.08.04.08C). Installations must comply with all general permit requirements.

FINDING COMMENTS: Recordkeeping requirements were not performed by installation personnel due to their lack of knowledge that a general discharge permit had been issued for the Forest Glen Annex.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Personnel responsible for managing aboveground storage tank secondary containment structures must maintain all records required in the general permit, including the frequency and estimated volume of storm water discharges from secondary containment structures.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.15.1.MD #3 I STATE CORRECTIVE ACTION Wastewater
FINDING ID: WA-JEK-04
MANUAL QUESTION NUMBER: WA-015-001-MD
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DPW, BOILER PLANT
IFS FACILITY NUMBER: 00120
FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Boiler "blowdown" is discharged to waters of the State without a permit.

CRITERIA: Installations/CW facilities which discharge to waters of the state must have a discharge permit (COMAR 26.08.04.01B(1) through (5), section C(2)(a)).

FINDING COMMENTS: The boiler is "blown down" once every 8-hour shift. A corrosive sludge dispersant chemical is used during blowdown. Information of the constituents of the blowdown chemicals used was unavailable.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Boiler Plant foreman must containerize boiler blowdown for disposal until the surge tank and associated piping are repaired to allow the resumption of blowdown discharge to the sanitary sewer.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 2000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.25.2 #2 I FEDERAL CORRECTIVE ACTION Wastewater

FINDING ID: WA-JEK-05

MANUAL QUESTION NUMBER: WA-025-002

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, WRAIR, MEDICAL AUDIO VISUAL SERVICE

IFS FACILITY NUMBER: 00040

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

TENANT NAME: WRAIR

FINDING DESCRIPTION: Unknown concentrations of silver in waste wash water, spent developer and effluent from a silver recovery unit are discharged to the sanitary sewer.

CRITERIA: Installations/CW facilities must not discharge into a POTW/FOTW any pollutant which would cause pass through or interference. Silver is toxic to the biological treatment process at the POTW (40 CFR 403.5(a) and 403.5(c)(2)). All waste must be characterized before disposal and disposed of properly (40 CFR 262.1(a)).

FINDING COMMENTS: This finding was identified in room B070. Equipment included two black and white and two color photo processors. Refer to finding number HW-JXL-05 for additional information.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Sample and analyze all wastes to determine silver concentrations prior to discharge to the sanitary sewer. If silver concentrations in the waste wash water, developer or fixer are greater than 3.3 mg/L and the silver recovery unit is capable of reducing silver concentrations below 3.3 mg/L, process wash water, developer and fixer through the unit prior to discharge. If the silver concentration of the effluent from the silver recovery unit is greater than 3.3 mg/L, containerize the effluent and coordinate recycling/disposal with the DPW, Planning and Environmental Division.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 150

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.25.1 #1 I FEDERAL CORRECTIVE ACTION Wastewater
FINDING ID: WA-JEK-06
MANUAL QUESTION NUMBER: WA-025-001
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DOIM, GRAPHICS SHOP
IFS FACILITY NUMBER: 00001
FACILITY TYPE: PRODUCTION FACILITIES

FINDING DESCRIPTION: Effluent from a black and white photo processing machine discharges waste photographic chemicals directly to the sanitary sewer.

CRITERIA: Installations/CW facilities must not discharge into a POTW/FOTW any pollutant which would cause pass through or interference. Silver is toxic to the biological treatment process at the POTW (40 CFR 403.5(a) and 403.5(c)(2)). All waste must be characterized before disposal and disposed of properly (40 CFR 262.1(a)).

FINDING COMMENTS: This photo processor is located outside room G012. Refer to finding number HW-JXL-05 for additional information.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Graphics Shop manager must containerize all waste effluent from the photo processor, coordinate sampling and analysis to determine silver concentrations. Coordinate recycling/disposal of containerized waste, sampling, and analysis with the DPW, Planning and Environmental Division.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT
COST: 150
1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.15.3.MD #2 I STATE CORRECTIVE ACTION Wastewater

FINDING ID: WA-JEK-07

MANUAL QUESTION NUMBER: WA-015-003-MD

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, SALT STORAGE AREA

IFS FACILITY NUMBER:

FACILITY TYPE: SUPPLY & STORAGE FACILITIES, LOGISTICS

FINDING DESCRIPTION: De-icing salt storage piles are not enclosed or covered as required by the installation's General Discharge Permit.

CRITERIA: Installations/CW facilities are required to comply with state and local wastewater regulations (EO 12088, Section 1-1). No person should discharge a pollutant to the waters of the District of Columbia. (District of Columbia Statutes, Part 1, Title 6, Chapter 9, Subchapter 3, Sections 6-922 and 6-926).

FINDING COMMENTS: The salt pile is located near the Roads and Grounds area.

STATUS OF CORRECTION:

CORRECTIVE ACTION: De-icing salt must be moved into the salt storage conex or covered to prevent exposure to precipitation.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 5000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.35.1.DC #1 I STATE CORRECTIVE ACTION Wastewater
FINDING ID: WA-JEK-08
MANUAL QUESTION NUMBER: WA-035-001-DC
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, MULT
IFS FACILITY NUMBER: MULT
FACILITY TYPE:

FINDING DESCRIPTION: Wastewater sample results for mercury exceed the permit limit at 6 sample locations.

CRITERIA: Industrial users must meet permitting requirements (D.C. Mun. Reg., Title 21, Sections 1502.1, 1502.2, and 1506.1(a), (b), and (d)).

FINDING COMMENTS: The discharge limit for mercury is 1 part per billion (ppb). This finding was identified at: manhole 4 (56 ppb), manhole 28A (22 ppb), manhole 29 (13 ppb), manhole 56 (3 ppb), manhole 75A (6 ppb) and manhole 106 (5 ppb). The probable source of mercury is from accumulated mercury due to historical use of mercuric compounds in routine operations. Mercury may have accumulated in sink traps.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Investigate the source(s) of the mercury at each sampling location with a mercury sniffer. Remove all mercury found in the sewer system and dispose of the mercury as hazardous waste.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 10000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.15.1.MD #1 I STATE CORRECTIVE ACTION Wastewater
FINDING ID: WA-JEK-09
MANUAL QUESTION NUMBER: WA-015-001-MD
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DPW, BOILER PLANT
IFS FACILITY NUMBER: 00120
FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Various materials have been discharged to ground water via spillage on an earthen floor.

CRITERIA: Installations/CW facilities which discharge to waters of the state must have a discharge permit (COMAR 26.08.04.01B(1) through (5), C(2)(a)).

FINDING COMMENTS: The earthen floor is extensively stained due to past spills. All material drums stored in this area are unlabeled and appear to have been there for many years. Refer to finding HW-JXL-02 for additional hazardous waste handling concerns.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Boiler Plant foreman must coordinate removal and disposal of the waste material drums with the DPW, Planning and Environmental (P&E) Division. The Chief, P&E Division must coordinate collection of soil and groundwater samples to determine the extent of contamination.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT
COST: 8000
1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.15.1.MD #2 I STATE CORRECTIVE ACTION Wastewater
FINDING ID: WA-JEK-10
MANUAL QUESTION NUMBER: WA-015-001-MD
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, MULT
IFS FACILITY NUMBER: MULT
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Waste water from vehicle steam cleaning operations discharges directly to nearby storm drains. These discharges have not been tested.

CRITERIA: Installations/CW facilities which discharge to waters of the state must have a discharge permit (COMAR 26.08.04.01B(1) through (5), C(2)(a)).

FINDING COMMENTS: This finding was identified at the DOL Motor Pool, Building 605; and the DOL Supply Warehouse, Building 178; both located at Forest Glen. Personnel interviewed stated that construction of a vehicle washrack for the DOL Motor Pool is being planned.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Wash vehicles in approved vehicle washracks "only", i.e. the washrack at DPW Maintenance Shop, Building 602. Construct a vehicle washrack facility for the DOL Motor Pool.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 25000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.15.1.MD #4 I STATE CORRECTIVE ACTION Wastewater

FINDING ID: WA-JEK-11

MANUAL QUESTION NUMBER: WA-015-001-MD

FINDING CATEGORY: CLASS I

FINDING TYPE: Negative EXISTING NOV: NO

LOCATION: MAIN POST, HOSPITAL

IFS FACILITY NUMBER: 00002

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: Waste wash water from vehicle washing on the west side of Building 2 is being discharged to a storm drain.

CRITERIA: Installations/CW facilities are required to comply with state and local wastewater regulations (EO 12088, Section 1-1). No person should discharge a pollutant to the waters of the District of Columbia. (District of Columbia Statutes, Part 1, Title 6, Chapter 9, Subchapter 3, Sections 6-922 and 6-926).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: Wash vehicles in approved washracks "only". The only approved washrack on the Main Post is at the DPCA, Autocraft Shop, Building 82.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.25.2 #1 I FEDERAL CORRECTIVE ACTION Wastewater
FINDING ID: WA-JEK-12
MANUAL QUESTION NUMBER: WA-025-002
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: FOREST GLEN, DOL, MOTOR POOL
IFS FACILITY NUMBER: 00605
FACILITY TYPE: MAINTENANCE FACILITIES

FINDING DESCRIPTION: Spilled oil and a caustic solution (powdered sodium hydroxide and water), used to clean up oil spills, are disposed into sinks connected to the sanitary sewer.

CRITERIA: Installations/CW facilities must not discharge into a POTW/FOTW any pollutant which would cause pass through or interference. Free oil can pass through and/or interfere with treatment processes at the POTW (40 CFR 403.5(a) and 403.5(c)(2)). Installations shall not introduce specific pollutants, including corrosive chemicals, into a POTW (40 CFR 403.5(b)). All waste must be characterized before disposal and disposed of properly (40 CFR 262.1(a)).

FINDING COMMENTS: A collection tank for spill cleanup wastes has been provided in a storage shed behind Building 605. Instructions on the sodium hydroxide container state that a "60-1 dilution" should be used as a first try when cleaning. Currently, personnel just dump some sodium hydroxide into a bucket and add water, resulting in a solution of unknown pH. Dry cleanup materials are readily available in the Motor Pool.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Motor Pool foreman must assure that personnel use dry clean up methods (such as "speedi dry") to clean up the bulk of a spill. Containerize waste "speedi dry" and coordinate disposal with the DPW, Planning and Environmental Division. Mopping will still be necessary to remove any oil residue left on the concrete after clean up with "speedi dry."

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 200

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.15.3.MD #1 I STATE CORRECTIVE ACTION Wastewater
FINDING ID: WA-JEK-13
MANUAL QUESTION NUMBER: WA-015-003-MD
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: DPW, P&E DIVISION
IFS FACILITY NUMBER: INST
FACILITY TYPE:

FINDING DESCRIPTION: A signed, finalized Storm Water Pollution Prevention Plan (SWPPP) has not been prepared, as required in the installation's General Discharge Permit.

CRITERIA: Specific discharges to waters of the state must have a general permit. All permit requirements must be met (COMAR 26.08.04.08C).

FINDING COMMENTS: A draft SWPPP, prepared in September 1993, should be used as a framework when preparing the final SWPPP. The draft SWPPP contains most of the information required in the SWPPP except for a topographic map of Forest Glen and an updated description of all processes occurring at the DOL, Motor pool.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Chief, P&E Division must ensure that a final SWPPP is signed by the Commander or an authorized representative of the Commander.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 1000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.25.2 #3 I FEDERAL CORRECTIVE ACTION Wastewater
FINDING ID: WA-JEK-14
MANUAL QUESTION NUMBER: WA-025-002
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, HOSPITAL, DPALS, ROOM 155
IFS FACILITY NUMBER: 00002
FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: A corrosive dishwashing powder used to clean glassware is being discharged through a sink drain to the sanitary sewer.

CRITERIA: Installations/CW facilities must not introduce specific pollutants into a POTW/FOTW, including materials which can cause corrosive structural damage (40 CFR 403.5(b)). All waste must be characterized before disposal and disposed of properly (40 CFR 262.1(a)).

FINDING COMMENTS: The dishwashing powder is corrosive enough to eat away the metal around the sink drain.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Use a non-corrosive detergent in the dishwasher.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.25.2.DC #2 I STATE CORRECTIVE ACTION Wastewater
FINDING ID: WA-JEK-15
MANUAL QUESTION NUMBER: WA-025-002-DC
FINDING CATEGORY: CLASS I
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, HOSPITAL
IFS FACILITY NUMBER: 00002
FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

FINDING DESCRIPTION: Storm water runoff from the west side of Building 2 discharges to a sanitary sewer inlet.

CRITERIA: Discharges to specific sewers must meet specific limitations. Storm waters shall be discharged only into those sewers specifically designated as storm or combined sewers (District of Columbia Code, 6-927(c) and 6-956(d) through (f)).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Chief, Planning and Environmental Division must ensure that a method to divert storm water away from the sanitary sewer inlet is provided.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 200

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.25.2 #1 III FEDERAL CORRECTIVE ACTION Wastewater

FINDING ID: WA-JEK-16

MANUAL QUESTION NUMBER: WA-025-002

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative EXISTING NOV: NO

LOCATION: MAIN POST, DPW, BOILER PLANT

IFS FACILITY NUMBER: 00015

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: A process tank labeled "sulfite and caustic only" is equipped with a valved drain pipe that leads directly to a floor drain.

CRITERIA: Installations/CW facilities shall not introduce specific pollutants into a POTW/FOTW, including materials which may cause corrosive structural damage (40 CFR 403.5(b)).

FINDING COMMENTS: When a boiler is taken off-line for maintenance, the tank of sulfite and caustic "blowdown" solution is drained and the solution collected. The empty tank is then cleaned with the wash water discharging through the drain pipe. Based on the current design, there is potential that an accidental discharge may occur.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Boiler Plant foreman should provide a means of protection for the drainage valve to prevent accidental discharges of caustic material to the floor drain and sewer system.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 100

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.25.2 #2 III FEDERAL CORRECTIVE ACTION Wastewater

FINDING ID: WA-JEK-17

MANUAL QUESTION NUMBER: WA-025-002

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DOIM, GRAPHICS SHOP

IFS FACILITY NUMBER: 00001

FACILITY TYPE: PRODUCTION FACILITIES

FINDING DESCRIPTION: Personnel are mixing and using a corrosive developer solution, "Kodalith", in sinks which discharge to the sanitary sewer.

CRITERIA: Installations/CW facilities must not discharge into a POTW/FOTW any pollutant which would cause pass through or interference, including materials which may cause corrosive structural damage (40 CFR 403.5(a) and 403.5(c)(2)). All waste must be characterized before disposal and disposed of properly (40 CFR 262.1(a)).

FINDING COMMENTS: This finding was identified in rooms G012 and G016.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Graphics Shop manager should ensure that personnel do not use the sink when mixing or using "Kodalith." Purchase and use a portable tray/basin equipped with secondary containment to replace the use of the sink.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 100

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.25.2 #3 III FEDERAL CORRECTIVE ACTION Wastewater
FINDING ID: WA-JEK-18
MANUAL QUESTION NUMBER: WA-025-002
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DOIM, GRAPHICS SHOP
IFS FACILITY NUMBER: 00001
FACILITY TYPE: PRODUCTION FACILITIES

FINDING DESCRIPTION: When the photo processor located outside Room G012 is unusable, photos are manually developed in a sink inside Room G012.

CRITERIA: Installations/CW facilities must not discharge into a POTW/FOTW any pollutant which would cause pass through or interference. Fixer solution contains silver which is toxic to the biological treatment process at the POTW (40 CFR 403.5(a) and 403.5(c)(2)). All waste must be characterized before disposal and disposed of properly (40 CFR 262.1(a)).

FINDING COMMENTS:

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Graphics Shop manager should not allow photo developing to be performed in the sink basin. Instead, Graphics Shop personnel should use individual trays equipped with secondary containment so that spills can easily be collected and disposed through coordination with the DPW, Planning and Environmental Division.

CORRECTIVE ACTION TYPE: OPERATIONAL OR PROCEDURAL CHANGE

COST: 100

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WA.25.2 #4 III FEDERAL CORRECTIVE ACTION Wastewater

FINDING ID: WA-JEK-19

MANUAL QUESTION NUMBER: WA-025-002

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, AFIP, MULT

IFS FACILITY NUMBER: 00054

FACILITY TYPE: HOSPITAL & MEDICAL FACILITIES

TENANT NAME: AFIP

FINDING DESCRIPTION: Spills or leaks of hazardous materials and wastes stored in chemical hoods would discharge to the sanitary sewer.

CRITERIA: Installations/CW facilities must not discharge into a POTW/FOTW any pollutant which would cause pass through or interference, including pollutants which may cause corrosive structural damage and pollutants which create a fire or explosion hazard (40 CFR 403.5(a) and 403.5(c)(2)). All waste must be characterized before disposal and disposed of properly (40 CFR 262.1(a)).

FINDING COMMENTS: Materials stored in areas with potential for unauthorized discharges were observed at the following labs: Toxicology, Room 4052, toluene, methylene chloride, methanol; Environmental Toxicology, Room 2050, methylene chloride, hexane, potassium hydroxide, nitric acid/hydrochloric acid waste, methyl isobutyl ketone (MIBK); Environmental Toxicology, Rooms 2042 and 2046, MIBK, hexane, ethanol, methanol, acetone, and methylene chloride.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Department managers should request that all unnecessary drains be sealed and assure that all other drains are plugged when not in use.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 1000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WATER QUALITY MANAGEMENT.

Drinking water is provided to WRAMC's Main Post, Forest Glen Annex and Glen Haven Annex by offpost suppliers. Therefore there are no civilian regulatory drinking water requirements applicable to these Army facilities. The only applicable requirements are Army regulations and good management practice. Problem areas include: no central drinking water authority responsible for the drinking water program to ensure a viable program; no disinfection of repaired/new water pipes/mains; no written plans/SOPs for cross connection control/backflow prevention, flushing of water systems, and emergency response; no current water supply maps; and the main post's water meters are inoperable or inaccessible.

WQ.2.1.A #1 POSITIVE ARMY/DOD CORRECTIVE ACTION Water Quality
FINDING ID: WQ-WJB-01
MANUAL QUESTION NUMBER: WQ-002-001-A
FINDING CATEGORY: POSITIVE
FINDING TYPE: Positive EXISTING NOV: NO
LOCATION: MAIN POST, DPW, P&E DIVISION
IFS FACILITY NUMBER: INST
FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The WRAMC initiated a lead and copper monitoring program of water at Main Post, Forest Glen, and Glen Haven 2 years ago. This program serves to alleviate consumer concerns and to verify lead and copper levels in WRAMC's drinking water. The installation has taken a proactive approach due to the fact that WRAMC purchases its drinking water at all three locations and the suppliers are responsible for the quality of the water.

CRITERIA: Installations should take a proactive approach to ensure safe drinking water is provided to consumers. This approach alleviates consumers concerns and verifies the quality of drinking water (MP).

FINDING COMMENTS:

STATUS OF CORRECTION:
CORRECTIVE ACTION:

CORRECTIVE ACTION TYPE:
COST: 0
1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WQ.1.4.A #1 III ARMY/DOD CORRECTIVE ACTION Water Quality

FINDING ID: WQ-WJB-02

MANUAL QUESTION NUMBER: WQ-001-004-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative EXISTING NOV: NO

LOCATION: MAIN POST, DPW, P&E DIVISION

IFS FACILITY NUMBER: INST

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Water supply distribution system maps are not current. The latest edition was dated 1987.

CRITERIA: The installation is required to prepare and keep current water supply distribution system maps (AR 420-46, para 2-7).

FINDING COMMENTS: The existing maps are missing pertinent information such as the fire hydrant located between Buildings 2 and 54 at the Main Post. The Master Planner is in the process of revising the scope of work on an existing contract to include the updating of some maps and construction plans.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Chief, Planning and Environmental Division must ensure the existing General Water Maps are updated either in-house or provide the necessary paperwork to contract the work out.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 2000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WQ.2.2.A #1 III ARMY/DOD CORRECTIVE ACTION Water Quality

FINDING ID: WQ-WJB-03

MANUAL QUESTION NUMBER: WQ-002-002-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative EXISTING NOV: NO

LOCATION: MAIN POST, DPW, P&E DIVISION

IFS FACILITY NUMBER: INST

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: There is no cross connection control/backflow prevention plan at WRAMC.

CRITERIA: No interconnection between a potable water distribution system and a sewage system shall be permitted. Each installation shall undertake an organized program that includes instruction, inspection, and required improvements in order to detect and remove all potential or existing cross-connections, and to insure that proper measures (e.g., air gaps and back flow prevention devices) are taken to prevent back siphonage (AR 40-5, para 12-2f; AR 420-46, para 3-3; and TB MED 576, para 4-2).

FINDING COMMENTS: Personnel at AFIP stated that there was an episode approximately 9 months ago where water from a fifth floor laboratory siphoned back into a drinking water fountain at Building 54, Main Post. The plan should identify locations where backflow prevention devices are required and the type of device required for each location. In addition, Plumbing Shop personnel should be trained in the areas of backflow prevention device installation and inspection. Estimated cost: \$2,000 per employee; or contract out consulting service to provide inspections and expertise on equipment selection and installation. Estimated cost: \$25,000 per year.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Chief, Planning and Environmental Division must prepare the necessary paperwork to ensure that a cross connection/backflow prevention plan is developed and maintained in accordance with guidelines from the American Water Works Association, U.S. Environmental Protection Agency (Publication 570/9-89-007), and USAEHA Water Quality Information paper number 24.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 20000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WQ.2.3.A #1 III ARMY/DOD CORRECTIVE ACTION Water Quality

FINDING ID: WQ-WJB-04

MANUAL QUESTION NUMBER: WQ-002-003-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, FIRE PROTECTION DIVISION

IFS FACILITY NUMBER: INST

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The WRAMC does not have a written water distribution system flushing plan.

CRITERIA: Water distribution system flushing shall be performed on an annual basis according to a written plan (AR 420-46, TM 5-660 and TB MED 576).

FINDING COMMENTS: Flushing is accomplished in conjunction with local governments in the surrounding areas. When the DC and Montgomery County governments flush the water line around WRAMC the Main Post fire department is notified. The Main Post fire department then flushes the WRAMC lines. Records are kept of flushing activities. The plan should address the systematic flushing of the system from the areas where the water enters the distribution systems to the extremities of the systems; operation and maintenance of the system valves; documentation of flushing events; and the reason for flushing.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Fire Chief, with oversight from the Chief, Planning and Environmental Division, is required to develop and implement a written comprehensive flushing and valve exercising program for each of the drinking water distribution systems in accordance with TM 5-660, Operation and Maintenance of Water Supply, Treatment, and Distribution System Facilities.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 5000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WQ.1.5.A #1 III ARMY/DOD CORRECTIVE ACTION Water Quality

FINDING ID: WQ-WJB-05

MANUAL QUESTION NUMBER: WQ-001-005-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative EXISTING NOV: NO

LOCATION: MAIN POST, DPW, P&E DIVISION

IFS FACILITY NUMBER: INST

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The WRAMC does not have a drinking water emergency SOP to alert WRAMC personnel in emergency situations.

CRITERIA: Installations are required to have a SOP for alerting personnel in national or local emergencies or times of actual or anticipated noncompliance (AR 420-46, para 2-6b).

FINDING COMMENTS: This SOP should address emergencies such as floods, tornadoes, drought, severe contamination of the water source and system, etc.; and list each person's responsibilities, actions, and personnel to contact. Each person/office involved in the SOP should have a copy readily available, and the SOP should be tested on a periodic basis to confirm that the planned procedures will remedy the situation in an efficient manner.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Chief, Planning and Environmental Division is required to coordinate the preparation of a written drinking water emergency SOP to serve as a guide in addressing actual or potential drinking water contamination or shortages. Excellent guidance is available via State of Washington publication "Emergency Planning Instructional Guide and Emergency Planning Workbook."

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 50000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WQ.1.1.A #1 III ARMY/DOD CORRECTIVE ACTION Water Quality

FINDING ID: WQ-WJB-06

MANUAL QUESTION NUMBER: WQ-001-001-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative

EXISTING NOV: NO

LOCATION: MAIN POST, DPW, P&E DIVISION

IFS FACILITY NUMBER: 00001

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: The DPW, Planning and Environmental (P&E) Division did not maintain a current file of applicable Federal, DOD, U.S. Army and State regulations on water quality.

CRITERIA: Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on water quality, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP).

FINDING COMMENTS: Missing documents include: AR 40-5, TM 5-660, and TB MED 575. According to personnel questioned, the missing regulations were ordered in November 1995.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Chief, P&E Division should determine the status of the existing order for regulations and continue to follow-up until all regulations are in order.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WQ.2.4.A #1 III ARMY/DOD CORRECTIVE ACTION Water Quality
FINDING ID: WQ-WJB-07
MANUAL QUESTION NUMBER: WQ-002-004-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW, UTILITIES DIVISION
IFS FACILITY NUMBER: INST
FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Not all water mains/pipes are disinfected after repairs/replacement prior to use.

CRITERIA: After new/repared water mains/pipes have been flushed to remove the dirt and debris introduced during repair or construction, they shall be disinfected prior to being put back into service (TB MED 576, para 4-3c(1); AR 420-46, para 3-1b; and TM 5-660, para 8-2d(1)(b)) and section 6H). After flushing the disinfection solution from the line a microbiological test is performed to ensure that adequate disinfection has occurred.

FINDING COMMENTS: The DPW, Utilities Division personnel were not sure that repaired/replaced line/mains were disinfected or that contractors were notified of the requirement. The Preventive Medicine Service (PVNTMED Svc) personnel said that they were not always notified of repairs/replacements and that they became involved only when they accidentally saw the repairs/replacements being made.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Chief, Utilities Division should: Develop an SOP for water mains/lines repairs/replacements; ensure that DPW personnel and contractors know of and adhere to SOP requirements, including disinfection (disinfection will be per AWWA Standard AWWA C651-86); and coordination with PVNTMED Svc personnel to ensure microbiological testing after disinfection.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WQ.2.5.A #1 III ARMY/DOD CORRECTIVE ACTION Water Quality

FINDING ID: WQ-WJB-08

MANUAL QUESTION NUMBER: WQ-002-005-A

FINDING CATEGORY: CLASS III

FINDING TYPE: Negative EXISTING NOV: NO

LOCATION: MAIN POST, DPW, UTILITIES DIVISION

IFS FACILITY NUMBER: MAIN POST

FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: Water meters which measure the purchased water used at the Main Post are inoperable or inaccessible (concrete covers the meter access point).

CRITERIA: Purchased water should be measured by a water meter (AR 420-46, para 8-2a).

FINDING COMMENTS: The Main Post is paying for water based on water supplier estimates instead of actual use. DPW has an FY 96 project programmed to make the meters accessible, however, this project has been programmed for years and has not been funded. Using water meters will ensure that WRAMC pays for only the water entering the post. For example, the estimated cost of water at the Main Post for FY 95 is \$219,212. Assuming a 20% water use reduction, the annual savings would be \$43,842.

STATUS OF CORRECTION:

CORRECTIVE ACTION: The Chief, Utilities Division should prepare all necessary paperwork to ensure the repair of the inoperable and inaccessible meters. When the project is completed, read the meters and provide the flows to the water supplier for determining actual use costs.

CORRECTIVE ACTION TYPE: CORRECTIVE PROJECT

COST: 310000

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

WQ.1.2.A #1 III ARMY/DOD CORRECTIVE ACTION Water Quality
FINDING ID: WQ-WJB-09
MANUAL QUESTION NUMBER: WQ-001-002-A
FINDING CATEGORY: CLASS III
FINDING TYPE: Negative EXISTING NOV: NO
LOCATION: MAIN POST, DPW
IFS FACILITY NUMBER: 00001
FACILITY TYPE: UTILITIES & GROUND IMPROVEMENTS

FINDING DESCRIPTION: There is no central DPW drinking water POC who has overall authority for management of the WRAMC drinking water program.

CRITERIA: Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).

FINDING COMMENTS: Presently without a central POC the drinking water program is not viable. To obtain information and/or action many divisions have to be contacted before the correct person/office is reached and action can be initiated. Program issues that need attention are: Coordinating drinking water activities within DPW, Preventive Medicine Service (PVNTMED Svc), and other organizations on post; and preparing and implementing a written: distribution system flushing program, distribution system cross connection/backflow prevention program, emergency alert SOP, and disinfection of repaired/replaced water mains/lines SOP.

STATUS OF CORRECTION:

CORRECTIVE ACTION: Appoint an individual with authority to address and resolve the many WRAMC drinking water issues.

CORRECTIVE ACTION TYPE: ADMINISTRATIVE OR POLICY CHANGE

COST: 0

1383 PROJECT NUMBER:

CORRECTIVE ACTION COMMENTS:

APPENDIX A

GLOSSARY OF ACRONYMS

AAFES	Army & Air Force Exchange System
ACM	Asbestos-Containing Material
AFIP	Armed Forces Institute of Pathology
AR	Army Regulation
ARMD	Air Resources Management Division
AST	Aboveground Storage Tank
AWWA	American Water Works Association
BMP	Best Management Practices
CAA	Clean Air Act
CEM	Continuous Emissions Monitoring
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CLPP	Child Lead Poisoning Prevention
CMS	Central Material Service
COMAR	Code of Maryland Regulation
CRMP	Cultural Resources Management Plan
CVOC	Control of Volatile Organic Compounds
CWA	Clean Water Act
DC	District of Columbia
DFR	Draft Findings Review
DMR	Discharge Monitoring Report
DOD	Department of Defense
DOL	Directorate of Logistics
DOT	Department of Transportation
DPALS	Department of Pathology and Area Laboratory Services
DPCA	Directorate of Personnel and Community Activities
DPW	Directorate of Public Works
DRMO	Defense Reutilization and Marketing Office
DSA	Direct Support Activity
DSHE	Directorate of Safety, Health and Environment
EA	Environmental Assessment
ECAR	Environmental Compliance Assessment Report
ECAS	Environmental Compliance Assessment System
EO	Environmental Office
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
FFCA	Federal Facilities Compliance Act
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act

GLOSSARY OF ACRONYMS (Cont.)

FONSI	Finding of No Significant Impact
FOTW	Federally-Owned Treatment Works
HAZCOM	Hazard Communication
HM	Hazardous Material
HPP	Historic Preservation Plan
HVAC	Heating Ventilation and Air Conditioning
HW	Hazardous Waste
H/S	Health and Safety
ICAP	Installation Corrective Action Plan
INRMP	Integrated Natural Resource Management Plan
INST	Installation
IPMC	Installation Pest Management Coordinator
IPMP	Installation Pest Management Plan
IRP	Installation Restoration Program
ISCP	Installation Spill Contingency Plan
ISO	Installation Safety Office
LTM	Long Term Measurement
MACOM	Major Command
MD	Maryland
MDB	Material Distribution Branch
MDE	Maryland Department of Environment
MEDCOM	Medical Command
MIBK	Methyl Isobutyl Ketone
MRI	Magnetic Resonance Imaging
MSDS	Material Safety Data Sheets
MULT	Multiple
NEPA	National Environmental Policy Act
NFPA	National Fire Protection Act
NOI	Notice of Intent
NOV	Notice of Violation
NPDES	National Pollutant Discharge and Elimination System
OSHA	Occupational Safety and Health Administration
PA	Programmatic Agreement
PCB	Polychlorinated Biphenyls
POL	Petroleum, Oils, and Lubricants
POTW	Publicly-Owned Treatment Works
PPE	Personal Protective Equipment
PVNTMED Svc	Preventive Medicine Service
PX	Post Exchange

GLOSSARY OF ACRONYMS (Cont.)

QAE	Quality Assurance Evaluator
RCRA	Resource Conservation and Recovery Act
RMW	Regulated Medical Waste
SHPO	State Historic Preservation Office
SOP	Standard Operating Procedure
SPCCP	Spill Prevention, Control, and Countermeasures Plan
SWPPP	Storm Water Pollution Prevention Plan
TAPES	Total Army Performance Evaluation System
TB MED	Technical Bulletin Medical
TEAM	The Environmental Assessment Management
TSCA	Toxic Substances Control Act
UL	Underwriters Laboratories
USACHPPM	U.S. Army Center for Health Promotion and Preventive Medicine
USAEC	U.S. Army Environmental Center
UST	Underground Storage Tank
VEIP	Vehicle Emissions Inspection Program
WRAIR	Walter Reed Army Institute of Research
WRAMC	Walter Reed Army Medical Center
WTP	Water Treatment Plant
WWTP	Wastewater Treatment Plant

APPENDIX B

DRAFT INSTALLATION CORRECTIVE ACTION PLAN (ICAP)

This appendix contains the ICAP framework, provided on disk and in hard copy to Walter Reed Army Medical Center and MEDCOM for further development. The purpose of the ICAP is to be a planning document for Walter Reed Army Medical Center and MEDCOM to use as a funding identifier and tracking system for executing the corrective actions specified in the ECAR. The ICAP is intended to be a matrixed format listing findings, corrective actions, schedules, and required resources for correcting the deficiencies.

Version 1.5.1 of the ECAS software and Version 1.5 User's Guide were provided to Walter Reed Army Medical Center at the end of the onsite assessment. The installation can continue to develop the ICAP using the ECAS software, or the ICAP can be developed in a database management software such as Dbase III or IV, Foxpro, Quattro Pro, Paradox, Lotus, etc. The ECAS software is capable of transferring the findings database (provided on disk as WRAMC.ZIP) into a generic data file. See Chapter 10, "Database Administration", in the User's Guide for more information on transferring the ECAS database to a commercial database software program.

Typically, MEDCOM will request the completed ICAP within 6 weeks of receipt of this ECAR and draft ICAP. The installation may be requested periodically by MEDCOM to submit a report on the status of the ICAP.

APPENDIX C

FINDINGS BY FACILITY

<u>FACILITY NO.</u>	<u>LOCATION</u>	<u>QUESTION NO.</u>	<u>CLASS</u>	<u>FINDING ID.</u>	<u>PAGE NO.</u>
	MAIN POST, SALT STORAGE	WA-015-003-MD	01	WA-JEK-07	3-130
00001	MAIN POST, DPW, P&E DIVISION	PO-005-004-	01	PO-JEK-02	3-92
00001	MAIN POST, DOIM, GRAPHICS	WA-025-001-	01	WA-JEK-06	3-129
00001	MAIN POST, DPW, HVAC SHOP	A -090-002-	01	A-WBM-04	3-6
00001	MAIN POST, DPW, P&E DIVISION	A -003-001-	01	A-WBM-05	3-7
00001	MAIN POST, DPW, P&E DIVISION	T1-002-001-	01	T1-JXL-01	3-115
00001	MAIN POST, DPW, P&E DIVISION	NR-010-002-	01	NR-DEP-01	3-57
00001	MAIN POST, DPW, P&E DIVISION	NR-020-001-MD	01	NR-DEP-02	3-58
00001	MAIN POST, DPW, P&E DIVISION	C -005-002-	01	CR-JAM-01	3-14
00001	MAIN POST, DPW, P&E DIVISION	C -005-001-	01	CR-JAM-02	3-15

00001	MAIN POST, DPW, P&E DIVISION	WQ-001-001-A	03	WQ-WJB-06	3-149
00001	MAIN POST, DPW	WQ-001-002-A	03	WQ-WJB-09	3-152
00001	MAIN POST, DPW, P&E DIVISION	PM-001-006-A	03	PM-KMH-05	3-77
00001	MAIN POST, DPW, P&E DIVISION	PM-001-004-A	03	PM-KMH-16	3-88
00001	MAIN POST, DPW, P&E DIVISION	PM-045-006-A	03	PM-KMH-12	3-84
00001	MAIN POST, DOIM, GRAPHICS	WA-025-002-	03	WA-JEK-17	3-140
00001	MAIN POST, DOIM, GRAPHICS	WA-025-002-	03	WA-JEK-18	3-141
00001	MAIN POST, DPW, P&E DIVISION	T3-001-013-A	03	T3-AMP-01	3-120
00001	MAIN POST, DPW, P&E DIVISION	T3-001-014-A	03	T3-AMP-02	3-121
00001	MAIN POST, DPW, P&E DIVISION	T2-900-003-G	03	T2-AMP-01	3-117
00001	MAIN POST, DPW, P&E DIVISION	T2-900-004-G	03	T2-AMP-02	3-118
00001	MAIN POST, DPW, P&E DIVISION	A -001-002-A	03	A-WBM-09	3-11
00001	MAIN POST, DPW, P&E DIVISION	O5-001-003-A	03	O5-LLB-01	3-69
00001	MAIN POST, DPW, P&E DIVISION	O5-001-007-R	03	O5-LLB-02	3-70

00001	MAIN POST, DPW, P&E DIVISION	O1-005-006-A	03	O1-DEP-01	3-62
00001	MAIN POST, DPW, WORK COORD	O1-005-002-A	03	O1-DEP-02	3-63
00001	MAIN POST, DPW, P&E DIVISION	O1-001-002-A	03	O1-DEP-03	3-64
00001	MAIN POST, DPW, P&E DIVISION	NR-001-003-A	03	NR-DEP-03	3-59
00001	MAIN POST, DPW, P&E DIVISION	NR-001-002-A	03	NR-DEP-04	3-60
00001	MAIN POST, DPW, P&E DIVISION	C -005-001-A	03	CR-JAM-03	3-16
00001	MAIN POST, DPW	C -001-002-A	03	CR-JAM-04	3-17
00001	MAIN POST, DPW, HVAC SHOP	HM-035-009-	HS	HM-AMP-05	3-23
00001	MAIN POST, DPW, HVAC SHOP	HM-035-004-	HS	HM-AMP-06	3-24
00001	MAIN POST, DPW, PAINT SHOP	HM-035-006-	HS	HM-AMP-10	3-28
00002	MAIN POST, HOSPITAL	WA-015-001-MD	01	WA-JEK-11	3-134
00002	MAIN POST, HOSPITAL, DPALS	WA-025-002-	01	WA-JEK-14	3-137
00002	MAIN POST, HOSPITAL	WA-025-002-DC	01	WA-JEK-15	3-138
00002	MAIN POST, HOSPITAL, DPALS	HW-010-001-	01	HW-JXL-03	3-52
00002	MAIN POST, INST COMMANDER	PM-001-003-A	03	PM-KMH-04	3-76

00002	MAIN POST, DENTAL CLINIC	SO-110-004-	03	SO-TED-06	3-106
00002	MAIN POST, HOSPITAL, MULT	SO-110-004-	03	SO-TED-07	3-107
00002	MAIN POST, HOSPITAL PX	SO-025-001-A	03	SO-DCB-04	3-104
00002	MAIN POST, DENTAL CLINIC	HM-002-001-00	HS	HM-AMP-25	3-43
00002	MAIN POST, DENTAL CLINIC	HM-001-003-	HS	HM-AMP-24	3-42
00015	MAIN POST, DPW, BOILER PLANT	A -003-001-	01	A-WBM-03	3-5
00015	MAIN POST, DPW, BOILER PLANT	ST-005-001-	03	ST-JEK-05	3-113
00015	MAIN POST, DPW, BOILER PLANT	WA-025-002-	03	WA-JEK-16	3-139
00015	MAIN POST, DPW, BOILER PLANT	HM-045-001-	HS	HM-AMP-03	3-21
00015	MAIN POST, DPW, BOILER PLANT	HM-035-004-	HS	HM-AMP-08	3-26
00040	MAIN POST, WRAIR, MED AUDIO	WA-025-002-	01	WA-JEK-05	3-128
00040	MAIN POST, WRAIR, HVAC SHOP	A -090-002-	01	A-WBM-01	3-3
00040	MAIN POST, AFIP, MULT	HW-055-001-DC	01	HW-JXL-01	3-50
00040	MAIN POST, WRAIR, MAVS	HW-010-001-	01	HW-JXL-06	3-55
00040	MAIN POST, WRAIR, MULT	SO-110-004-	03	SO-TED-05	3-105

00040	MAIN POST, AFIP, MULT	HW-055-001-DC	01	HW-JXL-01	3-50
00040	MAIN POST, WRAIR, MAVS	HW-010-001-	01	HW-JXL-06	3-55
00040	MAIN POST, WRAIR, MULT	SO-110-004-	03	SO-TED-05	3-105
00040	MAIN POST, WRAIR	SO-010-003-A	03	SO-DCB-02	3-102
00054	MAIN POST, AFIP, MULT	WA-025-002-	03	WA-JEK-19	3-142
00054	MAIN POST, AFIP, MULT	HM-002-001-	HS	HM-AMP-18	3-36
00054	MAIN POST, AFIP	HM-035-009-	HS	HM-AMP-19	3-37
00054	MAIN POST, AFIP	HM-045-001-	HS	HM-AMP-20	3-38
00054	MAIN POST, AFIP	HM-001-003-	HS	HM-AMP-21	3-39
00054	MAIN POST, AFIP, MICRO SUPP	HM-002-002-	HS	HM-AMP-22	3-40
00054	MAIN POST, AFIP	HM-035-001-	HS	HM-AMP-23	3-41
00082	MAIN POST, DPCA, AUTO	WA-025-001-	01	WA-JEK-02	3-125
00082	MAIN POST, DPCA, AUTO	A -090-001-	01	A-WBM-06	3-8
00086	MAIN POST, DEPT PSYCH	M-005-003-A	03	PM-KMH-14	3-86

000T2	MAIN POST, HOSPITAL, DPALS	HM-035-006-	HS	HM-AMP-11	3-29
00120	FOREST GLEN, DPW, BOILER PLANT	WA-015-001-MD	01	WA-JEK-09	3-132
00120	FOREST GLEN, DPW, BOILER PLANT	WA-015-001-MD	01	WA-JEK-04	3-127
00162	FOREST GLEN, DECA, COMMISSARY	PM-045-008-A	03	PM-KMH-07	3-79
00162	FOREST GLEN, DECA, COMMISSARY	PM-010-003-A	03	PM-KMH-08	3-80
00162	FOREST GLEN, DECA, COMMISSARY	HM-001-002-	HS	HM-KMH-30	3-48
00178	FOREST GLEN, DOL, SUPPLY	PO-020-001-	03	PO-JEK-06	3-96
00510	FOREST GLEN, AFIP	SO-025-001-A	03	SO-DCB-03	3-103
00602	FOREST GLEN, DPW, PEST CONTROL SHOP	PM-045-001-	01	PM-KMH-01	3-73
00602	FOREST GLEN, DPW, PEST CONTROL SHOP	M-045-001-	01	PM-KMH-02	3-74
00602	FOREST GLEN, DPW, PEST CONTROL SHOP	PM-050-001-MD	01	PM-KMH-03	3-75
00602	FOREST GLEN, DPW, PEST CONTROL SHOP	PM-055-001-A	03	PM-KMH-13	3-85
00602	FOREST GLEN, DPW, PEST CONTROL SHOP	PM-045-003-A	03	PM-KMH-17	3-89
00602	FOREST GLEN, DPW, PEST CONTROL SHOP	HM-001-00-	HS	HM-KMH-29	3-47

00603	FOREST GLEN, DPW, MOTOR POOL	HW-075-001-	01	HW-JXL-04	3-53
00603	FOREST GLEN, DPW, MOTOR POOL	PO-020-001-	03	PO-JEK-09	3-99
00605	FOREST GLEN, DOL, MOTOR POOL	WA-025-002-	01	WA-JEK-12	3-135
00605	FOREST GLEN, DOL, MOTOR POOL	PO-001-002-A	03	PO-JEK-07	3-97
MULT	INSTALLATION WIDE, DPW, P&E	WA-015-003-MD	01	WA-JEK-13	3-136
INST	MAIN POST, DPW, P&E	WQ-001-004-A	03	WQ-WJB-02	3-145
INST	MAIN POST, DPW, P&E	WQ-002-002-A	03	WQ-WJB-03	3-146
INST	MAIN POST, DPW, FIRE PROT	WQ-002-003-A	03	WQ-WJB-04	3-147
INST	MAIN POST, DPW, P&E	WQ-001-005-A	03	WQ-WJB-05	3-148
INST	MAIN POST, DPW, UTILITIES DIVISION	WQ-002-004-A	03	WQ-WJB-07	3-150
MULT	MAIN POST, DPW, P&E	A-001-003-A	03	A-WBM-08	3-10
INST	MAIN POST, DPW, P&E	WQ-002-001-A	PO	WQ-WJB-01	3-144
MAIN POST	MAIN POST, DPW, UTILITIES DIVISION	WQ-002-005-A	03	WQ-WJB-08	3-151
MULT	INSTALLATION WIDE	PO-002-001-	01	PO-JEK-01	3-91

MULT	FOREST GLEN, MULTIPLE	WA-015-001-MD	01	WA-JEK-10	3-133
MULT	INSTALLATION	ST-050-001-DC	01	ST-JEK-02	3-110
MULT	MAIN POST	ST-090-003-DC	01	ST-JEK-01	3-109
MULT	FOREST GLEN, MULTIPLE	ST-003-001-	01	ST-JEK-03	3-111
MULT	INSTALLATION WIDE	WA-025-002-DC	01	WA-JEK-01	3-124
MULT	MAIN POST, MULTIPLE	WA-035-001-DC	01	WA-JEK-08	3-131
MULT	INSTALLATION WIDE	WA-015-003-MD	01	WA-JEK-03	3-126
MULT	INSTALLATION WIDE	PO-005-006-	01	PO-JEK-03	3-93
MULT	FOREST GLEN, MOTOR POOL	A -055-002-	01	A-WBM-02	3-4
MULT	FOREST GLEN, DPW, P&E	A -005-020-MD	01	A-WBM-07	3-9
MULT	MAIN POST, DPW, P&E	PO-100-003-MD	01	PO-JXL-05	3-95
MULT	MAIN POST, MULTIPLE	HW-010-001-	01	HW-JXL-05	3-54
MULT	INSTALLATION WIDE	PO-065-006-	01	PO-JXL-04	3-94
MULT	INSTALLATION WIDE	HW-003-001-	01	HW-JXL-02	3-51

MULT	INSTALLATION WIDE	PM-001-006-A	03	PM-KMH-11	3-83
MULT	INSTALLATION WIDE	PM-045-017-A	03	PM-KMH-09	3-81
MULT	INSTALLATION WIDE	PM-045-005-A	03	PM-KMH-10	3-82
MULT	INSTALLATION WIDE	PM-001-007-A	03	PM-KMH-15	3-87
MULT	INSTALLATION WIDE	PM-001-006-A	03	PM-KMH-06	3-78
MULT	INSTALLATION WIDE	PO-005-007-	03	PO-JEK-08	3-98
MULT	FOREST GLEN	SO-025-001-A	03	SO-DCB-01	3-101
MULT	INSTALLATION WIDE	HM-002-001-	HS	HM-AMP-02	3-20
MULT	INSTALLATION WIDE	HM-002-001-	HS	HM-AMP-07	3-25
MULT	INSTALLATION WIDE	HM-045-001-	HS	HM-AMP-04	3-22
MULT	INSTALLATION WIDE	HM-002-001-	HS	HM-AMP-01	3-19
MULT	INSTALLATION WIDE	HM-001-002-	HS	HM-AMP-14	3-32
MULT	INSTALLATION WIDE	HM-040-002-	HS	HM-AMP-09	3-27
MULT	DPW, BOILER PLANT	HM-001-004-	HS	HM-AMP-15	3-33

MULT	INSTALLATION WIDE	HM-010-002-	HS	HM-AMP-13	3-31
MULT	INSTALLATION WIDE	HM-010-001-	HS	HM-AMP-12	3-30
MULT	INSTALLATION WIDE	HM-001-003-	HS	HM-AMP-16	3-34
MULT	INSTALLATION WIDE	HM-002-001-	HS	HM-AMP-17	3-35
MULT	INSTALLATION WIDE, WRAIR	HM-045-001-	HS	HM-AMP-26	3-44
MULT	MAIN POST, WRAIR	HM-002-001-	HS	HM-AMP-27	3-45
MULT	MAIN POST, WRAIR	HM-002-001-	HS	HM-AMP-28	3-46
MULT	FOREST GLEN, WRAIR	A -005-017-MD	HS	A-WBM-10	3-12
MULT	INSTALLATION WIDE	ST-025-001-	02	ST-JEK-04	3-112

ACTIVITIES AUDITED WITH NO FINDINGS

<u>FACILITY</u> <u>NO.</u>	<u>LOCATION</u>
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00002	DPW, RMW STORAGE AREA
00005	MAGNETIC RESONANCE IMAGING

WRAMC ECAR
22 Jan - 9 Feb 96

00016	DPW, ROADS AND GROUNDS
00049	DPW, CHILLED WATER PLANT
00156	VETERINARY CLINIC
00510	FOREST GLEN, AFIP, REPOSITORY