Environmental Management Procedure (EMP) 4.3.1 Tab 1

Subject: Environmental Aspect and Impact Analysis and Significance Rating

1. Purpose: This EMP outlines the procedure used by Fort Eustis to identify, analyze, and calculate the significance of environmental aspects and impacts that result from installation operations and activities.

2. Document Control: This is a controlled document. Controlled documents are updated as required, reviewed at least annually, and re-dated if changed. Any documents to include blank forms appearing in paper form are not controlled and should be checked against the file version prior to use on the:

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

3. References:

   A. JBLE-I 32-101, Environmental Management

   B. EMP Dictionary

   C. EMP 4.3.1 Environmental Aspects and Impacts

4. Scope: This EMP applies to all Activities and personnel, including military, civilians, vendors, suppliers, and contractor personnel who enter JBLE-Eustis. The definition of an Activity can be found in JBLE I 32-101.

5. Roles and Responsibilities:

   A. The EMS Cross Function Team (CFT) Chair is responsible to execute this procedure.

   B. Activities will appoint personnel to represent the Activity on the one of the Fort Eustis EMS Working Teams (Land Management, Installation Hazardous Material Management, Storm water quantity and quality, Spills, Energy and Water)

   5. Procedures:

   A. At a minimum of every year, JBLE (Eustis) will conduct a comprehensive review, analysis and significance rating of environmental aspects and impacts from installation operations, training activities, and mission related functions.

   B. The CFT will develop a list of potential environmental aspects and impacts. This list will be based on federal, state, and applicable local laws, DOD and AF regulations and instructions, federal executive orders, and any new or anticipated changes to these directives. JBLE (Eustis) installation-wide plans, Base Realignment and Closure actions, mission and operational changes, and sustainability will also be considered when developing the Aspect and Impacts list.

   C. The JBLE (Eustis) EMS Working Teams will analyze and finalize the list of environmental aspects and impacts and calculate a significance rating for each aspect and impact.

   D. The EMS Working Teams will use the eDASH Tool to calculate the significance of each aspect and impact. Aspects and Impacts will be rated based on the following factors:

      (1). Environmental, Safety and Occupational Health Risk (ESOH Risk): This is a two step process. Step one determines Severity and Step two determines the Probability of the ESOH Risk.

(a). Severity

i. Catastrophic – Irreversible or extreme damage to a natural environment, or loss of critical natural habitat, natural resource, or cultural resource. Replacement cost exceeding $1M, death, or permanent disability to an individual
ii. Critical – Reversible damage to a natural environment, major degradation to a critical natural habitat, natural resource or cultural resource. Replacement cost exceeding $200K. Permanent partial disability or severe injury or occupational illness with hospitalization of individual(s). Reversible environmental damage causes a violation of the law.
iii. Marginal – Minor reversible damage to a natural environment, natural habitat, natural or cultural resource. Loss exceeding $10K but less than $200K, injury or minor occupational illness resulting in at least one lost work day, or mitigable environmental damage without violation of law or regulation.
iv. Negligible – Less than minor environmental degradation, loss exceeding $2K but less than $10K, injury or occupational illness not resulting in a lost work day, or minimal environmental damage not violating law or regulation.

(b). Probability

i. Frequent: Occurs often in the life of the system
ii. Likely: Occurs several times in the life of the system
iii. Occasional: Will occur in the life of the system
iv. Seldom: Unlikely, but could occur in the life of the system
v. Unlikely: So unlikely, one can assume that it will not occur in the life of the system

(2). Regulatory Status: This factor rates the significance that if the Aspect/Impact was ignored, would there be a violation of the law or a statutory regulation.

(a). Score 5 – Legal requirement, currently not in compliance. Requirements needed to achieve compliance with the law
(b). Score 4 – Legal requirement, currently in compliance. Requirements needed in the future to maintain or achieve compliance with law
(c). Score 3 – Regulatory requirement, currently not in compliance. Requirements needed to achieve compliance with Executive Orders, DOD and AF Policy.
(d). Score 2 - Regulatory requirement, currently in compliance. Requirements needed to maintain or achieve compliance with Executive Orders, DOD and AF Policies
(e). Score 1 – Unregulated requirement

(3). Mission Degradation: Determine and rate mission impact of the Aspect/Impact. Both Primary installation mission and Base Support mission should be considered.

(a). Score 5 – Major degradation. Greater than 50% deviation of standard operating procedures occurs (costs, fines, resources, time, etc).
(b). Score 4 – Minor degradation. Less than 50% deviation of standard operating procedures occurs (cost, fines, resources, time, etc.).
(c). Score 3 – Training Area Restrictions. Range and/or training lands “off-limits” due to environmental aspects/impacts
(d). Score 2 – Activity Restrictions. Flying, driving, smoke operations, etc are “off-limits” due to environmental restrictions.
(e). Score 1 – Intensity Restrictions. Number of times an activity can be repeated due to environmental restrictions.

(4). Community Concerns: Community concerns can include lawsuits, obstruction efforts, number and scope of community complaints, negative press coverage, citizen generated Congressional, regulator, Tribal, or AF inquiries or interest.

(a). Score 5 – Public outcry or lawsuits
(b). Score 4 – Serious community concerns
(c). Score 3 – Moderate community concerns
(d). Score 2 – Community is unconcerned, but could easily become concerned
(e). Score 1 – Community supports the activity or is unconcerned

(5). Cost: Both Relative Cost and Return on Investment can be used to rate the significance of an Aspect or Impact.

(a). Relative Cost
i. Score 5 – Relative cost in the top 20% of all aspects considered
ii. Score 4 – Relative cost in the second 20% of all aspects considered
iii. Score 3 – Relative cost is in the third 20% of all aspects considered
iv. Score 2 – Relative cost is in the fourth 20% of all aspects considered
v. Score 1 – Relative cost is in the fifth 20% of all aspects considered

(b). Return on Investment
i. Score 5 – 1 year payback
ii. Score 4 – 2 year payback plus a high compliance burden
iii. Score 3 – 3 to 4 year payback plus a medium compliance burden
iv. Score 2 – 5 year payback plus a low compliance burden
v. Score 1 – Greater than 5 year payback

E. The CFT will finalize the significance rating for all the aspect and impacts using a sum and average methodology. It is important to note that all aspects and impacts are “important” but that the significance rating will be used to prioritize installation resources, determine objectives and targets, and continuous improvement efforts.

F. CFT Chair will brief the list of significant Aspects and Impacts to the Environmental, Safety, and Occupational Health Council for approval of the list.

G. The CFT will use the approved list to develop and track environmental objectives and targets to address the entire list of Aspects and Impacts per EMP 4.3.3, Objectives, Targets, and Programs. The EMS CFT will review the approved list at least annually for adequacy and to determine if changes have occurred that warrant a recalculation of significance.