
Environmental, Safety, and Occupational Health Plan

Fiscal Year 2023

1. Introduction

Purpose

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

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

Goals and Objectives

The goals and objectives of this plan are to maintain compliance with relevant environmental, safety, and occupational health rules, requirements, and regulations; to maintain conformance with the International Organization for Standardization (ISO) 14001:2015 Standard and the ISO 45001:2018 Standard; and to continually improve environmental, safety, and occupational health performance.

Scope

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

Responsibilities

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

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

The DLA-SM Environmental Division Chief, Occupational Safety & Health (OSH) Manager, and the Headquarters (HQ) ESOH Specialist are responsible for the oversight of environmental, safety, and occupational health plans and execution. The Depot ESOH

Specialists assist in developing and implementing the DLA-SM environmental, safety, and occupational health programs and assist Depot Managers and HQ Supervisors in resolving any related issues.

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

Management Control Plan

Internal and External Environmental audits, Safety and Health inspections, Radiation reviews, the Respiratory Protection Program and fit testing at all Depots, specific training and corrective action status reports are scheduled, monitored monthly, and all are reported to the DLA-SM Administrator annually.

2. Management and Administration

The DLA-SM Director of Materials Management, Environmental Division Chief, OSH Manager, and the ESOH Specialists will review this plan for accuracy and effectiveness of established goals and objectives.

3. Environmental

Cleanup

The site remediation, restoration, and cleanup activities for Fiscal Year (FY) 2023 are summarized as follows:

Somerville, New Jersey:

The initial remediation at Somerville is complete. A draft Remedial Action Report (RAR) and property Deed document are currently in review by all stakeholders.

FY23 Somerville activities include: vegetation restoration evaluations; sampling of newly discovered contaminated soils within the wetlands area of concern (AOC) 8N to determine extent of contamination. This will prompt the development of a new soil remediation and restoration contract in FY23 with estimated costs of \$1.5M. Continuous monitoring of well monitor 19S is also scheduled.

Environmental Audits

Compliance and Conformance Audits. Internal Environmental audits will be conducted at the Scotia, NY, Hammond, IN, and Hawthorne, NV Depots. The audits will be conducted by the DLA-SM ESOH Specialists and will be scheduled within the fiscal year. These annual audits will include review of pertinent plans and files. Following the audits, plans and files will be updated as appropriate. External Environmental audits will be coordinated through the United States Army Corps of Engineers (USACE) Louisville District by outside contractors and conducted on a triennial basis. The DLA

Installation Management Safety Office at DLA HQ also conducts non-routine external audits of the DLA-SM Depots.

Location	Fiscal Year
Triennial External ESOH Audit Schedule	
Hammond	2023
Scotia	2024
Hawthorne	2025

Audit Findings. Audit findings are monitored by the ESOH Specialists and recorded in a Corrective Action Summary Report.

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

ESOH Specialists. At each Depot, the ESOH Specialist makes routine reviews of all ESOH-related matters, as needed.

Stormwater

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

Defense State Memorandum of Agreement

Defense State Memorandum of Agreement (DSMOA) accounts, directly funded by the Transaction Fund, are established as necessary with USACE. No work is planned in FY23 through the DSMOAs program.

Pest Management Plans

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

Environmental, Safety, and Occupational Health Management System

Management Reviews are conducted during the Managers’ meetings or special review meetings. The “I Am the Key” website will be reviewed and updated within the fiscal year. Training on the updated Environmental, Safety, & Occupational Health Management System (ESOHMS) process will be provided to all employees.

Environmental Training

Environmental training will be specific to each individual job task. The training will include information about Depot environmental plans, such as: stormwater management; spill prevention, control, and countermeasures (SPCC) plans; and air emissions permits. Training will be annotated on a training matrix maintained by DLA HQ and available for personnel review. Training records are also available at Depots upon request.

4. Safety and Occupational Health

Hazard Identification and Abatement

Workplace Inspections. The DLA-SM OSH Manager will conduct an annual safety and health inspection of all staffed Depots. The purpose of these inspections is to ensure that DLA-SM is in compliance with regulatory requirements relating to safety and health. A physical inspection of work spaces will document violations of safety and health standards and work procedures that could lead to an accident and the adequacy of personal protective equipment (PPE). Each Depot workplace inspection will be scheduled accordingly throughout the fiscal year.

An inspection report will be prepared upon the completion of each inspection and forwarded to the Depot Manager, ESOH Specialists, and the Director of Materials Management for implementation and correction of noted deficiencies.

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

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

Occupational Health

Medical Surveillance. Annual occupational medical examinations will be performed on DLA-SM Depot employees in the medical surveillance program. Examinations will be scheduled by the individual Depots through local medical facilities. Headquarters personnel will schedule annual physicals only if they are required to travel to Depots to work directly with materials. The annual physical examinations will be scheduled within the fiscal year as appropriate.

Industrial Hygiene (IH) Sampling. Areas containing commodities, equipment, or processes that pose a potential health hazard will be monitored and evaluated to ensure that personnel exposure does not exceed an acceptable level. The DLA-SM OSH Manager will review the annual submittals of the hazardous chemical inventories from the Depots to determine if additional industrial hygiene monitoring or medical surveillance is required. Documents will be filed at DLA-SM HQ. IH Plans were completed in FY22. IH Surveys will be coordinated through the USACE Louisville District for FY23.

Personal Protective Equipment

Every effort will be made to eliminate/prevent occupational hazards through hazard elimination, hazard substitution, engineering controls, or administrative controls. In those instances where elimination of hazards is not possible, DLA-SM employees will be provided PPE at no cost to the employee.

Managers and HQ Supervisors share responsibility with employees for ensuring that periodic inspection, cleaning, disinfecting, replacement, and maintenance of PPE is

performed. Validation will be included in the safety inspection report. They are also responsible for ensuring that an adequate supply of PPE is available for use at their depots. Employees will comply with requirements to use PPE.

Mishap Reporting

Reporting Requirements. Mishaps involving personal injury, property damage, and motor vehicle accidents will be reported in accordance with the detailed reporting requirements contained in DLA Issuances and DLA-SM Accident Reporting & Investigating program. Reports will be submitted initially to the DLA-SM Depot Managers and the OSH Manager.

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

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

AED Program

The Hammond and Hawthorne Depots have been outfitted with automated external defibrillators (AEDs). During the FY, refresher training will be provided for DLA-SM employees. Training records will be documented in the Learning Management System (LMS) and on the ESOH training matrix. The AED equipment will be maintained at the Depot level by the Depot Managers and the ESOH Specialists. The Scotia Depot utilizes nearby first responder facilities for such health-related emergencies.

Safety and Health Training Requirements and Schedules

Required Training:

Respiratory Protection. Personnel working in occupations that require the use of respirators will be trained in the proper use, care, and maintenance of the respirators. This will be accomplished at the time of initial assignment and annually thereafter. Annual fit testing will be conducted in conjunction with the required annual training. Upon completion of annual fit testing, copies of the fit testing records will be maintained in Depot libraries. Annual Respirator Protection Program reviews will be maintained in Depot libraries. Respirator fit testing will be scheduled accordingly within the fiscal year.

General Safety Training. Each Depot will hold general awareness safety training monthly on subjects applicable to their particular working environment.

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

Ergonomics Training. All Depot employees will receive ergonomics training during the annual Depot safety inspection and training will be administered by the DLA-SM OSH Manager.

Hazardous Waste Operations and Emergency Response (HAZWOPER) Training. Depot employees and other relevant staff will complete annual HAZWOPER refresher

training. A 40-hour HAZWOPER training will be scheduled as needed for all new hires. The training will fulfill classroom requirements of OSHA 29 *Code of Federal Regulations* 1910.120(e) and (q). The 8-hr refresher training will be scheduled within the fiscal year as appropriate.

5. Radiation Protection Program

The Scotia Depot maintains a Nuclear Regulatory Commission (NRC) License to store, sample, repack, and transfer natural uranium and thorium mixtures as ores, concentrates, and solids. The DLA-SM Radiation Safety Officer (RSO) will complete an annual Radiation Review at the Scotia, NY Depot in the fourth quarter of FY23.