



TITLE

ENVIRONMENTAL MANAGEMENT PLAN

REV. 19

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APPROVAL SIGNATURES

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APPROVED BY: HUGH QUALLS, Top Mgmt. Rep./Director ISO 14001 Environmental Management System Base Operations Directorate	8/21/15
APPROVED BY: GEORGE R GRAM II, General Manager SOC NV LLC/Hawthorne Army Depot	8/31/15
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CONCUR: LTC. GREGORY K. GIBBONS, Commanding Officer Hawthorne Army Depot	9/9/15
CONCUR: GARY W AMUNSON, Site Manager Defense Logistics Agency Strategic Materials Mercury Storage and Transfer Program	
CONCUR: CRAIG REED, NUWC Representative Naval Undersea Warfare Center (Keyport Detachment)	9/10/15
CONCUR: DONALD R. DOCKREY, ESED Representative Range Operations Section, Expeditionary Systems Evaluation Division Hawthorne Office	9/9/15

INITIAL RELEASE

REVIEW, NO REVISION REQUIRED

REVIEW - REVISION REQUIRED (SEE HISTORY BELOW)



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TABLE 1- REVISION HISTORY

REV	CHANGE DESCRIPTION	AUTHOR	DATE
19	Corrected Typos and formatting issues thought. Change of title for K-Lammel-Schilling, Removed Burton Packard from Approval Signatures. Included references to Nevada Revised Statues and Nevada Administrating Code in Table 2 and Attachment 3. Moved Table to Contents to top of document, added Page numbers to List Of Tables & Attachments, adjusted Page Numbers as necessary. Changed references to Marine Corp Project Office (MCPO) to Expeditionary Systems Evaluation Division (ESED), Increased size of Inserts 1a – 1g. Added definition for CDRL, added Quality Plan numbers for each management system, Removed redundant definition for OHSAS 18001. In 5.3.3.2 (Objectives and targets) clarified the O&T, removing the words Aspects, Action Plans, and the reference to the Executive Orders. Added baseline reference to O&T #2, reduction information to O&T #3, and information about establishing a baseline in O&T 4. Added O&T # to Targets in Table 4. Added New Environmental Forms to Table 10. Updated Permit Expiration dates in Attachment 3.	K Lammel-Schilling	
18	Changed Document Number and document numbering IAW QA Control of Documents; Removed Hyperlinks to facilitate compatibility to Navy computers; Corrected grammar, spelling, formatting and numbering. Changed S. Berry to R. Rodriguez. ; Added T. Erickson as Environmental Manager, Removed R. Schleef as a signatory; Added DLA Mercury as a tenant; Removed EOs as Attachments and adjusted numbering in list of tables adjusted numbering of tables and matched Titles to the Titles in the text; Included correct citations and numbers for the references and removed redundant references thought document; Added Table of Contents; Changed Commander's Monthly Environmental Meeting (CMEM) to Commander's Environmental Meeting (CEM); Added a definition for SAC Spent Aerosol Cans; Changed Policy Statement to New Revision; Removed references to U.S. Army EMS Implementers Guide from Table 3 and Attachment 2; Updated Objectives and Targets for 2015; Moved the description of the Objectives and Targets for 2015 from the section 5.1.4.5 to 5.3.3.2; Change Legal Meetings from Biweekly to Monthly; Changed all Baseline references to 2011 and End of goals to 2017(End of Contract); Included Drums Spent Aerosol Cans (SAC) Disposed as a measurement in REDUCE TOXIC & HAZARDOUS CHEMICALS Target and Objective; Included Recycle Scrap Metals, Wood, and Plastic as a measurement in WASTE PREVENTION & RECYCLING PROGRAMS Target and Objective; Removed Baseline from WASTE PREVENTION & RECYCLING PROGRAMS Target and Objective; Changed Responsible Organization for actions Plans due to changes in SOC Structure; Included all environmental forms in Table 10 List of Forms Applicable to the Environmental Management System.; Attached Listing of Required Environmental Records and Reference Documents.	B. Packard, R. Rodriguez, K Lammel-Schilling	4/9/15
17	Complete Rewrite & Reformatted	S. Berry	7/2014
16	Converted to Word document, changed font, reformatted, and removed hyperlinks	K. Lammel-Schilling	7/9/14
15	Added signature for Environmental Manager changed Commander signature to HWAD Environmental Representative, Presented to CFT at CEM	Y. Downs, K. Lammel-Schilling	7/18/13
14	Changed DZHC to SOC; Removed Approval Signature "Director HDSOC" and references in text.	K. Lammel-Schilling	3/14/12



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TABLE 2 – REFERENCE DOCUMENTS

DOCUMENT NUMBER	APPLICABLE LEGAL & OTHER DOCUMENTS
40 CFR Parts 50 to 99	Subchapter C – Air Programs
40 CFR Parts 100 - 149	Subchapter D – Water Programs
40 CFR Parts 150 - 180	Subchapter E – Pesticide Programs
40 CFR Parts 260 - 280	Subchapter I – Solid Wastes Hazardous Wastes
40 CFR Parts 700 - 799	Subchapter R – Toxic Substances Control Act
40 CFR Parts 1000 - 1099	Subchapter U – Air Pollution Controls
NRS Chapter 445A	Nevada Revised Statues - Water Controls
NRS Chapter 445B	Nevada Revised Statues - Air Pollution
NRS Chapter 445C	Nevada Revised Statues - Environmental Requirements
NRS Chapter 459	Nevada Revised Statues - Hazardous Materials
NAC Chapter 445A	Nevada Administrative Code - Water Controls
NAC Chapter 445B	Nevada Administrative Code - Air Pollution
NAC Chapter 445C	Nevada Administrative Code - Environmental Requirements
NAC Chapter 459	Nevada Administrative Code - Hazardous Materials
Executive Order 13423	Environmental Executive Order Strengthening Federal Environmental, Energy, & Transportation Management
Executive Order 13514	Leadership In Environmental, Energy, And Economic Performance
AP9711-0863.01	Hawthorne Army Depot Main Base Title V Air Permit
AP9711-1134.01	New Bomb Class II Air Permit
NEVHW0023	Hawthorne Army Depot Main Base RCRA Permit
NEVHW0027	New Bomb RCRA Permit
SW-0375-TPS1-12C	Black Beauty Water Treatment Plant Permit
MI-0375-TPAS	Arsenic and Fluoride Groundwater Treatment Plant Permit
SW-0357-TPSI-12C	Potable Water Distribution System Permit
NEV2004524	Surface Water Treatment Plant Discharge Permit
NV0021946	WADF National Pollutant Discharge Elimination System (NPDES) Permit
NEV2003516	PODS National Pollutant Discharge Elimination System (NPDES) Permit
NV050000	Stormwater General Permit
GNEVOSDS09	Domestic Sewage Discharge Permit
Waiver SWMI-0968	Construction and Debris Landfill Wavier
SW-1209702	Treated Wood and Asbestos Landfill Permit
FAR Parts 7 , 11, & 23	Federal Acquisition Regulation (FAR) Green Purchasing Requirements
Army Regulation 200-1	Environmental Protection and Enhancement, December 2007.
Version 3.0 DTD 12/2005	US Army Environmental Management System Implementers Guide
ISO 14001:2004	International Standard For Environmental Management Systems – Requirements With Guidance For Use
ISO 14004:2004	Environmental Management Systems – General Guidelines on Principles, Systems And Support Techniques

 	ENVIRONMENTAL MANAGEMENT PLAN SYSTEM LEVEL PROCEDURE ISO 14001:2004 SOC NEVADA LLC	DOCUMENT No. SOC.QP.ENV.0001
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TABLE 2 – REFERENCE DOCUMENTS Continued

DOCUMENT NUMBER	APPLICABLE LEGAL & OTHER DOCUMENTS
W52P1J-11-D-0002	Operating Contract For The Hawthorne Army Depot
SOC.QP.QMS.0001	SOC Quality Plan – Control Of Documents
SOC.QP.QMS.0002	SOC Quality Plan – Control Of Quality Records
SOC.QP.QMS.0003	SOC Quality Plan – Internal Quality Audits
SOC.QP.QMS.0004	SOC Quality Plan – Control Of Non-Conforming Products
SOC.QP.QMS.0005	SOC Quality Plan – Corrective/Preventative Action
QP.BOP.ENV.0002	Green Procurement
QP.BOP.ENV.0006	HWAD Hazardous Materials-Wastes Contingency Plan
QP.BOP.ENV.0007	HWAD Stormwater Pollution Prevention Plan
QP.BOP.ENV.0009	HWAD Spill Prevention Control and Countermeasures Plan (SPCCP)
DZHC.HWAD.DP.0007	SOC Fire Prevention Manual
SOC.HWAD.FES.0005	Emergency Operations Plan, Disaster Preparedness Plan, Emergency Response Plan, and Anti-Terrorism Plan
QP.HRD.TTD.0005	Master Training Plan

DOCUMENTS REFERENCED IN THIS PROCEDURE ARE APPLICABLE TO THE EXTENT SPECIFIED HEREIN.

1. PURPOSE

- 1.1 The purpose of this document is to define the core elements of our Environmental Management System (EMS). Our EMS is in line with our Quality Management System (QMS) in that we will manage the EMS requirements for Document Control, Control of Records, Control of Non-Conforming Products, and Corrective and Preventative Action as the QMS defines these requirements.

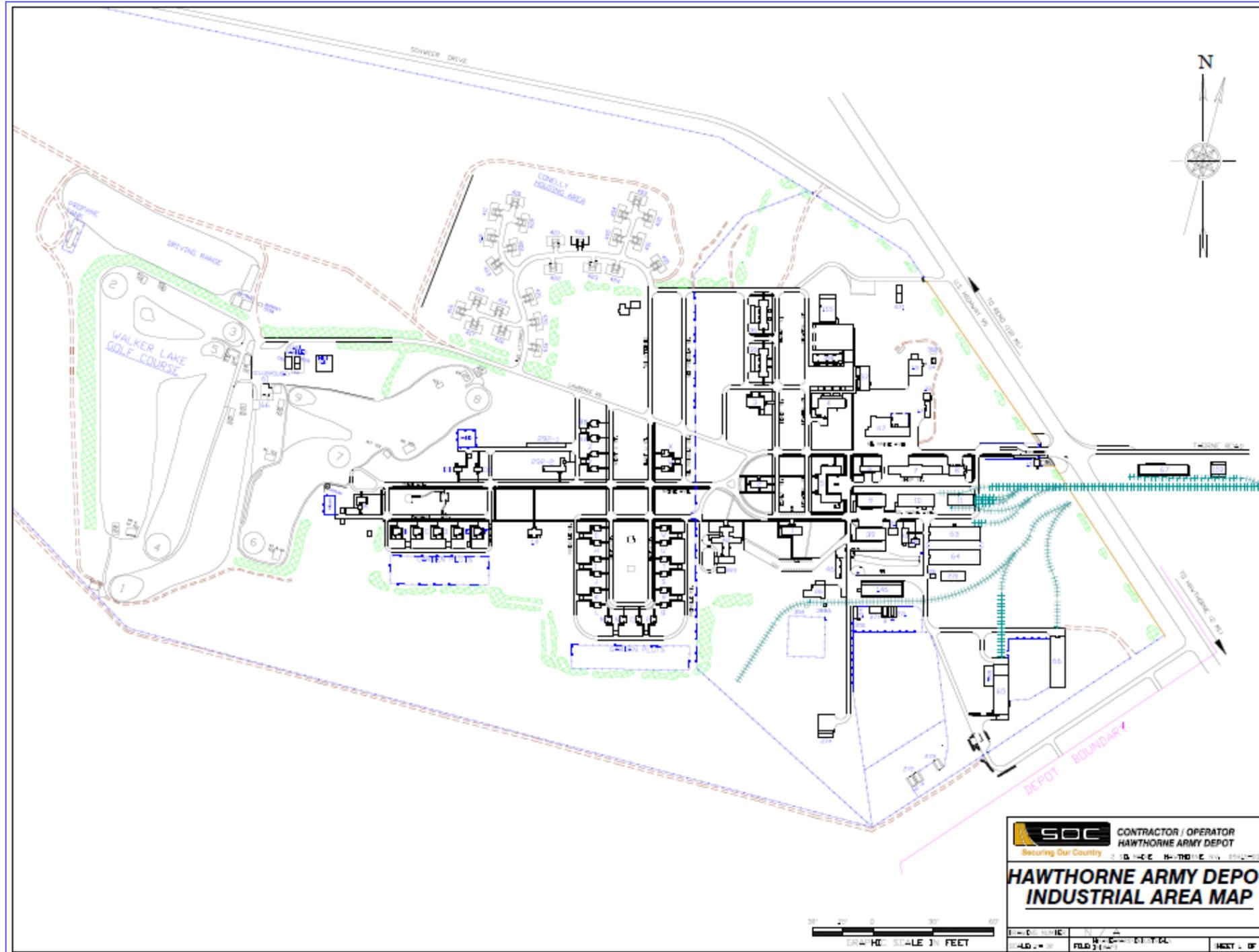
2. SCOPE (CLAUSE 1)

- 2.1 This document applies to all SOC NV LLC activities at the Hawthorne Army Depot (HWAD) as environmental stewardship is a key element to our continued success in the daily operation of the Depot. This document also provides for the compliance to federal and state law as provided by our permits and contract (W52P1J-11-D-0002) requirements.
- 2.2 SOC maintains a **“fence line to fence line”** EMS in order to invite and encourage tenant activities to participate. The operating contract states that the Depot Commander may require tenant’s participation.



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INSERT 1A. HWAD INDUSTRIAL AREA- "FENCE LINE TO FENCE LINE" SCOPE



SOC CONTRACTOR / OPERATOR
HAWTHORNE ARMY DEPOT
Securing Our Country

**HAWTHORNE ARMY DEPOT
INDUSTRIAL AREA MAP**

DATE: 10/11/11
DRAWN BY: [Name]
CHECKED BY: [Name]
SCALE: AS SHOWN

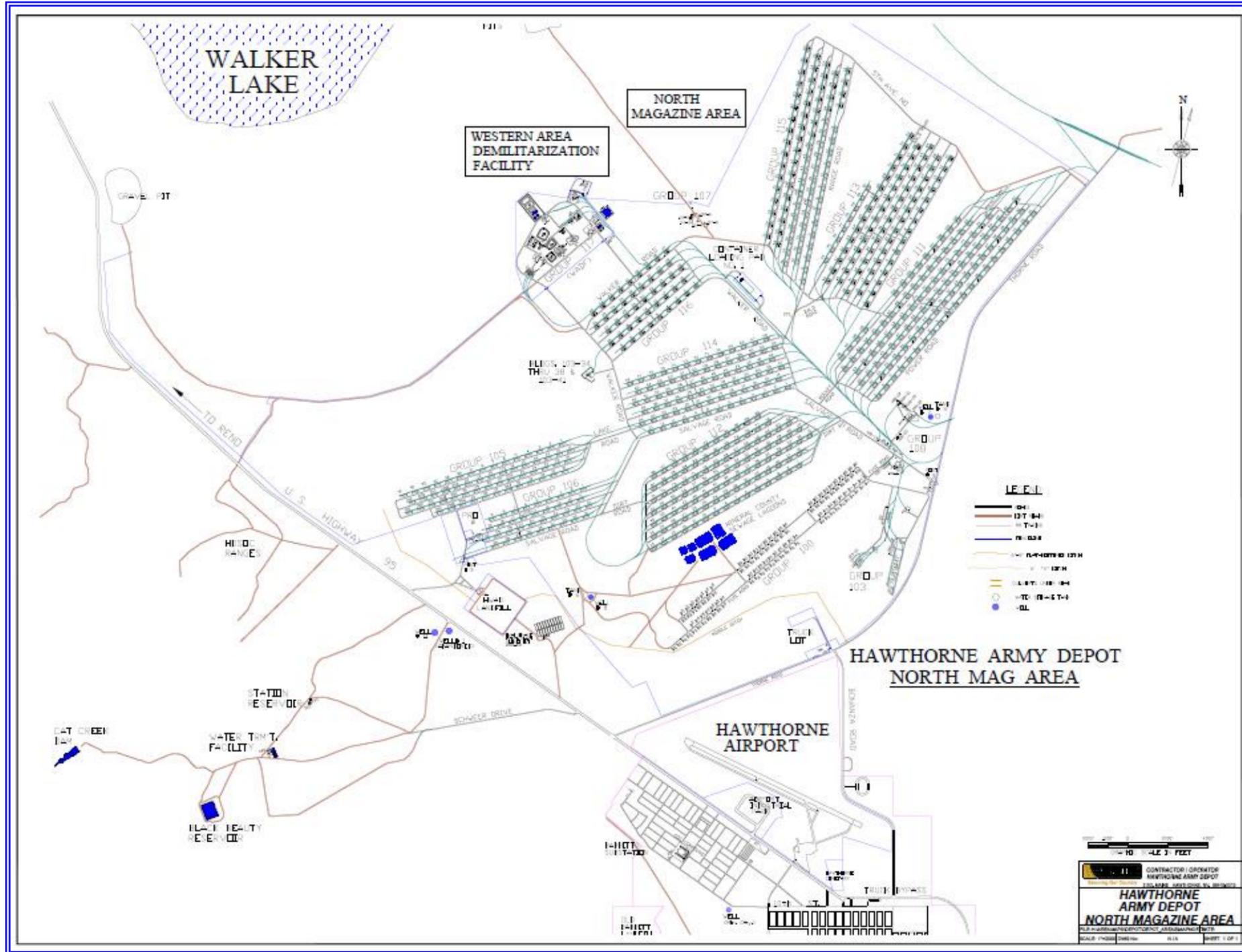
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INSERT 1B. SOUTH MAGAZINE AREA HWAD- "FENCE LINE TO FENCE LINE" SCOPE



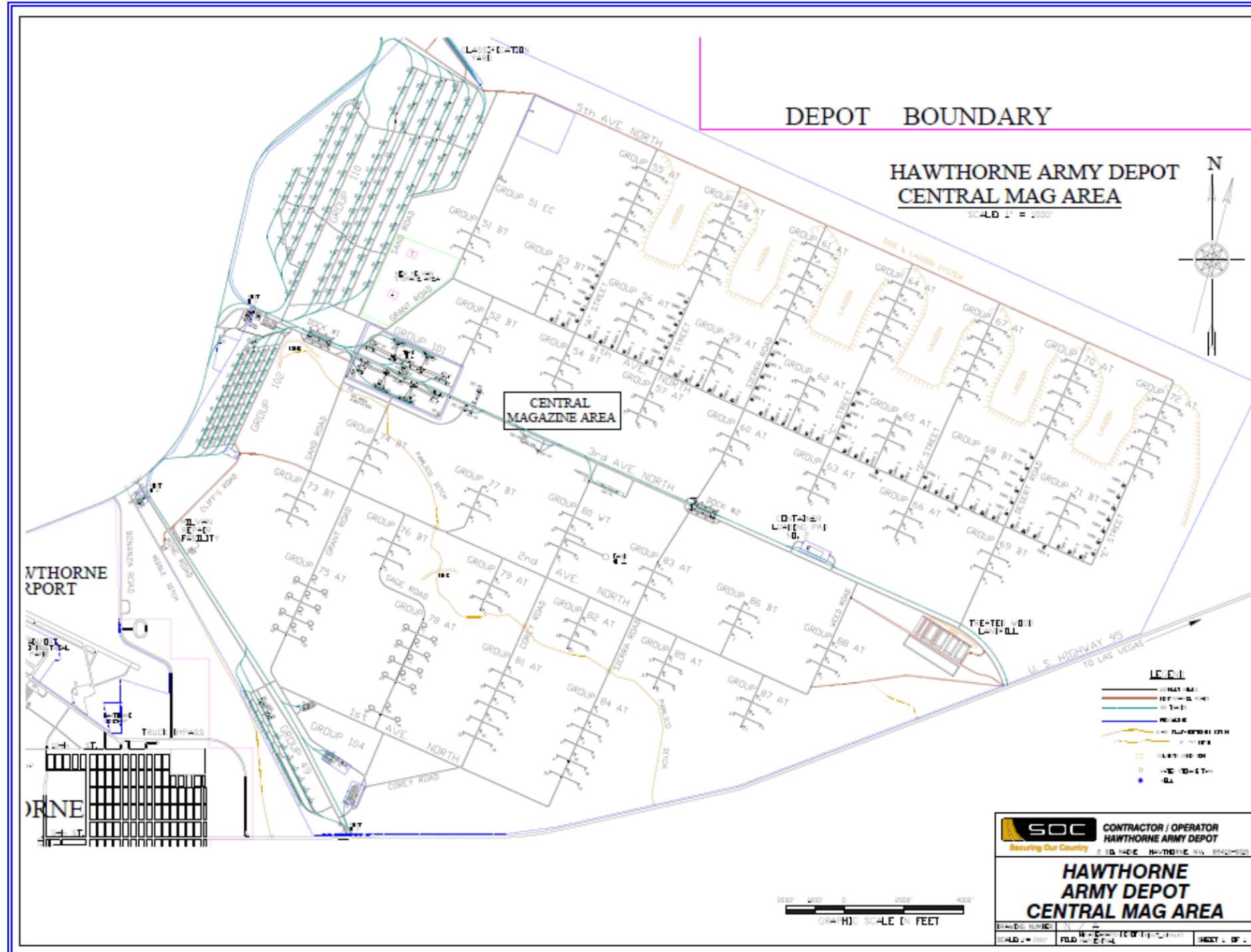
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INSERT 1C. HWAD NORTH MAGAZINE AREA – "FENCE LINE TO FENCE LINE" SCOPE



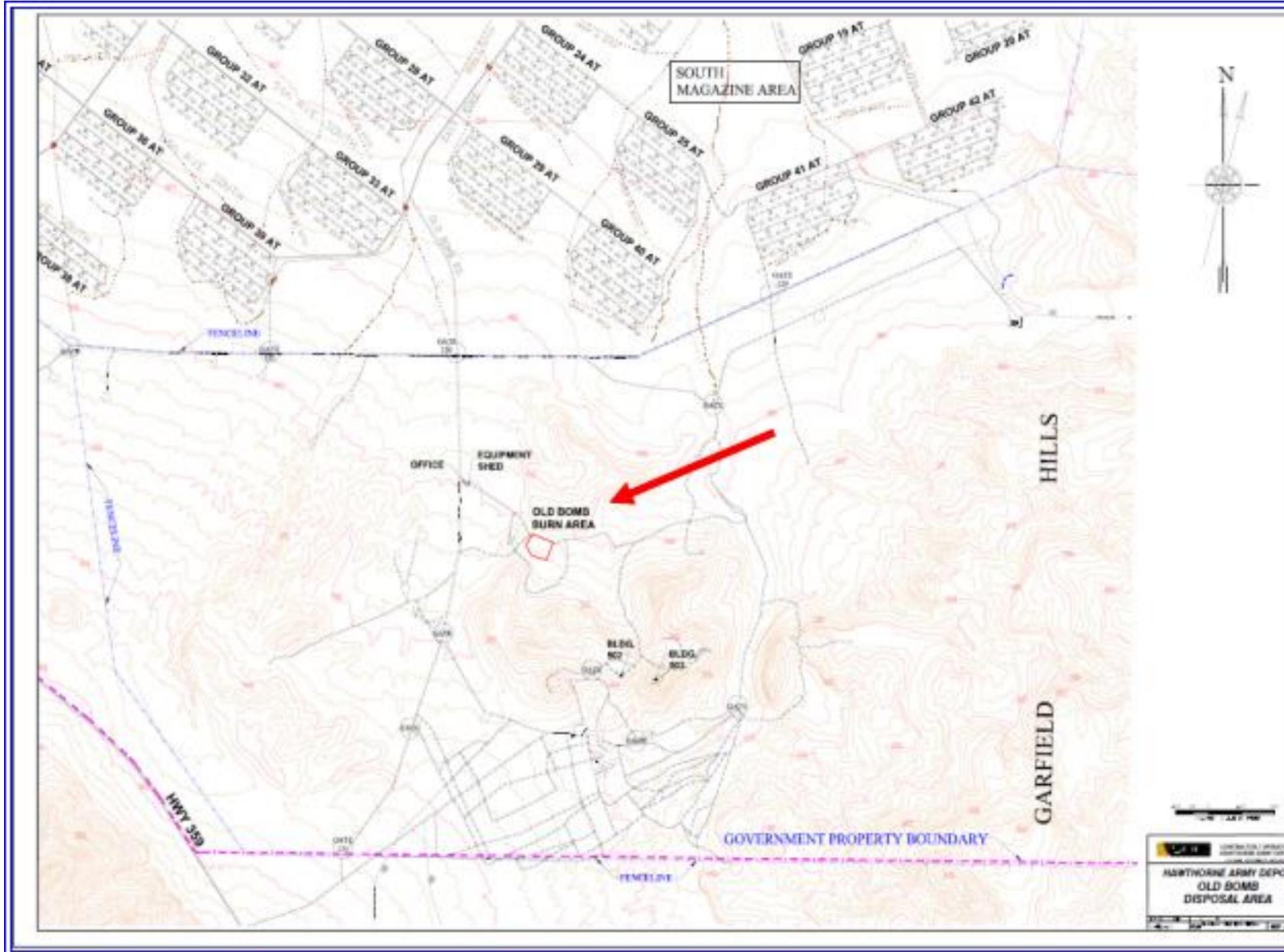
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INSERT 1D. HWAD CENTRAL MAGAZINE AREA – "FENCE LINE TO FENCE LINE" SCOPE



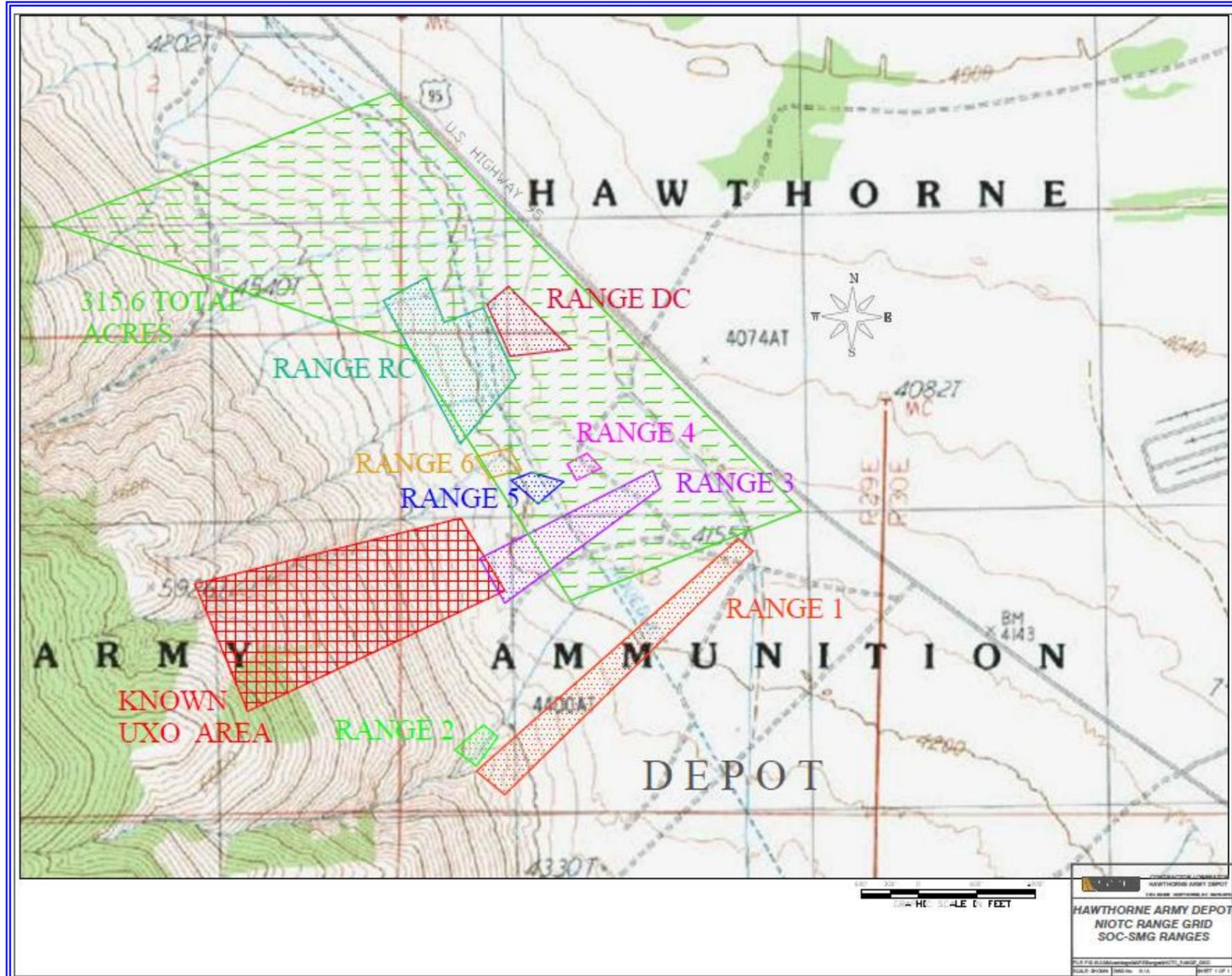
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INSERT 1F. HWAD OLD BOMB RANGE AREA – "FENCE LINE TO FENCE LINE" SCOPE



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INSERT 1G. HWAD NIOTC FIRING RANGES – "FENCE LINE TO FENCE LINE" SCOPE





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3. TERMS & DEFINITIONS (CLAUSE 3)

- 1. **ACO**.....Administrative Contracting Officer (Government Staff)
- 2. **APPLICABLE LEGAL REQUIREMENTS**Legal requirements promulgated and enforced by Federal, State, or local government authorities that apply to an organization’s processes, products, services or activities.
- 3. **AUDITOR**.....A person with the competence to conduct an audit
- 4. **CAPA**.....Corrective & Preventative Action
- 5. **CFT**Previously called the Cross Functional Team and is now the Environmental Management Committee (EMC), see EMC for definition.
- 6. **CDRL**.....Contract Deliverable Requirement List
- 7. **CEM**.....Commanders Environmental Meeting Consists of the Commander of HWAD, General Manager of SOC, Program Manager for Explosives Operations, ESED, NUWC Site Manager or designate, SOC Environmental Manager, ACO Environmental Protection Specialist(s), Government Staff Heads, EMS Representative, SOC Directors, and other personnel as required. The CEM receives advice and updates on the status of the Environmental Management system from the EMC.
- 8. **CO**.....Commanding Officer
- 9. **CONTINUAL IMPROVEMENT**.....A recurring process of enhancing the EMS in order to achieve improvements in overall environmental performance that is consistent with SOC NV LLC’s environmental policy.
- 10. **COR**.....Contracting Office Representative (SOC)
- 11. **CORRECTIVE ACTION**.....Action taken to eliminate the cause of a detected non-conformity
- 12. **DOCUMENT**A document stating results achieved or providing evidence of activities performed
- 13. **DLA Mercury**Defense Logistics Agency Strategic Materials Mercury Storage and Transfer Program
- 14. **EMC**.....Environmental Management Committee – is interchangeable with the term Cross Functional Team (CFT). Meets Quarterly to review the EMS and SOC’s Environmental Aspects and Impacts – is directly reportable to the Top Management Representative for the Environmental Management System’s conformance to the ISO Standard (14001) and meeting regulatory compliance with the Army and Federal and State governments.



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3. TERMS & DEFINITIONS – (CLAUSE 3)

CONTINUED

- 15. **EMS**.....Environmental Management System (ISO 14001:2004)
SOC.QP.ENV.0001
- 16. **EMSMR**.....Environmental Management System Management Representative
- 17. **EnMS**.....Energy Management System (ISO 51001:2011-E),
QP.SOC.EnMS.0001.
- 18. **EMSTMR**.....Environmental Management System Top Management Representative
- 19. **ENVIRONMENTAL ASPECT**A statement of SOC NV LLC's activities, products or services that can interact with the environment (*A significant environmental aspect has or can have a significant environmental impact*).
- 20. **ENVIRONMENTAL IMPACT**Any change to or in the environment/environmental structure, whether adverse or beneficial, wholly or in part resulting from SOC NV LLC's Environmental Aspects
- 21. **ENVIRONMENTAL OBJECTIVE**.....The overall environmental goal(s) that are consistent with the environmental policy that SOC NV LLC sets to achieve.
- 22. **ENVIRONMENTAL PERFORMANCE**.....Measurable results of an organizations management of its environmental aspects.
- 23. **ENVIRONMENTAL TARGET**.....A detailed performance requirement that is applicable to the organization or parts thereof, that arises from the environmental objectives and that needs to set and met in order to achieve those objectives.
- 24. **EO**Executive Order
- 25. **ESED**Expeditionary Systems Evaluation Division (formerly Marine Corps Project Office MCPO)
- 26. **HOST**.....The person(s) that guide visitors, contractors, subcontractors, vendors, or those that will do business on the HWAD.
- 27. **NON-CONFORMITY/NON-CONFORMANCE**....The failure to fulfill a requirement or commitment
- 28. **NUWC**.....Naval Undersea Warfare Center (Keyport Detachment)
- 29. **ORGANIZATION**.....For the purposes of this document it will include SOC NV LLC and may include the Administrative Contracting Officer (ACO), the Naval Undersea Warfare Center (NUWC) Detachment, the Expeditionary Systems Evaluation Division (ESED) and/or Defense Logistics Agency Strategic Materials Mercury Storage and Transfer Program (DLA Mercury).



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3. TERMS & DEFINITIONS – (CLAUSE 3)

CONTINUED

- 30. **OTHER APPLICABLE REQUIREMENTS**Other requirements to which the HWAD, tenants, and contractors subscribe to, such as DoD, Dept. of Army, Executive Orders, etc. that apply to the HWAD’s processes, activities, products, and services.
- 31. **POLLUTION PREVENTION**.....Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant or waste in order to reduce averse environmental impacts.
- 32. **PREVENTATIVE ACTION**An action taken to prevent a potential non-conformity.
- 33. **ROOT CAUSE ANALYSIS/RCA**.....A method of problem solving that tries to identify the root causes of faults or problems. A problem solving practice that attempts to identify and correct the root causes of events, as opposed to simply addressing their symptoms. RCA IS typically used as a reactive method of identifying event(s) causes, revealing problems and solving them. The analysis is done after an event has occurred and the RCA can be used to forecast or predict probable events before they occur
- 34. **QMS**Quality Management System (ISO 9001:2008), SOC.QM.0001
- 35. **SAC**.....Spent Aerosol Cans
- 36. **SMS**Safety Management System (OHSAS 18001:2007), SOC.OHS.SP.0001
- 37. **STAKEHOLDERS**.....Those whom the environmental laws, requirements, and expectations are required.
- 38. **TENANT**.....At the Hawthorne Army Depot those activities are defined as the Naval Undersea Warfare Center (NUWC), the Expeditionary Systems Evaluation Division (ESED) and Defense Logistics Agency Strategic Materials Mercury Storage and Transfer Program (DLA Mercury.)
- 39. **TOP MANAGEMENT**The Top Management group consists of the Commander of the Depot or his/her designee(s), the SOC NV General Manager, his directors; the Directors of Munitions and Logistics Services, Business Management, Base operations and the Deputy Directors of Munitions and Logistics Services and Base Operations.

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4. POLICY (CLAUSE 4.2)

- 4.1 Top Management has established an Environmental Management Policy, policy #1105 and ensures its continued suitability through an annual review. This policy can be found in the SOC Policy Manual which is maintained by the office of the General Manager. The General Manager, SOC NV LLC is the signatory authority for this policy.
- 4.2 The Environmental Management Policy may be viewed in its entirety below and in Attachment 1. The policy is communicated to all personnel when they are hired, when they enter the depot through the security office (Pass & I.D.) and distributed throughout the depot as it is posted conspicuously on official or unofficial bulletin boards and walls; additionally the policy is made available to the general public upon request.
- 4.3 SOC continuously monitors tenant environmental activities, operations and their environmental systems, however is not responsible for the management of those systems. All required data from tenant activities is collected and reported as part of HWAD's permitting requirements thus we maintain environmental regulatory compliance and conformance to the EMS at these facilities as directed by the Commanding Officer.

INSERT 2. ENVIRONMENTAL MANAGEMENT POLICY, SOC POLICY #1105


POLICY #1105

ENVIRONMENTAL POLICY STATEMENT

SOC Nevada LLC, Operating Contractor of the Hawthorne Army Depot (HWAD) will, comply with Federal, State & Local laws, regulations and other requirements & have established this Environmental Management Policy, Policy #1105.

SOC Nevada LLC provides its environmental guidance and stewardship to the community, our employees, the Administrative Contracting Officer (ACO) & tenant activities (Marine Corps Programs Office (MCPO) & the Naval Undersea Warfare Center (NUWC)) located at HWAD in the following ways:

- Green &/or Sustainable Operations** – Implementing effective Pollution Prevention & Waste Minimization programs to Reduce, Reuse and Recycle (R³) materials.
- Regular Communication** – Communicate our Environmental Commitment & efforts to our customers, staff and our community for Continual Improvement
- Environmental Protection** – Respond to all incidents immediately to minimize any Environmental Impact where SOC activities are concerned in the material management, renovation and demilitarization of ammunition and components or other military items & the operation of the facility.
- Environmental Leadership** - Keeping our primary values based in Health, Safety, Environmental Protection and Stewardship, Pollution Prevention and Continual Improvement with the understanding that environmental protection and safety are the same in basis; and
- Networking** – Provide a framework for the identification of ways to minimize our water consumption, fuel reduction, prevention of hazardous waste emissions and promotion of recycling programs to reduce adverse Environmental Impacts and measure progress to our Objectives & Targets.



Rev 3
 March 2015

GEORGE R. GRAM, II General Manager Date
 SOC Nevada LLC

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5. PLANNING (CLAUSE 4.3)

5.1 ENVIRONMENTAL ASPECTS (CLAUSE 4.3.1)

5.1.1 We recognize that a critical element of a good working EMS is to identify and understand how our activities impact or may impact the environment. Through that recognition the EMSTMR has selected and appointed personnel to form a committee/team officially named the Environmental Management Committee (EMC). The EMC will meet once each quarter to discuss the EMS and our Environmental Aspects and real or potential Environmental Impacts of our business and business practices. We have identified the following environmental aspects through our activities and contractual obligations as the operating contractor of the Hawthorne Army Depot. Those aspects include but are not limited to: *See Attachment 2 for a complete list of our Environmental Aspects.*

5.1.2 **IDENTIFICATION OF PROCESSES, ACTIVITIES, PRODUCTS, AND SERVICES** - The EMC identifies processes, activities, products, and services that has established a general framework for the identification and evaluation of environmental aspects and associated impacts (real or potential). The EMC has the appropriate personnel to assist in the identification of Environmental Aspects and Impacts (real or potential). The output of this process is documented and communicated using the Summary of Processes, Activities, Products, and Services Report.

Note: The NUWC and ESED detachments have identified the applicable Aspects and Impacts relative to their operations and will provide them to internal and/or external auditors.

5.1.2.1 Processes, activities, products, and services identified are intended to be 'large enough for meaningful examination and small enough to be sufficiently understood', **Reference: 4.2.2 ISO 14004, Environmental Management Systems - General Guidelines on Principles, Systems and Supporting Techniques.**

5.1.2.2 We have considered those processes, activities, products and services that we can control and over which it can be expected we would have some influence to be in the following three functional areas; These areas are also taken into consideration when identifying processes, activities, products, and/or providing services:

- ☞ **MISSION REQUIREMENTS** – Are those processes, activities, operations, products and services that are integral to the accomplishment of our mission.
- ☞ **SUPPORT SERVICES & FACILITIES MANAGEMENT** – Are those processes, activities, products, and services that support our mission and/or are necessary to support infrastructure
- ☞ **LEGACY ISSUES** - existing environmental issues that are a direct result of past operations

5.1.2.3 **IDENTIFICATION OF ENVIRONMENTAL ASPECTS AND IMPACTS** - Each of our processes, activities, products, and services are reviewed at least annually to identify associated Environmental Aspects and Impacts.



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5. PLANNING (CLAUSE 4.3)

CONTINUED

5.1.2.4 Environmental Aspects and Impacts are identified through EMC meetings with appropriate personnel. The meetings are held quarterly and are a part of the management review process. The Aspects and Impacts of both controlled and uncontrolled processes are considered. The meetings are scheduled and facilitated by the EMSMR with concurrence of the Manager, Environmental Services.

5.1.2.5 Our Environmental Aspects and Impacts have been identified for each activity, product, and service are grouped into categories. Sample categories include the following real or potential impacts:

- | | |
|--------------------------------|------------------------|
| ☞ Air Pollutant Emissions | ☞ Recyclable Materials |
| ☞ Human Exposure | ☞ Waste |
| ☞ Natural Resource Consumption | ☞ Water Discharge |
| ☞ Land Disturbance | ☞ Noise increase |
| ☞ Energy Conservation | ☞ Other (to be noted) |

5.1.2.6 The output of the Aspects and Impacts identification process is documented using an Aspect Prioritization Worksheet for Aspects Associated with Processes, Activities, Products, and Services (SOC 676-E Form). Flowcharts depicting environmental aspects and impacts related to our processes, activities, products, and services can be viewed in Appendix A of this manual. A blank Aspect Prioritization Worksheets (SOC 676-E) may be found on the "G" drive under "Intranet" in the "Environmental" folder, listed under "Aspects and Impacts". Completed flowcharts will be maintained as records, IAW Quality Plan, Control of Records SOC.QP.QMS.0002.

5.1.2.7 Executive Order's (EOs), contractual, regulatory, and permitting requirements were essential in determining and developing our current Aspects and Impacts.

5.1.3 **CRITERIA FOR THE EVALUATION OF ENVIRONMENTAL ASPECTS & IMPACTS** - Identified environmental aspects evaluate a variety of real and/or potential environmental impacts using risk-based assessment methodology. We utilized methodology contained in the U.S. Army EMS Implementers Guide to evaluate and rank environmental aspects and impacts. The evaluation categories and scale to score are from the U.S. Army Environmental Management System Implementers Guide and are summarized in the Criteria for Evaluating the Significance of Aspects/Impacts (TABLE 3).

5.1.3.1 A numerical Impact Significance Score is assigned to each process and its associated impacts. Our environmental aspects, impacts, and significance scores are documented with the Aspect Prioritization Worksheet (SOC 676-E) and maintained as quality records IAW SOC.QP.QMS.0002, Control of Quality Records.



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5. PLANNING (CLAUSE 4.3)

CONTINUED

TABLE 3-CRITERIA FOR THE EVALUATION OF ENVIRONMENTAL ASPECTS & IMPACTS

The table below summarizes the categories used to rate the significance of environmental Aspects and Impacts. The aspect/impact identification and evaluation process is performed as described in the Environmental Aspect/Impact section of this manual. The NUWC & ESED may develop and follow their own criteria.

FREQUENCY OR LIKELIHOOD SCALE (F)

5 =	Continuous	Ongoing/Daily
4 =	Frequent	More than once per month
3 =	Infrequent	More than once per year but less than once per month
2 =	Rare	Impact may occur once every year or two
1 =	Never	Never occurs or is highly unlikely

ENVIRONMENTAL IMPACT SEVERITY SCALE (E)

5 =	Severe	Immediate threat, likely to result in widespread damage to human health or the environment. Requires great effort to remediate and correct
4 =	Serious	no immediate health threat, but significantly damages the environment; difficult but possible to remediate
3 =	Moderate	somewhat harmful, but correctable
2 =	Mild	small potential for harm to environment, correctable
1 =	Insignificant	trivial consequences, easily correctable or not impact

MISSION IMPACT SEVERITY SCALE (M)

5 =	Loss of ability to accomplish critical mission or near mission failure
4 =	Severely degraded mission capability or serious mission restrictions
3 =	Moderate mission restrictions
2 =	Minor mission impacts or restrictions
1 =	Insignificant mission impacts or restrictions; alternative courses of action are available
0 =	No mission impacts or restrictions

REGULATORY IMPACT SCALE (R)

5 =	Regulated	noncompliance condition; actual or possible enforcement action or NOV or required by Executive Order
4 =	Regulated	generally in compliance, but not completely controlled or managed; some risk of noncompliance in future, or under scrutiny by regulators
3 =	Regulated	in compliance, well controlled or managed; little regulator interest
2 =	Likely to be regulated	in future by federal, state, or host nation agency
1 =	Best management/business practice (BMP) applies	
0 =	No requirements apply	

COMMUNITY CONCERN SCALE (C)

4 =	Public outcry or lawsuits.
3 =	Serious community concern, political or activist inquiries, intense negative media
2 =	Moderate community concern, some media coverage.
1 =	Community is not currently concerned, but could become so.
0 =	Community is ambivalent or unconcerned

FORMULA FOR CALCULATING ENVIRONMENTAL ASPECTS & ASSOCIATED IMPACTS:

$F \times (E + M) + C + R$ for example the most severe score would be $5 \times (5 + 5) + 4 + 4 = 58$



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5. PLANNING (CLAUSE 4.3)

CONTINUED

- 5.1.4 **SIGNIFICANCE OF ENVIRONMENTAL ASPECTS & IMPACTS** - An impact "Significance Score" of forty (40) has been determined to be an appropriate cut-off value to deem an impact "**significant**". Impacts identified and yielded a Significance Score greater than or equal to forty (40) are considered to be a "Significant Impact", and those that are less than forty (40) are not considered to be "Significant".
- 5.1.4.1 SOC Environmental Services has considered our Significant Environmental Impacts and have suggested our significant environmental aspects (i.e., those aspects that have or may have a significant environmental impact) when developing objectives and targets and establishing, implementing, and maintaining the EMS. The significance of Environmental Aspects is approved by the EMC membership. Our significant Environmental Aspects have been identified as such by the EMC. Our SEA's are viewable in Attachment # 2.
- 5.1.4.2 The U.S. Army's Implementers Guide has determined the Significance Score Value to be forty (40) and will be the cut-off point. After careful consideration of all identified Aspects and Impacts the following factors were considered during the selection of the Significance Score Values during quarterly EMC meetings. The following were considerations:
1. The nature and extent of activities and processes
 2. The relative score of each identified environmental aspect
 3. The resources (human, financial, equipment, technology etc.) available for use in the implementation of the EMS.
- 5.1.4.3 The overview of the operations contributing to and affected by the environmental aspects are found in Attachment # 2.
- 5.1.4.4 SOC has taken into consideration while planning the EMS, Presidential Executive Order 13423 Strengthening Federal Environmental, Energy and Transportation Management and Executive Order 13514, Federal Leadership in Environmental, Energy and Economic Performance to determine which significant aspects we would monitor and measure as they have the most significant impact on SOC and HWAD.
- 5.1.4.5 SOC's Significant Environmental Aspects, have been identified and will be monitored IAW the ISO 14001:2004 International Standard as follows:
1. **Hazardous Waste Operations:** Pick up, sample, process, and ship hazardous waste, maintain all required permits and documentation, Inspections and audits as required. Each process that treats of hazardous waste is analyzed as a separate aspect.
 2. **Open Detonation & Demilitarization** of conventional ammunition and explosives / energetics and occasional treatment of reactive wastes. Some donor material derived from 117-7 with analysis of sludge being over 12% reactive
- 5.1.5 **ASPECT REVIEW AND UPDATE** - The results of this environmental aspect and impact evaluation are reviewed by the EMC and as part of the Management Review process. Based on the results of the Management Review, the MR for the EMS will determine the need to update the Aspect Prioritization Worksheet and any related documents. Once updates have been made the EMSMR will review and recommendations will be made Top Management for their approval.

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5. PLANNING (CLAUSE 4.3) CONTINUED

5.1.5.1 Targets and Objectives are listed in section 5.3.5 with the explanation relating to their importance to SOC and the EMS.

5.1.5.2 While identifying of our environmental aspects of the work performed at HWAD we tried to and hopefully succeeded to identify those environmental aspects and the impacts of current activities, new and/or modified activities, in order to determine which aspects result or could result in a significant impact and keep the list as current as possible for each quarterly review and evaluation.

5.2 LEGAL & OTHER REQUIREMENTS – (Clause 4.3.2) - Legal and Other Requirements are reviewed and considered during planning, implementation, and maintenance of the EMS through environmental compliance programs (monthly meetings with the program Team Leader and the Manager, Environmental Services) and by incorporating legal compliance requirements during and after the identification and evaluation of our environmental Aspects and Impacts. These requirements are reviewed, updated and implemented through quarterly EMC meetings where review of regulations and permits occurs to ensure compliance. SOC will achieve this conformance requirement by following the terms and conditions for performance under the operational requirements of our contract with the U.S. Army or by other means mandatory or otherwise under these terms.

5.2.1 Legal and Other Requirements are specific to each organization. Our Legal and Other Requirements have been identified and implemented through the execution of individual Performance Work Statements (PWS's) and are relative to our contractual obligations. Changes to our Legal and Other Requirements will be accessible in a variety of media to include but not limited to utilization of the company's "G" drive (previously the company Intranet), internet websites, hardcopy regulations (received during certification training) or purchased, email, inter-office communications, meetings and so forth.

5.2.2 To ensure that SOC identifies, evaluates, monitors and reports its Legal and Other Requirements that are applicable to environmental, health, safety and quality aspects of our processes, activities, products and services, the Legal and Other Requirements shall support the Environmental Policy (Policy #1105 – Section 4)

5.2.3 Access to applicable requirements - Environmental Compliance Programs also include information regarding regulatory requirements, access to federal, state, local and Army regulatory requirements via the internet. The organization shall maintain access to environmental, regulations and requirements through a variety of means, to include, but not limited to:

- US Government Printing Office at <http://www.gpo.gov/fdsys/>
- United States Environmental Protection Agency (Federal) <http://www.epa.gov/>
- Nevada Department of Environmental Protection (State) <http://ndep.nv.gov/>
- United States Department of Transportation (DOT) <http://www.dot.gov/>
- Presidential Executive Order(s) <http://www.epa.gov/oaintmnt/practices/eo13423.htm>
- Various Publications and Emails *Internet Search or Hardcopy Library (Environmental Office, Right to Know / Right to Understand Centers etc.)*



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5. PLANNING (CLAUSE 4.3)

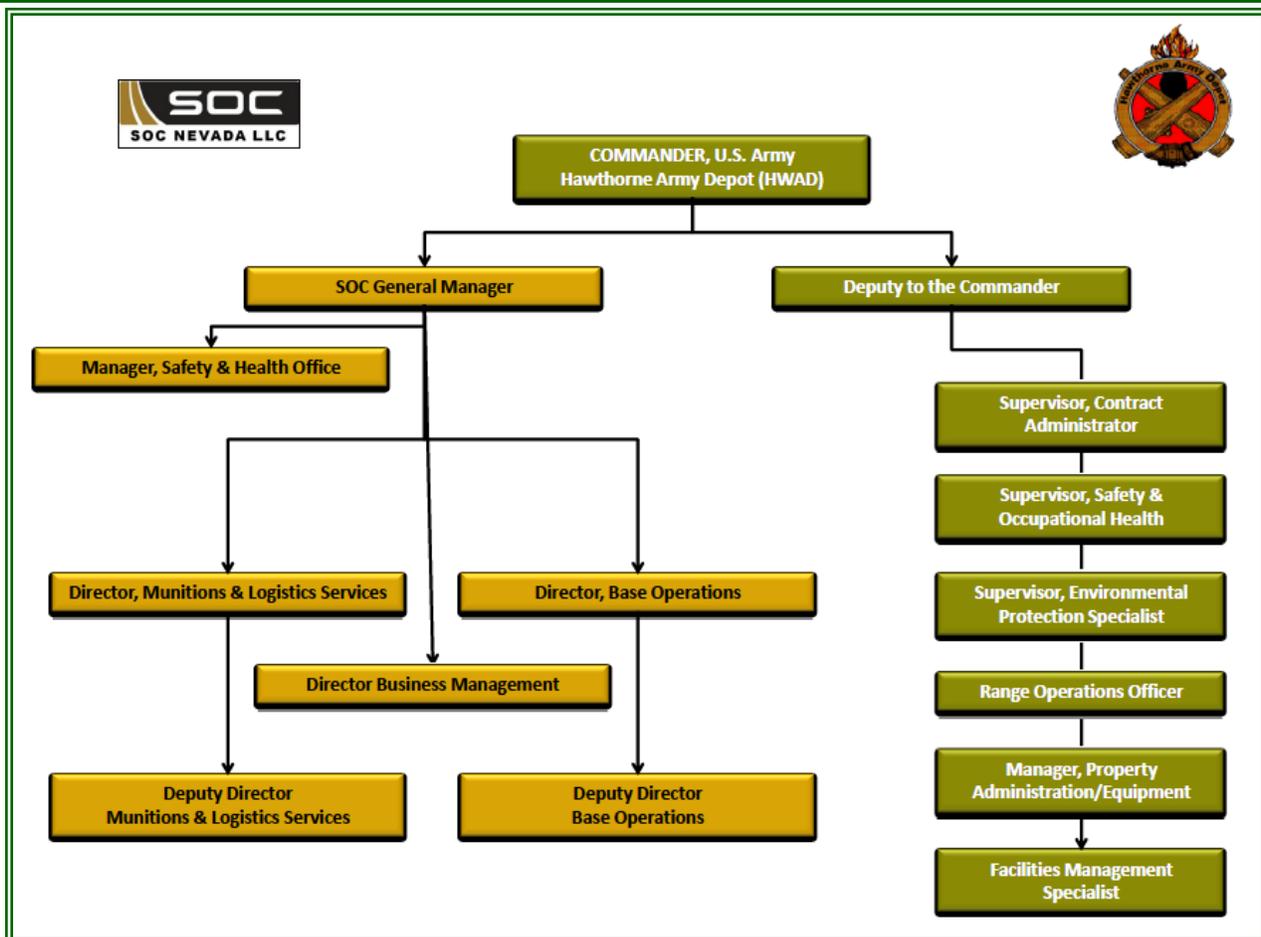
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5.2.4 Identification, Tracking, and Communication of Applicable Requirements - The environmental office shall coordinate the identification and evaluation of applicable Legal and Other Requirements. External Resources (e.g., consultants, attorneys, etc.) may be called upon but are not a requirement, to assist in the evaluation of and response to applicable legal and other requirements.

5.2.5 The applicability of Legal and Other Requirements are summarized in each of SOC's Environmental Compliance Programs. Additionally, SOC maintains our contractual requirements through an inventory of our Legal and Other Requirements for each organization can be found on the "G" drive in the Intranet Directory and the Environmental Folder. A Summary of our Contract Data List Requirements has been attached to this manual for reference and can be found in Attachment 3. The EMS Legal and Other Requirements were identified through quarterly EMC meetings. Additionally the Depot Organizational Chart may be utilized to identify key personnel/positions for those requirements. See Flowchart 1

DEPOT ORGANIZATIONAL CHART

Flow Chart 1





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5. PLANNING (CLAUSE 4.3) CONTINUED

5.2.6 Legal and Other Requirements are communicated to stakeholders, through training (OJT or Formal), email, hardcopy correspondence, meetings (CEM, EMC, Monthly Internal Communications Meetings [ICM] etc.). Identified action-oriented requirements (e.g., monitoring events, reports, inspections, etc.) are also summarized in the Summary of our Contract Data List Requirements (Attachment 3). Legal and Other Requirements specific to the Administrative Contracting Officer (ACO), hosts, contractors, subcontractors, vendors, visitors, (includes all visitors entering the depot through the security office for the purposes of receiving a badge), regardless of their length of stay will be briefed and made aware of our Environmental Policy and environmental system prior to being released and allowed to work or supply services.

5.2.7 It is the responsibility of the Environmental Services staff to monitor resources described in this procedure to ensure that new and emerging requirements can be met, are identified and incorporated into the EMS during monthly meetings with key staff members and/or subject matter experts in the specific topic of discussion.

5.2.8 **EVALUATING COMPLIANCE WITH LEGAL AND OTHER REQUIREMENTS** - Compliance to the International Standard's Legal and Other Requirements shall be verified during the internal audit process. Each organization's Legal and Other Requirements are an essential part of an internal audit. Advanced copies of audit questions can be obtained by contacting the EMS Management Representative (EMSMR) at extension 7571.

5.3 OBJECTIVES, TARGETS & PROGRAMS (CLAUSE 4.3.3) - EMC will recommend suggested Objectives and Targets to Top Management based on our Legal and Other Requirements and take into consideration the overall strengths and weakness' associated with each and their environmental impact. Top Management will establish our Objectives and Targets to ensure they are designed to sufficiently guide the overall direction of the EMS. A Summary of Objectives and Targets by year is used to document the organization's Objectives and Targets, show their relationship with identified Significant Environmental Aspects and Impacts and our movement toward continual improvement.

5.3.1 The following elements are and have been considered during the establishment of our Objectives and Targets. Discussions regarding Objectives, Targets and Programs specific to the EMS will be documented, retained and maintained as quality records IAW SOC.QP.QMS.0002, Control of Quality Records.

- 🔗 Environmental Policy – Attachment 1/Policy #1105 – SOC Policy Manual
- 🔗 Legal & Other Requirements
- 🔗 Significant Environmental Aspects
- 🔗 Technological Options & Limitations
- 🔗 Financial, Operational & Mission Requirements
- 🔗 Stakeholder Views (includes employees and other interested parties)

5.3.2 The EMS Management Representative (EMSMR) will present the established Objectives and Targets to the CEM for review and comment and prior to the implementation of any resulting Action Plans.

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5. PLANNING (CLAUSE 4.3) CONTINUED

5.3.3 **ACHIEVING OBJECTIVES & TARGETS** - The EMSMR will develop EMS Action Plans for each established Objective and Target. Action Plans shall identify action items, personnel, functions, schedules and the resources necessary to achieve established Objectives and Targets. Current EMS Action Plans can be viewed in the Summary of Objectives & Targets shown in Section 5.1.17 (1, 2, 3, & 4) of this manual. Individual organizational/process Action Plans may also be obtained by contacting the EMSMR at extension 7571.

5.3.3.1 Our established Objectives and Targets our monitored and measured using defined metrics (milestones) as described in the Monitoring, Measurement and Evaluation of EMS Compliance element of this manual found in SECTION 7. EMS Action Plans may be revised by the EMSMR, based on the performance results of monitoring activities. The EMC shall review all Action Plans prior to submitting them to the Top Management for final approval of changes to any established and previously approved Action Plans for established Objectives and Targets. New Action Plans shall be reviewed by the EMC prior to being presented to the Top Management for final approval.

5.3.3.2 The Objectives and Targets established for 2015 are as follows:

Objective & Target #1: Reduce Water Consumption Intensity - Implement sustainable practices for water conservation. Refer to “Water Conservation Plan”, actions during a drought situation.

- Beginning in FY2012, reduce water consumption intensity, relative to the baseline of the Depot’s water consumption relative to FY2011 through lifecycle cost effective measures by two percent (2%) annually through the end of FY 2017.
- Upgraded water plant to meet consumption requirements and meet the regulatory mandates, such as
- 2014 - Established a mandate on water consumption
- 2015 - “Water Conservation Plan” conservation measures. (Note: –/31/2015 - still in draft).

Objective & Target #2: Reduce Vehicle Petroleum Consumption - Implement sustainable practices for decreasing the use of petroleum based fuels and fuel conservation

- Beginning in FY2012, Ensure fleet operations of twenty (+20) or more motor vehicles reduces fuel consumption by two percent (2%) annually relative to FY2011 through the end of fiscal year 2017, increases the total fuel consumption that is non-petroleum-based by two percent (2%) annually, and uses Plug- In Hybrid (PIH) vehicles when PIH vehicles are commercially available at a cost that is reasonably comparable, on the basis of life-cycle cost, to non-PIH vehicles.
- Implement practices for energy efficiency, avoid and/or reduce greenhouse gas emissions and reduce petroleum products in our vehicle fleet.

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5.	PLANNING (CLAUSE 4.3)	CONTINUED
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Objective & Target #3: Reduce Toxic & Hazardous Chemical Procurement, Use & Disposal - Implement sustainable practices for decreasing the use of toxic and hazardous chemicals

- 🌀 Beginning in FY2012, reduce use of Chemicals that produce a hazardous waste residue, relative to the baseline of the Depot's chemical use in FY2011 through lifecycle cost effective measures by two percent (2%) annually through the end of FY 2017.
- 🌀 Implement sustainable practices for the reduction and/or elimination of the procurement and use of hazardous and/or toxic chemicals
- 🌀 Review Chemical Use through Monthly Chemical Inventories and recommend/propose "green" substitutions
- 🌀 Reduce the amount of toxic and hazardous chemicals and materials acquired, used, or disposed through the implementation of "Green Procurement" QP.BOP.ENV.0002 R2.

Objective & Target #4: Waste Prevention & Recycling-Programs - Implement sustainable practices for pollution and waste prevention and recycling.

- 🌀 Track and establish baseline for recyclable materials that are sold for recovery.
- 🌀 Implement sustainable practices for the reduction and/or elimination of waste and recycle to the fullest extent possible.
- 🌀

6.	IMPLEMENTATION & OPERATION (CLAUSE 4.4)
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6.1. RESOURCES, ROLES, RESPONSIBILITY AND AUTHORITY (CLAUSE 4.4.1) - The EMS Top Management Representative (EMSTMR) has been designated by the, General Manager of SOC, with the concurrence of the Commander of HWAD. The EMSTMR is responsible for the overall management system, coordination and system performance reports to Top Management and will be conveyed to the members at the CEM. The EMSMR is responsible for the day-to-day management of the system and has been designated so by the EMSTMR. The Organizational Chart (Flowchart 1) shows organizational reporting requirements, responsibility and their interaction as it relates to the EMS.

6.1.1 SOC performs periodic position description reviews to determine responsibilities, tasks, and required competencies of personnel required to perform those jobs. Reviews include an assessment of management system roles, responsibilities, tasks and competencies associated with the position. Human Resources is responsible for coordinating the review of Roles and Responsibilities, maintaining performance, and training records to ensure the qualifications and/or professional certifications necessary to perform position specific requirements can be met. On-the-Job Training (OJT) records and daily training records are maintained at the shop level. Both types of records will be provided to auditors (internal & external) upon request.

6.1.2 Top Management is responsible for ensuring Roles and Responsibilities are defined and communicated to the EMSTMR/MR to maintain system conformance. The EMSTMR/MR is responsible for establishing, managing and communicating the Roles and Responsibilities for each organization to the Environmental Management Staff who will provide oversight to ensure day to day system conformance, implementation and regulatory compliance of the EMS.



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6. IMPLEMENTATION & OPERATION (CLAUSE 4.4) CONTINUED

6.1.3 Through organizational design, Attachment 4 – Resources, Roles, Responsibilities and Authorities depicts roles and responsibilities at the program level for the Top Management Hierarchy that is displayed in the positions included in the EMS Organizational Chart. Top Management is responsible for the integration of EMS performance within the organization through a reward, discipline, and appraisal system that has been established within established procedures and policies. Other resources where roles, responsibilities and authorities are defined may be shown in position descriptions, performance evaluations, procedures, and/or other company documentation.

6.1.4 Directors, Managers and Supervisors are responsible for the identification of roles and responsibilities for personnel and to communicate those roles and responsibilities. Top Management shall review input from the Directors, managers and supervisors to ensure consistency with established policies and procedures between contractors, subcontractors, tenants, and training units.

6.2 COMPETENCE, TRAINING AND AWARENESS (CLAUSE 4.4.2) – This section will be used to describe how we identify our training needs, provide relevant training and ensure that employees are competent to perform their assigned duties in aiding SOC achieve their Targets and Objectives and the activities that have a potential impact on our SEA's: (Table 4)

6.2.1 Reinforce the importance of the Environmental Policy and the requirements of the EMS.

6.2.2 Define our Significant Environmental Aspects (SEA's) of work activities and the environmental benefit of improved personal performance

6.2.3 Define our employees Roles and Responsibilities with respect to the EMS to include Emergency Preparedness and Response.

6.2.4 Stress the utilization of Operational Controls to ensure the management of our Environmental Aspects to include associated duties and the potential consequences of not having and using those specified controls.

6.2.5. Define the minimum competencies and qualifications for key position functions and ensure they are established IAW the Structure & Reasonability Procedures element of the EMS and are documented in Roles and Responsibilities.

6.2.6 **IDENTIFYING & COMMUNICATING TRAINING NEEDS** - Training needs and requirements are identified for each affected position within their position description and are documented. Each Organization is responsible for coordinating their training requirements, maintaining, reviewing and updating those training needs/ requirements with the Human Resources Manager and/or Training Officer IAW with the Master Training Plan (QP.HRD.TTD.0005), and/or contractual and legal/regulatory requirements. Each Organization is responsible for documenting onsite training through the use of a Training Report Form (DZHC 84-E). Formal training for certification or professional certificate shall be forwarded to Human Resources for retention in an employees work history file. Daily and On-the-Job Training records may be found in shops at the supervisory level and/or maintained in the Human Resources Offices.

6.2.7 The Environmental Manager with the Manager for Human Resources shall notify each organization through their Directors, Managers and Supervisors of new and emerging environmental regulatory training requirements that will require modification to the Master Training Plan or their individual training programs.



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6. IMPLEMENTATION & OPERATION (CLAUSE 4.4) CONTINUED

- 6.2.8 Each Organization is allowed to make revisions to the content of the Master Training Plan during the annual review of the plan, when there is a process or material change that may result in a new or different environmental requirement(s)/impact(s).
- 6.2.9 Environmental training is provided at a frequency needed to ensure compliance with regulatory and other requirements and to maintain sufficient awareness of the EMS within the organization. Training may be provided On-the-Job as well as in a classroom setting. Training is provided primarily by internal resources however, external resources may be used when specialized skills and knowledge are warranted.
- 6.2.10 A training schedule is distributed when training is identified or request made to the Human Resource Training Officer. The Training Officer is responsible for notifying the appropriate supervisory personnel to include but not limited to the Commander, Directors, Managers, Supervisors, Employees, Tenants, Program Managers, and/or Training Units of planned significant environmental training activities.
- 6.2.11 The Commander, Directors, Managers, Supervisors, Tenants, Program Managers, and Training Units are responsible for ensuring that their employees attend the required training to ensure we meet our compliance and conformance requirements.
- 6.2.12 Employees are responsible for participating in and attending required training sessions.
- 6.2.13 Trained and qualified instructors are authorized to conduct training. Instructors are responsible for assessing the effectiveness of the training program by utilizing a Training Assessment Form (DZHC 0161-E or Training 0001) and for making improvements as necessary. Instructors will document training on a Training Report (DZHC 84-E R1) retaining one (1) copy, forwarding one (1) copy to the Human Resources Training Officer and forwarding one (1) copy to their Directorate Secretary or department Clerk for records retention. All training records will be maintained IAW Quality Plan SOC.QP.QMS.0002 Control of Records.
- 6.2.14 SOC ensures competency of environmental training, competency will be using one or more of the following methods:
 - 1. Written and/or verbal testing
 - 2. Online training and testing tools
(Either method is acceptable and will be left to discretion of the Instructor).
- 6.2.15 SOC ensures the competency of personnel who impact or contribute to our EMS Objectives and Targets through the identification of those positions and maintaining minimum educational requirements as follows:



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ENVIRONMENTAL TARGETS	POSITIONS AFFECTING ENVIRONMENTAL TARGETS	ACTIVITIES THAT HAVE POTENTIAL IMPACT ON OUR SEA's (-/+)	TRAINING REQUIREMENT (MASTER TRAINING PLAN)	COMPETENCY REQUIREMENTS
O & T #1: REDUCE WATER CONSUMPTION INTENSITY	Water Operator	Maintain water levels in reservoirs & tanks, Ensure adequate pressures to maintain supplies to Depot needs (+)	OJT/Tiering; HAZMAT (24hr), Distribution Systems Certification – Water Operator 1 Water Treatment Operator 1, Water Treatment Operator T2, Backflow Tester, Water Distribution Operator 2 & Chlorine 1 st Responder Tech.	High School Diploma or Equivalent, +Chemical course work, four (4) yrs. Experience testing & treating water; certification in Water Distribution, Treatment Plant Operations & Waste Water Treatment IAW State law ; meet all federal environmental & DOD requirements
	Pipefitter Plumber	Preventive maintenance program plans, work orders, emergency calls, layout sketches, blueprints, drawings, specifications, or similar guidance regarding water infrastructure (+)	OJT/Tiering, HAZMAT (24 hr.), Lock Out-Tag Procedures, Chlorine First Responder Technician and Propane Distribution.	High School or equivalent, certifiable technical or trade schooling, four (4) years apprenticeship or one (1) year as a journeyman as a Pipe fitter/Plumber.
	Grounds (Laborer)	Perform a variety of tasks incidental to grounds work, check sprinkler systems for leaks, defects & malfunctions. (+)	OJT/Tiering, & HAZMAT (24 hr.).	High School or GED equivalent & basic knowledge of grounds maintenance preferred.
	Greens Keeper	Perform a variety of manual labor tasks incidental to a greens keeper, water greens & fairways, caulks broken water pipelines or replaces valves for sprinkling system & performs related work to maintain efficient operation of greens & fairways water system (+)	OJT/Tiering, and HAZMAT (24 hr.).	High School or GED equivalent, basic knowledge of golf & grounds maintenance preferred.
	Supervisor, Water Operations	Direct personnel & allocate resources for repairs & maintenance (+)	OJT, HAZMAT (24 hr.), Distribution Systems Certification, Water Distribution Operator 1, Water Treatment Operator 1, Water Treatment Operator T2, Backflow Tester, Water Distribution Operator 2, and Chlorine First Responder Technician	College or trade school, four (4) years experience testing & treating water. Must be certified in Water Distribution, Treatment Plant Operations, & Waste Water Treatment IAW existing Nevada State laws; must be able to meet all federal environmental & DOD regulation requirements.
	Civil Engineer	Perform engineering duties in planning, designing, & oversee construction & maintenance of building structures, & facilities, such as roads, railroads, irrigation projects, pipelines, water & sewage systems, & waste disposal units. Compute load & grade requirements, water flow rates, & material stress factors to determine design specification. (+)	OJT/Tiering, & HAZMAT (24 hr.).	B.S. degree in Civil Engineering, three (3) years experience having knowledge in standard theories & practices of civil engineering, i.e. background in the maintenance, construction, & operation of facilities. Must have knowledge of construction codes.



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O & T #2: REDUCE VEHICLE PETROLEUM CONSUMPTION	Equipment Mechanic	Perform preventive maintenance, overhaul, & repair work. Adjust interrelated systems in machinery such as power drives, speed reduction mechanisms, lubrication systems & conveyors, & pneumatic/hydraulic power equipment. (+)	OJT/Tiering, HAZMAT (24 hr.), Lock Out-Tag Procedures and Equipment Maintenance Division IOPs 1300, 1301, 1302, and 1303.	High school or equivalent. Certifiable technical or trade school training as an Equipment Mechanic, four (4) years related job experience. Ability to read blueprints, sketches, and specifications, figure floor dimensions & angles, & be able to set up machines or equipment.
	Auto Mechanic	Repair, rebuild gas & diesel powered automobiles and trucks. Replace, repair, & reassemble as necessary. Adjust, time, tune, & test assemblies & complete units for proper operation. (+)	OJT/Tiering, HAZMAT (24 hr.), & Asbestos Automotive Brake & Clutch Work.	High school graduate or equivalent. Certifiable automotive trade school, three (3) years prior experience in automotive repair & maintenance & wheel alignment experience.
	Petroleum Technician	Receive, issue, and inventory petroleum products for all plant operating equipment, including gasoline & diesel fuel. Operate mobile refueling equipment in the dispensing of fuels to equipment or into storage tanks. Verify inventory by recording meter reading or gauging tanks with appropriate measuring device. Compare reading from meters & gauging instruments with log sheets to verify amount of POL dispensed. Adjust record as required & submit the necessary reports for appropriate relief from product shortage liability. (+)	OJT/Tiering, HAZMAT (24 hr.).	High School or equivalent, eighteen (18) months direct experience in the function, must have a thorough knowledge of safety regulations in working with petroleum products.
	Supervisor, MHE & Mobile Equipment	Direct personnel & allocate resources for repairs & maintenance. (+)	OJT & HAZMAT (24 hr.).	College or trade school degree or 3 years of experience



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O & T #3: REDUCE TOXIC & HAZARDOUS CHEMICALS	Environmentalist 8	Develop, implement, & coordinate policies on matters involving air, water, & waste. Advise management on the practical & necessary steps to prevent or abate pollution arising from SOC's operations. Perform inspections of environmental projects & recommend corrective measures as required. Develop environmental policies, procedures, & standards in accordance with State laws, Federal laws, & Army Regulations. (+)	OJT, HAZMAT (24 hr.), Visible Emissions, RCRA Training and Advanced Specialized Environmental Courses.	B.S. Chemistry, Physical Science, Engineering, or related field, or a combination of experience and education that demonstrates a level of knowledge capable of performing at this level. Three (3) years direct experience in the Environmental field.
	Equipment Mechanic	Perform preventive maintenance, overhaul, & repair work. Adjust interrelated systems in machinery such as power drives, speed reduction mechanisms, lubrication systems & conveyors, & pneumatic/hydraulic power equipment. (+)	OJT/Tiering, HAZMAT (24 hr.), Lock Out-Tag Procedures & Equipment Maintenance Division IOP's 1300, 1301, 1302, and 1303.	High school or equivalent. Certifiable technical or trade school training as an Equipment Mechanic, four (4) years related job experience. Ability to read blueprints, sketches, & specifications, figure floor dimensions and angles, & be able to set up machines or equipment.
	Heavy Equipment Mechanic	Repair various specialized mechanical parts of equipment. Steam clean equipment & parts as required. Responsible for reporting potential real environmental concerns to the Environmental Service. Follow MSDS guidelines. (+)	OJT/Tiering, HAZMAT (24 hr.), Lock Out-Tag Procedures, & Asbestos Automotive Brake & Clutch Work.	High school or equivalent. Certifiable technical or trade school education, three (3) years as a heavy equipment mechanic working with diesel engines, generators, electrical apparatus, power takeoff, hydraulic, & air systems. Applicant must be able to read blueprints, sketches, & specifications.
	Pest Controller	Select & apply appropriate measures to control or eradicate pests. Follow SDS guidelines for handling storage, & disposal of Hazardous materials. Mix a variety of chemicals IAW approved standard formulas. Apply fungicides, pesticides, insecticides, & herbicides for control of fungus, & noxious weeds. (+)	OJT/Tiering, HAZMAT (24 hr.), Confined Space Entry, and Pest Control License	High school graduate or equivalent. Applicant must have a certifiable technical training in the field of Pest & Rodent Control, must have completed two (2) years formal training/ apprenticeship & have passed the State of Nevada, Federal & DoD examinations for Certification as appropriate.



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O & T #3: REDUCE TOXIC & HAZARDOUS CHEMICALS	Painter	Follow SDS guidelines for handling, storage, & disposal of Hazardous Materials & cleaning equipment, & disposal of Hazardous Materials. Responsible for reporting potential real environmental concerns to the Environmental Service. (+)	OJT/Tiering, HAZMAT (24 hr.), Asbestos Worker, OSHA Lead Action, & EPA Renovation, Repair and Painting (Lead).	High School or equivalent. Certifiable technical or trade training, two (2) years experience preparing & painting surfaces.
	Auto Mechanic	Repair, rebuild gas and diesel powered automobiles and trucks. Replace, repair, and reassemble as necessary. Adjust, time, tune, and test assemblies and complete units for proper operation. (+)	OJT/Tiering HAZMAT (24 hr.), & Asbestos Automotive Brake & Clutch Work.	High school graduate or equivalent. Certifiable automotive trade school, three (3) years prior experience in automotive repair & maintenance & wheel alignment experience.
	Facilities Mechanic	Follow SDS guidelines for handling, storage, and disposal of HAZMAT, Responsible for reporting potential real environmental concerns to the Environmental Service. (+)	OJT/Tiering, HAZMAT (24 hr.), Lock Out-Tag Procedures, Asbestos Worker, OSHA Action Lead, CO2 Line Breaking Procedure for the Mercury Storage Warehouses – BOP.IOP.CAP.0001 & EPA Renovation, Repair & Painting (Lead)	High school or equivalent. Heavy Equipment, two (2) years experience in remodeling & repairing structures, maintaining and repairing small motors, LP Gas & electrical appliances, equipment, & components.
	Janitor	Use cleaning agents to maintain the cleanliness of restrooms & office areas. Follow MSDS guidelines for handling, storage, & disposal of Hazardous Materials. Mix agents used in the cleaning buildings. (+)	OJT/Tiering, HAZMAT (24 hr.), Asbestos Awareness, & Asbestos Awareness for General Industry Custodians.	High School or GED equivalent & no prior experience necessary.



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O & T #4: WASTE PREVENTION & RECYCLING PROGRAMS	Munitions Destroyer	Destroy ammunition, explosives, propellants, & toxic munitions by burning or detonation. Follow Materials Safety Data Sheet guidelines for handling, storage, & disposal of Hazardous Materials. Apply variations of basic methods for destroying explosives, both burning & exploding such as; use of shaped charges to section large items; use of open burning beds to destroy bulk explosive; use of detonation pits to dispose of bomb, shell, & rocket ammunition. (+)	OJT/Tiering & HAZMAT (24 hr.).	High school or equivalent. Complete Explosive Safety Ordnance ID, & Demolition class at SOC & two years experience as a Munitions Handler
	Environmentalsit 8	Develop, implement, & coordinate policies on matters involving air, water, & waste. Advise management on the practical & necessary steps to prevent or abate pollution arising from SOC's operations. Perform inspections of environmental projects & recommend corrective measures as required. Develop environmental policies, procedures, & standards IAW State & Federal laws, & Army Regulations. (+)	OJT, HAZMAT (24 hr.), Visible Emissions, RCRA Training & Advanced Specialized Environmental Courses.	B.S. Chemistry, Physical Science, Engineering, or related field, or a combination of experience & education that demonstrates a level of knowledge capable of performing at this level. Three (3) years direct experience in the Environmental field.
	Purchasing Officer	Responsible for subcontracting of materials, supplies, fuels, machinery, equipment, ammunition & components & services required to accomplish the Depot's missions IAW Uniform Codes, & FAR requirements, insure Government/Company regulation/policy directives regarding contracting are carried out. (+)	OJT & HAZMAT (24 hr.).	B.A./B.S. in Procurement/Purchasing, BA or a related field. Training in Contract Law, Uniform Codes, and the FAR Regulation is essential, three (3) years in the procurement field. Communication skills, and effective writing techniques. Knowledge of subcontract solicitation, evaluation, award, and termination.



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O & T #4: WASTE PREVENTION & RECYCLING PROGRAMS	Material Segregator	Verify the identity, completeness, & condition of excess & surplus property received disposal. Follow MSDS guidelines for handling, storage, & disposal of Hazardous Materials. Receive a variety of material from on & off-base federal agencies. Assure identification including proper documentation, dollar value, stock number, quantity, & correct authority. (+)	OJT/OJT/Tiering & HAZMAT (24 hr.).	High school or equivalent, six months (6) experience in Property Disposal Operations or eighteen (18) months in munitions handling functions. Supply & vehicle scale operation experience helpful.
	Supervisor, Production Planning/Bussiness Development	Review all developed documentation, schedule meetings, research through telecom, internet or whatever means necessary to establish sound planning procedures in the demilitarization or renovation of assigned ammunition projects. Recommend improvements of procedures for equipment, process systems, & manpower recommendations for the effective operation of the Demilitarization and Renovation Projects. (+)	OJT/Tiering, HAZMAT (24 hr.), & Asbestos Supervisor/Contractor.	High school graduate or GED. Certifiable technical or trade training or equivalent in experience & five (5) years experience in equipment & Demilitarization Systems to include two (2) years supervisory experience.
	Munitions Handler	Follow MSDS guidelines for handling, storage, & disposal of Hazardous Materials. Disassemble, assemble, clean, repair, rework, inspect, test, load, package, move, or mark any ordnance items or components. Operate mobile equipment such as vehicles for transporting personnel, tools, equipment, ammunition components, or machines used in the manufacture and LAP of munitions such as chemical stripping vats, stress relief ovens, grit blast machines, spray paint & electrostatic paint systems, melt kettles, hydraulic presses, overhead hoists. (+)	OJT/Tiering & HAZMAT (24 hr.).	High school or equivalent, six (6) months of direct experience in the function or eighteen 18 months directly related experience.

A failure to perform job specific functions as prescribed by procedural guidance and/or acquire the required training &/or certifications would result in potential (-) negative impacts to our SEA's.



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6. IMPLEMENTATION & OPERATION (CLAUSE 4.4)

CONTINUED

6.3 COMMUNICATION (CLAUSE 4.4.3) – The intent of this section is to inform internal and external interested and affected parties with information that is:

- ☞ Accurate with respect to the specific information being communicated
- ☞ Representative of the Organization's overall EMS
- ☞ Adequately explained to the recipient
- ☞ Easily understood by the recipient

6.3.1 SOC utilizes a variety of communication media (e.g., bulletin boards, our “G” Drive, Newsletters, annual reports, meetings, [all hands, team] etc.) to achieve the required level of communication. Specific types of communication media are selected based on the nature of the information being communicated and the intended audience. Table 5 Summary of Communication Methods summarizes the established communication methods, types of information communicated, and the intended audiences.

TABLE 5 SUMMARY OF COMMUNICATION METHODS

INFORMATION COMMUNICATED	COMMUNICATION METHODS	INTENDED AUDIENCE
EMS ISO 14001 Program and Program Requirements	The HWAD Environmental Management System (EMS) ISO 14001 is managed and communicated using a split network. Some SOC employee's use a government furnished network and utilize government issued computers due to the nature of their work. Management System Administrators and/or Document Control Administrators have been given access to a centralized location on the server for those personnel who work on the Government or dot.mil side of the network. Information posted to this network (“G” Drive) is copied weekly to the SOC server so employees utilizing company equipment and the company server have timely access to the information. This was formerly the HWAD Intranet. This form of communication is not available to all employees and it is therefore necessary to send information to central access points (supervisors, secretaries, clerks) and request that the information be posted conspicuously or that they conduct a training notification and document the discussion on a Training Report (DZHC 84-E). All EMS Standard Procedures and other environmental information is communicated by utilizing our “G” drive. DLA Mercury, ESED, and NUWC do not have access to SOC networks. In order to communicate requirements and changes to the EMS these organizations are provided CD's of the information when it is needed and requested. Information is also communicated through e-mails, telephone, postings, etc.	All SOC personnel
HWAD Environmental Policy	The Environmental Policy is accessible to all employees, vendors, visitors, and training units through postings in common areas throughout the HWAD, training, handouts, and the “G” drive. The Environmental Policy is made available to the public upon request through the ACO Staff and the Environmental Offices.	All personnel
External Communications	Significant environmental communications with external agencies, which include HWAD ACO Staff may include be not limited to the following: regulators, local residents, insurers, customers (internal & external), environmental groups, emergency response services, government bodies, industry associations, suppliers, and the general public and will be documented at the discretion of the Environmental Services Manager.	All personnel
Regulatory Communications	Significant environmental communications with a Regulatory Community will be documented per 1.5.13, “communications support, documentation & permits PWS”	All personnel



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6. IMPLEMENTATION & OPERATION (CLAUSE 4.4) CONTINUED

- 6.3.2. **COMMUNICATION OF EMERGENCY SITUATIONS** - All personnel are responsible for reporting environmental hazards, accidents, and emergency situations immediately upon discovery, IAW the QP.BOP.ENV.0006 HWAD Hazardous Materials-Wastes Contingency Plan and/or SOC.HWAD.FES.0005 Emergency Operations Plan, Disaster Preparedness Plan, & the Emergency Response Plan.
- 6.3.3 **INTERNAL COMMUNICATION** includes, but is not limited to, documents, bulletin boards, our “G” Drive, Newsletters, annual reports, Safety Stand Down Day meetings, all hands meetings, Internal Communication Meeting, team meetings, All hands emails, and Mass Notification system.
- 6.3.4 Top Management is responsible for communicating relevant EMS information to personnel under their direction. Relevant information includes, but is not limited to, the following:
 - Roles, responsibilities and authorities
 - Operating procedures
 - Emergency response procedures
 - Consequences of deviating from established procedures
 - Significant Environmental Aspects/Impacts
- 6.3.5 The selection of the most appropriate communication methods is at the discretion of the responsible Manager. Top Management encourages personnel to identify and report shortcomings, deficiencies and/or defects within EMS in order for us to stay within and meet our Federal, State, and local environmental regulations, requirements and laws.
- 6.3.6 Top Management ensures the Environmental Policy Statement (Policy# 1105) is communicated to Contractors, Sub-Contractors, Vendors, Visitors, Training Units, etc. working under the direction of the SOC by including the Policy in appropriate contract documents and contractor plans. This way it can be communicated to contractors that they are required by local policy and by law to comply with environmental regulatory requirements.
- 6.3.7 **DEFECTS & DEFICIENCIES** - All SOC personnel are responsible for reporting EMS, defects, deficiencies and incidents to the Manager of Environmental Services, their supervisor and/or the Assistant Manager of Environmental Services. If the Manager or Assistant Manager of Environmental Services is not available, employees may and should report the issue directly to an Environmental Services staff member. All deficiencies, defects, and/or incidents identified are documented IAW Quality Plan SOC.QP.QMS.0005, Corrective & Preventative Action.
- 6.3.8 **EXTERNAL COMMUNICATION** - The selection of the most appropriate method(s) for external communication is left to the discretion of the Top Management. The local library, local newspaper and availability of personnel on the Government Staff are generally used to communicate to and with the public. The Environmental Policy is communicated to all affected parties through training, posting on the “G” drive and through our security office when visitors or contractors check in.



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6. IMPLEMENTATION & OPERATION (CLAUSE 4.4)

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6.3.9 **REGULATORY AGENCIES** - The Director of Base Operations, the Manager, of Environmental Services, the Assistant Manager, of Environmental Services and the ACO Staff Environmental contact are the primary interface with representatives from any regulatory agency. In the event that the Manager, Environmental Services is unavailable this responsibility falls to the Director of Base Operations and/or the Assistant Manager. All communications that require action are recorded by the receiving party in accordance with the SOC.QP.QMS.0002 Control of Records and PWS 1.5.2, Communications, Support Documentation and Permits.

6.3.10 **NON-REGULATORY THIRD PARTIES** - Inquiries and communications concerning SOC's EMS, environmental performance and/or our Significant Environmental Aspects (SEA's) shall be directed to the Environmental Manager/Assistant Manager or designee, for determination of an appropriate response. Inquiries and communications may include mail, email, faxes, telephone calls, or personal visits. When necessary, the Manager/Assistant Manager or designee of Environmental Services will record relevant information regarding responses to all communications received from external parties IAW QMS.SOC.QP.0002, Control of Records and PWS 1.5.2, Communications, Support Documentation and Permits.

6.3.11. Copies of written communications from external parties, other than regulators, on environmental matters are maintained in the Environmental Services Office. All non-written communications from external parties are documented using appropriate means and discretion of the by the individual receiving the communication. All records of external communications are maintained IAW QMS.SOC.QP.0002, Control of Quality Records.

6.3.12 **OUTREACH TO INTERESTED PARTIES** - SOC may elect to solicit the views of external interested parties with respect to the EMS, if the need arises. Situations which might warrant an outreach may include expansions; application for or renewal of an environmental permit; an emergency situation; coverage in the media; etc. All solicitations of external interested parties' views must be solicited IAW the Purchasing Manual and pre-approved by the Top Management Representative, or their designee and the Environmental Services Manager.

6.3.13 Effectiveness of, and need to continue, proactive external communication efforts will be evaluated during the Management Review process.

6.4 **DOCUMENTATION (CLAUSE 4.4.4)** – A current version of our documents are maintained electronically in PDF format and are considered “Controlled” on our “G” drive under the Environmental directory (G:\Intranet\Environmental). Electronic backups are maintained by SOC Information Services. Printed versions of major program plans (i.e., Emergency Response Plans, the Contingency Plan, etc.) are the responsibility of the originator to maintain and distribute as necessary. In the event of a computer system failure, power failure or other emergency situation, hard copy formats of these documents are available at the SOC Fire Department and a Controlled Copy will be maintained by the Base Operations Document Control Administrator.

6.5 **CONTROL OF DOCUMENTS (CLAUSE 4.4.5)** - Controlled documents will be distributed by the Base Operations Document Control Administrator at the discretion of the document generator.

6.5.1. **DOCUMENT CREATION & APPROVAL** – Documents will be created to establish, maintain and ensure continual improvement. Additionally, organizations that are required to produce documents to support the EMS will be notified by the EMSMR of the requirement.



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6. IMPLEMENTATION & OPERATION (CLAUSE 4.4) CONTINUED

- 6.5.2 Newly generated documents will have numbers assigned IAW QP SOC.QP.QMS.0001, Control of Documents with the following exceptions: The Environmental Management Plan documents will have the number format SOC.QP.ENV.**** and the EMS document formats will be used when documents are generated by the EMS in support of the EMS.
- 6.5.3 When documents are revised, the document owner makes appropriate revisions to the document and routes a draft revision to each Signatory authority for re-approval of the document. Comments received on the document revision are reviewed by the document owner and incorporated, as appropriate or explained to the requestor why the change was not incorporated. Upon approval of document revisions by the document approvers, the DCA shall post the revised document to the EMS directory on the "G" drive notify affected personnel that a change has occurred. Notifications are made via email or other appropriate form of communication in accordance with the Internal Communications element found in this manual.
- 6.5.4 Supervisors are responsible for notifying affected personnel, under their direction, of relevant document changes.
- 6.5.5 Personnel may print documents from the system for instructional, reference, or knowledge purposes. However, personnel are responsible for understanding that printed documents are current only as of the date and time printed. All personnel must verify that printed documents are current prior to use unless otherwise stated on the document. This can be accomplished by checking document revision date signed and date reviewed.
- 6.5.6 Document will be reviewed annually to ensure their continued suitability.
- 6.5.7 Documents of external origin, such as permits and other regulatory reference materials are considered to be controlled in accordance with SOC.QP.QMS.0001, Control of Documents.

6.6 OPERATIONAL CONTROL (CLAUSE 4.4.6) - Operations and activities that could result in significant environmental impacts are controlled to ensure the Environmental Policy is followed and the EMS objectives are achieved. This section covers both internal activities (e.g., maintenance, management of waste materials, operation of equipment, etc.) and external activities (e.g., management of contractors, purchase of chemicals from suppliers, etc.) for SOC.

- 6.6.1 Operations and activities that may result in significant environmental impacts are controlled with documented procedures. Documented procedures may include:
 - 🔗 Work instructions/Internal Operating Procedures (WI's/IOP's)
 - 🔗 Letters of Instruction (LOI) Specific to operation criteria
 - 🔗 Standing Operating Procedures (SOP's)
 - 🔗 Operating and/or Permit limits



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6. IMPLEMENTATION & OPERATION (CLAUSE 4.4) CONTINUED

- 6.6.2 Standing Operating Procedures (SOP's) are required for all hazardous material operations IAW AMC-R 385-100, U.S. Army Safety Manual. Procedures for general operations outside of hazardous materials shall be developed on an as needed basis based on significant environmental and employee safety aspects associated with the job/project, the Environmental Policy, Safety Policy, objectives, training requirements and the responsibilities of affected personnel. The Managers of Environmental Services, The Manager of Safety and Health or their designees and selected personnel (management and hourly) may be tasked to periodically review non-hazardous/non-ammunition work related operations and activities to identify which activities may require operational controls.
- 6.6.3 When it is determined that additional operational controls are needed, the Environmental Staff evaluates the most efficient means to establish these controls. These means may include modifying or enhancing existing procedures or developing new ones.
- 6.6.4 Written procedures are developed, approved, reviewed, updated, and distributed IAW SOC.QMS.QP.0001 Document Control. At a minimum, these procedures must address responsibilities and tasks applicable to various operating conditions (i.e., normal, abnormal and emergency conditions).
- 6.6.5 Each Organization is responsible for developing necessary Operating Procedures specific to unit and facility operations with environmental aspects and impacts (e.g., waste handling, wastewater treatment, etc.). Any party who initiates development or revision of an Operating Procedure within their respective organization is responsible for coordinating with the Environmental Manager. The Environmental Manager will solicit input from affected management personnel for Significant Aspects & Impacts in accordance with the section of this document titled Aspects & Impacts and route a draft version of the procedure to the affected parties for review and comment.
- 6.6.7 Relevant operating procedures are shared with contractors and suppliers that are affected by the procedures. The individual managing the contractor's activities and organization procurement personnel share the responsibility for ensuring that relevant operating procedures are communicated to contractors and suppliers through contract pre-award.
- 6.6.8 The Environmental Staff, Commander, Directors, Managers, Supervisors or other Subject Matter Experts (SME's) personnel are responsible for providing training on relevant Operating Procedures to affected personnel, under their direction, in accordance with the Master Training Plan and Training, Awareness, and Competence section of this manual.
- 6.6.9 Approved operating procedures are communicated internally IAW the Communication section of this manual.

6.7 EMERGENCY PREPAREDNESS & RESPONSE (CLAUSE 4.4.7) - SOC is committed to ensuring the safety of its employees, ACO Staff, visitors, contractors, sub-contractors, tenants, training units, all persons who enter the depot, and our surrounding community. The implementation of this element and its supporting documents and are intended to minimize or eliminate hazards to human health and the environment resulting from emergency situations. These plans are distributed as required by law, available electronically on the G drive, and by request.



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6. IMPLEMENTATION & OPERATION (CLAUSE 4.4) CONTINUED

- 6.7.1 SOC will maintain the following emergency response plans that provide comprehensive procedures for planning and responding to accidents, incidents and emergency situations:
 - ☛ QP.BOP.ENV.0006 HWAD Hazardous Materials-Wastes Contingency Plan
 - ☛ QP.BOP.ENV.0007 HWAD Stormwater Pollution Prevention Plan (SWP3)
 - ☛ QP.BOP.ENV.0009 HWAD Spill Prevention, Control and Countermeasure Plan (SPCCP)
 - ☛ SOC.HWAD.FES.0005 Emergency Operations Plan, Disaster Preparedness Plan, Emergency Response Plan, and Anti-Terrorism Plan (The four plans [Annex's] are in one document)

- 6.7.2 SOC has committed the necessary resources (e.g., manpower, equipment, and materials) to prevent, control, and respond to emergency situations. Priorities have been established for prevention and response personnel are based upon the protection of human life, the mitigation of environmental impacts, and the protection of property.
- 6.7.3 These plans include specific roles, responsibilities and procedures for the prevention of and response to accidents and emergency situations.
- 6.7.4 The emergency procedures in the emergency response plan are periodically tested, as described in the plans. The Spill Prevention, Control and Countermeasures Plan, requires annual classroom and On-the-Job training that is conducted by the Environmental Staff and other qualified instructors/training personnel.
- 6.7.5. Distribution and control of emergency response plans is performed IAW Quality Plan SOC.QMS.QP.0001, Document Control. Due to the nature of emergency events and the need to have immediate access to relevant information during an emergency, some emergency plan information is distributed in hard copy format to relevant emergency response personnel. The Manager, Environmental Services and the Chief, Fire and Emergency Services are responsible for the review, revision and distribution of emergency plans. Plans will be reviewed annually or more frequently as we may find that following an accident, incident or emergency situation, planned and documented activities are insufficient in response to its implementation in an emergency situation, if significant changes occur during an operation require plan modification, if operational personnel changes occur or a change in regulatory requirements occur to ensure the continued suitability and to ensure these plans continue to meet all regulatory and statutory requirements.



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7. CHECKING (CLAUSE 4.5)

7.1 **MONITORING AND MEASUREMENT (4.5.1)** - This element of the EMS is intended to establish SOC's process for monitoring and measuring the performance of our EMS. Monitoring and measurement of the EMS is necessary to evaluate and improve our performance, additionally monitoring and measurement allows SOC to identify areas that require corrective action and to determine the root causes of such problem areas.

7.1.1 The following mechanisms have been implemented to aide SOC in monitoring and measuring our environmental performance:

7.1.1.1. **SUMMARY OF OBJECTIVES & TARGETS BY YEAR** - summarizes the SOC's significant environmental aspects, objectives & targets, and operational control procedures by year.

7.1.1.2. **MANAGEMENT SYSTEM PLANS** - used to track SOC's performance against performance indicators that result from established objectives and targets.

7.1.1.3. **SCHEDULED AUDITS & INSPECTION ANNUALLY** - The Environmental Manager tasks qualified personnel to perform the EMS Auditor role to conduct visual inspections of site operations to compare site operating conditions to applicable legal, DoD, Army and other requirements. Additionally daily inspections are performed by QA Inspectors assigned to working production sites and Safety Engineers/Officers report problems to assess environmental performance.

7.1.2. The EMSMR, with support from EMSTMR, and the Manager, Environmental Services are responsible for the selection of appropriate performance indicators and monitoring frequency necessary to track performance of the EMS.

7.1.3 SOC's has developed the SOC EMS Corrective & Preventative Action Log, which is used in conjunction with the QMS Quality Plan SOC.QP.QMS.0005, Corrective & Preventative Action and describes the internal compliance assessment process. The Corrective & Preventative Action Plan is reviewed, and updated annually to ensure its continued suitability. The Manager, Quality Assurance is responsible for updating this Plan. The SOC EMS Corrective and Preventative Action Log and the status of environmental non-conformities is reviewed monthly by the CEM team and quarterly by the EMC, these reviews allow us to verify the status of outstanding non-conformities and the actions that have been or will be taken to correct them.

7.1.4 When selecting performance indicators, the Environmental Manager seeks to identify the "critical few" performance indicators that are:

- 👉 Objective, verifiable, and reproducible
- 👉 Relevant to the our processes, activities, products, and services
- 👉 Consistent with the Environmental Policy and objectives and targets
- 👉 Practical, financially, and technologically feasible

7.1.5 The Manager, Environmental Services and the EMSMR will select performance indicators that provide a clear picture of past performance and identify future performance trends. Performance indicators are documented on the Summary of Objectives and Targets which will provide a summary-level overview of key Environmental Management System parameters for each calendar year and tracks any changes from year to year since the establishment of the baseline that was reestablished upon contract award in January 2011.



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7. CHECKING (CLAUSE 4.5)

CONTINUED

7.1.6 The Manager, Environmental Services and the EMSMR are responsible for assigning responsible personnel to the task of tracking our progress versus individual Environmental Performance Indicators (EPI's). Designated personnel are responsible for recording performance versus established indicators and communicating results to the Environmental Manager. The Environmental Manager and the EMSMR are responsible for entering performance indicators into the Summary of Objectives & Targets. Our current summary of our Environmental Aspects and Impacts is listed in Attachment 2 of this document.

TABLE 6 - SUMMARY OF ENVIRONMENTAL OBJECTIVES & TARGETS

Goals Recommended by EO 13423 & 13514	ENV IMPACT	OBJECTIVES, TARGETS & ACTION PLANS	RESPONSIBLE ORGANIZATION
1. Implement sustainable practices for water conservation	Reduce Water Consumption Intensity	Beginning FY 2012, reduce water consumption intensity, relative to the baseline of the HWAD water consumption in FY 2011 through life cycle cost effective measures by 2% annually through end of FY 2017	Base Operations
2. Implement sustainable practices for energy efficiency, greenhouse gas emissions avoidance or reduction, and petroleum products use reduction and vehicle fleet management	Reduce Vehicle Petroleum Consumption and Type of Vehicle (gas consumption)	Ensure that, if SOC operates a fleet of at least 20 motor vehicles SOC, relative to SOC baselines for FY 2011 reduces the fleet's total consumption of petroleum products by 2% annually through the end of FY 2017	Base Operations
3. Implement sustainable practices for reduction or elimination of acquisition, use, and disposal of toxic or hazardous chemicals	Reduce Toxic & Hazardous Chemicals; & Disposal	Ensure that the SOC reduces the quantity of toxic and hazardous chemicals and materials acquired, used, or disposed of by SOC Review all chemical use and propose substitutions that are non-aerosol.	All Organizations with SOC
4. Implement sustainable practices for pollution and waste prevention and recycling	Increased Waste Prevention & Recycling Programs	Ensures that SOC maintains cost effective waste prevention and recycling programs.	ALL Organizations at SOC

7.1.7 Action Plans have been developed and are used to document EMS Objectives and Targets and to monitor and measure SOC's performance indicators compared to established goals.

7.1.8 SOC's environmental baseline year for HWAD operations is to reduce water consumption intensity; reduce petroleum product vehicle consumption and number of those types of vehicles; reduce toxic and hazardous chemicals, and our waste prevention and recycling programs.



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7. CHECKING (CLAUSE 4.5) CONTINUED

7.1.8.1 **REDUCE WATER CONSUMPTION INTENSITY** in 2011 calendar year.

- 253,023,023 gal. (Potable Tank and Well Water)

7.1.8.2 **REDUCE VEHICLE PETROLEUM CONSUMPTION** in 2011 calendar year.

- 145,584 (Gallons of MOGAS, Light Duty Vehicles)
- 227 (Vehicle Count)

7.1.8.3 **REDUCE TOXIC & HAZARDOUS CHEMICALS** in 2011 calendar year.

- 162 (14 oz. Break Kleen®)
- 19 (Drums Spent Aerosol Cans (SAC) Disposed)

7.1.8.4 **WASTE PREVENTION & RECYCLING PROGRAMS** (No Baseline)

- 5,382,360 lbs. (Hazardous Waste, Munitions)
- 3,252,000 lbs. (Recycle Scrap Metals)
- 0,000,000 lbs. (Recycle Wood)
- 0,000,000 lbs. (Recycle Plastic)

7.1.9 **BASELINE ADJUSTMENTS** - At the first of each calendar year, all performance indicators will be measured against their baselines. This analysis will occur during the beginning of each year, typically after data has been collected and then reviewed with the EMC. Possible adjustments to the baseline will be evaluated should future environmental performance metrics (averaged over several years) contrast significantly with 2011 data. If the EMC, with concurrence from Top Management, agrees a baseline adjustment is necessary then a new baseline will be established for a more accurate comparison purposes. Beginning the first of each calendar year, all performance indicators will be measured against their baselines. This analysis will occur during January of each year with the EMC. Possible adjustments to the baseline will be evaluated should future environmental performance metrics (averaged over several years) contrast significantly with the 2011 data. If the EMC, with concurrence from Top Management, agree a baseline adjustment is necessary and warranted then a new baseline would be established for a more accurate comparison.

7.1.9.1 The EMSMR and EMC periodically review SOC's progress with respect to our established performance indicators IAW the SOC.QP.EMS.0002, Management Review Environmental Management Plan. Defects and deficiencies identified during the monitoring and measurement processes will be documented IAW Quality Plan SOC.QP.QMS.0005 Corrective Action & Preventive Action by the EMSMR.

7.1.9.2 The following establishes SEA specific metrics to monitor and measure SOC's environmental performance. The Environmental Performance Indicators (EPIs) shown have been identified and are an appropriate means to monitor and measure our Objectives and Targets.



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7. CHECKING (CLAUSE 4.5)

CONTINUED

TABLE 7 - ENVIRONMENTAL PERFORMANCE INDICATOR (EPI) MEASUREMENT FORMULAS

- **EPI-1 - REDUCE WATER CONSUMPTION INTENSITY** Reduce Total Water Consumption Output from the Potable Water Tanks & Wells.
 - **ANNUAL REDUCTION** = (Baseline)(.02) (Year from Baseline)
 - **TARGET:** Baseline (BL) – Annual Reduction(AR) (BL – AR)
- **EPI 2 - REDUCE VEHICLE PETROLEUM CONSUMPTION**
- **EPI 2.1 - REDUCE TOTAL PETROLEUM VEHICLE COUNT** (from lightweight type gasoline vehicles).
 - **ANNUAL REDUCTION** = (Baseline)(.02) (Year from Baseline)
 - **TARGET:** Baseline (BL) – Annual Reduction (AR) (BL – AR)
- **EPI-3 REDUCE TOXIC & HAZARDOUS CHEMICALS** Reduce Amount of Hazardous Chemicals Used throughout SOC's Operations.
- **EPI-3.1 REDUCE SAC Drums Disposed** Reduce the Quantity of Hazardous Chemicals Disposed throughout SOC's Operations
 - **ANNUAL REDUCTION** = (Baseline)(.02) (Year from Baseline)
 - **TARGET:** Baseline (BL) – Annual Reduction (AR) (BL – AR)
- **EPI-4 WASTE PREVENTION & RECYCLING PROGRAMS** Track the amount re-usable Hazardous Waste Munitions; and recyclable Scrap Metals, Wood and Plastic.
 - *Note: 3/23/15, we will no longer measure it against a baseline. Trying to measure Hazardous Waste Munitions with the Army's unpredictable workload seems to be unmeasurable. We will continue to track Hazardous Waste Munitions and recyclable materials i.e., Scrap Metals, Wood, and Plastic.*



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7. CHECKING (CLAUSE 4.5)

CONTINUED

TABLE 8 - BASELINE METRICS - ENVIRONMENTAL PERFORMANCE FORMULAS

EPI-1: 2011 – 253,023,023 gals Water Consumed
(Actual Baseline)

2012 **Target** = 252,516,977
Actual = 177,073,360

2013 **Target** = 252,011,944
Actual = 179,813,548

2014 **Target** = 251,507,921
Actual = 160,239,760

2015 **Target** = 233,380,380
Actual =

EPI-2: 2011 – 145,584 gals Gasoline Consumed
(Actual Baseline)

2012 **Target** = 142,672
Actual = 151,081

2013 **Target** = 139,819
Actual = 135,845

2014 **Target** = 137,023
Actual = 136,672

2015 **Target** = 132,922
Actual =

EPI-2.1: (Sub Indicator to EPI-2)

2011 227 Gasoline Type Vehicles, Light duty
(actual baseline)

2012 **Target** = 222
Actual = 233

2013 **Target** = 217
Actual = 201

2014 **Target** = 214
Actual = 171

2015 **Target** = 209
Actual =

EPI-3: 2011 – 162 Containers Purchased (actual baseline)

2012 **Target** = 159
Actual = 282

2013 **Target** = 156
Actual = 401

2014 **Target** = 152
Actual = 1,140

2015 **Target** = 149
Actual =

Note: 3/23/15, currently we track "Brakleen" and will continue, even though we are purchasing that product in bulk, not aerosol. Tracking "Aerosol" products is proving to be difficult. Purchasing cannot track and it is nearly impossible to track through the Chemical Inventory System.



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TABLE 8 - BASELINE METRICS - ENVIRONMENTAL PERFORMANCE FORMULAS

EPI-3.1: (Sub Indicator to EPI-3)

2011 – 19 SAC Drums (Actual Baseline)

2012 **Target** = 18

Actual = 15

2013 **Target** = 17

Actual = 24

2014 **Target** = 16

Actual = 13

2015 **Target** = 15

Actual =

Note: 3/23/15, this EPI is a sub indicator to EPI-3. We will track "Spent Aerosol Can" drums that are sent to "US Ecology" for disposal as a replacement. This EPI will continue to follow the EO 13423 to reduce the quantity of toxic and hazardous chemicals and materials acquired, used, or disposed by 2% annually.

EPI-4: (No Baseline)

2011 - 5,382,360 lbs. Waste Munitions
- 3,252,000 lbs. Scrap Metals

2012 - 10,701,376 lbs. Waste Munitions
- 5,894,000 lbs. Scrap Metals

2013 - 12,503,458 lbs. Waste Munitions
- 7,450,000 lbs. Scrap Metal

2014 - 12,847,864 lbs. Waste Munitions
- 7,910,723 lbs. Scrap Metal

2015 - 00,000,000 lbs. Waste Munitions
- 00,000,000 lbs. Scrap Metals
- 00,000,000 lbs. Recyclable Wood
- 00,000,000 lbs. Recyclable Plastic

NOTE: FORMULA ADJUSTMENTS

The methodology for determining and updating the formula for these EPI's is explained in the environmental baseline. Criteria for change include:

-  Formula no longer reflects Environmental Consumption
-  Major changes to SOC operations affecting Environmental Aspects
-  Other EPI formula changes

Annual data will be entered into these formulas for tracking against baseline and reviewed by the Environmental Management Team (EMC quarterly) and Top Management (yearly). SOC Stakeholders will be notified of progress on a regular basis through emails, ICM, and other internal communication opportunities.



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7. CHECKING (CLAUSE 4.5) CONTINUED

7.1.10 **ACTION PLANS** - The shows a list of Action Items for project implementation.

TABLE 9 – OBJECTIVES AND TARGETS – ACTION PLANS

ACTION ITEM	PRIORITY - SCHEDULE	RESPONSIBLE JOB - PERSON	HUMAN RESOURCES NEEDED	FINANCIAL RESOURCES NEEDED	STATUS
EPI-1: Products that allow for quick adjustments to irrigation run times during peak season, set seasonal adjustments for weather conditions that require less water to cut down irrigation run times without the need to adjust each station.	High	SOC Manager, Engineering, Facilities and Planning and Supervisor, Janitorial, Painting, Housing and Grounds	5	Using in-house labor and budget materials	Summer 2015
EPI-1: Rain Delay features that incorporate a user to specify the number of days to keep the controller in the OFF mode. To prevent watering during an extended period of inclement weather, but will resume watering automatically without requiring a return visit to the controller.	High	SOC Manager, Engineering, Facilities and Planning and Supervisor, Janitorial, Painting, Housing and Grounds	5	Using in-house labor and budget materials	Summer 2015
EPI-1: Solar Panels eliminate the need for batteries and provide maintenance free operation to power the controller 24 hours a day, 7 days a week.	Medium	SOC Manager, Engineering, Facilities and Planning and Supervisor, Janitorial, Painting, Housing and Grounds	5	Using in-house labor and budget materials	Summer 2015
EPI-2.1: Audit fleet vehicle numbers before procuring new fleet vehicles to reduce surplus. Reduce the light duty fleet by 5 vehicles	High	SOC Manager, Maintenance & Utilities and Fleet Management & Equipment	3	Capital Investment Budget	Winter 2015
EPI-2: Purchase (1) an electric car to significantly reduce air pollution and reduction in total greenhouse gas and other emissions.	High	SOC Manager, Maintenance & Utilities and Fleet Management & Equipment	3	Capital Investment Budget	Winter 2015
EPI-3: Use Non-Toxic Cleaning Products – are a source of harmful solvents that can be inhaled or ingested. Replace these harsh products with eco-friendly non-toxic green cleaners.	High	SOC Manager, Engineering, Facilities and Planning and Supervisor Janitor	4	Using in-house labor and budget materials	Spring 2015
EPI-4: Buy only what we will use. This is environmental cost to buying something and letting it sit on the shelf forever. Solvent or solvent-containing liquids such as Brake Kleen or some cleaners, by the time that product spoils, the solvents will have evaporated and contributed needlessly to air pollution.	High	SOC Manager, Maintenance & Utilities and Fleet Management & Equipment and Manager, Engineering, Facilities and Planning and Supervisor Janitor	6	Budget and procure products	Spring 2015
EPI-4: "Waste Prevention", the elimination of materials before it becomes waste and is either recycled or sent to a Landfill, such as munitions components. Waste prevention provides opportunities to save both money and natural resources.	High	SOC Munitions and Logistics Services and Ammunition Process Operation	6	Using in-house labor	Spring 2015
EPI-4: Recycled-content products that were manufactured with recycled materials, either collected from a recycling program or from waste recovered during the normal manufacturing process.	Medium	SOC Business Management Office and Purchasing Officer.	2	Budget and procure products	Spring 2015
EPI-4: Publicize waste prevention efforts through awareness among personnel in all areas including Tenants and Lessees.	HIGH	SOC EMS 14001 Management Representative	1	Budget awareness materials	Spring 2015



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7. CHECKING (CLAUSE 4.5) CONTINUED

7.1.11. The EMSTMR, EMSMR and the Manager, Environmental Services will have the overall responsibility for project implementation, verification of the results and improvements. Refer to 4.2 Management Responsibility which defines the methods used to show the performance improvements. See the Environmental Corrective and Preventive Action (CAPA) Log which is available on the "G" drive or upon request.

7.1.12. SOC Top Management shall use the action plans and other outputs resulting from the planning process for implementation and operation. Key components of this system element are:

- ☞ Competence, Training and Awareness
- ☞ Communication
- ☞ Documentation
- ☞ Control of Documents
- ☞ Operational Control
- ☞ Design
- ☞ Procurement of Environmental Services, Products, Equipment and Environmental

7.1.13 **CALIBRATION AND MAINTENANCE OF MEASURING AND TEST EQUIPMENT (M&TE)** - Where Measuring and Test Equipment (M&TE) is used to measure environmental performance, equipment calibration, and maintenance is performed IAW the manufacturer's recommended procedures, an approved standard or sent out to a certified laboratory for calibration and maintenance. M&TE are schedule at various intervals and are part of SOC's preventive maintenance program. M&TE are processed IAW our Calibration & Verification Plan, SOC.QP.QAD.0010. Operating Procedures are developed as needed for the calibration and maintenance of specific monitoring equipment IAW Section 6.5, Operational Control of this manual.

7.2 EVALUATION OF COMPLIANCE (CLAUSE 4.5.2) - SOC uses a variety of means to evaluate compliance with applicable laws and regulations. These means include, but are not limited to:

- ☞ External and Internal Environmental Performance Assessment System (EPAS) Audits or other Army Environmental Assessment programs, which facilitate external evaluation for regulatory compliance and conformance to the EMS 14001 Standard
- ☞ Periodic, random inspections of operating conditions conducted by ACO environmental personnel for regulatory compliance
- ☞ Joint Munitions Command (JMC) regulatory compliance and conformance to the EMS 14001 Standard
- ☞ State of Nevada regulatory audits and inspections
- ☞ Federal EPA regulatory audits and inspections
- ☞ External ISO 14001 certification audits (Advance Waste Management (AWM – Registrar or other)
- ☞ Monthly meetings to discuss programs, program elements, current and future requirements and implementation plans/progress.



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7. CHECKING (CLAUSE 4.5) CONTINUED

7.2.1 SOC has implemented and uses Quality Plan SOC.QP.QMS 0005, Corrective and Preventative Action in our internal EMS performance and compliance assessment process. Quality Plan SOC.QP.QMS.0005, Corrective and Preventative Action is reviewed and updated as necessary or at a minimum on an annual basis and is in conformance with ISO 9001:2008 Quality Management Systems Standard and approved by the Manager, Quality Assurance. The Manager, Quality Assurance or his/her designee is responsible for updating the procedure IAW SOC.QP.QMS.0001 Control of Documents.

7.3 **NON-CONFORMANCES, CORRECTIVE & PREVENTATIVE ACTION (CLAUSE 4.5.3)** – SOC Environmental Management will utilize Quality Plan SOC.QMS.QP.0005 Corrective/Preventative Action for to document non-conformances, deficiencies, defects, potentials for improvement and prevention unless otherwise specified herein: The intent of this section is to define the organization's processes for:

- Handling and investigating EMS non-conformances.
- Acting to mitigate resulting adverse environmental impact(s) and/or consequences arising from accidents, incidents, and/or non-conformances.
- Performing Root Cause Analysis to prevent recurrence of an accident, incident and/or non-conformance.
- Based on the Root Cause Analysis SOC will initiate and complete corrective and preventive action and confirm the effectiveness of their findings through further follow-up.

7.3.1 **OVERVIEW OF NONCONFORMANCE** – Non-conformances, defects, deficiencies and potential improvements/preventative items, may be identified through external audits, internal audits or during facility environmental inspections/walk-throughs. Additionally, nonconformance items may be identified by personnel at any level of employment at SOC, this includes but is not limited to employees, ACO staff, contractors, subcontractors, visitors or other interested parties, including but not limited to regulators. A nonconformance can be system-level (e.g., an ineffective management system component) or at the operational-level (e.g., improper storage or identification of hazardous waste).

7.3.1.1 The scope of any corrective and preventive action taken will be commensurate with the magnitude of the nonconformance and related impacts.

7.3.1.2 As part of the corrective and preventive action notice, the Manager, Environmental Services, EMSMR or designee will make changes to documents or records as necessary.

7.3.2 **OPERATIONS - LEVEL NONCONFORMANCE** – When the audit team or other source has identified a defect or deficiency, he/she will notify the Auditee immediately. The recipient of the notification is then responsible for performing a root cause analysis surrounding the non-conformance. The Root Cause ID Tool is available on the “G” drive. Contact SOC Environmental Services for assistance.

7.3.2.1 When an operations-level nonconformance is identified, the Audit Team is responsible for notifying the EMSMR, Area Supervisor, and the Manager, Environmental Services. The Corrective/Preventative Action (CAPA) log is updated and is reviewed by the EMSMR on a monthly basis to ensure closure of all CAPA’s in a timely manner.



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7. CHECKING (CLAUSE 4.5)	CONTINUED
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7.3.2.2 Records are the result of an investigation and defects, deficiencies and/or nonconformities may require a formal Corrective/Preventive Action to be initiated. This is left to the discretion of the EMSMR/Auditor/Inspector and is based on the severity of the defect, deficiency or non-conformance. When a Corrective/Preventative Action is initiated the summarized information will be entered into the Environmental Corrective/Preventative Action Log to ensure timeliness of correction of the problem.

7.3.2.3 Corrective/Preventative Actions will be given a suspense date (typically ten (10) working days) for correction or preventative measures to be initiated. When suspense dates are not met by the CAPA receiver, the CAPA will be reissued and elevated to the next level of management with a shortened suspense date (five (5) work days). When the second suspense date is missed the CAPA is then elevated to the level of the General Manager with a three (3) day suspense date for an explanation/answer to the CAPA. The correction or implementation of preventative measures does not have to be completed but some action has to have taken place and a response to the issuing agent received.

7.3.2.4 Specific action items are submitted to Top Management for Environmental Corrective/Preventative Action. The EMSMR or designee uses the Environmental Corrective and Preventive Action and the Environmental Corrective and Preventive Action Log to monitor the status and suspense of corrective actions.

7.3.2.5 The EMSMR will update and/or revise EMS policies and procedures to reflect changes that result from identified Corrective/Preventive Action. The EMSMR is responsible for the initial notice to affected personnel for implementation of the appropriate corrective action or preventative measures. It then becomes the responsibility of the appropriate level of Management to ensure corrective/or preventive action occurs.

7.3.2.6 The Corrective and Preventive Action form (DZHC 372-E) and the Environmental Corrective and Preventive Action Log are intended to provide status and information relating to corrective actions. The log will be updated as necessary by the EMSMR and reviewed by the EMSTMR IAW our EMS Management Review SOC.QP.EMS.0002. The EMSMR will report the status of outstanding corrective and preventative actions and any actions taken relative to the resolution or implementation of a corrective/preventative action to the Top Management. The CEM team may provide suggestions and concurrences to achieve resolution of the deficiencies identified during the review.

7.3.3 **SYSTEM-LEVEL NONCONFORMANCE** - When system-level non-conformances are identified during an internal or external audit, the Environmental Services Manager or the EMSMR will be responsible for notifying the Top Management. This may be achieved through a sit down meeting or email notification with a read response attached to the email for those members who may be absent and unable to physically attend a meeting.

7.3.3.1 Upon notification of a system-level nonconformance, the Manager, Environmental Services the EMSMR or designee will investigate any environmental impact(s), real or potential and will take necessary steps to initiate a root cause analysis. This will ensure the problems surrounding a system level non-conformance are identified and the necessary corrective/preventive action can be taken. Investigation results will be documented on Corrective/Preventive Action Form (DZHC 372-E) and the Environmental Corrective/Preventive Action Log.



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7. CHECKING (CLAUSE 4.5) CONTINUED

7.3.3.2 The Manager, Environmental Services or the EMSMR is responsible for implementing and communicating required Corrective/Preventive Action to all affected personnel.

7.3.3.3 Manager, Environmental Services, EMSMR or designee is responsible for updating and revising our EMS policies and procedures to reflect changes that could impact our Environmental Aspects, Legal and Other requirements, when this occurs an out of cycle EMC meeting is held and changes approved by Top Management with concurrence from the CEM.

7.4 CONTROL OF RECORDS (CLAUSE 4.5.4) – Control of Records, will be accomplished IAW SOC.QP.QMS.0002 Control of Records unless otherwise stated in this section of the EMP.

7.4.1 The Manager, Environmental Services or the EMSMR shall approve any areas where hard copy records are stored with respect to the EMS. Storage of records is provided in secure filing or storage cabinets in an environment to prevent damage, deterioration, or loss or in an electronic data file with appropriately controlled access. Record storage areas shall be secure from unauthorized access and free from reasonable environmental threats (e.g., water leaks, extreme temperatures, etc.).

7.4.2 **ELECTRONIC RECORDS** - The following requirements are specific to maintaining electronic records.

7.4.2.1 Electronic records that are under the control of the EMS “G” Drive Managers (e.g., those persons with read/write permission to update the G” Drive) are maintained within the file/folder structure of the drive.

7.4.2.2 Electronic records, under the control of persons that do not have read/write permissions to the “G” Drive are maintained in a designated electronic storage location (e.g., Information Services general file storage system).

7.4.3 **RECORDS RETENTION** - Record retention requirements may be established by regulatory agencies, Department of the Army, the Depot, our corporate offices, contracts, etc. The record retention guidelines are included in the Attachment #5 Listing of Required Environmental Records and Reference Documents and represent the minimum duration that each type of record must be maintained. At a minimum, SOC ensures that applicable regulatory required retention times are met. SOC periodically assesses record retention requirements during internal auditing process are adhered to.

7.4.4 Records retained beyond an assigned retention time are not considered to be management system records. They are considered to be “Historical or Archived Records” and will no longer be managed under the requirements of the EMS.

7.4.5 **DISPOSITION OF RECORDS** - Designated personnel are responsible for periodically evaluating records under their management versus applicable retention times. Records that have been maintained in excess of applicable retention times are to be disposed of in an approve manner. Potentially sensitive records, such as personnel related or legal records are shredded prior to their disposal. Non-sensitive records are managed with other waste office papers.



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7. CHECKING (CLAUSE 4.5) CONTINUED

7.5 INTERNAL AUDITS/AUDIT PROGRAM (CLAUSE 4.5.5) - The EMSMR and Manager, Environmental Services are responsible for planning SOC's performance assessment and the coordination of audits of the EMS. A typical EMS Audit Plan & Summary Report includes, but is not limited to the following information:

- 🌀 Purpose
- 🌀 Approach
- 🌀 Administrative Procedures
- 🌀 Standing Operating Procedures (SOP)
- 🌀 Other

7.5.1 AUDIT FREQUENCY - Audits will be performed annually to ensure conformance and compliance requirements are met. The scopes of our audits are determined based on consideration of the following:

- 🌀 Importance of activities
- 🌀 Results of previous audits
- 🌀 Results of Management Reviews
- 🌀 Organization's performance versus established Objectives and Targets

7.5.2 STAFFING AUDIT TEAMS - SOC strives to develop audit teams that possess the skills and expertise necessary to conduct fair and unbiased, objective audits for the EMS. Audits shall provide sufficient benefit to the EMS to ensure continual improvement and conformance to the standard. When selecting auditors, consideration is given to the following criteria:

- 🌀 **COMPETENCE** - auditors should possess the appropriate combination of knowledge, skills, and experience to perform a responsible audit.
- 🌀 **OBJECTIVITY** - auditors should be independent of the activities they audit; they should be free from bias and conflict of interest throughout the audit process
- 🌀 At least one person on the audit team should be an experienced in Environmental Compliance.

7.5.2.1 Audits are conducted by appropriately trained and qualified auditors, as described in SOC.QP.QMS.0003, Internal Quality Audit.

7.5.2.2 SOC may elect to use internal or external resources, or a combination of both, to conduct EMS audits. Audit teams may consist of one or more, trained, qualified auditors. A qualified Lead Auditor, who demonstrates competence, will be designated for each EMS audit conducted.

7.5.3 DUE PROFESSIONAL CARE AND CONFIDENTIALITY - Auditors shall use a level of care, diligence, and judgment expected of any auditor while conducting an EMS audit. EMS auditors are not permitted to disclose information or documents obtained during or after an audit, including the audit report, to any third party without written approval the General Manager.



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7. CHECKING (CLAUSE 4.5) CONTINUED

- 7.5.3 **THE AUDIT PROCESS** - EMS audit activities are performed in a three-stage process that includes: preparation, execution, evaluation, and evaluation reporting. Each stage of the audit process is described below.
- 7.5.5. **AUDIT PREPARATION** - The EMSMR and the designated Lead Auditor collaborate to complete an Audit Plan prior to each ISO 14001 audit. The Audit Plan establishes audit objectives, scope, criteria, staffing, reporting requirements, etc.
 - 7.5.5.1. The Lead Auditor will notify the person/persons who will be affected by the audit (including audit team members and those being audited) a minimum of one (1) week prior to the audit
 - 7.5.5.2. The Lead Auditor will prepare the audit team on how the audit will be conducted. This includes providing audit team members with an audit plan, their audit assignments and relevant support documentation (e.g., protocols, checklists, procedures, previous audit reports, etc.). The Lead Auditor will consult with the audit team members prior to the audit to verify that they have reviewed the necessary audit information and clearly understand their role and audit assignments.
 - 7.5.5.3. Each auditor is responsible for reviewing the documentation that is provided to them by the Lead Auditor to develop an understanding of the scope and objectives of the audit and the nature of the SOC'S EMS.
- 7.5.6. **EVALUATION OF THE MANAGEMENT SYSTEM** - The overall objective of an audit is to evaluate our EMS against the ISO 14001 Standard and against the documentation that describes what we say we do. This objective is accomplished by the audit team's evaluation of our implementation and the overall effectiveness of the EMS. The following activities are performed during the evaluation phase of the audit:
- 7.5.7. **OPENING MEETING** - The Audit Team holds a brief opening meeting with affected personnel to review the scope, plan, and schedule for the audit.
- 7.5.8. **EVALUATION/AUDIT ACTIVITIES** - Using their audit protocols and checklists as guides, the audit team separates and gathers objective evidence (e.g., controlled documents, records and confirmed statements) to verify conformance to the EMS. Activities may include: interviews with organization personnel, review of pertinent records, observation of activities and processes. Auditors must maintain notes of audit activities so that nonconformance items/audit findings can be effectively described during the reporting phase of the audit.
- 7.5.9. **Notification** – Upon detection of a nonconformance, defect or deficiency the auditor is obligated to notify the Auditee at the time of detection verbally with a written back up and a request for corrective action.
- 7.5.10. **CLOSING MEETING** - The audit team will hold a closing meeting with affected personnel to review the preliminary findings of the audit and clarify any open or inaccurate items.
- 7.5.11 **REPORTING** - The Lead Auditor directs the following reporting efforts in 7.5.12 through 7.5.14.



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7. CHECKING (CLAUSE 4.5) CONTINUED

- 7.5.12 **DOCUMENTATION OF NONCONFORMANCE ITEMS/AUDIT FINDINGS** - Each auditor will record audit findings based on the results of their audit activities. Nonconformance, noncompliance items and associated Corrective/Preventive Actions are entered into the Environmental Corrective/Preventive Actions Log.
- 7.5.13 **AUDIT FOLLOW-UP & CORRECTIVE ACTION** - Audit findings that require corrective action are managed IAW the Corrective/Preventive Action Quality Plan, SOC.QP.QMS.0005. It is the responsibility of the personnel being audited, **NOT** the audit team members, to perform any corrective action associated with audit findings.
- 7.5.14 **AUDIT REPORTS** - including audit findings and the results of related corrective action, are reviewed by the EMSTMR and Top Management when performing Management Review.
- 7.5.15 **JOINT MUNITIONS COMMAND (JMC) OR OTHER ARMY COMMANDS** may perform external audits. The Army will follow their own outline of how to conduct audits.
- 7.5.16 **OTHER INTERNAL AUDIT CRITERIA** – SOC will complete internal audits that will include, but not be limited to the following: manuals, standard operating procedures, permits, evaluations of compliance/conformance, internal operating procedures, desk manuals, quality plans and the results of previous audits.

8. MANAGEMENT REVIEW (CLAUSE 4.6)

- 8.1 **MANAGEMENT REVIEW (CLAUSE 4.6)** – SOC's formal review of the EMS by the EMSTMR, EMSMR, and Top Management. The management review process is designed to ensure the continued suitability, adequacy, and effectiveness of the SOC'S EMS.
 - 8.1.1 The EMSTMR and EMSMR frequently perform informal review and provide updates of the EMS as part of day-to-day operations through review with Top Management, Management Review, meetings, phone calls and electronic communications (email).
 - 8.1.2. The EMSTMR and/or the EMSMR are responsible for scheduling and leading formal management review meetings that are attended by Top Management. These meetings may be held in conjunction with the Commanders Environmental Meeting (CEM).
 - 8.1.3 The following information will be communicated, reviewed and evaluated a minimum of once per year or more frequently if necessary by Top Management during Management Review meetings:
 - ☞ a. Results of Internal and External Audits
 - ☞ b. Communication(s) from external interested parties, to include complaints.
 - ☞ c. The environmental performance of the organization.
 - ☞ d. The extent to which objectives and targets have been met or their shortfalls and opportunities for improvement.
 - ☞ e. The status of any open Corrective and Preventive Actions.
 - ☞ f. Follow-up actions from previous Management Reviews
 - ☞ g. Circumstantial changes to include new developments in Legal and Other Requirements related to Environmental Aspects.
 - ☞ h. Recommendations for improvement

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8. MANAGEMENT REVIEW (CLAUSE 4.6) CONTINUED

- 8.1.4 Management Review meeting minutes are recorded and maintained by the EMSMR or designee. Minimally our Management Review meeting minutes will identify:
- ☞ Date of meeting
 - ☞ Invitees – Attending & Absent (Participants and non-participants)
 - ☞ Agenda and key issues discussed
 - ☞ Action items, including responsibility assignments and schedules, arising out of the meeting.
 - ☞ Follow the instructions in element 4.6 Management Review.
- 8.1.5 Meeting Minutes will be sent to all invitees, both attending and absent, requesting comment or concurrence. The email will be sent ‘Read Receipt Requested’ These emails will be maintained as part of the meeting record and managed in accordance with SOC.QP.QMS.0002, Control of Quality Records.

9. METRICS

- 9.1 Measurement Charts to monitor our Environmental Performance Indicators will be maintained IAW this document.

10. RECORDS

- 10.1 For a listing of Environmental Records, refer to Attachment 5, Listing of Required Environmental Records and Reference Documents, The Quality Records listed in the attachment shall be generated and managed in accordance with SOC.QP.QMS.0002, Control of Quality Records.



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11. FORMS

11.1 The following forms are applicable to this document and shall be generated and managed in accordance with SOC.QP.QMS.0002, Control of Quality Records.

TABLE 10 - APPLICABLE FORMS

FORM NUMBER	TITLE
DA 200	Transmittal Record
DD 1348-1A	Issue Release/Receipt Document
DZHC 108-E	Waste Tracking Log
DZHC 5-E	Container Tracking Form
Various	Vendor Disposal Profile Request Form
Various	Vendor Disposal Profile Amendment Form
Various	Vendor Universal Land Disposal Restriction Form
EPA8700-22	Hazardous Waste Manifest
EPA8700-22A	Hazardous Waste Manifest Continuation
F-14	Non-Hazardous Waste Manifest
SOC 127-E	SPCCP Container Insp. Form
SOC 674	EMS Program Management Report
SOC 676	Aspect Prioritization Worksheet
SOC 717	Checklist for Environmental Compliance Inspections
SOC 718	Environmental Training Report for Contractors and Vendors
SOC 719 - Database	Sample Log
SOC 723	Environmental Hotline Phone Log
SOC 724	90 Day Weekly Inspection Checklist
SOC 725	Table K-3 Inspection Checklist for HW Storage Bldgs
SOC 726	NEPA EBS Checklist
SOC 727	New Bomb Land Disposal Restriction Form
SOC 728	NEPA Pre-Scoping Report for Draft EAs
SOC 729	NPDES Well Sampling Data Sheet
SOC 730	New Bomb Certificate of Disposal
SOC 731	Checklist for Off Site Audits of Waste Handlers
SOC 732	HWAD Waste Stream Profile
SOC 733	Log Sheet for Documents Delivered
SOC 734	HWAD Off-Site Waste Shipment Loadsheet
SOC 735	Air Emissions Unit Operation Log - Boiler
SOC 736	Air Emissions Unit Operation Log - Hot Gas
SOC 737	Air Emissions Unit Operation Log - PODS -Tap Log
SOC 738	Air Emissions Unit Operation Log - Surface Coating Booth
SOC 739	Air Emissions Unit Operation Log - Generator



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TABLE 10 - APPLICABLE FORMS

FORM NUMBER	TITLE
SOC 740	Air Emissions Unit Operation Log - PODS - No Waste Throughput
SOC 741	Air Emissions Unit Operation Log - Rotoclone
SOC 742	Air Emissions Unit Visible Emission Log
SOC 743	Air Emissions Unit Maintenance Log
SOC 744	Air Emissions Unit Operation Log - BeadBlaster
SOC 747	SPCC Timed Leak Test Form
SOC 748	RF-9 CEMS Gas Audit Form
Spill number	Nevada State Spill Report