

ACTIVITY INSPECTIONS

ENVIRONMENTAL MANAGEMENT PROCEDURE

(EMP) 4.5.2

JBLE-EUSTIS



25 June 2020

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DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 633D AIR BASE WING
JOINT BASE LANGLEY-EUSTIS VA

OFFICE OF THE COMMANDER

MEMORANDUM FOR ALL 733 MSG UNITS AND FEVA ORGS

SUBJECT: JBLE-Eustis Environmental Management Procedures (EMPs)

1. EMPs apply to all JBLE-Eustis activities (including tenants, associated units, and contractors) that impact any environmental resource area on the installation, to include, but not limited to Air Quality, Water Quality, Hazardous Waste, Hazardous Materials, Natural Resources, Cultural Resources, Solid Waste and Recycling, Inspections, Training, Tanks, Spill Prevention, Pollution Prevention, and Pest Management.
 - a. EMPs enable our compliance with Federal, State, Department of Defense, and Air Force regulations, directives, instructions, and manuals, and are specific to JBLE-Eustis.
 - b. EMPs assign responsibilities, provide instruction and guidance for appropriate management of environmental programs to ensure the installations regulatory compliance.
2. JBLE-Eustis personnel may access these EMPs electronically via the Environmental Management Procedures section of the JBLE-Eustis Environmental website at: <https://www.jble.af.mil/Units/Army/Eustis-Enviromental/> under Environmental Management Procedures (EMPs), EMP Library.
3. The Office of Primary Responsibility for this document is 733d Civil Engineer Squadron Environmental Element (733 CES/CEIE), and will review all EMPs annually, and update as appropriate. Major revisions require concurrence from the JBLE-Eustis Environmental Management System (EMS) Cross-Functional Team (CFT) and approval by the Environmental Safety and Occupational Health Council (ESOHC).
4. All EMPs are unclassified and will be posted in "Read Only" .pdf format, reviewed, revised and rescinded IAW current directives.

COL HUNG Digitally signed by COL HUNG
Date: 2021.09.15 09:35:07
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HARRY D. HUNG, Colonel, USA
Vice Commander

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Environmental Management Procedure (EMP) 4.5.2

SECTION: 4.5.2.1

SUBJECT: ACTIVITY AND FACILITY INSPECTIONS

PURPOSE:

This EMP establishes the procedures for the conduct of Activity and Facility Inspections.

Document Control: This is a controlled document. Controlled documents are updated as required, reviewed at least annually, and re-dated if changed. This EMP document should be checked against the file version before use on the public website:

JBLE – Eustis Environmental website: <http://www.jble.af.mil/Units/Army/Eustis-Environmental/>

REFERENCES:

- A. AFI 90-201, *Air Force Inspection System*
- B. AFI 32-7001, *Environmental Management*

SCOPE:

Applies to all activities and personnel, including military, civilians, vendors, suppliers, and contractor personnel who enter JBLE-Eustis.

- A. The scope and detail of the Activity Inspections will be compiled utilizing: the last Activity Inspection; the Activity Corrective Action Plan (ACAP) status, new regulatory requirements, and particular emphasis areas specified by higher command
- B. Activity Inspections will use the Environmental Inspection Procedures (EIP), the Team Guides with Virginia and Air Force supplements, the program specific Playbook as found on eDASH, and JBLE-Eustis environmental policies as the inspection standards. In addition, 733 Civil Engineer Squadron (CES) Environmental Element (CEIE) will develop specific inspection checklists that incorporate JBLE-Eustis policies and procedures to ensure adequate inspections and communicate installation standards to activities and facilities.
- C. Facility inspections may be conducted periodically to collect data, assess the facility's status, and determine corrective actions or updates. These inspections may be performed by government personnel or approved contractors.

ROLES AND RESPONSIBILITIES:

A. CES/CEIE will:

- (1). Conduct Activity Inspections.
- (2). As part of the Activity Inspection process, CES/CEIE may conduct inspections of the higher-risk Temporary Storage Sites (TSSs), Satellite Accumulation Sites (SASs), and Non-Hazardous Sites (NHSs) during waste pickups and or container deliveries as time permits. The HWAF staff will typically conduct these inspections.
- (3). The tracking process will include electronic and written records as deemed appropriate.
- (4). In addition to tracking inspections in the program area developed checklists, track inspections, findings, and corrective actions using the Enforcement Actions, Spills, and Inspections Environmental Reporting (EASIER), AF Inspections (AFINS) module. CES/CEIE Program Managers may elect to enter inspections individually, group by month, quarter, or annually, depending on the need for corrective actions. (NOTE: eDASH Finding Tracker Tool was shut down on Feb 21).
- (5). Brief Activity Inspection results and status of corrective actions quarterly to the Cross-Functional Team (CFT) and semiannually to the Environmental, Safety, and Occupational Health (ESOH) Council.
- (6). Internal inspectors are trained on techniques and root cause determinations.
- (7). Approve the ACAP.
- (8). Conduct announced and unannounced inspections to ensure compliance.

B. Activities will allow full access to all facilities during regular business hours to inspectors and CES contractors. CEIE may take pictures during these inspections to record data. If the activity has a sensitive area, then they must inform the inspector.

ACTIVITY AND FACILITY SELF-INSPECTION PROCEDURES:

A. Activities and Facilities will:

- (1). Fully support the conduct of the inspection by:
 - (a). Ensuring the Activity Environmental Coordinator (AEC) or Commander/Director is present during the Activity Assessment.
 - (b). Ensuring Activity areas and documents are accessible during the Activity Inspection.

- (c). The AEC will update the Activity Facilities and Operations Inventory quarterly and provide a copy to CES/CEIE when notified of a CES/CEIE inspection and must be submitted before the inspection.
 - (2). Develop an ACAP using ACAP Summary Report FEVA Form 32-601 within 30 days of receiving the final Activity Inspection report.
- B. Pre-inspection actions:
- (1). CES/CEIE will notify the AEC or Commander/Director by email two days before the start of the inspection to coordinate final details and requirements. These are short-notice inspections.
 - (2). CES/CEIE will review the previous inspection and the current Activity Facilities and Operations Inventory.
- C. Onsite assessment actions:
- (1). CES/CEIE program managers will coordinate with the AEC or Commander/Director at the start of each scheduled or non-scheduled inspection day.
 - (2). AECs will ensure all areas of the Activity are available to be inspected.
 - (3). CES/CEIE program managers will use EASIER AFINS on eDASH to capture observations, findings, and root cause information on site.
 - (4). CES/CEIE program managers will record all identified findings of non-compliance and input them into EASIER AFINS.
 - (5). CES/CEIE program manager will determine the “root cause” for each finding using the Root Cause Reference List on the EASIER AFINS,
 - (6). The program manager will notify the AEC immediately regarding findings that are compliance findings [e.g., leaking tank, incompatible Hazardous Waste/Hazardous Materials (HW/HM) storage] or could cause harm to the environment or human health. CEIE will notify the appropriate installation safety, fire, and environmental personnel.
 - (7). The CES/CEIE program manager will conduct an informal exit briefing to the AEC after the onsite portion of the inspection.
- D. Post-inspection actions:
- (1). CES/CEIE program managers will finalize all records NLT 10 working days following the end of the onsite portion of the inspection.

- (2). CES/CEIE will provide a final inspection report to the activity AEC NLT 15 working days after completion of the onsite inspection. The final report will include a copy of the inspector's checklists.
 - (3). The Activity will complete the ACAP by indicating actions taken to close findings and actions planned to close the remaining open findings. The ACAP will be forwarded through the Commander or Director of the inspected site to CES/CEIE NLT 30 calendar days after receipt of the final report.
 - (4). Activities will update their ACAP quarterly and notify CES/CEIE of findings closed during the period. In addition, all findings progress noted during the CES/CEIE inspection will be reported that have been corrected.
 - (5). CES/CEIE will review the ACAP received within 15 working days for completeness and resolutions of outstanding findings.
 - (6). CES/CEIE will track the status of outstanding findings and report the status of findings at the quarterly CFT and the semiannual ESOH Council meetings.
- E. As part of the program managers' inspection process, they may conduct inspections of the higher-risk areas:
- (1). TSSs, SASs, and NHSs during waste pickups and or container deliveries as time permits. These inspections will typically be conducted by the HWAF and recorded on HWAF Pickup Inspection Checklist FEVA Form 32-641.
 - (a). Findings noted during these inspections will be forwarded to the Hazardous Waste and Inspection Program Managers.
 - (b). These inspections will be part of the activity's records and require an ACAP when findings are noted.
 - (c). Correct all findings of non-compliance and report completed actions at least quarterly to the CES/CEIE Program Manager.
 - (2). Hazardous Materials Inspections:
 - (a). These inspections will typically be conducted by the HazMart staff, Fence-to-Fence Hazardous Materials Contract Support staff, or Hazardous Materials Program Manager using the HazMart Inspection Checklist FEVA Form 32-683.
 - (b). These inspections will be part of the Activity's records and require an ACAP when findings are noted.

- (c). Correct all findings of non-compliance and report completed actions at least quarterly to the CES/CEIE Installation Hazardous Materials Manager.
- (d). Copies of inspection checklists will be given to the Internal Assessment Program Manager.

F. Facility inspections:

(1). Facility inspections are mainly for inspecting and collecting facility data. In addition, inspections can be in support of the following but not limited to:

- (a). Hazardous Waste Program
- (b). Air Program.
- (c). Water Programs (Stormwater and Wastewater).
- (d). Hazardous Material Program.
- (e). Tank Program

(2). Activities will fully support these inspections:

- (a). By allowing full access to all facilities during regular business hours to inspectors and CES contractors. CEIE may take pictures during these inspections to record data. If the activity had a sensitive area, they must inform the inspector.
- (b). Generally, the Inspectors are not required to be escorted unless your facility has this requirement in which you will need to provide the escort.
- (c). Answering questions concerning the facility's activities.
- (d). Generally, your facility requires no additional support unless other data is requested.

Section: 4.5.2.2

SUBJECT: External and Internal Regulatory and Permit Inspections

PURPOSE:

This section establishes the procedures for internal and external regulatory and permit inspections.

ROLES AND RESPONSIBILITIES:

A. CES/CEIE will:

- (1). Manage the regulatory and permit inspections program.
- (2). Track the process, including electronic and written records as deemed appropriate.
- (3). Brief status of corrective actions of findings at quarterly CFT and semiannual ESOH Council meetings.

B. Installation Activities and Facilities will:

- (1). Allow full access to all facilities during regular business hours to inspectors and CES contractors. CEIE may take pictures during these inspections to record data. If the Activity has a sensitive area, they must inform the inspector.
- (1). Conduct all required regulatory and permit inspections.
- (2). Correct all findings of non-compliance and report completed actions at least quarterly to the CES/CEIE.

REGULATORY AND PERMIT INSPECTION PROCEDURES:

A. Inspections and audits can be scheduled, short notice or no notice.

- (1). Inspectors should coordinate with the CES/CEIE, regardless of the type of inspection.
- (2). In cases where the inspector shows up at the inspection site without prior coordination with CES/CEIE:
 - (a). Ask to see the Inspector's credentials.
 - (b). Do not impede the inspection.
 - (c). Immediately inform CES/CEIE of the inspection. CES/CEIE will send a representative.
 - (d). Be courteous to the inspectors.
 - (e). Provide access to requested facilities and documents.
 - (f). Do not volunteer information or makeup answers if you are unsure of the correct answer.

B. External Regulatory Inspections:

- (1). Environmental Protection Agency (EPA)

(2). Virginia Department of Environmental Quality (VDEQ)

(3). Hampton Roads Sanitation District (HRSD)

(4). DOD

(5). US Air Force

(6). US Army

C. Internal Regulatory Inspections:

(1). CES/CEIE will:

(a). Develop and track the annual schedule for all regulatory and permit inspections, including facility type (e.g., Storage Tank), location, frequency of inspection, and responsible personnel.

(b). Conduct inspections as required. Inspectors will report completion to the CES/CEIE, Point of Contact (POC), and provide a finding of non-compliance information if necessary.

(c). Inspectors will notify the ICAP Manager, CES/CEIE, that an inspection was completed. Information required is building #, POC, type of inspection (tank, generator, oil-water separator, outfall, etc.), date, finding description if applicable, and root cause if known.

(d). Develop a corrective action for the finding and brief the status until completion at the quarterly CFT and semiannual ESOHC meetings.

(e). Verify regulatory, and permit inspections are appropriately conducted.

(f). Report and record all external and internal inspections:

i. EASIER AFINS database within five Business Days of the inspection.

ii. EASIER AFINS database within one Business Day of receipt of an enforcement action.

iii. CES/CEIE Inspection Summary: located at O:\CEI Installation Management Flight\CEIE Environmental Element\2 - Inspections.

(2). Activity inspectors will conduct inspections as required. Inspectors will report completion to the AEC and provide any finding of non-compliance information if necessary. The Activity requires the following inspections:

- (a). Quarterly AEC inspections of all the Activity’s facilities and operations.
- (b). Weekly (within 7 calendar days) inspections of TSSs, SASs, and NHSs.
- (c). Monthly (within 30 days) inspections of all HM and universal waste (UW) storage locations.

SECTION: 4.5.2.3

SUBJECT: Internal Inspections Conducted by Activities

PURPOSE:

Establishes the procedures for Activities to conduct Internal Inspections

ROLES AND RESPONSIBILITIES:

A. CES/CEIE will:

- (1). Have oversight of the Activity Inspections program.
- (2). Develop the Activity Inspection Multimedia Checklist.
- (3). Train AEC to use the checklist.
- (4). Verify Activity Internal Inspections have been appropriately conducted during annual Activity Inspections.

B. Installation Activities and Facilities will:

- (1). Conduct Activity Internal Inspections as required.
- (2). Correct all findings of non-compliance found during any inspection.
- (3). Prepare an ACAP for each AEC quarterly inspection.
- (4). Keep records of inspections for at least 3 years.
- (5). Those Activities that have higher HQs on the installation, e.g., “Bde to Bn,”; “Dir to Div,” etc., will have their AEC participate in at least 2 of the quarterly AEC inspections each year.

INTERNAL INSPECTION PROCEDURES:

- A. Activity inspectors will conduct inspections as required. The Activity requires the following inspections:
- (1). Weekly (within 7 calendar days) inspections of TSSs, SASs, and NHSs (HWMP).
 - (2). Monthly (within 30 days) inspections of all HM and UW storage locations (HWMP).
 - (3). All findings will be corrected immediately if possible or NLT 10 calendar days.
- B. The AEC will conduct quarterly Activity Internal Inspections of all Activity facilities and operations.
- (1). The Activity Inspection Multimedia Checklist will be used.
 - (2). The AEC will maintain an inventory of all the activities facilities and operations using FEVA Form 32-600, Activity's Facilities and Operations Inventory. The AEC may modify this spreadsheet to fit the Activity's facilities and operations. However, format and column headers must be maintained.
 - (3). Each subordinate Activity will be inspected, for example, a Battalion, each company, or detachment; for a Directorate, each division or department depending on the organization, will be inspected; for those organizations having contractor support, the contractor as a whole will be inspected.
 - (4). AECs will record findings of non-compliance found during the inspections.
 - (5). Prepare an Activity Corrective Action Plan (ACAP) for each AEC quarterly inspection:
 - (a). The ACAP will be prepared using the format in the ACAP Summary Report.
 - (b). The ACAP will be signed by the Commander or Director, having to appoint the authority of the AEC within 30 days of the inspection date.
 - (6). Subordinate Activities will be re-inspected by the AEC within 30 days of any inspection or re-inspection that shows three or more findings.
 - (7). Activities will make on-the-spot corrections or take immediate actions to correct all findings of non-compliance found during any inspection if possible or NLT 10 calendar days.
- C. Activities will record and report the status of the Activity's internal inspections:
- (1). Activity Inspectors will report completion to the AEC and provide a finding of non-compliance information if necessary for their required weekly and monthly inspections.

- (2). The original copy of the ACAP signed by the Commander or Director will be kept on-site in the AEC's files and made available for inspection.
 - (a). A copy of the ACAP will be sent to the activity's next higher HQs in the chain of command, e.g., a Battalion will send a copy to its Brigade HQs; Contractors will send a copy to their COR and the corporate/owner's office.
 - (b). Documentation of this will be kept on-site in the AEC's files.
 - (3). An inspection report will be sent to CES/CEIE within ten calendar days of the completion of the AEC's quarterly inspection utilizing the Activity Inspection Multi-Media Checklist.
 - (a). The report will be signed and certified by the Commander/Director. By signing the report, the Commander/Director confirms that all information is true and accurate.
 - (b). The report will be sent by digitally signed email to 733 CES/CEIE (Subject Internal Assessments) (733MSG.733CES.CEIEAdmin@us.af.mil)).
 - (c). The report will include the following documents:
 - i. Copy of the completed Activity Inspection Multi-Media Checklist
 - ii. Copy of the completed Activity Facilities and Operations Inventory FEVA Form 32-600
 - iii. Provide a copy of the transmittal correspondence required in paragraph (2).
 - (4). A copy of the completed ACAP Summary Report FEVA Form 32-601 will be sent to CES/CEIE within 30 calendar days of the AEC's quarterly inspection completion.
 - (a). The ACAP is required when there are findings noted on the inspection in a paragraph.
- D. The report will be sent by digitally signed email to 733 CES/CEIE (Subject: Internal Assessments) (733MSG.733CES.CEIEAdmin@us.af.mil). CES/CEIE will:
- (1). Report inspection metrics to the Installation CFT quarterly and the ESOH Council semiannually.
 - (2). Notify Command for Activities failing to report inspection data.
 - (3). Use the EASIER AFINS on eDASH to record and track all findings. This information is available to higher-level Commands.

E. CES/CEIE Program Managers:

(1). Media Program Managers will:

- (a). Review inspection reports and ACAPs.
- (b). Conduct unannounced inspections to verify inspection reports and ACAPs.

(2). Inspection Program Manager will:

- (a). Enter data into eDASH within 15 calendar days of receipt of inspection reports.
- (b). Closeout findings in eDASH within 15 calendar days of receipt of ACAPs.
- (c). Maintain inspection and ACAP database to track metrics.

SECTION: 4.5.2.3.1

SUBJECT: Activity Corrective Action Plans (ACAP)

PURPOSE:

This section establishes the procedures for preparing and reporting Activity Corrective Action Plans (ACAP).

ROLES AND RESPONSIBILITIES:

- A. AECs will generate ACAPs using the format in paragraph 6 below.
- B. Commanders and Directors will submit the completed ACAP to CES/CEIE within the timeframes specified in paragraph 6 below.
- C. CES/CEIE will:
 - (1). Review and approve ACAPs submitted.
 - (2)..

ACAP PROCEDURES:

- A. The AEC will complete all items for each finding noted during the assessment utilizing the ACAP Summary Report FEVA Form 32-601 upon completion of a Quarterly Activity Inspection, receipt of the Final Inspection Report of a completed Installation Activity Assessment, or a tasking resulting from a regulatory agency. The completed ACAP will consist of the following:

- (1). Appendix A - Activity Inspection Multi-Media Checklist.
- (2). Appendix B - Facilities and Operations Inventory FEVA Form 32-600.
- (3). Appendix C ACAP Summary Report FEVA Form 32-601.

B. The ACAP will be completed and or submitted within the timeframes specified below:

- (1). Within 30 days of the Quarterly Activity Inspection, a memo signed by the Commander or Director will be attached to the final inspection, and a copy of the completed ACAP will be sent to the Activity's next higher HQs for military, Contracting Officer's Representative (COR) for contractors. This final inspection will be kept for three years and available for inspection.
- (2). Within 30 days of receipt or as specified on the Final Assessment Report of a completed Installation Activity Assessment, a Memo signed by the Commander or Director having to appoint authority for the AEC will be submitted to CEIE along with the completed ACAP. Instead of paper copy memos, a digitally signed Email with the completed ACAP may be provided and is preferred. For example, send to: 733MSG.733CES.CEIEAdmin@us.af.mil
- (3). Within 30 days of receipt or as specified by the CEIE tasking (written, Email, or verbal) as a result of external assessments conducted by regulatory agencies, a memo signed by the Commander or Director will be submitted to CEIE along with the actions required by the tasking. In place of paper copy memos, a digitally signed Email with the necessary actions by the tasking may be submitted and is preferred. Send to: 733MSG.733CES.CEIEAdmin@us.af.mil.
- (4). CEIE will review and approve the submitted ACAP.
- (5). CEIE will track the status of outstanding findings and report the status of findings at the quarterly CFT and semiannual ESOH Council meetings.

APPENDICES:

APPENDIX A:

Go to JBLE public web site: <https://www.jble.af.mil/Units/Army/Eustis-Enviromental/>

APPENDIX B:

Go to the JBLE public web site: <https://www.jble.af.mil/Units/Army/Eustis-Environmental/>

APPENDIX C:

Go to the JBLE public web site: <https://www.jble.af.mil/Units/Army/Eustis-Environmental/>