# 25 Years of TEAM Guide Assessments: What Now?

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ENGINEER RESEARCH & DEVELOPMENT CENTER

# ERDC-CERL                    ESOH Compliance  Quad

## Problem Statement

How can Federal facilities avoid the ramifications of noncompliance (environmental and/or safety)?

- fines ($), response costs
- operational / training impacts
- damage to natural resources / human capital
- detrimental public relations

## New Technology

- A single standardized organizational schema correlating Federal, State, and Agency regulatory requirements

- RMF-compliant application reflecting the Plan–Do-Check-Act Model for compliance evaluations

- Applications to more narrowly identify pertinent regulatory requirements based on activity type

## Impacts

- Federal Agency implementation of annual, consistent, empirical audit/inspection programs using a standardized set of tools which:
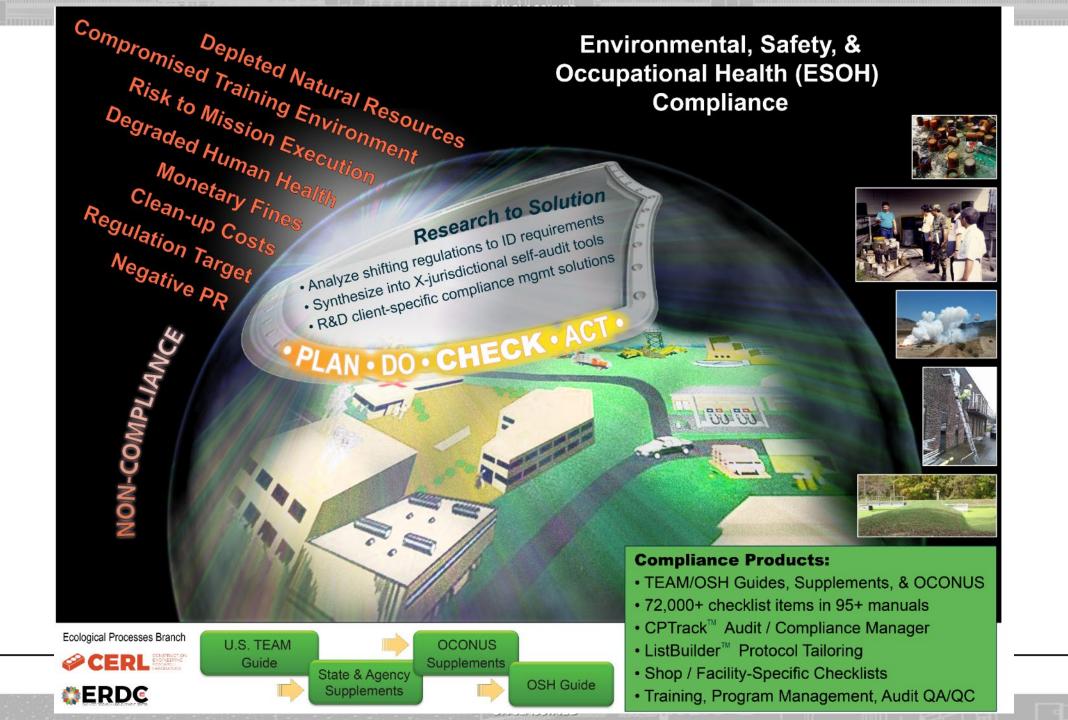  - Educate field-level personnel on regulatory requirements
  - Facilitate analysis and comparison of data for trends, root cause, and policy gaps
  - Reduces monetary, mission, and personnel risks

## Annual Timeline and Execution

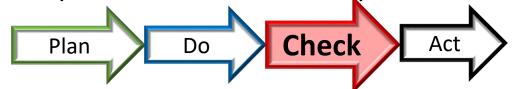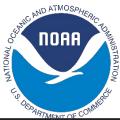| Product | Schedule | Additional Information |
|---|---|---|
| U.S. TEAM Guide | Updated Quarterly | Dec, Mar, Jun, Sep |
| State Supplements | Updated Annually | ≈ 5/month |
| OCONUS Supplements | Variable | |
| Agency Supplements | Updated Quarterly | Dec, Mar, Jun, Sep |
| OSHGuide | Updated Quarterly | Dec, Mar, Jun, Sep |
| CPTrack | Updated Monthly | New functions/regs |
| Training/Audits | As Requested | |

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# Environmental, Safety, & Occupational Health (ESOH) Compliance

Depleted Natural Resources
Compromised Training Environment
Risk to Mission Execution
Degraded Human Health
Monetary Fines
Clean-up Costs
Regulation Target
Negative PR

NON-COMPLIANCE

## Research to Solution

- Analyze shifting regulations to ID requirements
- Synthesize into X-jurisdictional self-audit tools
- R&D client-specific compliance mgmt solutions

• PLAN • DO • CHECK • ACT •

**Compliance Products:**

- TEAM/OSH Guides, Supplements, & OCONUS
- 72,000+ checklist items in 95+ manuals
- CPTrack™ Audit / Compliance Manager
- ListBuilder™ Protocol Tailoring
- Shop / Facility-Specific Checklists
- Training, Program Management, Audit QA/QC

Ecological Processes Branch

**CERL** CONSTRUCTION ENGINEERING RESEARCH LABORATORY

**ERDC**

U.S. TEAM Guide → OCONUS Supplements

State & Agency Supplements → OSH Guide

# ESOH Compliance

Enhancing Compliance and Stewardship Across the Federal Government

Plan → Do → **Check** → Act

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4

# What we used to find . . . .  Surprising storage



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# What we used to find . . . . Unorthodox disposal



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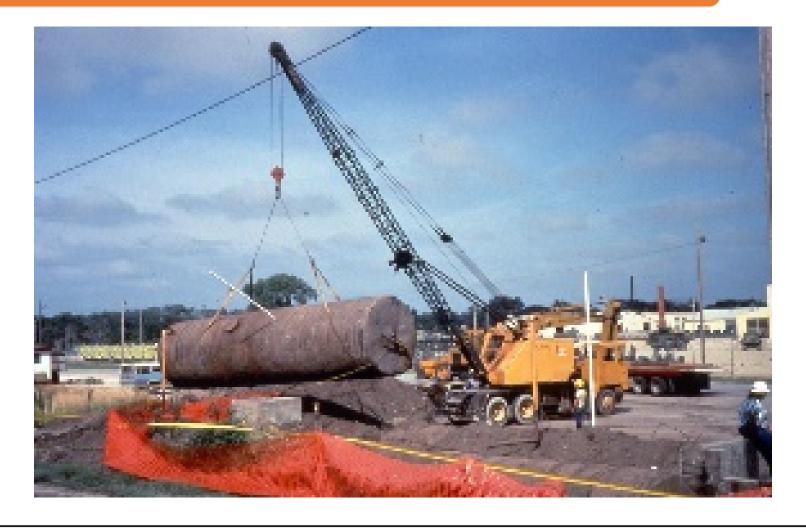# What's happened since . . . Risky facilities closed



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# What's happened since . . . Tanks yanked



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# What's happened since . . . Waste piles cleaned up



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# What we find now . .



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# Common Findings:   Housekeeping

## Labeling

- Fuel Pumps
- Hazardous Materials Containers
- Hazardous Waste/Used Oil/Universal Waste
- Pesticide Application Equipment & Storage
- PCB Equipment & Storage

## Daily Operational Practices

- Storage (HazMat/Waste, Pesticides, POL, etc)
- Personnel training, certification, licensing
- Inspections (storage areas, USTs)
- Improper disposal (open dumps, tires, hazmat containers, drains)

## Paperwork Updates

- Inventories (Air Emissions, HM, HW, Tanks, Pesticides, Asbestos, PCBs, etc)
- Safety Data Sheets
- Personnel assignments
- Spill Plans

## COMMON BUT NOT HOUSEKEEPING

- Permits
- Programs:  HazComm, HWMP, Pesticide Application, Natural Resource, Pretreatment, UIC
- Facilities and equipment
  - Water/wastewater systems
  - Air pollution control equipment

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# Common Findings

| Common Noncompliance Issues | TEAM Supplement Checklist Item Number |
|---|---|
| **Hazardous Material** | |
| Unlabeled or improperly labeled hazardous materials | HM.1.3.US |
| Safety Data Sheets (SDS) not available for hazardous materials onsite | HM.1.2.US |
| Spills in excess of a Reportable Quantity | HM.20.2.US |
| Cabinets storing flammable liquids are not flam cabinets | HM.35.4.US |
| Hazardous materials inside flam cabinets are not closed | HM.35.5.US |
| **Hazardous Waste** | |
| Wastes not characterized (orphan drum) | HW.10.1.US. |
| Universal waste storage not labeled properly | HW.280.2.US |
| VSQG exceeds quantity limitations | HW.15.1.US |
| VSQG labels containers incorrectly | HW.15.1.US |
| SQG exceeds time/quantity limitations | HW.20.1.US |
| SQG labels containers incorrectly | HW.20.1.US |
| SQG satellite accumulation areas managed incorrectly | HW.35.1.US |
| SQG 180-day accumulation area does not have containment/alarm communication/ spill control equipment/fire equipment | HW.40.2.US |
| LQG exceeds time/quantity limitations | HW.55.1.US |
| LQG labels containers incorrectly | HW.55.1.US |
| LQG satellite accumulation areas managed incorrectly | HW.75.1.US |
| LQG 90-day accumulation area does not have containment/alarm/communication/ spill control equipment/fire equipment | HW.80.4.US |

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# Where To Now?

- Assumption #1:  We would like to save money, time, effort

- Assumption #2:  We would like to maintain an acceptable level of compliance/noncompliance

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13

## Option 1

- # Declare Victory

  - We've fixed the big problems, and will accept the risk for the small problems:  If caught, pay the fines, take the PR hit (if any)

- # Drawbacks?

  - Seems to be against spirit of EMS, Executive Orders

  - Small problems grow into big ones

  - Lose track:  (1) People only do what you check on; (2) You can only manage what you can measure

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14

# Option 2

- Status Quo:  Keep on doing what you're doing now
  - Maintain commitment to compliance at current level of effort
  - Accept there will be minor noncompliance; that's why we audit

- Drawbacks?
  - Not taking advantage of history
  - Not showing commitment to improvement / cost savings
  - Leaving organization open to NOVs

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15

## Option 3

- Diffuse Compliance Efforts Beyond Assessments / Environmental Office

  - Involve those being assessed in the process

  - Educate targeted facility personnel

  - Build compliance efforts into daily operations

## Involve the Assessed in Assessments

- Provide audit checklists to facility personnel to conduct internals

  - Trade offs:  The more direct regulatory information you deliver, the more expertise it takes to use it

- Provide common findings for self-check

  - Don't try to teach regulations / compliance techniques

  - Forewarn, forearm

# Educate Targeted Personnel

"People need to be **reminded** more often than they need to be instructed" – Samuel Johnson

- We already provide reminders about:  Solid waste recycling; cold degreaser usage; discharges to storm drains; sharps containers; etc

- We could be doing it for:

  - Flam cabinets, POL, used oil/rags
  - SAPs, Universal Waste containers
  - Sink drains

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18

# Build Compliance into Daily Operations

- Make Programs Living Documents

  - Distributed Spill Plans

  - Shop-Specific HazMat / SAP Inventories

  - Inspection Checklists for USTs, Storage Areas

- Broad Categories of Benefits

  - Keeps information visible, active, updated

  - Does thinking for people: subconscious habit forming

  - Makes it easier to assess compliance

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## What Is Your Agency Doing To . . .?

- Foster internal assessments?

- Involve non-Env. Office staff?

- Externalize 'lessons learned'?

- Provide 'living' programs?

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# Send All Your Great Ideas To:

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