

CHAPTER 15

Environmental Management

This chapter outlines installation management philosophy goals, policies, and programs designed to protect the environment and conserve our natural and cultural resource heritage. In recent years, concern for the environment has increased. Both the Army and the public have increased their expectations concerning environmental stewardship. Army budgets commit a large portion of our scarce resources to environmental programs. The National Environmental Policy Act requires commanders at all levels to evaluate environmental impacts of activities before making decisions. At overseas locations, this guidance is supplemented by Executive Orders 12088, 12114, and DOD Directive 6050.16.

The Army recognizes the growing environmental challenges as it enters the next century. The environmental

vision is clear. The Army will be a national leader in environmental and natural resource stewardship. A sound strategy of proper management, leadership, and commitment will achieve this vision.

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POLICY

The Army recognizes the commitment to protecting the environment and accepts the role of environmental stewardship. The Army has developed a strategy to achieve this policy.

The concept of environmental stewardship is designed to inspire, direct, and empower Army personnel at all levels. The basic commitments reflected in the policy are demonstrating leadership, being good environmental stewards, and protecting the environment.

The US Army Environmental Strategy into the twenty-first century is a comprehensive program that provides the direction for achieving the goal of environmental stewardship. The strategy consists of specific goals, objectives, and an action plan. It harnesses the strengths of the Army – command leadership, organization, and commitment to purpose – to achieve environmental stewardship by wisely using and managing resources.

The strategy consists of four environmental program areas-compliance, restoration, prevention, and conservation. These four areas are environmental pillars because they support the vision of environmental stewardship. Each pillar has an associated goal. They are-

- Give immediate priority to sustained compliance with all environmental laws.

- Continue to restore contaminated sites as quickly as funds permit.
- Focus efforts on pollution prevention to reduce or stop pollution at the source.
- Conserve and preserve natural and cultural resources so they will be available for present and future generations.

COMPLIANCE PILLAR

The compliance pillar goal requires the Army to follow all environmental laws. Compliance assures the operations at Army installations meet federal state, local and applicable host-nation environmental requirements and Army regulations. The Army’s challenge is to comply with all the applicable requirements of these laws.

In the 1970’s and 1980’s our nation produced many new environmental laws designed to protect the environment, to include laws and regulations in the areas of waste water discharge, threatened and endangered species, noise abatement, wetlands, air quality attainment, historic sites, and solid and hazardous waste management. In October 1992, the Federal Facility Compliance Act became effective. This law subjects our installation solid and hazardous waste operations to the same penalties for noncompliance imposed upon civilian firms. In other words, the government gave up sovereign immunity.

Under the law, fines can be as high as \$25,000 per day per violation.

The Army has not met its goal to be free of citations for noncompliance. It continues to receive violation notices for facilities that do not meet requirements of federal and state laws.

Commanders must emphasize the importance of following laws designed to protect the environment. They must ensure organizations are properly staffed to meet the challenge and establish positive working relationships with communities and regulators. The National Environmental Policy Act (NEPA) requires commanders at all levels to evaluate environmental impacts of activities before making decisions. NEPA must be institutionalized within the decision-making processes with particular emphasis in the operational area.

The Army Environmental Compliance Assessment System was established to help installation commanders identify compliance deficiencies. It helps them develop corrective actions, identify resource requirements and track the corrective actions. If the installation determines that it is out of compliance, the commander notifies the MACOM and energizes the installation environmental team. Team members must negotiate with regulatory agencies to set compliance requirements and timetables and develop a corrective action plan. They also prepare and submit a 1383 Report. This becomes the justification for the budget request. Action is then taken to implement the corrective action plan and to seek help from support agencies.

RESTORATION PILLAR

Restoration includes all activities necessary to clean up installations contaminated by past practices. The restoration goal is to protect human health and environment through rapid clean up of contaminated sites.

The Army has identified over 10,500 potentially contaminated sites and has studied most sites determining contamination limits and composition. Study results will be used in site cleanup with installation commanders actively participating in management of the cleanup on site.

Even though some cleanup may take decades to complete, the Army is committed to starting cleanup on 12 percent of the sites yearly and have all identified sites started by the beginning of the twenty-first century.

PREVENTION PILLAR

The prevention goal is to adopt and implement integrated management approaches, procedures, and

operations to reduce all environmental contamination and pollution. The pollution prevention pillar strategy focuses efforts on preventing or reducing pollution before it is released. Pollution prevention is accomplished through reducing or eliminating wastes and conserving resources. It also includes using raw materials and energy more efficiently and reducing the emission of toxic materials.

The Army has achieved success in reducing the production of hazardous waste. Reducing hazardous waste avoids the high cost of disposal and reduces potential environmental contamination. The prevention goal is to reduce hazardous waste production in five years by 50 percent.

Commanders can prevent pollution by instilling the pollution prevention ethic in all mission areas throughout the Army community.

CONSERVATION PILLAR

The conservation goal is to conserve, protect, and enhance environmental and natural and cultural resources. Commanders must use all practical means consistent with Army missions so present and future generations may use and enjoy them. Conservation is the protection, improvement, and use of natural and cultural resources. This is done according to principles consistent with good stewardship and the maintenance of training lands.

The Army has a major role in managing the nation's natural resource base. In its national defense and civil works missions, the Army is entrusted with the stewardship of more than 20 million acres of land, including America's unique natural and cultural resources. Sixty-three Army installations are home to at least one federally listed threatened or endangered species. Army installations have more than 10,000 historic buildings assembled in over 80 separate historic districts. The National Register of Historic Places lists these and more than 100,000 archaeological sites.

The protection, care, and wise management of natural and cultural resources are critical to ensuring the Army can perform its national defense mission. The Army must continue to move toward integrating our training and industrial missions with the conservation of these limited, precious resources. The Army must institutionalize a strong stewardship ethic and bond it firmly with our goal to maintain a trained and ready force.

CRITICAL ELEMENTS FOR SUCCESS

The Army environmental strategy provides the critical elements to hold the structure together. The six policy elements listed below are critical to the strategy's fulfillment and must have the full commitment of the Army's top leadership:

- Commit the chain of command — Leadership direction and support are needed to implement improvements in all facets of Army activities and operations. Environmental directives are communicated through the chain of command and Army leaders must ensure their implementation.
- Organize for success — To meet future environmental challenges, the Army must continue to build high quality, multidisciplined organizations. They must have access to top management on environmental issues.
- Spread the environmental ethic — Ethical stewardship is a natural outgrowth of the Army's role as a protector of US national and economic security. In everything the Army community does, it must show concern for the environment.
- Train and educate the force – As good training is instrumental in winning wars, proper education and awareness play a crucial role in implementing changes within the Army to promote environmental stewardship.
- Prioritize Army resources – The cost of environmental protection is part of the costs of maintaining a ready, well-equipped, and well-trained Army. Emphasis must be on innovative and cost-effective approaches to environmental concerns.
- Harness market forces – Considering environmental costs in Army acquisition decisions can spur suppliers to develop more environmentally benign products. Working with the private sector to share innovations, technologies, and ideas will help preserve and enhance the environment. It will increase the Army's influence through its purchasing power. It is Army policy to minimize the purchase of hazardous material (HAZMAT). Through the logistics community the Army can bring its considerable purchasing power to bear causing environmentally benign materials to be bought whenever possible.

ENVIRONMENTAL PROGRAMS

The following environmental programs provide the basic structure to support the Army's environmental objectives. Successful program implementation requires proactive senior leadership involvement, adequate resources, communication, and organization. Program policies are stated in AR 200-1. Each program has an associated strategy action plan designed with specific actions needed to achieve stated program objectives. The goals and related Army policies for environmental programs are outlined below.

NOTICE OF VIOLATION (NOV) CONTROL AND MANAGEMENT PROGRAM

The goals are to demonstrate leadership in environmental protection and improvement and to comply with all applicable federal, state, regional, and local environmental quality goals.

Installation managers should monitor compliance with applicable federal, state, regional, and local environmental quality requirements. Unit, activity, or installation commanders who receive any notices of noncompliance should immediately coordinate the NOV with their legal office and must report the event to

their MACOM. MACOMs must, within 48 hours, report receipt of NOVs, consent orders, or compliance orders to the Army Environmental Center.

All personnel will ensure that all instances of non-compliance with environmental laws and permits are identified and corrected immediately. This begins with written requests and reports through the chain of command. Installation managers will identify funding requirements and deadlines for implementation. They also identify areas where correction is dependent on major construction, budget submission, or other long-range programming and execution requirement.

ENVIRONMENTAL COMPLIANCE ASSESSMENT SYSTEM (ECAS)

The goals are to assist commanders in attaining and sustaining compliance with environmental laws and regulations. Policies state that each installation will authorize an external assessment at least once every four years. Installations will develop corrective actions to address the deficiencies identified in the external assessment. Each installation will conduct an internal self-assessment at the midpoint of the assessment cycle.

Assessments are conducted using the standard Army ECAS protocol. Assessments in OCONUS commands are implemented to ensure compliance with the substantive standards of applicable host-nation environmental laws, regulations, international agreements, and final governing standards. This is all according to DOD Directive 6050.16.

Installations or facility managers prepare the previsit ECAS questionnaire during the ECAS scoping phase. They take an active role during the on-site assessment to include in-briefs and exit briefs. They also help in the development of corrective actions, choose the final corrective actions, and implement corrective actions. Active involvement of the installation environmental quality control committee is strongly encouraged throughout the ECAS process.

OVERSEAS ENVIRONMENTAL COMPLIANCE PROGRAM

The goals are to develop, implement, and comply with standards and regulations which adequately protect human health and the environment at overseas Army installations. DOD Directive 6050.16 and the Overseas Environmental Baseline Guidance Document (OEBGD) lay out procedures and criteria for environmental compliance at DOD installations OCONUS. DOD executive agents are appointed to identify host nation and SOFA environmental standards. They also evaluate whether these or the baseline guidance is the governing standard for particular programs in specific countries. The agents also issue final governing standards (FGS) and periodically revalidate standards.

Unless inconsistent with applicable host-nation law, base rights, status of forces (SOFA) agreements, or other international agreements, the baseline guidance applies when host-nation environmental standards do not exist, are not applicable, or provide less protection to human health and the natural environment than the baseline guidance.

NATIONAL ENVIRONMENTAL POLICY ACT

The goals of the National Environmental Policy Act of 1969 are to provide efforts to eliminate damage to the environment and to achieve a better understanding of ecological systems and natural resources. An additional goal is to integrate public involvement in federal decision making. Following NEPA will fulfill the social, economic, and other requirements of present and future generations of Americans.

NEPA requires commanders at all levels to evaluate environmental impacts of activities before making decisions. The Army must institutionalize NEPA within our decision-making process with particular emphasis in the operational area. In making decisions, Army leaders weigh such factors as mission requirements, technical issues, schedules, and costs. NEPA adds one more factor to the decision-making matrix—environmental impact.

Installation managers need to ensure the wise use of natural resources on Army lands. This is done by matching military mission activities with the ecological compatibility of the land and natural resources. Commanders must-

- Integrate environmental considerations into the decision process in accordance with AR 200-2.
- Avoid mission delays by identifying and planning for environmental requirements that will apply to mission activities.
- Comply with all laws requiring approval of regulatory agencies before taking actions that may have environmental consequences.
- Monitor proposed actions and ensure that appropriate environmental documentation is prepared. Once a decision is made, monitor to ensure compliance with mitigation and monitoring commitments made in NEPA documentation.
- Coordinate environmental documents and public affairs initiatives with MACOMs. Help in the review of environmental documents prepared by DOD and other Army or federal agencies.
- Ensure the public is involved in and informed about the environmental analysis during the decision-making process.

AIR QUALITY MANAGEMENT PROGRAM

The goals are to control the emissions to the atmosphere to protect human health, protect the environment, and comply with all applicable federal, state, and local air quality control regulations. Installation managers need to-

- Identify sources of air emissions; determine the type and amount of pollutants being emitted.
- Ensure that all activities conform with applicable state and federal implementation plans and conduct conformity determinations as required.
- Monitor sources of regulated pollutants to ensure compliance with applicable standards.

- Obtain required permits for the construction and operation of regulated sources.
- Procure commercial equipment that meets applicable standards.
- Cooperate with federal, state, and local authorities in achieving the goals of implementation plans.
- Obtain training or certification for operators of air pollution sources in order to meet regulatory requirements and minimize emissions from these sources. Specific guidance to meet these objectives is in DA Pamphlet 200-1, Chapter 4, and page 4-1 of Draft AR 200-1, Chapter 4, paragraph 4-1b(1) to (6).

RADON REDUCTION PROGRAM

The RADON goal is to reduce the risk of lung cancer to soldiers, their families, and civilian personnel by minimizing exposures to radon. The policy requires identification of structures owned and leased by the Army that have indoor radon levels greater than four picocuries per liter (Pci/L) of air. Commanders must modify all Army-owned structures having radon levels greater than four Pci/L and reduce levels to four Pci/L or less. Commanders must report all instances of noncompliance; notify occupants of the result of random monitoring and what actions are necessary and maintain an archival database compatible with the Army system for storing all measurement data.

ASBESTOS MANAGEMENT PROGRAM

The goals are to manage asbestos (including all asbestos-containing materials, friable and nonfriable), and to minimize environmental release and subsequent occupational and incidental exposure. The policy is to-

- Exclude asbestos from all DA procurement where an asbestos-free substitute exist.
- Handle, store, transport, and dispose of asbestos in accordance with federal, state, local, and applicable overseas requirements.
- Establish multidisciplinary installation asbestos management teams.
- Develop and execute installation wide asbestos operation and management programs designed to minimize exposure of individuals to asbestos, until abatement is accomplished for areas known to have asbestos.
- Perform installation wide surveys to establish and maintain an inventory of all DA controlled structures containing asbestos.
- Assess all areas known or suspected to have asbestos.

- Meet the notice requirements in demolishing any building, with or without asbestos-containing materials, and in conducting renovation work that involves the stripping and removal of asbestos containing material.
- Evaluate the potential exposure sources.
- Promptly take remedial action on identified health hazards.
- Prevent the occupational exposure to asbestos in accordance with applicable legal and medical standards.
- Report all instances of noncompliance.

DRINKING WATER MANAGEMENT PROGRAM

The goals are to conserve water resources, protect them from contamination and ensure their availability for legitimate use. It also ensures compliance with all applicable regulation. The policies are to-

- Preserve rights to and conserve all water resources.
- Provide drinking water that satisfies the most stringent regulations and standards set by Environmental Protection Agency (EPA) and applicable state and local agencies.
- Provide drinking water that satisfies Army standards developed for field environments and other military-unique situations.
- Report all instances of noncompliance.

Relationships and responsibilities are described in the water supply regulation AR 420-46.

WASTE WATER MANAGEMENT PROGRAM

The goals are to protect our water resources from contamination and to ensure that all installations comply with their permits. The policies are to-

- Control or eliminate all sources of pollutants to surface or ground waters by conventional treatment systems or by employing alternative or innovative processes.
- Demonstrate leadership to attain the national goals of zero discharge of water pollutants.
- Cooperate with federal state, regional and local authorities in forming and carrying out water pollution control plans.
- Report all instances of noncompliance.

ENVIRONMENTAL NOISE ABATEMENT PROGRAM

The noise goal is to protect present and future installation missions and protect the health and welfare of military personnel, family members, and civilian

employees. The goal also includes protecting the public, and reducing community annoyance from environmental noise where feasible. The policy is to-

- Reduce harmful or objectionable noise impacts to the greatest practical extent.
- Comply with applicable laws respecting the control and abatement of environmental noise.
- Maintain an active program to protect the present and future operational capabilities of installations and facilities.

HAZARDOUS WASTE MANAGEMENT PROGRAM

The hazardous waste management goal is to manage hazardous waste to promote the protection of public health and the environment. The policy is to-

- Substitute nontoxic, nonhazardous materials for toxic/hazardous ones.
- Ensure compliance with local, state, and federal hazardous waste requirements.
- Ensure waste management practices that include generation, treatment, storage, disposal, and transportation are managed to protect public health and the environment.
- Reduce the need for corrective action through controlled management of solid and hazardous waste.
- Report all instances of noncompliance.
- Track hazardous material and waste from initial detection to final resolution.
- Minimize purchase of hazardous material.

SOLID WASTE MANAGEMENT PROGRAM

The goal is to manage the generation, collection, storage, processing treatment, and disposal of solid wastes in compliance with federal, state, and local environmental laws and regulations, by using an integrated management approach to arrive at the most cost-effective and environmentally safe procedures. Army installations will minimize the generation and disposal of solid wastes by actively encouraging and participating in source reduction, reuse, recycling and composting programs. Installations will develop and maintain Affirmative Procurement Programs for acquiring recyclable and recycled content products.

UNDERGROUND STORAGE TANK PROGRAM

The goal is to ensure compliance with federal, state, and local environmental laws and regulations. The policy is that underground storage tanks will not be

used to store hazardous waste. All new and replacement underground storage tanks will use double wall construction with an interstitial space. The exclusion given to heating oil tanks under Resource, Conservation and Recovery Act (RCRA) Subtitle I is not recognized by Army policy. In all cases abandoned underground storage tanks are to be removed from the ground.

INSTALLATION RESTORATION PROGRAM

The goal is to clean up previously contaminated lands on active Army installations as quickly as funds permit to protect human health and the environment. The policy states that the Army will-

- Protect the health and safety of installation personnel and the public.
- Protect the quality of the environment by identifying and addressing the threats posed by uncontrolled hazardous materials.
- Comply with state, regional, and local requirements applicable to the cleanup of hazardous materials contamination to include site safety.
- Promote establishing a comprehensive public affairs program.
- Solicit public comments on proposed actions and consider public comment in decision making.
- Keep the EPA and state regulators informed of IRP activities and request their comments on Army plans and reports.

INSTALLATION POLLUTION PREVENTION PROGRAM

The goals are to adopt and implement integrated management approaches, procedures, and operations in all Army mission areas. This is to conserve and reduce the consumption of resources. The goals also minimize the environmental contamination and pollution resulting from water usage and solid waste generation. The policy is to-

- Conserve water and other natural resources.
- Minimize or eliminate sources of pollutants to the air, land, and surface or ground water due to water usage and solid waste generation.
- Demonstrate leadership to attain national goals set for controlling water pollutants.
- Conserve and recover resources.
- Reuse or recycle materials that normally enter the solid or liquid waste stream.

- Cooperate with federal, state, regional, and local authorities in the formation of water resources, solid waste, and waste water management plans.
- Report all instances of noncompliance and implement actions to achieve compliance.

CULTURAL RESOURCE MANAGEMENT PROGRAM

The goal is to ensure that the Army manages the cultural resources under its control in compliance with the public laws. It also must support a spirit of stewardship of America's historic and cultural heritage. The policy is to-

- Establish policies and processes for timely and efficient compliance with all public laws and regulations.
- Identify properties that meet eligibility criteria for inclusion on the National Register of Historic Places and other cultural resources requiring consideration under the law.
- Develop installation cultural resources management plans as part of the installation master plan.
- Use historic buildings, structures, and places in a manner consistent with the mission. Ensure that the historic integrity of the property is not damaged.
- Protect the research integrity of archaeological sites and honor places and traditions of value to the military personnel and others.
- Consult with groups and individuals associated with cultural resources on installations about their protection, access, and use.
- Provide the necessary natural and cultural resources training to all Army personnel.

NATURAL RESOURCES MANAGEMENT PROGRAM

The goal is to integrate wise use of natural resources existing on Army lands with installation training and/or testing mission operations while adhering to applicable legal requirements. Commanders should-

- Develop and implement training and/or testing mission compatible, progressive programs for land management and use while maintaining a healthy ecology and the long-term capability of the land to sustain the installation training and/or testing mission.
- Plan land use to avoid or reduce adverse effects on the environmental quality and the installation training and/or testing mission..

- Prepare and implement an Integrated Natural Resources Management Plan (INRMP) for the installation in coordination with all installation mission functional elements and appropriate federal and state agencies.
- Ensure that natural resources issues receive the attention of and are considered by the installation's Environmental Quality Control Committee.

FISH AND WILDLIFE AND ENDANGERED SPECIES MANAGEMENT PROGRAM

The goal is to maintain a trained and ready Army while meeting its environmental compliance and stewardship responsibilities. These policies are listed in the Endangered Species Act and related environmental statutes. The policies designed to accomplish the program goals are for DA personnel at all levels to-

- Ensure they carry out mission requirements in harmony with the requirements of the Endangered Species Act (ESA).
- Work in harmony with trainers or land users and with the federal agencies charged with enforcement of the ESA.
- Engender proactive attitudes within the installation in managing the conservation of endangered species while meeting the imperative of maintaining a trained and ready Army.
- Establish cooperative and mutually beneficial working relationships with all installation elements, other DOD and federal agencies, state, and public interest organizations on endangered species matters.
- Identify and locate endangered, threatened, and candidate species on installations.
- Prepare installation Endangered Species Management Plans (ESMPs) for all endangered and threatened species.
- Annually monitor compliance with and the effectiveness of ESMPs.
- Consult with the US Fish and Wildlife Service or National Marine Fisheries Service on any activity that may affect an endangered or threatened species.

TRAINING LAND MANAGEMENT PROGRAM

The goals are to preserve and protect natural and cultural resources and implement land management programs that determine and monitor land use carrying capacities. It also must balance uses with Capabilities, protect sensitive biological and cultural resources, and repair and restore damaged land.

Installation managers should-

- Monitor the condition and trends of training lands using the Integrated Training Area Management (ITAM) methods.
- Use ITAM data for land use planning, documenting long-term cumulative damage, and maintenance programming.
- Site military missions according to the capabilities of lands to sustain such uses.
- Implement training procedures to reduce long-term cumulative damage to training lands and improve environmental quality.
- Enforce training restrictions that protect training lands and environmental quality.
- Renovate damaged training lands to the point where they maintain environmental quality and provide realistic training opportunities.
- Minimize long-term cumulative damage to training lands using such techniques as training area rotation and scheduling to avoid critical areas or critical times of the year.
- Educate military personnel in the philosophies and regulations about management of training lands and environmental protection.
- Ensure that water supplies and water rights are available to support fish and wildlife programs.

ENVIRONMENTAL TRAINING PROGRAM

The goals are to develop highly competent environmental staff at all levels and develop an environmentally aware and knowledgeable Army community and work force. The goal also includes developing quality environmental training and awareness products that support the overall environmental program.

The policy is to institutionalize the ethic of environmental stewardship on the installations by providing environmental awareness training to units and the community and developing a high quality environmental staff at the installation level.

INSTALLATION TEAM FOR ENVIRONMENTAL MANAGEMENT

The commander is responsible for the installation environmental program and can best achieve success through strong command involvement and the efficient use of the installation staff. This is primarily

PUBLIC AFFAIRS PROGRAM

The importance of public involvement as an integral part of the installation environment program requires constant emphasis. The goal of the public affairs program is to promote the ethic of environmental stewardship.

Policies are to promote active public affairs involvement in every aspect of environmental programs implementation and disseminate policy on all activities affecting the environment throughout the installation and community. Public involvement is a planned effort to reduce citizen conflict through mutual two-way communication. The public affairs officer must have a detailed plan to keep the public and the work force environmentally aware of issues and programs. It is also important to build a cooperative and trusting relationship with the environmental regulatory community.

1383 REPORTING SYSTEM

The primary purpose of the RCS 1383 Report and supporting 1383 data base is to identify all Army environmental program requirements. These requirements are tracked from the time they are first identified until they are executed. The data reported in the 1383 Report is used to forecast costs of new program requirements. The data is also used in policies under development or proposed for promulgation by the Congress and EPA. It is used to prepare budget guidance, build the POM, develop budget estimates, and validate budget requests. It helps in assessing the execution of the Army environmental program. This includes the objectives of the eight-year Army strategic action plan at all levels. It is also used to prioritize and distribute funds in times of shortfall. The 1383 Report, produced from the 1383 database, is required by executive order. The report is submitted semiannually through the MACOM and the Army Environmental Center to DA for final review and approval. The report is then sent to EPA and to OMB, who use the information in preparing the President's budget for submission to Congress. The 1383 system has become the centerpiece for programming and planning resources needed to execute the Army's environmental program.

done by using the Environmental Coordinator and Environmental Quality Control Committee (EQCC).

Each installation must have an EQCC. The EQCC acts on the broad range of environmental programs

outlined in this chapter. The EQCC advises the installation commander on environmental priorities, policies, strategies, and programs. The EQCC will normally meet monthly and include as a minimum, the following members:

- The environmental coordinator, who is key in developing the action plans and monitoring compliance of all programs.
- The DPW, who may have the responsibility for the overall direction of the environmental protection program.
- The safety officer, who manages and monitors compliance with Occupational Safety and Health Administration (OSHA) requirements in environmental management. Statutory and regulatory safety requirements are included in compliance and restoration issues. Safety is also involved in training, inspections, reviews of SOPS and site plans, and serves as advisor to the commander and environmental personnel on OSHA and safe management of hazardous materials.

- The environmental law specialist, who should be involved in planning, executing, and monitoring the environmental programs. Environmental permits and negotiation of compliance agreements are areas of special concern.

Army Medical Department Preventive Medicine personnel, through training, oversight and direct support, who assist the installation environmental staff and operational units meet their responsibilities related to compliance, restoration, prevention, and conservation. They are involved with interpretation and implementation of health-based environmental standards. They should be involved with the health aspects of pollution prevention and conservation efforts. They can provide occupational healthcare and industrial hygiene services necessary to maintain compliance during restoration work. Examples of typical restoration support includes: reviewing health and safety plans prior to work; identifying and evaluating work related health problems; and providing recommendations to control or eliminate any health hazards identified.