DEPARTMENT OF THE ARMY
ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

REPLY TO
ATTENTION OF

DAIM-ZA

OCT 12 2010

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Environmental Management and Assessment Requirements

1. References.

a. Army Regulation 200-1, Environmental Protection and Enhancement, 13 Dec 07.

b. Department of Defense Instruction (DoDI) 4715.6, Environmental Compliance, 24 Apr 96.

c. DoDI 4715.17, Environmental Management Systems (EMS), 15 Apr 09.

d. Memorandum, DAIM-ZA, 10 Jul 09, Subject: Implementation & Maintenance of Environmental Management Systems

e. ISO 14001:2004(E), Environmental Management Systems.

2. In today's climate of increasing regulation and decreasing budgets, it is critical to actively manage and monitor environmental performance, and to identify and correct potential problems before they adversely affect the Army mission. Army installations designated as 'Appropriate Facilities' (Enclosure 1) will maintain a fully-implemented Environmental Management System (EMS) as the framework to manage all environmental programs, as well as the environmental aspects associated with all other installation operations. We will continue to audit installation-level environmental performance, including the overall management system, via the Environmental Performance Assessment System (EPAS) program. This policy guidance updates the EMS and EPAS requirements set forth in Army Regulation (AR) 200-1 and reference d.

3. EPAS Scope. EPAS is the Army's program for auditing installation-level environmental performance, and is a key element in the plan-do-check-act framework of our EMSs. Periodic External EPASs, together with annual Internal EPASs, provide the Installation Commander with an overview of the installation's overall environmental posture. An EPAS assessment includes: (a) an assessment of the EMS's conformance to ISO 14001, Army EMS policy, and the installation's own EMS procedures (for installations listed in Enclosure 1), (b) an assessment of the installation's compliance with legal and other requirements, and (c) an outline of corrective actions required to address deficiencies identified during the assessment. The compliance portion of the EPAS will assess all applicable environmental media at

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an installation, with emphasis on U.S. Environmental Protection Agency (EPA) "Federal Facilities Compliance and Enforcement Focus Areas" (for US installations) to identify and correct potential issues before they become enforcement actions (ENFs).

4. External EPAS Cycle and Execution. Army Environmental Command (AEC) will continue to execute the External EPASs for the Active Army on a 3-year cycle (Enclosure 2). National Guard Bureau (NGB) and Army Reserve Division (DAIM-ODR) will continue to execute the External EPASs for their respective installations (as defined by AR 200-1), and will be resourced to implement a 3-year cycle beginning in FY12 for consistency with references b-d. Execution of External EPASs will be given priority for funding within their respective environmental budgets.

5. Internal EPASs. Installations will maintain an internal assessment procedure and will conduct annual Internal EPASs that evaluate all applicable compliance media and conformance to ISO 14001. Internal audits will be conducted by installation personnel where feasible. Installations that received an External EPAS during the fiscal year need not conduct a full Internal EPAS; however, at a minimum, their Internal EPAS will assess areas or facilities that were not assessed during the External EPAS. Army Commands may issue additional guidance on conducting effective Internal EPASs at their installations (including desk-top records reviews and use of facility-level personnel) to minimize the resource requirements of evaluating dispersed/ remote facilities.

6. Assessment Criteria. Internal and External EPASs will be conducted using *The Environmental Assessment and Management [TEAM] Guide* and associated Army supplements (which identify Federal and State regulatory requirements, or country-specific Final Governing Standards requirements, and AR 200-1 requirements), ISO 14001, and any Command-specific assessment guidance.

7. Corrective Action. In accordance with ISO 14001 section 4.5.3, installations will implement and maintain a procedure for addressing non-conformances, preventive actions, and corrective actions. Installations will also develop Corrective Action Plans to address any non-conformances (i.e., compliance findings or EMS/ISO 14001 non-conformances) identified during External or Internal EPASs. The Corrective Action Plan will identify the root cause of each non-conformance (using the root cause codes in Enclosure 3), the corrective action to be taken, and the responsible party for correcting the non-conformance. The corrective action must address both the non-conformance and its root cause. Installations will record the results of the corrective actions and review their effectiveness. Commands will monitor the status of their installations' corrective actions to ensure that identified program deficiencies are indeed being corrected. Timeframes for completing the corrective actions are provided in Enclosure 4. Commands may issue Command-specific procedures for tracking and close-out of corrective actions.

8. Re-Declaration of Conformance. The Army remains committed to maintaining effective EMSs at all installations designated as 'Appropriate Facilities' (Enclosure 1). In accordance with DoDI 4715.17, after each External EPAS, Installation Commanders will re-declare they have a conformant EMS. The process and timelines for re-declaration are established in the Army's *Protocol for Declaration of Conformance* (Enclosure 5).

9. Management Review. Management involvement is a key component of any management system. Installation Commanders will attend, and will encourage Senior Commanders or their designated representatives to attend, quarterly Environmental Quality Control Committee (EQCC) meetings to ensure Leadership is engaged on environmental issues that may impact mission. In conjunction with the EQCC, Installation Commanders will conduct a formal Management Review at least annually to address the requirements in ISO 14001 section 4.6. The review will discuss the non-conformances identified in the Internal and External EPASs to ensure resources for the corrective actions are allocated as appropriate.

10. Trends and Reporting. EPAS also provides Army Commands, Army Service Component Commands, Direct Reporting Units, and HQDA with the ability to collect the compliance data necessary to evaluate Command- or Army-wide environmental trends, and to shape or reset our environmental programs where necessary. Commands will evaluate their External EPAS trends and will report their trends to ACSIM during the annual Army Environmental Program Reviews.

11. Removal from or Additions to the Appropriate Facilities List. ACSIM's Environmental Division maintains the Army Appropriate Facilities List for EMS implementation (Enclosure 1). Enclosure 6 provides guidance on removing additional installations from the Appropriate Facilities List, as well as adding new organizational-level EMSs to the list.

12. Your implementation of these requirements will build a stronger environmental management program that effectively identifies and resolves potential issues before they become an operational hurdle. My point of contact for this action is COL Michael Ahn, DAIM-ISE, (703) 601-1933 (DSN 329), email: michael.c.ahn@us.army.mil.

RICK LYNCH
Lieutenant General, GS
Assistant Chief of Staff
for Installation Management

6 Encls
1. Army Appropriate Facilities List
2. Active Army External EPAS Cycle
3. EPAS Root Cause Codes
4. Timelines for Corrective Actions
5. Declaration of Conformance Protocol
6. EMS Guidance for Closing Installations

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Enclosure 1 – Army Appropriate Facilities List

Army installations listed below have been designated as Appropriate Facilities for implementation and maintenance of Environmental Management Systems (EMSs) per DoDI 4715.17. This listing is current as of 1 August 2010. Enclosure 6 lays out the process for revisions to the Army Appropriate Facilities List.

US Appropriate Facilities		
AMC	**ARNG (cont.)**	**IMCOM (cont.)**
Anniston AD	Michigan	Fort A P Hill
Blue Grass AD	Minnesota	Fort Belvoir
Hawthorne AD	Mississippi	Fort Benning
Holston AAP	Missouri	Fort Bliss
Iowa AAP	Montana	Fort Bragg
Lake City AAP	Nebraska	Fort Buchanan
Letterkenny AD	Nevada	Fort Campbell
McAlester AAP	New Hampshire	Fort Carson
Milan AAP	New Jersey	Fort Drum
Military Ocean Tml Sunny Point	New Mexico	Fort George G Meade
Pine Bluff Arsenal	New York	Fort Gordon
Radford AAP	North Carolina	Fort Greely
Red River AD	North Dakota	Fort Hamilton
Scranton AAP	Ohio	Fort Hood
Sierra AD	Oklahoma	Fort Huachuca
Tobyhanna AD	Oregon	Fort Jackson
Tooele AD	Pennsylvania	Fort Knox
Joint System Mfg Center, Lima	Puerto Rico	Fort Leavenworth
Watervliet Arsenal	Rhode Island	Fort Lee
ARNG	South Carolina	Fort Leonard Wood
Alabama	South Dakota	JB Lewis-McCord
Alaska	Tennessee	Fort McCoy
Arizona	Texas	JB Myer-Henderson Hall
Arkansas	US Virgin Islands	Picatinny Arsenal
California	Utah	Fort Polk
Colorado	Vermont	Fort Riley
Connecticut	Virginia	Fort Rucker
Delaware	Washington	Fort Sill
Florida	Washington DC	Fort Stewart
Georgia	West Virginia	Fort Wainwright
Guam	Wisconson	NTC & Fort Irwin
Hawaii	Wyoming	Presidio of Monterey
Idaho	**MEDCOM**	Redstone Arsenal
Illinois	Fort Detrick	Rock Island Arsenal
Indiana	**Army Reserve**	Soldier Systems Center
Iowa	9th MSC - Hawaii	US Army CSTC & Camp Parks
Kansas	**IMCOM**	US Army Research Lab Adelphi
Kentucky	Aberdeen PG	USAG Hawaii
Louisianna	Carlisle Barracks	West Point Military Reservation
Maine	Detroit Arsenal	White Sands Missile Range
Maryland	Devens Reserve Force Training Area	Yuma Proving Ground
Massachusetts	Dugway Proving Ground	
		Total US Appropriate Facilities: 121

Overseas Appropriate Facilities		
IMCOM	USAG Hohenfels	USAG Schweinfurt
USAG Ansbach	USAG Humphreys	USAG Stuttgart
USAG Baden-Wuerttemberg	USAG Japan (Camp Zama)	USAG Vicenza
USAG Bamberg	USAG Kaiserslautern	USAG Wiesbaden
USAG Baumholder	USAG Livorno	USAG Yongsan
USAG Benelux	USAG Mannheim	**SMDC**
USAG Daegu	USAG Red Cloud	US Army Kwajalein Atoll
USAG Grafenwoehr	USAG Schinnen	
Total Overseas Appropriate Facilities: 21		
Total Army Appropriate Facilities: 142		

Removed from the Army Appropriate Facilities List:

Date	Installation	Command
May 06	CE Kelly	IMCOM
Jul 07	USAG Darmstadt	IMCOM
Aug 07	Kansas AAP	AMC
Aug 07	Lone Star AAP	AMC
Aug 07	Riverbank AAP	AMC
Aug 07	Walter Reed Army Medical Center	MEDCOM
Jun 08	65th RRC	Army Reserve
Jul 08	9th RRC	Army Reserve
Jul 08	63rd RRC	Army Reserve
Jul 08	70th RRC	Army Reserve
Jul 08	77th RR	Army Reserve
Jul 08	81st RRC	Army Reserve
Jul 08	88th RRC	Army Reserve
Jul 08	89th RRC	Army Reserve
Jul 08	90th RRC	Army Reserve
Jul 08	94th RRC	Army Reserve
Jul 08	96th RRC	Army Reserve
Jul 08	99th RRC	Army Reserve
Aug 08	USAG Hessen	IMCOM
Apr 09	MTA Camp Edwards	ARNG
Jun 09	Fort Dix	IMCOM
Jun 09	Fort Monmouth	IMCOM
Jun 09	Fort Monroe	IMCOM
Jun 09	Fort Richardson	IMCOM
Jun 10	Fort Eustis	IMCOM
Jun 10	Fort Sam Houston	IMCOM

Enclosure 2 – External EPAS Cycle for Active Army Installations

The current 3-year External EPAS assessment cycle for Active Army installations is provided below. This cycle will be adjusted as Active Army installations close or become hosted entities at Joint Bases.

AMC	**AMC**	**AMC**
Corpus Christi AD	Crane AAP	Anniston AD
Holston AAP	Iowa AAP	Blue Grass AD
Lake City AAP	Military Ocean Tml Concord	Deseret Chemical Depot
Letterkenny AD	Radford AAP	Hawthorne AD
Milan AAP	Red River AD	McAlester AAP
Military Ocean Tml Sunny Point	Sierra AD	Pine Bluff Arsenal
Pueblo Chemical Depot	Tooele Army Depot	Umatilla AD
Scranton AAP		Watervliet Arsenal
Tobyhanna AD	**IMCOM**	**IMCOM**
Joint System Mfg Center Lima	Aberdeen PG	Adelphi Laboratory Center
IMCOM	Carlisle Barracks	Devens Reserve Force Training Area
CTSC & Camp Parks	Fort AP Hill	Dugway Proving Ground
Detroit Arsenal	Fort Bragg	Fort Belvoir
Fort Benning	Fort Campbell	Fort Buchanan
Fort Bliss	Fort Hamilton	Fort Gordon
Fort Carson	Fort Knox	Fort Hood
Fort Drum	Fort Leonard Wood	Fort Huachuca
Fort Jackson	Fort McCoy	Fort Leavenworth
Fort George G Meade	Fort Riley	Fort Lee
Joint Base Myer-Henderson Hall	Fort Sill	Joint Base Lewis-McCord
Fort Polk	Redstone Arsenal	Fort Stewart
Fort Rucker	Rock Island Arsenal	Presidio of Monterey
NTC & Fort Irwin	USAG Bamberg	USAG Natick / Soldier Systems Ctr
Picatinny Arsenal	USAG Baumholder	USAG Ansbach
USAG Alaska	USAG Heidelberg	USAG Hawaii
USAG Benelux	USAG Humphreys	USAG Hohenfels
USAG Daegu	USAG Schinnen	USAG Japan
USAG Grafenwoehr	USAG Schweinfurt	USAG Kaiserslautern
USAG Fort Greeley	USAG Yongan	USAG Stuttgart
USAG Livorno	**MEDCOM**	USAG Wiesbaden
USAG Mannheim	Fort Detrick	White Sands Missile Range
USAG Red Cloud	Walter Reed Army Med Center	Yuma PG
USAG Vicenza		**SMDC**
West Point Military Reservation		Kwajalein Atoll

Enclosure 3 – EPAS Root Cause Codes

The following compliance finding root causes are based on the ISO 14001 standard and are intended to support the installation's Environmental Management System (EMS). When developing a Corrective Action Plan, installations will review the root causes for their compliance findings to ensure that the corrective actions address the finding as well as its root cause. Installations should review the compliance finding root causes during, or in preparation for, their EMS Management Review as the root causes may indicate weaknesses in the overall EMS. These root cause codes may be updated by HQDA as needed without re-issuance of this policy memorandum.

Major Heading	Sub-Heading	Code	Definition	ISO 14001 Section
Command Emphasis & Oversight	Policy (CP)	CP01	Strategic planning or formal policies of environmental protection and stewardship are not established or are deficient.	4.2
		CP02	Formal policies are not issued from an appropriate level of authority.	4.2
	Management (CM)	CM01	Management is not aware of or has misinterpreted the regulations.	4.3.2
		CM02	Management review process supporting, controlling, or improving daily/contract operations is absent or inadequate.	4.4.6 4.5.1 4.6
		CM03	Environmental responsibilities are not clearly defined in position standards or understood by personnel.	4.4.1
		CM04	Management functions within the organizational structure are not afforded appropriate priority to support the environmental mission.	4.4.1
Plans & Implementation	Plans (IP)	IP01	Environmental management plans or procedures are not in place or inadequate.	4.4.4 4.4.6
		IP02	Environmental management plans or procedures are not properly implemented.	4.4.1 4.4.6
		IP03	Review process to update existing plans, procedures, or systems is not established or is inadequate.	4.4.5 4.6
	Implementation (II)	II01	Document control or retention for reporting and tracking is absent or is inadequate.	4.4.5 4.5.4
		II02	Personnel ignore and are not held accountable for established environmental plans, policies, or procedures.	4.4.1 4.4.6
		II03	Personnel do not consistently follow established environmental plans, policies, or procedures.	4.4.1 4.4.6
		II04	Review and follow-up of assessments, inspection programs, and/or identified environmental problems are not conducted or are inadequate.	4.5.3
	Communication (IC)	IC01	Communication with external agencies is ineffective.	4.4.3
		IC02	Communication channels within the organization are ineffective.	4.4.3

Major Heading	Sub-Heading	Code	Definition	ISO 14001 Section
Training & General Awareness	Training (TT)	TT01	General environmental awareness training is not conducted or is inadequate.	4.4.2
		TT02	Environmental media specific management training is not conducted or is inadequate.	4.4.2
Resources	Resources (RR)	RR01	Funds for environmental-related activities are not sufficient.	4.4.1
		RR02	Staffing levels for environmental-related activities are not sufficient.	4.4.1
		RR03	Inadequate design or failure in equipment or material selection.	4.4.6
		RR04	Supplies/contracted deliverables were not properly identified or have not been received.	4.4.6
Other (External Phenomena)	Other (OO)	OO01	Noncompliance is resulted from theft, tampering, sabotage, criminal trespass, vandalism, or fire.	4.4.7
		OO02	Noncompliance is caused by weather, ambient conditions, or acts of God.	4.4.7
		OO03	Compliance is dependent upon external entity action.	---
		OO04	To be determined by Quality Assurance team.	---

Enclosure 4 – Timeframes for Completion of Corrective Actions

Corrective actions associated with External EPASs will be documented in the 'Installation Corrective Action Plan' feature of the Command-specific EPAS software pending development of an enterprise EPAS assessment tool. Installation Commanders will implement corrective actions as soon as feasible. Commands will monitor the status of their installations' corrective actions to ensure that EPAS findings are corrected within acceptable timeframes.

EMS Non-Conformances

Corrective actions for all major non-conformances must be completed within 6 months of the finding in order for the Installation to retain its conformance status. Most EMS non-conformances can be corrected with in-house resources and/or operational changes. Commands will monitor the completion of their installations' major non-conformances and will revoke an installation's conformance status if the installation does not complete the corrective actions for its major non-conformances within the 6-month timeframe. Commands will immediately notify DAIM-ISE of any such loss of conformance status.

Compliance Findings

Corrective actions for compliance findings may be accomplished: (a) by on-the-spot corrections, (b) with in-house resources and/or operational changes, or (c) via projects or other contracted actions. On-the-spot corrective actions (e.g., applying a missing label) will be implemented whenever possible. The following table provides time guidelines for correcting the other types of common EPAS findings.

Type of Compliance Corrective Action	Guideline (Time to Correct)
Records	3 months
Operational practices	4 months
Facility projects accomplished in-house	6 months
Plans accomplished in-house	6 months
Training	6 months
Testing/sampling	6 months
Program management	9 months
Permit revision	9 months
Supplies/equipment	9 months
Surveys/studies	12 months
Plans accomplished by contract	18 months
Facility projects accomplished by O&M contract or unspecified Minor Military Construction	18 – 24 months
Facility projects accomplished by MILCON contract	60 months

Major Non-Conformance – A non-conformance is classified as 'major' when objective evidence, as documented in the finding, shows one of the following:

- A numbered element of ISO 14001 has not been addressed, has not been implemented, or is ineffective.

- Multiple specific requirements within an element of ISO 14001 have not been addressed, implemented, or are ineffective.

- Minor non-conformances, against an element of the standard, are observed at multiple locations and indicate a systemic failure of the ISO 14001 element in question.

- The scope of the EMS is not installation-wide and does not include important host, tenant, or mission activities.

Enclosure 5 – U.S. Army Protocol for Declaration of Conformance for Environmental Management Systems (EMS) (updated: 1 Aug 2010)

1. Purpose

This Protocol establishes the requirements for a fully-implemented EMS and the process for the U.S. Army's designated Appropriate Facilities to declare conformance with: a) applicable Army and DoD EMS policy requirements, b) the International Organization for Standardization (ISO) 14001:2004 standard (Environmental Management Systems), and c) the Appropriate Facility's own EMS requirements. This process is consistent with the Office of the Federal Environmental Executive's (OFEE's) *Implementing Instructions for Executive Order (EO) 13423* [Strengthening Federal Environmental, Energy, and Transportation Management]. This Protocol also establishes the requirements for subsequent re-audits of the EMS and re-declarations of conformance (see Sections 3 and 6).

This document supersedes the 10 Jul 09 Protocol.

2. Applicability

This protocol applies to all Army installations on the "Appropriate Facilities List for EMS Implementation". This Protocol may also be used by Army installations or organizations that are not included on the Appropriate Facilities List but wish to voluntarily implement an ISO 14001:2004-conformant EMS.

3. Army Policy

Army EMS policy requires all designated Appropriate Facilities to implement and maintain a mission-focused, ISO 14001:2004-conformant EMS that includes the environmental aspects of all activities, products, and services of all installation missions, sub-installations, facilities (including Government Owned, Contractor Operated), tenants, and contractors.

Office of the Secretary of Defense (OSD) and Army policy limits the pursuit of 3rd-party certification of an Appropriate Facility's EMS to those instances where it provides a clear and documented benefit to the mission. Therefore, most Army Appropriate Facilities will declare conformance with EMS requirements based on a 2nd-party External EMS Audit conducted as part of the Command External EPAS program (see Section 4).

Fully-Implemented EMS & Initial Declaration of Conformance. OFEE's "*Implementing Instructions for EO 13423*" and OSD policy establish the criteria for a fully-implemented EMS. Applying these criteria to the Army, a fully-implemented EMS is one that: a) has been the subject of a formal External EMS Audit, b) all major non-conformances identified during the audit have been corrected and the Appropriate Facility's Commander (i.e., the Garrison Commander, Adjutant General, or Reserve Regional Support Command (RSC) Commanding General, as applicable, or their designated representative) has endorsed a Corrective Action Plan to address any unresolved minor non-conformances identified during the audit, and c) the Commander has formally declared conformance to Army EMS policy, ISO 14001:2004, and the installation's own EMS requirements. The process for making this initial Declaration of Conformance is set forth in the following paragraphs. The deadline for Commanders of Army Appropriate Facilities to make this initial declaration was 31 Dec 09.

Re-Declaration of Conformance. OFEE's "*Implementing Instructions for EO 13423*" and DoDI 4715.17 – *Environmental Management Systems* (15 Apr 09) establish the requirement to conduct external audits of the EMS every 3 years to support re-declaration of conformance. The process for re-declaring conformance after these External EMS Audits is laid out in the following paragraphs.

4. External EMS Audits

The first step in the Declaration of Conformance is the completion of a formal audit by a qualified party outside the control or scope of the EMS (i.e., an External EMS Audit conducted under the External EPAS program). Army Environmental Command (AEC) executes the External EPASs for the Active Army; National Guard Bureau (NGB) and Army Reserve Division (DAIM-ODR) execute the External EPASs for their respective installations. The audits will be conducted to evaluate conformance with the elements of ISO 14001:2004 and applicable ACOM/ASCC/DRU guidance (e.g., the Active Army Supplement to *The Environmental Assessment and Management [TEAM] Guide*, the ARNG Supplement). Minimum qualifications for the External EMS Audit team are set forth in the following section.

Although the Army's preference is to use Army assets to conduct 2nd-party External EMS Audits, Army Working Capital Fund installations and other installations that already have 3rd-party certification may elect to continue to use a 3rd-party registrar to conduct their external audit. In these cases, the external audit will be conducted following the registrar's audit procedures and funded through the installation's budget.

External Audit Team Qualifications

Auditors should possess personal attributes that allow them to act ethically, fairly, professionally, independently, and conduct audits that are evidenced based. External auditors should also have skills in audit principles, EMSs, organizational knowledge, environmental laws and regulations, environmental management methods and techniques, environmental science and technology, and technical and environmental aspects of Army operations. ISO 19011:2002 Section 7 provides additional guidance for competence and evaluation of auditors.

External EMS auditors will also demonstrate continuing competence and proficiency through a combination of experience (i.e., at least 20 audit days serving as an EMS auditor every 3 years) and training (e.g., completion of a 40-hour lead auditor course and an additional 24 hours of related professional development training within a 3-year period).

The External EMS Audit team will include one Lead Auditor and at least one additional auditor. The need for additional auditors will be determined taking into account the status of EMS implementation and installation size and complexity. The audit team must be from an organization outside the scope of the installation/facility being audited and must meet the minimum training and experience requirements for the Lead Auditor and supporting auditors set forth in Table 1 at the end of this Protocol.

Identification & Documentation of EMS Audit Findings. The external auditing team will identify any findings of non-conformance with Army EMS policy, the ISO 14001:2004 standard, and the Appropriate Facility's own EMS requirements. Any findings of non-conformance will be documented in a formal External EMS Audit report provided to the Appropriate Facility and communicated to the Commander and designated EMS Management Representative. ACOMs/ASCCs/DRUs will provide copies of their new final audit reports to DAIM-ISE in

conjunction with the semi-annual Army EMS data calls. DAIM-ISE is required to submit a sampling of each year's External EMS Audit reports to OSD in accordance with OSD policy.

5. Recognition of External EMS Audit Findings

After receipt of the External EMS Audit report, the Appropriate Facility will prepare a proposed Corrective Action Plan (in accordance with ISO 14001:2004 Section 4.5.3) to address any findings of non-conformance and the timeframe for completing each corrective action. A copy of the Corrective Action Plan will be provided to the Appropriate Facility's ACOM/ASCC/DRU for review in accordance with the ACOM/ASCC/DRU's guidance. In submitting the proposed Corrective Action Plan, the Appropriate Facility's Commander is affirming his/her commitment to continual improvement (per their EMS policy), including follow-through on the proposed actions in the Corrective Action Plan.

6. Formal Declaration and Re-Declaration of Conformance

Per OFEE's guidance, an EMS can be considered conformant even with unresolved minor non-conformances, as long as the corrective action is defined, planned, and endorsed by the Commander. An EMS cannot be declared conformant if there are unresolved major non-conformances (e.g., the EMS is missing an element of the ISO 14001:2004 standard).

After all major non-conformances have been corrected, validated in accordance with the Command's procedure for closing findings, and the Appropriate Facility's Commander has endorsed a Corrective Action Plan to address any unresolved minor non-conformances, the Commander shall sign a memorandum declaring: a) conformance with Army EMS policy, the ISO 14001:2004 standard, and their own EMS requirements, b) recognition of any External EMS Audit findings of non-conformance, and c) the Commander's commitment to complete any unresolved corrective actions in their corrective action plan. This memorandum will be submitted to the Appropriate Facility's ACOM/ASCC/DRU. ACOMs/ASCCs/DRUs will submit copies of any new declaration memoranda to DAIM-ISE in conjunction with the semi-annual Army EMS data calls.

Appropriate Facilities that completed a Self-Declaration under the 2005 Army Self-Declaration Protocol must re-declare conformance under this Protocol if their prior declaration does not address all three elements required by OFEE's "*Implementing Instructions for EO 13423*" for a fully-implemented EMS (i.e., an External EMS Audit, recognition of any findings of non-conformance, and a formal declaration of conformance).

Once the initial Declaration of Conformance has been made, an external audit of the EMS will be conducted at least every 3 years. After the external audit has been completed and any findings of non-conformance have been recognized (i.e., any major non-conformances have been resolved and any remaining minor non-conformances have been addressed in a Corrective Action Plan endorsed by the Commander), the Appropriate Facility's Commander will re-declare they have a conformant EMS.

7. Additional Requirements

Internal EMS Audits

Army Appropriate Facilities will conduct Internal EMS Audits at least annually in accordance with ISO 14001:2004 Section 4.5.5 and their own Internal EMS Audit procedure. The Internal EMS Audit team should be selected to facilitate objectivity and impartiality of the audit. Additional guidance on the selection of and qualifications for internal auditors can be found in ISO 19011:2002. Contracted staff may assist in limited parts of the audit, but it is HQDA's intent that the internal audit be accomplished by installation staff to the maximum extent possible.

Findings from the Internal EMS Audit will be documented and briefed to the Commander and senior leaders of the Appropriate Facility in accordance with ACOM/ASCC/DRU guidance and the Appropriate Facility's Internal EMS Audit procedure. Any findings of non-conformance identified during the audit will be addressed in accordance with ISO 14001:2004 Section 4.5.3 and the Appropriate Facility's procedure for non-conformities, corrective action, and preventive action.

Change in Conformance Status

A major non-conformance can be identified during an External or Internal EMS Audit or at any time by staff within the organization. Once a major non-conformance has been identified and confirmed, it must be corrected within a 6-month timeframe in order for the Installation to retain its conformance status. When a major non-conformance is not corrected within that timeframe or its closure is unsatisfactory, the ACOM/ASCC/DRU has the authority to determine that the Appropriate Facility has lost its conformance status. The ACOM/ASCC/DRU will immediately notify DAIM-ISE of any such loss of conformance status.

To re-establish its conformance status, the Appropriate Facility must first correct all outstanding major non-conformances and adequately address the associated root causes. Once this has been validated in accordance with the Command's procedure for closing findings (see Section 6), the Installation Commander can submit a letter to its ACOM/ASCC/DRU requesting to have its conformance status reinstated. The ACOM/ASCC/DRU will notify DAIM-ISE upon its approval."

Protocol Review & Update

This Protocol will be reviewed and updated as appropriate to incorporate changes in OSD and Army EMS policy or program at a frequency consistent with those policy/program changes and not to exceed 5 years.

Table 1 – Team Leader & Auditor Qualifications for External EMS Audits

Qualifications	Auditor in Training	Auditor [a]	Lead Auditor
Education	High School or equivalent	High School or equivalent	High School or equivalent
Work Experience	at least 1 year	at least 5 years	at least 5 years
Army or DoD Work Experience	at least 1 year supporting the Army or other DoD service	at least 2 years supporting the Army or other DoD service	at least 2 years supporting the Army or other DoD service
Environmental Work Experience	at least 1 year	at least 2 years	at least 2 years
EMS Auditor Training	successful completion of a 40-hour EMS (ISO 14001) Lead Auditor course	same as Auditor in training, plus an additional 24 hours of related professional development training within a 3-year period [b]	same as Auditor [b]
EMS Audit Experience	none [c]	at least 20 audit days (completed in the past 3 years) of documented experience as an EMS Auditor in Training (under the oversight and mentorship of an auditor competent as a Lead Auditor) [d]	The same audit experience as an auditor, plus documented experience as a Lead Auditor (under the direction of an auditor competent as a Lead Auditor) on at least two complete audits (completed in the past 2 years). [d]

a) Commands may establish their own waiver procedures to reduce these auditor requirements on a case-by-case basis, for auditors with exceptional performance.

b) Auditor training may include any training event that assists the auditor in understanding how the Army operates, environmental training or conference attendance that assists auditors maintain proficiency in their environmental discipline or audit skills.

c) Auditors in Training should, as part of their auditing training experience, be provided the opportunity to audit each element of the ISO standard.

d) Audit experience may include up to one day of off-site audit activity (such as pre-site visit preparation and/or post site visit final audit report preparation) for each audit.

References

Assistant Chief of Staff for Installation Management (ACSIM) Memorandum, Subject: Environmental Management Systems Self-Declaration, 14 Feb 05.

ACSIM Memorandum, Subject: Implementation & Maintenance of Environmental Management Systems, 10 Jul 09.

Army Regulation (AR) 200-1, Environmental Protection and Enhancement, 13 Dec 07.

Assistant Deputy Under Secretary of Defense (Environment, Safety, and Occupational Health) [DUSD(ESOH)] Memorandum, Subject: DoD EMS Self-Declaration Policy, 16 Jul 04.

Department of Defense Instruction 4715.17, Environmental Management Systems, 15 Apr 09.

Executive Order 13423 – Strengthening Federal Environmental, Energy, and Transportation Management, 24 Jan 07.

Instructions for Implementing EO 13423, Office of the Federal Environmental Executive, 29 Mar 07.

ISO 14001:2004(E), *Environmental Management Systems.*

ISO 19011:2002(E), *Guidelines for Quality and/or Environmental Management Systems Auditing.*

ISO 14004:2004, *Environmental Management Systems – General guidelines on principles, systems and support techniques*, 2nd Edition.

Office of the Federal Environmental Executive, Memorandum for Agency Environmental Executives, Subject: EMS Self-Declaration Protocol, 27 Jan 04.

Office of the Federal Environmental Executive, *Environmental Management Systems Agency Self-Declaration Protocol for Appropriate Federal Facilities*, Final Version, 10 Sep 03.

U.S. Army Environmental Center (or Command since its dated Sep 07 after the change), *Incentive Programs for Implementing Environmental Management Systems,* 28 Sep 07.

Enclosure 6 –
EMS Guidance for Installations Identified for Closure, Realignment, or Joint Basing

Numerous Army installations have been identified for realignment or closure via BRAC (for CONUS facilities) and the Army's transformation plan (for overseas facilities), or for consolidation under a Joint Base. This EMS guidance is applicable to installations currently on the Army's Appropriate Facilities List which have also been identified for realignment, closure, or Joint Basing.

Activities and services will eventually cease at Army installations designated for closure. At Joint Base installations, responsibility for managing Army activities and services may transfer to a new host organization (e.g., Army installations designated to become part of joint basing operations managed by the Air Force). . Close coordination will facilitate the transition of EMS functions and responsibilities at these installations. Joint Basing memorandums of agreement (MOAs) may provide additional guidance for transfer of EMS functions.

Removal from Appropriate Facilities List

Army installations or organizations requesting to be removed from the Appropriate Facilities List will do so in writing providing justification. The request memo will be signed by the Installation Commander and submitted through the ACOM/ASCC/DRU. Removal requests supported at the ACOM/ASCC/DRU-level will be submitted to DAIM-ISE via a concurrence memo.

Additions to the Appropriate Facilities List

Army installations or organizations created under the Army's transformation plan that meet the criteria for an Appropriate Facility, or existing installations/facilities not previously evaluated for inclusion on the Army's Appropriate Facilities List, will notify DAIM-ISE in writing of their status. Army criteria for the Appropriate Facilities List include facility size, complexity, staffing levels, command structure, and the environmental aspects of the facility's operations (reference ACSIM memorandum, DAIM-ZA, 10 Jul 03, Subject: Army Environmental Management System Policy).

OFEE's "Instructions for Implementing EO 13423" allow new Appropriate Facilities to submit a proposed schedule for EMS implementation. For the Army, the request to add these new Appropriate Facilities to the Army list must include a brief EMS implementation plan with specified timeframes for conforming with Army EMS policy and ISO 14001, and having a fully-implemented EMS. The request and implementation plan/detailed schedule must be submitted through the ACOM/ASCC/DRU to DAIM-ISE.

EMS Considerations for Closing or Realigning Installations

a. Significant Aspects & Objectives, Targets, & Programs

For Appropriate Facilities where activities and services (and, therefore, significant aspects) will cease: EMS objectives, targets, and programs generally address 'significant aspects'. Installations announced for closure should review their significant aspects and modify them as appropriate in light of closure-related activities. Installations should then consider focusing their objectives, targets, and programs on significant aspects at facilities 'key to closure' or actions that will support closure activities.

For Appropriate Facilities where activities and services (and, therefore, significant aspects) will transfer to a new host organization: The closing installation should re-assess its targets and programs in light of the transfer timetable. The new host organization should conduct an aspects/impacts analysis of the transferred functions and update its collective aspects register, significant aspects, targets, objectives, and programs accordingly.

b. Document & Record Control / Retention

ISO 14001:2004 has narrow definitions for documents and records. Installations announced for closure should consider expanding their activities related to document and record control to ensure that legally-mandated or policy-driven environmental documentation (beyond EMS documents and records) are retained during and after closure in accordance with the Army Records Information Management System (ARIMS). Examples include (but are not limited to) remediation/clean-up documentation, medical monitoring records, system testing data, and environmental audit reports. ARIMS provides additional guidance on retention of documentation. Where EMS and legal responsibilities will transfer to a new host organization, the closing installation should coordinate with the new host to ensure relevant documents and records are appropriately maintained by the new host organization.

c. Training

Awareness training at installations identified for closure should also be modified as they approach their closure date. Formal awareness training (and documentation of the training) would cease upon removal from the Appropriate Facilities List. However, installations should consider continuing some form of awareness training (or awareness 'campaign') focused on their significant aspects related to closure activities until the installation actually closes. For example, if abandoned hazardous material and hazardous waste are significant aspects, the installation's awareness training may focus on increasing awareness of the installation's process for turn-in of excess hazardous material and management of hazardous waste during closure activities.

Some competency training (e.g., hazardous waste management, drinking water/wastewater surveillance, asbestos abatement) is driven by legal requirements and may need to be continued until that activity ceases. However, installations should consider aligning the timing of the training with the closure timeline.

New host organizations will need to expand their EMS training to include personnel and services transferring from the closing installation to the new host.