
Final Plan

**DEFENSE LOGISTICS AGENCY (DLA)
STRATEGIC MATERIALS**



**Pollution Prevention Plan
May 2017**

Executive Summary

The Pollution Prevention Act of 1990 directs each Department of Defense (DoD) installation to develop a pollution prevention (P2) Plan. The P2 Plan is a tool that summarizes the current state of P2 activities and the mandated P2 goals for the depots and identifies areas of potential P2 opportunities for all commands, units, tenants, and contractor organizations on the depot. The P2 Plan for the Defense Logistics Agency (DLA) Strategic Materials was prepared in accordance with Executive Order (EO) 13693, "Planning for Federal Sustainability in the Next Decade."

This P2 Plan illustrates the measures DLA Strategic Materials has taken to achieve its mandated P2 goals. The plan also identifies and describes the implementation of P2 actions required by EO 13693, as well as DoD requirements. This P2 Plan focuses on P2 aspects of EO 13693 such as energy, environmental water, fleet, buildings, and acquisition management to drive national greenhouse gas reductions and support preparations for the impacts of climate change.

This P2 Plan has been updated and has been reissued to Headquarters and Depot personnel. DLA Strategic Materials personnel will comply with this P2 Plan. It is maintained to reflect current personnel responsibilities and current regulatory requirements and goals. It also is reviewed and updated after change in Depot conditions or operations affecting P2 goals and programs.

This P2 Plan also serves as a guidance tool for DLA Strategic Materials senior management personnel to use when establishing and maintaining policy P2 programs at the depots. In addition, the success of this P2 Plan, and the resultant compliance with all regulations and requirements, depends on staff and personnel at DLA Strategic Materials depots following the requirements and recommendations outlined herein.

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Acronyms and Abbreviations

AFV	alternative fuel vehicle
CFR	<i>Code of Federal Regulations</i>
CPG	Comprehensive Procurement Guidance
DLA	Defense Logistics Agency
DoD	Department of Defense
EHS	extremely hazardous substance
EISA	Energy Independence and Security Act
EMS	Environmental Management System
EO	Executive Order
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
GHG	greenhouse gas
ISO	International Organization for Standardization
LEPC	local emergency planning committee
NEPA	National Environmental Policy Act
OHSAS	Occupational Health and Safety Advisory Services
P2	pollution prevention
PPA	Pollution Prevention Act
PPIC	Pollution Prevention Information Clearinghouse
RCRA	Resource Conservation and Recovery Act
RMAN	Recovered Material Advisory Notice
SARA	Superfund Amendments and Reauthorization Act
SERC	state emergency response commission
TRI	Toxic Release Inventory
USC	United States Code

1.0 Purpose

Pollution prevention (P2) is reducing or eliminating waste at the source by promoting the use of nontoxic or less-toxic substances, implementing conservation techniques, and recycling materials rather than putting them into the waste stream. It includes practices that eliminate discharge of hazardous or toxic chemicals to the environment and that protect natural resources through conservation and improved efficiency. P2 aims to eliminate or reduce waste (not just hazardous) released to land, air, and water without simply transferring or distributing pollutants among these media.

P2 represents the first step in managing waste. Source reduction is assigned the highest priority because it reduces or eliminates wastes at the source of generation. Recycling is the next preferable approach because it involves reusing or regenerating materials and wastes into usable products. Treatment and disposal are considered last-resort measures. The following are descriptions of such methods of P2:

- Source reduction is the use of materials, processes, or practices that reduce or eliminate the quantity and toxicity of wastes at the source of generation. Source reduction techniques include practices such as raw material substitutions, improved operating practices, changes in industrial processes, and technological changes. Land use practices that prevent ecological impacts also are source reduction techniques. Examples include avoiding construction in wetland or other ecologically sensitive areas, minimizing land clearing to reduce erosion, and planning new construction to minimize the amount of impervious surfaces to reduce stormwater runoff.
- Recycling refers to the reuse or regeneration of materials and wastes into usable products and byproducts. Recycling also refers to the reclamation of products no longer in use (for example, reclaiming metals from outdated equipment). Recycling includes practices such as onsite or offsite recycling, materials exchange or reuse, recovery of materials, and composting of organic wastes, all of which help to reduce dependence on expensive virgin materials.
- Federal agencies and facilities are directed to implement acquisition programs aimed at encouraging new technologies and building markets for environmentally preferable and recycled products. Known as affirmative procurement, it is the purchasing of alternative products that are environmentally preferable or that are made with the maximum amount of recovered material content. Purchasing products containing recovered materials promotes the production of recycled products and closes the loop by creating markets for collected materials.
- Waste treatment changes the form or composition of a waste stream through a controlled reaction. Examples of treatment technologies include incineration of municipal solid waste, biological treatment of wastewater, and thermal oxidation of solvent vapors. Treatment technologies reduce the volume of waste or create a less-concentrated hazardous or toxic waste for disposal. The problem with treatment is that it often results in the transfer of hazardous substance from one medium to another

(for example, incineration can cause the movement of a hazardous substance from a solid to air; wastewater treatment creates sludge); consequently, treatment is not an environmentally preferred alternative.

- Disposal generally refers to land disposal at permitted facilities. Disposal also includes wastewater treatment plant effluent discharged to surface waters. Disposal is considered the least favored waste management alternative because of the harmful effects these wastes can have on the environment. In addition, the number of permitted waste sites available for disposing of hazardous materials and solid waste is limited, and many of these sites are approaching capacity. This demand for additional capacity is leading to soaring disposal costs. There are also hazard and liability concerns associated with transportation of wastes that need to be considered as well.

This P2 plan defines the goals and structure of the P2 program for Defense Logistics Agency (DLA) Strategic Materials. Specifically, the P2 Plan:

- Describes federal and state P2 regulatory requirements
- Identifies the procedures that are used to comply with the requirements of all applicable Executive Orders (EOs) and federal, state, and local laws and regulations pertaining to hazardous and nonhazardous waste

Therefore, the overarching purpose of the P2 Plan is to identify management structure, technical elements, administrative requirements, and investment strategy to develop and implement effective P2 technologies and practices at the DLA Strategic Materials depots.

The DLA Strategic Materials P2 Plan contains sections of text with the following information:

- Section 1 provides a brief purpose for the DLA Strategic Materials P2 Plan.
- Section 2 documents applicable federal, state, and Department of Defense (DoD) regulations.
- Section 3 highlights the scope and applicability of the P2 Plan.
- Section 4 highlights DLA Strategic Materials personnel responsibilities pertinent to P2.
- Section 5 lists baseline information and provides a snapshot of current P2 activities.
- Section 6 identifies additional P2 efforts and outreach activities.

2.0 Regulations and Requirements

Table 2-1 presents the highlights of applicable federal regulations related to P2.

TABLE 2-1
 P2-Related Federal Regulations

Citation	Regulation Name	Description and Depot Requirements
40 <i>Code of Federal Regulations</i> (CFR) 260–299	Resource Conservation and Recovery Act (RCRA)	<p>In 1976, the U.S. Congress passed RCRA. The following are the primary goals of RCRA:</p> <ul style="list-style-type: none"> • Protect human health and the environment from the potential hazards of waste disposal. • Conserve energy and natural resources. • Reduce the amount of waste generated. • Ensure that wastes are managed in an environmentally sound manner. <p>RCRA and its amendments, the Hazardous Solid Waste Amendments, provide standards for managing hazardous waste and universal waste in order to minimize risk to human health and the environment.</p> <p>Requirements: Depot must establish affirmative procurement programs.</p>
40 CFR 350–399	Emergency Planning and Community Right-to-Know Act (EPCRA)	<p>EPCRA, also known as Superfund Amendments and Reauthorization Act (SARA), Title III, was implemented in 1986 to help communities understand the chemical hazards in their areas.</p> <p>Requirements: Depot must notify local emergency planning committees (LEPCs) and state emergency response commissions (SERCs) of extremely hazardous substances (EHSs) onsite. Any releases of an EHS must also be reported to the LEPC and SERC; depot must notify the public regarding the quantities of toxic substances used, processed, released, and disposed of via annual Toxic Release Inventory (TRI) Form R reporting. Form R reports must be submitted to the U.S. Environmental Protection Agency (EPA) and the state environmental agency; the reports are then made available to the public.</p>
40 CFR 100–199	Clean Water Act	<p>This act amended the Federal Water Pollution Control Act and requires federal agency consistency with state nonpoint source pollution abatement plans. The act was amended in 1987 to strengthen enforcement mechanisms and to regulate stormwater runoff. The Clean Water Act requires states to establish best management practices for reducing nonpoint source pollution.</p> <p>Requirements: Depot may be required to obtain a National Pollutant Discharge Elimination System permit for industrial stormwater discharges. Depot must keep an updated stormwater pollution prevention plan onsite. Depot must perform analytical monitoring as required under the depot permit to be submitted.</p>

TABLE 2-1
 P2-Related Federal Regulations

Citation	Regulation Name	Description and Depot Requirements
42 United States Code (USC) 13101 and 13102	Pollution Prevention Act (PPA)	<p>The PPA of 1990 established a national policy on P2. Major provisions of the PPA include the following:</p> <ul style="list-style-type: none"> • Providing matching funds for state and local P2 programs through the P2 Incentives for States grant program to support business with P2 programs • Establishing a P2 strategy outlining EPA's intent to promote source reduction and collect data on source reduction and recycling • Operating a source reduction clearinghouse. EPA's P2 Information Clearinghouse (PPIC) provides telephone reference and referrals and distributes P2 documents. Information can be obtained from the PPIC via the PPIC website (http://www.epa.gov/oppt/ppic/) or via phone at (202) 566-0799
40 CFR 247	Comprehensive Procurement Guideline for Products Containing Recovered Materials	<p>EPA designates recycled content items in the Comprehensive Procurement Guideline (CPG); hence they are known as EPA "Guideline Items." These guidelines are published in 40 CFR 247. EPA also prepares Recovered Material Advisory Notices (RMANs). These companion documents contain recommended minimum recovered material content standards for designated items, in addition to recommendations for specifications and purchase mechanisms. In the CPG, EPA recommends both post-consumer recovered material content and total recovered material content levels. Standards for both of these content levels are recommended because EPA has found manufacturers using both types of materials to manufacture their products. These material types are defined as follows:</p> <ul style="list-style-type: none"> • <i>Recovered materials</i> means waste materials and by-products that have been recovered or diverted from solid waste but does not include those materials and by-products generated from, and commonly used within, an original manufacturing process. • <i>Post-consumer materials</i> means a material or finished product that has served its intended end use and has been diverted or recovered from the waste destined for disposal, having completed its life as a consumer item. Post-consumer material is part of the broader category of recovered materials. <p>The RMAN levels are expressed as percentages of post-consumer content or total recovered content (see Plan B for explanation of terms). However, the RMANs apply to specific compositions of the CPG items and may vary for CPG items made of different materials.</p> <p>To date, the CPG has established the mandatory procurement of 54 items in eight product categories, which include the following:</p> <ul style="list-style-type: none"> • Construction Products • Landscaping Products • Nonpaper Office Products • Paper Products • Park and Recreation Products • Transportation Products • Vehicular Products • Miscellaneous Products <p>Requirements: The CPG implements Section 6002 of RCRA, which requires EPA to designate items that are or can be produced with recovered materials and to recommend practices for the procurement of designated items by procuring agencies. Once EPA designates an item, RCRA requires any procuring agency using appropriated federal funds to procure that item to purchase it with the highest percentage of recovered materials practicable.</p>

TABLE 2-1
 P2-Related Federal Regulations

Citation	Regulation Name	Description and Depot Requirements
Public Law 110–140	Energy Policy Act of 2007	<p>The Energy Independence and Security Act (EISA) establishes a framework for facility project management and benchmarking. Under this new requirement, agencies must identify all “covered facilities” that constitute at least 75 percent of the agency’s facility energy use. A covered facility may be defined as “a group of facilities at a single location or multiple locations managed as an integrated operation.” The EISA also establishes stormwater management criteria for development or redevelopment projects involving a federal facility with a footprint exceeding 5,000 square feet.</p> <p>Requirements: An energy manager must be designated and, in so much as possible, redevelopment and development projects should implement stormwater strategies to maintain the predevelopment hydrology of the property.</p>

Table 2-2 outlines the presidential EOs issued that address P2. These EOs include goals and guidance for implementing P2 metrics at federal agencies.

TABLE 2-2
 P2-Related Executive Orders

EO Number	EO Title	EO Description and Requirements
13693	Planning for Federal Sustainability in the Next Decade	<p>This The new EO outlines forward-looking goals for federal agencies in the area of energy, climate change, water use, vehicle fleets, construction, and acquisition. It supports federal leadership to drive national greenhouse gas reductions and to support preparations for the impacts of climate change through encouraging the following:</p> <ul style="list-style-type: none"> • Reducing energy use and cost • Finding renewable or alternative energy solutions • Improving water use efficiency and management
13221	Energy Efficient Standby Power Devices	<p>Requires agencies to purchase products that use no more than 1 watt in standby power consuming mode. The Department of Energy, DoD, and the General Services Administration issue a list of acceptable products that meet this requirement. The following link published by the Federal Energy Management Program is a guide on how to buy equipment with low standby power: http://www.eere.energy.gov/femp/pdfs/standby_power.pdf</p>

TABLE 2-2
P2-Related Executive Orders

EO Number	EO Title	EO Description and Requirements
13212	Actions to Expedite Energy-Related Projects	Authorizes agencies to expedite projects that will increase the production, transmission, or conservation of energy. It also states that agencies will expedite the review of permits or take other actions necessary to accelerate the completion of energy-related projects.
12844	Federal Use of Alternative Fuel Vehicles (AFVs)	Requires procurement and use of AFVs, where possible. Requires facilities to purchase 50 percent more AFVs from 1993 to 1995 than specified in the Energy Policy Act of 1992.
12898	Federal Actions to Address Environmental Justice	Requires facilities to document potential environmental impacts in environmental justice areas and target such impacts for reduction through P2.

3.0 Scope and Applicability

Executive Order 13693, *Planning for Federal Sustainability in the Next Decade*, was adopted in 2015 and requires federal agencies to be leaders in “energy, environmental water, fleet, buildings, and acquisition management to continue to drive national greenhouse gas reductions and support preparations for the impacts of climate change.” To achieve this mandate, an accurate evaluation of current industrial operations is essential to the development of a successful P2 Program. Additionally, the goals associated with water conservation, green purchasing, petroleum conservation, sustainability building, P2, recycling, and electronics management were updated and expanded.

The scope of this document, therefore, focuses on the environmental and energy mandates of EO 13693 regarding hazardous materials, hazardous waste, solid waste, the use of non-petroleum based fuels, energy conservation, water conservation, and electronic equipment procurement and recycling.

This P2 Plan is applicable to depot personnel generating waste (hazardous and nonhazardous) at DLA Strategic Materials depots. Depots performing operations that generate waste will use this plan as a tool for process implementation in a manner consistent with the depot P2 program.

4.0 Responsibilities

Successful integration of P2 in the EMS is dependent on contributions from key depot personnel. Table 4-1 identifies the roles and responsibilities of these individuals.

TABLE 4-1
P2 Roles and Responsibilities: DLA Strategic Materials

Responsible Party	Action
Administrator	Direct programs to develop, implement, and administer management and engineering procedures and policies that will achieve and maintain full compliance with federal, state, and local environmental regulatory requirements for DLA as related to P2.
Chief, Operations & Logistics	Provide information to the Administrator for the DLA Strategic Materials upon request.
Chief, Environmental Division	Ensure that DLA continues to integrate P2 into its EMS. Collect data from the depots to monitor progress and complete the P2 summary reports. Track new goals and EOs and disseminate new P2 goals to the depots. Review the integration of P2 with the EMS during annual EMS audits for applicability, feasibility, and progress. Provide depots with information, initiatives, and guidance on implementing DLA's P2 goals. Maintain P2-related documents in accordance with the Environmental, Safety, and Occupational Health Management System's procedure for document management.
Contracting Officers	Procure environmentally preferable products as specified by DLA and General Services Administration.
Depot Managers	Implement initiatives associated with meeting objectives, targets, and other P2 goals. Increase P2 awareness at the depot level, and maintain records of quantities to be reported. Report progress to Chief of the Environmental Division.

5.0 Pollution Prevention Baseline Information and Current Activities

Tracking metrics within the P2 program implemented at DLA Strategic Materials depots is necessary to determine progress in meeting the EO goals. Focusing on these metrics allows DLA Strategic Materials depots to determine whether goals are being met and allocate resources (energy, money, and personnel) toward areas of need. The following sections discuss material reduction, reuse, and recycling and the reduction of environmental impacts due to waste and materials associated with the DLA Strategic Materials mission.

5.1 P2 Goals

Currently, EO 13693, signed October 2015, outlines the goals for environmental, energy, and transportation management at federal agencies (Table 5-1).

TABLE 5-1
 Goals Outlined in EO 13693

Program Area	Reduction Goal	Baseline Year	Reduction Year
GHG Emission	Set an agency-wide reduction target for Scope 1, 2, & 3 GHG emissions.	2008	2025
Energy Efficiency	Improve energy efficiency and reduce GHG emissions by reducing energy intensity by 2.5 percent annually.	2015	2025
Energy Efficiency	Total amount of building electric energy and thermal energy shall be clean energy, accounted for by renewable electric energy and alternative energy: not less than 10% in FY 16&17; not less than 13% in FY18&19; not less than 16% in FY 20&21; not less than 20% in FY 22&23; and not less than 25% by FY 25 and each year thereafter.	2016	2025 and thereafter
Energy Efficiency	Implement renewable energy projects.	NA	NA
Fossil Fuels and Vehicle Fleet Management ⁽¹⁾	Reduce fleet-wide per-mile greenhouse gas emissions from agency fleet vehicles, relative to a baseline of emissions in FY 2014, to achieve the following percentages: less than 4% by the end of FY 17; not less than 15% by the end of FY 2021; and not less than 20% by the end of FY 2025.	2014	2025
Fossil Fuels and Vehicle Fleet Management ⁽¹⁾	Use low GHG-emitting vehicles (that is, alternative fuel vehicles) and support the use of alternative fuel vehicles, including E-85 compatible vehicles, zero emission and plug-in hybrid vehicles, and compressed natural gas powered vehicles.	NA	NA
Fossil Fuels and Vehicle Fleet Management ⁽¹⁾	Optimize the number of vehicles in the agency fleet.	NA	NA

Water Efficiency	Reduce agency potable water consumption measured in gallons per gross sq. ft. by 36% by FY 2025 through reductions of 2% annually through then.	2007	2025
Water Efficiency	Implement water reuse initiatives including water meters and green infrastructure features on federally owned property to help with stormwater and wastewater management.	NA	NA

TABLE 5-1
 Goals Outlined in EO 13693

Program Area	Reduction Goal	Baseline Year	Reduction Year
Water Efficiency	Reduce agency industrial, landscaping, and agricultural water consumption by 2 percent annually or 20 percent total.	2010	2025
Water Efficiency	Implement stormwater and wastewater management practices that follow EPA guidance.	NA	NA
Solid Waste	Divert at least 50 percent of nonhazardous solid waste and construction and demolition debris from landfills.	NA	NA
Solid Waste	Increase diversion of compostable/organic material.	NA	NA
Pesticides	Implement pest management and sustainable landscape management practices.	NA	NA
Regional and Integrated Local Planning	Participate in local/regional transportation, energy, ecosystems, and watershed planning.	NA	NA
Regional and Integrated Local Planning	Incorporate energy considerations into National Environmental Policy Act (NEPA) documents for new or expanded facilities.	NA	NA
Sustainable Design	Make annual progress toward 100 percent conformance with the revised Guiding Principles.	NA	NA
Sustainable Design	At least 15 percent of the agency's existing buildings leases (above 5,000 gross square feet) must meet the Guiding Principles.	NA	2015
Sustainable Design	All new federal buildings that enter the planning process beginning in 2020 are designed as zero-net-energy.	NA	2030
Green Purchasing	Ensure that <i>95 percent of new contract actions</i> (task and delivery orders) are for products and services that meet the following "green" criteria, in cases where greener options meet the agency's performance requirements: <ul style="list-style-type: none"> • Energy-efficient • Water-efficient • Biobased • Environmentally preferable • Non-ozone depleting • Contain recycled content • Nontoxic or less toxic 	NA	NA
Management of Toxic and Hazardous Chemicals and Materials	Develop toxics and hazardous chemicals and materials reduction plan.	2008	NA

TABLE 5-1
 Goals Outlined in EO 13693

Program Area	Reduction Goal	Baseline Year	Reduction Year
Management of Toxic and Hazardous Chemicals and Materials	Reduce the quantity of toxic and hazardous chemicals and materials acquired, used, or disposed of, including ozone-depleting substances.	NA	NA
Management of Toxic and Hazardous Chemicals and Materials	TRI Reporting.	NA	NA
Electronics Stewardship	Ensure the procurement of ENERGY STAR- and Federal Energy Management Program-designated electronics.	NA	NA
Electronics Stewardship	Implement environmentally sound policies for managing electronic equipment.	NA	NA
Electronics Stewardship	Implement best management practices for energy-efficient management of servers and federal data centers.	NA	NA
EMSs	Continue to implement the EMS <ul style="list-style-type: none"> • At all appropriate organizational levels, and • To achieve the performance necessary to meet the EO goals. 	NA	NA

NOTE:

⁽¹⁾ DLA Strategic Materials has fewer than 20 vehicles, so this is voluntary.

5.2 Baseline Information at DLA Strategic Materials Depots

5.2.1 Greenhouse Gases

Scope 1 GHGs are the direct emissions occurring from sources that are owned or controlled by the organization. These include emissions from combustion in owned or controlled boilers, furnaces, and vehicles. Scope 2 accounts for GHG emissions from the generation of purchased electricity consumed by the organization. Scope 2 emissions physically occur at the facility where electricity is generated.

DLA Strategic Materials depots are responsible for reporting progress towards these goals to the DLA Strategic Materials Chief, Environmental Division.

Scope 3 emissions are a consequence of the activities of the organization, but occur from sources not owned or controlled by the organization. Some examples of Scope 3 activities are production of purchased materials; transportation of purchased fuels; and use of sold products and services.

5.2.2 Energy Efficiency

DLA Strategic Materials is working toward reducing its energy needs. At this time, each of the depots is doing annual energy efficiency awareness training and taking measures to reduce energy use as appropriate.

5.2.3 Fossil Fuels and Vehicle Fleet Management

DLA Strategic Materials has less than 20 fleet vehicles and, consequently, is technically exempt from this requirement. Fleet vehicles are obtained through the General Services Administration, so new fleet vehicles are in compliance with government green purchasing guidelines. Where possible, the vehicles used at DLA Strategic Materials depots will use alternative fuels.

5.2.4 Water Efficiency

Where it is practical and economically feasible, DLA Strategic Materials depots will adopt environmentally beneficial landscaping practices that complement and enhance the local environment and minimize the adverse effects that the landscaping might have. DLA Strategic Materials depots will use landscaping practices and technologies such as growing native plant species and composting to conserve water and prevent pollution.

DLA Strategic Materials depots have developed stormwater pollution prevention plans in accordance with the requirements of their individual or general stormwater permit (or exemptions). These plans identify potential sources of pollution that may reasonably be expected to affect the quality of stormwater discharges from the facility. In addition, the plans describe of the best management practices that are used to reduce the pollutants in stormwater discharges and ensure compliance with the terms and conditions of the permit.

5.2.5 Solid and Hazardous Waste

DLA Strategic Materials depots are very small quantity (VSQ) generators of hazardous waste. Their primary waste streams are related to temporary remediation projects. Information on current projects can be found in the fiscal year 2017 Environmental, Safety, and Occupational Health Plan.

Solid waste at the depots is typically municipal solid waste. At some depots, recycling does occur, but diversion rates are not tracked, and disposal has gone up in recent years.

5.2.6 Pesticides

DLA Strategic Materials prohibits the use of pesticides, herbicides, and rodenticides. Depots may request exceptions to the policy by following the request and implementation procedures in the 2017 Pest Management Plan.

5.2.7 Regional and Local Planning

Each DLA Strategic Materials depot interacts individually with its local community. Formalized community interactions occur either through actions undergoing National Environmental Policy Act (NEPA) review or through the depot's installation restoration program. The most prominent example of an NEPA action requiring significant community involvement was the mercury shipping project. Local communities were consulted heavily, and their input was integral to the final decision process.

Additionally, as part of the installation restoration program, each depot has a Community Relations Plan. These plans are a way to inform area residents of the depot's environmental stewardship efforts. The community relations plans are available for public review at nearby public libraries and are maintained on our internal shared drive.

5.2.8 Sustainable Design

Sustainable design projects are planned at DLA Strategic Materials depots as appropriate.

5.2.9 Green Purchasing

The DLA Contracting Office is responsible for implementing green criteria into contracts and purchases. The importance of green purchasing is communicated to purchasers via credit card training. The DLA Strategic Materials Environmental division assists contracting upon request.

5.2.10 Hazardous Material and Toxics Tracking

DLA Strategic Materials depots store mercury and beryllium powder. Employees working with or near the mercury or beryllium powder receive special training.

5.2.11 Electronics Stewardship

DLA Strategic Materials manages electronic stewardship by working with other appropriate federal agencies. Electronic purchases are ENERGY STAR (or equivalent rated), and old equipment is turned to the Defense Reutilization and Marketing Office for proper disposal.

5.2.12 Environmental Management System

DLA Strategic Materials depots implement an Environmental, Safety, and Occupational Health Management System based on International Organization for Standardization (ISO) 14000 and Occupational Health and Safety Advisory Services 18000. It is a mature system with set objectives and targets.

5.2.13 Petroleum, Oil, and Lubricants and Chemical Usage at DLA Strategic Materials Depots

The depots do not use large amounts of petroleum, oil, and lubricants or other chemicals. However, where possible, the depots recycle motor oil, antifreeze, hydraulic fluid, and other maintenance-type chemicals to the maximum extent possible.

6.0 P2 Program Objective and Outreach

6.1 P2 Program Objectives

Every fiscal year, DLA Strategic Materials publishes the Environmental, Safety, and Occupational Health Plan. This document is the overarching guidance document for the program and includes current projects, training needs, and overall management. The goals in this P2 Plan are part of the Environmental, Safety, and Occupational Health program and strive for the following:

- Reduce the DLA's impact on human health and the environment
- Minimize issues of regulatory noncompliance
- Reduce operating costs by reducing the amount of wastes generated and products purchased
- Reduce potential environmental impacts while maintaining mission readiness

6.2 P2 Outreach and Training

The following P2 outreach activities are ongoing at DLA Strategic Materials depots:

- Environmental management that includes P2 and visitor responsibilities listed on the visitor's brochure. Brochures are available to visitors at each depot entrance.
- Posted signs throughout the depots reminding employees to conserve precious resources and recycle, which conveys the general P2 awareness message to visitors.

P2 training is covered by a number of different training programs, such as the following:

- Stormwater P2 training according to the stormwater pollution prevention plans
- Environmental stewardship, which is covered during EMS training
- Green procurement training for credit card holders
- Energy Awareness Training