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DEPARTMENT OF THE ARMY
U.S. ARMY AUDIT AGENCY
Office of Counsel
3101 Park Center Drive
Alexandria, Virginia 22302-1596

January 6, 2012

Office of Counsel

This responds to your narrowed Freedom of Information Act (FOIA) request, dated 28 November 2011, received in this office on 5 December 2011. You requested Army Audit Report, A-2007-0084-FFE, Reduction of Contaminated Waste at Army Depots. Please find enclosed the requested report.

The official Army position for report is included in the report at Annex B. The “command comments” contained in the report are the audited activities’ comments on the draft report. The official Army position reflects the results of the command-reply process and establishes the Army position on the findings, conclusions, and recommendations in the report. Therefore, the Army position supersedes the command comments.

Your request for Army Audit Report A-2009-0017-ALE, Residual Value of Real Estate in Europe is denied. This report is marked “For Official Use Only” and is being withheld under Exemption 4 of the FOIA¹ which protects “trade secrets and commercial or financial information obtained from a person that is privileged or confidential”. Also, the information contained in the report is exempt from release under Exemption 2 of the FOIA which protects disclosure that would “significantly risk circumvention of agency regulation or statutes.”² Furthermore, the information contained in this report is being withheld under Exemption 5 of the FOIA which protects not merely documents, but also the integrity of the deliberative process itself where the exposure of that process would result in harm.³

The FOIA requires that “any reasonably segregable portion of a record” must be released after appropriate application of the exemptions. We have reviewed the above mentioned audit report and determined that the nonexempt information is inextricably intertwined with the exempt information, such that reasonable segregation is not possible.⁴

You may appeal this denial of your request to the Secretary of the Army, Office of General Counsel. You must file your appeal in such a way that it will reach the appellate authority within 60 calendar days of the date of this letter. If you decide to appeal, please send your appeal through this office in order that all relevant materials may be forwarded with the appeal for review by the appellate authority.

¹ 5 U.S.C. 552(b)(4)


² 5 U.S.C. 552(b)(2)

³ 861 F.2d 1114

⁴ 566 F.2d 260

You have been determined to be an “all others” requester. The time spent searching for the reports took approximately one hour per report and the released report has fifty, (50), pages. Your requester category under FOIA allows two, (2), hours search time and the first 100 pages of duplication free of charge. Therefore there are no fees assessed for the processing of the narrowed request. Please direct any questions to the undersigned by calling, (703) 681-1426, or e-mail timothy.s.hankins.civ@mail.mil and reference 2012-003. Thank you in advance for you cooperation in this matter.

Sincerely,


TIMOTHY S. HANKINS
Paralegal/FOIA Officer



U.S. Army Audit Agency
Service • Ethics • Progress



Reduction of Contaminated Waste at Army Depots

Audit Report: A-2007-0084-FFE

22 February 2007

Executive Summary

Audit Report A-2007-0084-FFE
22 February 2007



Reduction of Contaminated Waste at Army Depots



Results

We reviewed actions managers for the Pollution Prevention Program took to identify, consolidate, and minimize hazardous wastes generated at Anniston, Corpus Christi, and Red River Army Depots. We found that the Army has begun efforts to reduce the overall volume of contaminated wastes generated annually. However, because the three depots didn't implement measurement criteria that accurately track data about hazardous materials use, the actual success rate of those efforts remains unknown.

Program managers didn't take full advantage of the Hazardous Materials Management System to accurately determine the amount of hazardous materials each depot used. Consequently, depot managers couldn't gauge annual progress toward meeting or exceeding waste reduction goals established in Executive orders and by DOD and Army policy. Although managers at each depot knew and reported the amount of hazardous wastes generated, they couldn't directly attribute reductions or increases in annual volumes to the effectiveness of waste management techniques or fluctuating workload.

In addition, Red River Depot didn't manage and minimize health risks in accordance with its locally developed installation regulations. Specifically, not all personnel routinely exposed to hazardous materials received periodic health screenings as required by depot regulations. As a result, although not specifically required by Army regulations, some Red River Depot personnel may not have received medical oversight to the full extent provided for in installation guidance.

Recommendations

We recommended that the Army:

- Have the depots use the Hazardous Materials Management System to implement measurement criteria that accurately tracks the annual volume of hazardous materials use data and also encourages reduction of these materials at their maintenance facilities.
- Provide depot personnel with periodic health screenings appropriate to their job classification.

The Office of the Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health) and the Commander, U.S. Army Materiel Command agreed and said they had taken or would take corrective actions. Their comments represent the official Army position on the report and are in Annex B.



**DEPARTMENT OF THE ARMY
U.S. ARMY AUDIT AGENCY
OFFICE OF THE DEPUTY AUDITOR GENERAL
FORCES AND FINANCIAL AUDITS
3101 PARK CENTER DRIVE
ALEXANDRIA, VA 22302-1596**

22 February 2007

Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health)
Commander, U.S. Army Materiel Command

This is our report on the audit of the reduction of contaminated wastes at Army depots. We reviewed actions your organizations took to establish and maintain environmental oversight over contaminated waste generated during depot maintenance operations. Our review focused on the Army's efforts to effectively reduce the approximately 15 million pounds of contaminated wastes the Army's three major maintenance depots generate each year.


We performed the audit in accordance with generally accepted government auditing standards and included tests of management controls we considered necessary under the circumstances.

The report addresses Recommendation A-1 to the Deputy Assistant Secretary of the Army and Recommendation B-1 to the Commander, Army Materiel Command. The Army's official position on the conclusions, recommendations, and command comments is in Annex B.

For additional information about this report, contact the Environment and Civil Works Audits Division at 410-278-4287.

I appreciate the courtesies and cooperation extended to us during the audit.

FOR THE AUDITOR GENERAL:


CLARENCE G. JOHNSON, JR.
Acting Program Director
Environment and Civil Works Audits

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INTRODUCTION

POLLUTION PREVENTION

Congress passed the Pollution Prevention Act of 1990 (42 U.S.C. § 6601 et seq.), calling pollution prevention a “national objective” and declaring “source reduction is fundamentally different and more desirable than waste management and pollution control.” The act states that:

- Pollution should be prevented or reduced at the source whenever feasible.
- Pollution that cannot be prevented should be recycled in an environmentally safe manner whenever feasible.
- Disposal or other release into the environment should be employed only as a last resort.

In April 2000 the President issued Executive Order 13148 (Greening the Government Through Leadership in Environmental Management). The order requires agencies to develop and implement an environmental management system to ensure that they establish strategies to support environmental leadership programs, policies, and procedures.

Environmental Management AR 200-1 (Environmental Protection and Enhancement) provides both general and specific guidance for the Army’s implementation of Federal law, as well as the requirements set forth in Executive orders and DOD policy and guidance. The Army’s Pollution Prevention Program focuses on implementing changes in chemicals, equipment, and processes to achieve a meaningful, cost-effective reduction in the generation of pollution without adversely affecting mission readiness.

Resource Conservation and Recovery Act During 1976 Congress enacted the Resource Conservation and Recovery Act (42 U.S.C. § 6901 et seq.) as a comprehensive regulatory program for the management of hazardous wastes from “cradle-to-grave.” The act requires that hazardous wastes be treated, stored, and disposed of in ways that minimize risks to human health and the environment. Section 3005(h) states that a condition of any permit issued under this section for the treatment, storage, or disposal of hazardous waste on the premises

where the waste was generated is that the permittee certify at least annually that the generator of the hazardous waste has a program in place to reduce the volume or quantity and toxicity of the waste to the degree the generator has determined to be economically practicable.

A – MANAGING CONTAMINATED WASTE

OBJECTIVE

Did the Army effectively identify potential sources of contamination?

CONCLUSION

Yes. Anniston Army Depot, Corpus Christi Army Depot, and Red River Army Depot effectively identified potential sources of contamination. Environmental managers at each depot were thoroughly aware of the locations of hazardous waste streams and their associated collection sites. By identifying waste streams and using industry standard disposal methods, the depots ensured compliance with established Federal and State environmental laws. Each depot minimized hazards and risks to human health and the environment because it effectively:

- Used the Hazardous Materials Management System (HMMS) to identify, monitor, measure, and report hazardous waste streams.
- Performed internal and external environmental inspections to provide oversight over production operations and ensure regulatory compliance.
- Maintained environmental compliance and committed a relatively low number of environmental violations and infractions.

However, depot managers could not accurately determine whether annual pollution prevention efforts were successful because the amount of wastes generated varied with workload, and the depots didn't implement measurement criteria for analyzing the amount of hazardous materials consumed during maintenance operations.

As a result, although the Army had reasonable assurance that depots generally complied with waste storage and disposal requirements, it didn't effectively use HMMS to minimize pollution by tracking and reducing the amount of hazardous materials each depot used.

Our detailed discussion of this condition begins on page 7. Our recommendation to correct it is on page 11.

BACKGROUND

Depot maintenance is a unique and complex process that generates significant levels of hazardous wastes. The Army performs the majority of its maintenance work at three depots:

- Anniston Depot, located in Alabama, is designated the Center of Technical Excellence for the M1 Abrams Tank. The depot performs major repair on a variety of systems, including the Armored Vehicle Launch Base, M88 Hercules Recovery Vehicle, M551 Armored Reconnaissance Airborne Assault Vehicle, and the M728 Combat Engineer Vehicle. The top four wastes the depot generates are blast media, wastewater treatment plant sludge, filters and charcoal from electroplating operations, and parts washer solvent.
- The primary mission of Corpus Christi Depot, located in Texas, is to overhaul, repair, modify, retrofit, test, and modernize helicopters, engines, and components for all Military Services and foreign military customers. The primary aircraft the depot supports are the AH-1W Super Cobra, AH-64A Apache, MH-60 Pavehawk, OH-58D Kiowa, SH-60 Seahawk, UH-1N Huey, and UH-60 Blackhawk. The top four wastes the depot generates are oil, paint debris, paint thinner, and paint sludge.
- Red River Depot, also located in Texas, is designated the Center of Technical Excellence for the overhaul of light and medium weapon systems, including the Bradley Fighting Vehicle Series, Heavy Expanded Mobility Tactical Truck, High Mobility Multipurpose Wheeled Vehicle, and Multiple Launch Rocket Systems. The top four wastes the depot generates are blasting media, baghouse dust from fluidized bed systems, sludge, and waste caustics.

Environmental Compliance and Permitting

Federal and State environmental regulators issue environmental permits to operate facilities that store, treat, and manage hazardous materials. To comply with the permits, permit holders must follow specific Federal and State environmental laws

and regulations. If a permit holder violates permit requirements or applicable environmental laws, regulators can issue notices of noncompliance or notices of violation. Regulators normally issue notices of noncompliance when initial infractions, such as failure to meet minor documentation requirements, are identified or reported. These notices are administrative in nature and carry little or no penalty. However, regulators usually require permit holders to formally respond to notices of noncompliance and describe corrective actions.

Notices of violation represent a more severe infraction or a failure to sufficiently respond to an earlier notice of noncompliance. Notices of violation often carry monetary or administrative penalties that can include permit suspension or revocation. Both types of infractions are potentially detrimental to depot operations and could erode public confidence in the Army's management of its facilities, as well as weaken working relationships within the regulatory community.

HMMS

Because modern depot operations use a variety of hazardous materials (such as paint strippers, solvents, and thinners), HMMS addresses the task of tracking materials coming onto the depot. HMMS uses a barcode tracking system to maintain an inventory and give the depot visibility over all chemicals used in the depot environment, not just hazardous materials. HMMS tracks materials, the people who use them, and the processes the materials are used in. The system allows depots to preauthorize materials before ordering, giving depot managers total visibility and control over what comes into each facility.

In addition, HMMS has an issue and a reissue function that allows bulk quantities of materials to be broken into job-specific quantities, which reduces spillage, contamination, and worker exposure to hazardous materials. The system also allows the tracking of hazardous wastes from generation through disposal and automatically generates waste manifests to help reduce disposal costs.

DISCUSSION

In this section we discuss these four areas:

- Identifying hazardous waste streams.
- Making internal environmental inspections.
- Complying with regulatory requirements.
- Tracking and reducing hazardous wastes.

Identifying Hazardous Waste Streams

Environmental managers at each of the three Army depots reviewed effectively identified the hazardous waste streams their maintenance operations generated and established appropriate collection sites to accumulate and temporarily store the waste. Each depot used HMMS to identify, monitor, and report waste streams. As a result, the depots identified environmentally sensitive tasks throughout maintenance operations and minimized risks to human health and the environment.

U.S. Army Environmental Command personnel explained that the maintenance and repair of combat and tactical vehicles and fixed and rotary wing aircraft presented one of the Army's biggest contamination concerns. To meet mission requirements, depots perform a number of waste-generating activities, such as stripping paint, repainting, cleaning parts, removing used oil and antifreeze, electroplating, and finishing metal. These tasks produce large quantities of hazardous wastes and require effective collection, storage, and disposal procedures to ensure compliance with Federal and State laws and to minimize risks of exposure to waste.

HMMS showed that overall volumes of hazardous materials used and the total number of vehicles serviced at the depots increased over the last 5 fiscal years. Here are the details:

	FY 01	FY 02	FY 03	FY 04	FY 05
Anniston*	2,961,361	3,920,781	3,556,508	5,139,955	4,893,096
Corpus Christi	297,817	217,110	212,139	243,730	254,057
Red River	2,585,424	2,288,852	2,720,885	4,460,746	5,410,210

* Includes both hazardous and nonhazardous materials.

Number of Vehicles Serviced
(Doesn't Include Components or Small Arms)

	FY 01	FY 02	FY 03	FY 04	FY 05
Anniston	573	647	670	778	1,047
Corpus Christi	74	81	52	57	76
Red River	274	661	820	1,162	5,738

The depots used HMMS to track waste streams, determine the volumes and costs associated with waste disposal, and report wastes generated to DA, Federal agencies, and State environmental divisions to meet regulatory requirements.

Making Internal Environmental Inspections

Environmental inspections at each depot were generally effective. Inspections are an essential element of efforts to ensure compliance with the many permits Army depots hold. Internal inspections by depot personnel and external inspections by Federal and State regulators provided adequate oversight over maintenance operations and any associated effects on the environment. Consequently, the depots successfully identified potential permit infractions and quickly took corrective action to resolve most issues and prevent future infractions.

Anniston Depot had three internal inspectors in the Directorate of Engineering and Quality who were primarily responsible for compliance checks related to the Resource Conservation and Recovery Act. On average, the inspectors performed about 4,600 inspections and audits annually. They generally looked for and addressed the same concerns inspectors from the State of Alabama and the U.S. Environmental Protection Agency checked for because those issues could lead to violations or infractions.

Inspectors at Red River Depot did weekly internal environmental inspections that focused on regulatory compliance. When they found an infraction, the inspectors classified its severity and recommended corrective actions. Depot personnel documented their internal inspections and reviewed the status of corrective actions from prior inspections.

Inspectors at Corpus Christi Depot also performed weekly internal environmental inspections.

Complying With Regulatory Requirements

Given the size and complexity of their operations, the three depots had few environmental violations and infractions related to maintenance operations. We reviewed internal and external environmental inspection reports for October 2003 through July 2005 and found that:

- Anniston Depot received seven environmental notifications. The notifications and one administrative order were primarily administrative in nature.
- Corpus Christi Depot received two notices of violation. The notifications resulted from an air emission event in December 2004, which was caused by vapor degreaser equipment exceeding permitted amounts. The depot didn't electronically report the emission event to the State of Texas within 24 hours. The depot revised its procedures for the vapor degreaser and met State requirements for resolution of the issues identified in the notice of violation.
- Red River Depot received two notices of violation and one enforcement action from the State of Texas. The violations were based on the depot's failure to notify State regulators about a change to the depot's air permit. The depot resolved the issued by submitting the notification form.

We concluded that the Army had reasonable assurance that depots generally were in compliance with Federal and State waste storage and disposal requirements. Most of the infractions and violations were administrative in nature and often self-reported by the depots.

Tracking and Reducing Hazardous Wastes

All three depots used HMMS to track the quantity of hazardous materials coming onto the depot, the amount issued to users, and the quantity of hazardous wastes disposed of. However, depots currently supply DA with annual data about hazardous wastes based on the total volume of production (workhours) for the year. This method cannot attribute attempts a depot makes to meet pollution prevention goals because of the many variables involved. The method is centered on waste volume—not on reduction. It needs to be analyzed to identify opportunities to reduce the amount of hazardous materials used and, in turn, the wastes disposed of.

Depot managers can use HMMS to accurately assess the amount of hazardous materials that maintenance activities generate. By doing so, depots would give Army environmental managers the capability to accurately assess year-to-year data and progress toward meeting waste reduction goals. If they tracked hazardous materials coming in, the depots could accurately explain the changes in quantities generated that are attributable to their pollution reduction efforts versus changes attributable to variations in workload.

We consulted with managers from the Office of the Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health) and solicited their input for identifying the most workable recommendations for analyzing, quantifying, and tracking the annual quantities—and associated reductions—of hazardous wastes generated at each depot. The managers agreed that the Army needed better methods for measuring the success or failure of pollution prevention initiatives. They also suggested the use of HMMS to track hazardous materials coming onto the depot and consumed by each workstation or individual worker. This data can be correlated to the hazardous wastes that were likely generated in a given timeframe.

In addition, in September 2000 U.S. Army Materiel Command issued a memorandum that directed all installations to develop and implement a program to track hazardous materials and hazardous wastes in accordance with the provisions of AR 200-1. Most command installations use HMMS. The system tracks hazardous substances that are ordered, received, stored, issued, used, recycled, or spilled and calculates the generation of hazardous wastes through the use of a set of process algorithms. However, the current methodology provides only raw data and can't accurately attribute changes in hazardous wastes to pollution prevention measures the depots may have taken.

We address the action needed to adequately measure the amount of volatile and hazardous materials used to assess the success of waste reduction efforts in Recommendation A-1.

**RECOMMENDATION
AND COMMENTS**

This section contains a specific recommendation and a summary of command comments for the recommendation. The official Army position and verbatim command comments are in Annex B.

**For the Deputy Assistant Secretary of the Army
(Environment, Safety and Occupational Health)****Recommendation A-1**

Direct Army Materiel Command to require depots to analyze HMMS data and implement measurement criteria that accurately track the annual volume of hazardous materials use and encourages reduction of these materials.

**Command Comments and
Official Army Position**

The Office of the Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health) agreed and said it would take corrective actions. As the office explained, DOD, the Army, and Army Materiel Command are currently engaged in a major transformation effort specifically addressing this recommendation. The DOD Hazardous Materials Business Process Reengineering effort will address tracking, use, and reduction of use of hazardous materials.

The office said it would work with Army Materiel Command to determine interim periods and transition timeframes necessary to meet the requirements of the recommendation with the existing HMMS system and the expected successor system. The office said it would issue directive guidance within 180 days of the publication of this report.

B – MINIMIZING HEALTH RISKS

OBJECTIVE

Did the Army effectively consider health issues during the depot maintenance process?

CONCLUSION

Partially. One of the three depots didn't perform periodic health screenings for personnel working with or routinely exposed to hazardous materials. Each depot had developed local safety and occupational health regulations to supplement Army guidance, but Red River Depot didn't manage safety risks in accordance with its own guidance or perform all required periodic examinations.

As a result, although not specifically required by Army regulations, some Red River Depot personnel may not have received medical oversight to the full extent provided for in installation regulations.

Our detailed discussion of this condition begins on page 13. Our recommendation to correct it is on page 14.

BACKGROUND

The Occupational Safety and Health Administration sets standards for protecting the safety and health of workers. Army and installation regulations provide additional guidance to further promote employee safety and health:

- AR 385-10 (The Army Safety Program) details the Army's safety management policy for protecting people and property against accidental loss. The regulation requires commanders to designate a safety and occupational health manager to lead the safety office, which assists in integrating risk management into daily operations and develops programs to reduce injuries and illness.
- AR 11-9 (Army Radiation Safety Program) provides guidance to help ensure that Army radiation safety regulations are consistent with Federal regulations, requires Army

radiation authorizations when using machine-produced ionizing radiation, and strengthens the guidance from major commands and installations for radiation safety.

- Corpus Christi Depot Regulation 385-1 (Safety and Occupational Health Program) establishes the depot's radiological safety and health program. The regulation prescribes responsibilities and procedures for acquiring, receiving, storing, shipping, using, transporting, maintaining, and disposing of materials or equipment that produce ionizing radiation. The regulation requires depot personnel to receive a routine physical at least once every three years.

DISCUSSION

In this section we discuss one area: depot safety regulations.

Depot Safety Regulations

Red River Depot didn't perform periodic health screenings for personnel working with or routinely exposed to hazardous or radiological materials. At the time we conducted this audit, health personnel at Corpus Christi Depot said they didn't conduct any health screenings after the initial preemployment screening even though Depot Regulation 385-1 required periodic health screenings. As of 10 July 2006, Corpus Christi personnel revised the depot regulation to eliminate this requirement.

Regulations required the medical director to perform three types of physical examinations: preemployment, routine (at a minimum, once every three years), and termination of employment.

Red River Depot Regulation 385-27 (Safety Radiation Protection Program) states that workers are to undergo periodic health screenings a minimum of once every three years. New employees received a preemployment physical examination conducted at the health clinic. In addition, employees in certain jobs (security guards, fire fighters, jobs requiring the employee to wear a respirator, and jobs in high-noise areas) require routine physical examinations annually. However, other than the preemployment examinations, the depot didn't do periodic health screenings. We couldn't determine why.

Because the depot's safety and health offices didn't provide personnel with prescribed health maintenance, long-term health issues could continue undetected. In addition, the failure to routinely screen employees could raise the Army's risk of liability if personnel take legal action against the depot for physical ailments contracted during employment.

We address the action needed to correct this problem in Recommendation B-1.

RECOMMENDATION AND COMMENTS
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This section contains a specific recommendation and a summary of command comments for the recommendation. The official Army position and verbatim command comments are in Annex B.

For the Commander, U.S. Army Materiel Command

Recommendation B-1

Make sure Red River Depot personnel receive the level of medical oversight and periodic health screenings Army and depot regulations prescribe.

**Command Comments and
Official Army Position**

Army Materiel Command agreed and said it would take corrective action.

GENERAL AUDIT INFORMATION

SCOPE AND METHODOLOGY

We conducted the audit:

- From June 2005 through January 2007 under project A-2005-FFE-0446.000.
- At the Office of the Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health); U.S. Army Materiel Command; Anniston Army Depot; Corpus Christi Army Depot; and Red River Army Depot.
- In accordance with generally accepted government auditing standards and included the tests of management controls that we considered necessary under the circumstances.

We used output from automated systems for background purposes only. Because we didn't base any of our conclusions on data these systems provided, we didn't assess the reliability of the data.

The audit covered transactions representative of operations current at the time of the audit.

To determine whether the Army effectively identified potential sources of contamination, we:

- Evaluated the workflow of depot maintenance operations to make sure the three depots sufficiently identified effects on the environment and fully explored opportunities to minimize contamination.
- Evaluated the integration of pollution prevention initiatives into the depot maintenance process.
- Reviewed HMMS data for the three depots.
- Reviewed the results of internal and external environmental inspections.
- Reviewed notices of noncompliance and notices of violation issued by Federal and State regulators and the corresponding documentation.

- Interviewed key environmental and production personnel.
- Visited selected depot facilities to observe operations.
- Prepared, in consultation with depot personnel, simplified flowcharts of the overhaul process at two depots.
- Evaluated Army regulations to determine whether they contained guidance on assessing consolidations of environmentally sensitive tasks.
- Reviewed Anniston Depot's Process Specific Opportunity Assessment, dated March 2005.
- Analyzed and reviewed pollution prevention plans and initiatives with key environmental and production managers.
- Compared differences in the historical volumes of waste streams with current waste stream data.
- Discussed policies and procedures for tracking and monitoring pollution prevention initiatives with depot functional managers.
- Reviewed State of Texas regulatory laws and regulations governing pollution prevention activities for pollution generators within the State.
- Discussed with functional managers at Army Materiel Command the need for and feasibility of implementing a lessons learned database for Army depots.

To determine whether the depots effectively considered health issues during the depot maintenance process, we:

- Interviewed key safety and occupational health personnel.
- Analyzed and reviewed recordable injury rates.
- Reviewed and researched citations from the U.S. Department of Labor's Occupational Safety and Health Administration.

- Compared different safety programs and initiatives for the improvement of safety.
- Evaluated Army regulations to determine whether depots were following guidelines when dealing with the health and safety of employees.

RESPONSIBILITIES

The Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health) is responsible for providing policy, programming, and oversight for the Army's environment, safety, and occupational health programs. These responsibilities include developing policies, guidance, and strategies to address emerging environmental issues and ensuring that Army installations are in compliance with environmental regulations. The office also establishes policy, sets standards, proposes programming and funding, and provides program management and oversight for safety and occupational health matters.

Army Materiel Command is the Army's premier provider of material readiness, technology acquisition support, materiel development, logistics power projection, and sustainment. Command's missions range from development of sophisticated weapon systems and cutting-edge research to the maintenance and distribution of spare parts.

Command operates the Army's research, development, and engineering centers; the U.S. Army Research Laboratory; depots; arsenals; ammunition plants; and other facilities. Its maintenance depots restore weapons systems needed as the Army makes its way to full transformation. Command's overhaul and modernization efforts are aimed at enhancing and upgrading major weapon systems and include the insertion of new technologies to make the systems better and more reliable. Two of its major subordinate commands are U.S. Army Aviation and Missile Command Life Cycle Management Command, which is responsible for Corpus Christi Army Depot, and U.S. Army TACOM Life Cycle Management Command, which is responsible for Anniston and Red River Army Depots.

ACKNOWLEDGMENTS

These personnel contributed to the audit: George Sunderland (Audit Manager); Jayesh Parmar (Auditor-in-Charge); Kathleen Anshant (Editor); and Robert Chambers, Phillip Hahn, James Lagergren, Stephanie Matthews, and Nathan Metzger (Auditors).

We are sending copies of this report to the:

Assistant Secretary of the Army (Installations and
Environment)
Assistant Chief of Staff for Installation Management
Commander, U.S. Army Environmental Command

We will also make copies available to others upon request.

OFFICIAL ARMY POSITION AND VERBATIM COMMENTS BY COMMAND



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT SECRETARY
INSTALLATIONS AND ENVIRONMENT
110 ARMY PENTAGON
WASHINGTON, DC 20310-0110

DEC 0 5 2006

SAIE-ESOH

MEMORANDUM FOR U. S. Army Audit Agency, Office of the Deputy Auditor General,
Forces and Financial Audits, 3101 Park Center Drive, Alexandria, VA 22302-1596

SUBJECT: Response to U.S. Army Audit Agency Draft Audit of Contaminated Waste
Reduction at Army Depots (Project A-2005-FFE-0446.00)

1. The subject Draft Audit has one recommendation for this office.
2. This office agrees with the recommendation as indicated in the enclosure. The report does not need classification or protective marking.
3. My point of contact for this action is Mr. Robert Luther at (703) 697-4032.

Encl

Tad Davis

Addison D. Davis, IV
Deputy Assistant Secretary of the Army
(Environment, Safety, and Occupational Health)



Recommendation to DASA (ESOH)**Recommendation A-1****For the Deputy Assistant Secretary of the Army (Environment,
Safety and Occupational Health)**

Recommendation: Direct Army Material Command to require depots to analyze HMMS data and implement measurement criteria that accurately tracks the annual volume of hazardous material use and encourage reductions of these materials.

Command Comment: Agree.

DoD, the Army and the Army Material Command (AMC) are currently engaged in a major transformation effort specifically addressing this recommendation. The DoD Hazardous Materials Business Process Reengineering effort led by ODUSD(I&E) Business Enterprise Integration will address tracking, use and reduction of use of hazardous materials. The Army Material Command is a significant participant in this process and is developing Army systems in parallel with the DoD effort. This office will work with AMC to determine interim periods and transitioning timeframes necessary to meet the requirements of the recommendation with the existing HMMS system and expected successor systems. This office will issue directive guidance within 180 days of the final report of this audit.

Encl



DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY MATERIEL COMMAND
9301 CHAPEK ROAD
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AMCIR

29 January 2007

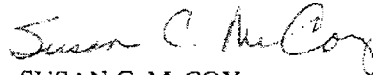
MEMORANDUM FOR Audit Liaison Office, U.S. ARMY AUDIT AGENCY, 3101 Park Center Drive, Alexandria, VA 22302-1596

SUBJECT: Command Comments, USAAA Draft Report, Reduction of Contaminated Waste at Army Depots, Project Number A-2005-FFE-0446.000. AMC A0542

1. Headquarters, U.S. Army Materiel Command (HQ AMC) has reviewed the subject draft report and concurs with the reported facts and conclusions. Further, HQ AMC concurs with the recommendation and specific comments are enclosed.
2. The point of contact for this action is Mr. Tilden Jio commercial (703) 806-9021, DSN 656-9021 or email address Tilden.Jio@us.army.mil.

FOR THE COMMANDER:

Encl


SUSAN C. McCOY
Director, Internal Review and
Audit Compliance Office

COMMAND COMMENTS
USAAA Draft Report, A-2007-0XXX-FFE
Reduction of Contaminated Waste at Army Depots

Finding B: Minimizing Health Risks

Objective: Did the Army effectively consider health issues in the depot maintenance process?

Conclusion: Partially. One of the three depots didn't perform periodic health screenings for personnel working with or routinely exposed to hazardous materials. Although each depot had developed local safety and occupational health regulations to supplement Army guidance, Red River Depot didn't manage safety risks in accordance with its own guidance or perform all of the required periodic examinations.

As a result, while not specifically required by Army regulations, some Red River Depot personnel may not have received medical oversight to the full extent provided for in installation regulations.

Recommendation B-1: Make sure Red River depot personnel receive the level of medical oversight and periodic health screening prescribed by Army and depot regulations.

Command Comments: Agree. As confirmed by the Occupational Medicine Consultant to The Surgeon General, the Occupational Health Clinic at Red River depot is performing those periodic health screenings mandated by Army and the Occupational Safety and Health Administration (OSHA), but not those mandated by depot regulations. The corresponding depot regulation is currently undergoing revision. The resulting regulation will not set independent health care delivery standards or propose to obligate Defense Health Program funds. Commander, U.S. Army Materiel Command (AMC) ensures that U.S. Army Medical Command (MEDCOM) operated Health Clinics provide occupational medicine services to his employees in accordance with OSHA and MEDCOM regulations and guidelines through annual visits by his Safety Rapid Review Team (SRRT) (Attachment). The team includes experts in Occupational Health and Industrial Hygiene and operates in full partnership with MEDCOM. The SRRT is assisting Red River with the review and revision of its Safety and Occupational Health regulation.

Enclosure

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