

DEFENSE LOGISTICS AGENCY STRATEGIC MATERIALS

Environmental, Safety, and Occupational Health Plan—Fiscal Year 2015

1. Introduction

Purpose

The purpose of the Defense Logistics Agency (DLA) Strategic Materials Environmental, Safety, and Occupational Health (ESOH) Plan is to provide guidelines to DLA Strategic Materials activities for planning, coordinating, implementing, and managing effective environmental, safety, and occupational health programs. We are committed to a safe and healthy workplace and are exemplary environmental stewards.

This plan details the goals for DLA Strategic Materials' environmental, safety, and occupational health programs for the upcoming year and will be used as the benchmark to ensure that DLA Strategic Materials is in compliance with internal policies as well as regulatory requirements mandated by the U.S. Department of Defense (DoD), U.S. Environmental Protection Agency (EPA), U.S. Occupational Safety and Health Administration (OSHA), state agencies, and others. Further, our Environmental, Safety, and Occupational Health Management System (ESOHMS) provides the framework that results in our operations, planning, and cleanups being accomplished in a proactive, systematic manner.

Goals and Objectives

The goals and objectives of this plan are to attain and maintain compliance with relevant environmental, safety, and occupational health rules, requirements, and regulations; to maintain conformance with the International Organization for Standardization (ISO) 14001:2004 standard and the Occupational Health and Safety Assessment Specification (OHSAS) 18001:2007; and to continually improve environmental, safety, and occupational health performance.

Scope

The DLA Strategic Materials ESOH Plan applies to DLA Strategic Materials personnel regardless of their position within the organization or their duty station. Contract personnel working on behalf of DLA Strategic Materials will be held to the same standards.

Responsibilities

Employees will adhere to applicable federal, state, and local regulations, as well as DoD, DLA, and DLA Strategic Materials directives and instructions as a routine part of their work assignments.

The Administrator for DLA Strategic Materials is responsible for ensuring that the organization has established environmental, safety, and occupational health programs that provide necessary controls and oversight for DLA Strategic Materials operations.

The Director of the Material Management Directorate is responsible for the oversight of environmental, safety, and occupational health plans and execution. An Environmental Staff Officer assists in developing and implementing the DLA Strategic Materials environmental, safety, and occupational health programs and assists depot managers and supervisors in resolving any related issues.

Depot managers are responsible for implementing the DLA Strategic Materials environmental, safety, and occupational health programs at their respective facilities. Depot managers and supervisors are key people in the environmental, safety, and occupational health programs due to their frequent contact with employees. Depot managers and supervisors share responsibility with employees for ensuring that their personnel are trained in environmental, safety, and occupational health and for enforcing rules and policies.

Management Control Plan

Internal and external environmental audits, safety and health inspections, and corrective action status reports are scheduled, monitored monthly, and reported to the DLA Strategic Materials Administrator periodically.

2. Management and Administration

The DLA Strategic Materials Director of Materials Management and the Environmental Staff Officer will review this plan for accuracy and effectiveness of established goals and objectives.

3. Environmental

Cleanup

The site remediation, restoration, and cleanup activities for Fiscal Year (FY) 2015 are summarized as follows:

- **Large, Pennsylvania:** Remediation work expected to be completed during third quarter.
- **Somerville, New Jersey:** Remediation work will begin during first quarter.

Close-out

- **Warren, Ohio:** No Further Action package and Environmental Covenant submitted to Ohio EPA for review/acceptance.

Environmental Audits

Compliance and Conformance Audits. Internal audits will be conducted at the Warren, Ohio, Hammond, Indiana, and Hawthorne, Nevada depots by the DLA Strategic

Materials Environmental Protection Specialists (EPSs). Additionally, a triennial external audit will be conducted at the Scotia, New York depot by a contracted consulting firm. These audits will include review of pertinent plans and files. Following the audits, plans and files will be updated as appropriate. The audit schedule is provided in the following table:

Location	FY Quarter
Internal Audits	
Hammond	3
Warren	3
Hawthorne	4
External Audit	
Scotia	3

Audit Findings. Audit findings are monitored by the Environmental Officer and recorded in a quarterly Corrective Action Summary Report.

Root Cause Analyses. Root cause analyses will be conducted on appropriate audit findings, and appropriate corrective actions will be addressed within 6 months of the posting.

Environmental Monitors. Make routine reviews at each depot, as needed.

Stormwater

Stormwater Pollution Prevention (SWPP) Plans and Training. If necessary, SWPP plans will be updated, according to regulatory and ESOHMS program requirements.

Defense State Memorandum of Agreement

Defense State Memorandum of Agreement (DSMOA) accounts, directly funded by the Transaction Fund, have been established by the Omaha District United States Army Corps of Engineers. States with DSMOAs will include Pennsylvania, Ohio and West Virginia. DLA Strategic Materials Headquarters has funded approved work plans for the states.

Pest Management Plans

DLA Strategic Materials Pest Management Plans will be reviewed and/or updated as necessary, and compliance will be monitored during annual audits.

Environmental, Safety, and Occupational Health Management System

Management reviews are conducted during the managers' meetings or special review meetings. The "I Am the Key" website will be reviewed and updated during the FY. Training on the updated Environmental Management System process will be provided to all employees in the second quarter of FY 15.

Environmental Training

The training will be specific to each individual job task. The training will include information about depot environmental plans, such as stormwater, spill prevention, and countermeasure control plans. Training will be tracked in the Learning Management System or on a training matrix, which is maintained by DLA Headquarters and available for personnel review. Training records are also available at depots upon request.

4. Safety and Occupational Health

Hazard Identification and Abatement

Workplace Inspections. The DLA Strategic Materials Safety Manager will conduct a safety and health inspection of staffed depots. The purpose of these inspections is to ensure that DLA Strategic Materials is in compliance with regulatory requirements that relate to safety and health. A physical inspection of work spaces will document violations of safety and health standards, work procedures that could lead to an accident, and the adequacy of personal protective equipment (PPE). The inspection schedule is provided in the following table:

Location	FY Quarter
Hawthorne	3
Hammond	2
Scotia	4
Warren	3

An inspection report will be prepared upon the completion of each inspection and forwarded to the Depot Manager, Corrective Action Coordinator (CAC), and the Director of Materials Management for implementation and correction of noted deficiencies.

A "Notice of Unsafe/Unhealthful Working Condition" will be posted for those deficiencies with a Risk Assessment Code of "3" and below, as specified in DLA Strategic Materials policy. Safety and health deficiencies that require more than 30 days for correction will be entered into the Enterprise Safety Applications Measurement System (ESAMS). Within 30 days of receipt of the inspection report, the responsible management official will reply to DLA Strategic Materials – Materials Management Division, outlining the corrective actions taken or initiated on the noted deficiencies.

During the annual safety and health inspection, each area will be evaluated including applicable hazardous material data to determine PPE requirements.

Under the new DLA Voluntary Protection Program at the headquarters level, safety monitors will be appointed to conduct quarterly inspections; and monthly inspections will be conducted on a directorate basis by rotation of individual employees. Installation Support will conduct annual inspections.

Safety Monitors at each depot will make routine inspections as needed.

Occupational Health

Medical Surveillance. Annual occupational medical examinations will be performed on DLA Strategic Materials depot employees in the medical surveillance program. Examinations will be scheduled by the individual depots through the Public Health Service units identified in the Medical Services contract. Headquarters personnel will schedule annual physicals only if they are required to travel to depots and work directly with materials. The schedule for the annual physical examinations is provided in the following table:

Location	Month
HQ	2 nd quarter
Hammond	March
Scotia	April
Warren	September
Hawthorne	upon hiring (annually thereafter)

Industrial Hygiene Sampling. Areas containing commodities that pose a potential health hazard will be monitored to ensure that personnel exposure does not exceed an acceptable level. Processes and storage operations will be evaluated to determine the need for additional sampling. The DLA Strategic Materials Safety and Health Manager will review the annual submittals of the hazardous chemical inventories from the depots to determine if additional industrial hygiene monitoring or medical surveillance is required. Documents will be filed at DLA Strategic Materials Headquarters.

Personal Protective Equipment

Every effort will be made to eliminate occupational hazards through engineering controls. In those instances where elimination of hazards is not possible, DLA Strategic Materials employees will be provided PPE at no cost to the employee.

Managers and supervisors share responsibility with employees for ensuring that periodic inspection, cleaning, disinfecting, replacement, and maintenance of PPE is performed. Validation will be included in the safety inspection report. They are also responsible for ensuring that an adequate supply of PPE is available for use at their depots. Employees will comply with requirements to use PPE.

Mishap Reporting

Reporting Requirements. Mishaps involving personal injury, property damage, and motor vehicle accidents will be reported in accordance with the detailed reporting requirements contained in DLA One Book chapter titled "Safety." Reports will be submitted through the respective chain of command to DLA Strategic Materials—Operations and Logistics Division.

Corrective Action and Follow-up. Mishaps will be thoroughly investigated locally, and steps will be taken to prevent similar incidents from occurring.

Mishap Analysis. The DLA Strategic Materials Safety and Health Manager will prepare and distribute, on an annual basis, a mishap summary report. Depots will post a copy of the annual mishap summary on their designated safety bulletin board.

AED Program

Staffed depots have been outfitted with automated external defibrillators (AEDs). During the FY, refresher training will be provided for DLA Strategic Materials employees. Training records will be documented in the Learning Management System (LMS) and on the environmental training table. The AED equipment will be maintained at the depot level by depot managers.

Safety and Health Training Requirements and Schedules

Required Training: Respiratory Protection. Personnel working in occupations that require the use of respirators will be trained in the proper use, care, and maintenance of the respirators. This will be accomplished at the time of initial assignment and annually thereafter. Annual fit testing will be conducted in conjunction with the required annual training. Upon completion of annual fit testing, a copy of the fit testing record will be forwarded to DLA Strategic Materials—Operations and Logistics Division. The schedule of respirator fit testing and training is as follows:

Location	FY Quarter
Hammond	4
Scotia	3
Warren	2
*Hawthorne	3

***tentative;
awaiting hiring of
new employees**

General Safety Training. Each depot will hold general awareness safety training monthly on subjects applicable to their particular working environment. PPE training and certification will be given to depot personnel (this does not include security guards or clerical personnel).

Hazard Communication Training. Each Depot will provide annual Hazard Communication training in accordance with the Strategic Materials Hazard Communication Plan. Training is accomplished during one of the monthly depot safety meetings during the year.

ESOHMS Training. ESOHMS training is available via the DLA Strategic Materials ESOH Awareness Training Manual & EMS Update Powerpoint Presentation. The training covers key elements of the DLA Strategic Materials Interpretive Guidance Documents (IGDs), appropriate ISO standards, executive orders and the “I Am the Key” website. Refresher training is accomplished during monthly depot safety meetings.

Hazardous Waste Operations and Emergency Response (HAZWOPER) Training. Hawthorne depot employees will complete Annual HAZWOPER refresher training will occur at each active DLA Strategic Materials depot. The training will fulfill classroom

requirements of OSHA 29 *Code of Federal Regulations* 1910.120(e) and (q). The training schedule is as follows:

Location	FY Quarter
Hammond	3
Scotia	3
Warren	3
Hawthorne	3

AED Training. See AED program previously discussed.

5. Radiation Protection Program

Licensed radioactive materials are no longer held within the National Defense Stockpile although we continue to maintain a current U.S. Nuclear Regulatory Commission License. The Scotia Depot will receive a final status survey once sufficient amounts of commodities are removed to permit acceptable access. This is not likely to occur in FY 2015. The DLA Strategic Materials Radiation Safety Officer will complete an annual radiation survey at the Scotia, NY depot in the first quarter of FY 15.

6. Respiratory Protection Program

An annual review of the program at each location will be conducted by Respiratory Protection Evaluators in accordance with the following schedule:

Location	FY Quarter
Hammond	4
Scotia	3
Warren	2
Hawthorne	3