



ECO Quarterly

DIRECTORATE OF PUBLIC WORKS-ENVIRONMENTAL DIVISION
COMPLIANCE-POLLUTION PREVENTION

1st Quarter FY15

New USAG-HI Hazardous Waste Shop Storage Point (HWSSP) Rules will Increase Compliance, Reduce Administrative Burden and Save Paper

Beginning in 1st Quarter of FY 2015 (01 October 2014) Environmental Compliance Officers (ECOs) will only need to conduct a weekly inspection on the facility's HWSSP if there is Hazardous Waste stored inside. ECOs will still be required to include the HWSSP section of the checklist as part of their monthly inspection even if it is empty and will need to do the inspection weekly if Hazardous Waste is placed inside the storage point until it is turned-in to DPW.

The Environmental Division concluded that this easing of the administrative requirements of the HWSSP was appropriate for a number of reasons. First, the requirement is a locally imposed requirement that is more stringent than the state or federal regulations. Second, by keeping the inspection as

part of the monthly requirement, the storage point will still be adequately maintained. Finally, it will provide administrative relief to the ECOs and their environmental compliance programs. As a result, this change will drastically reduce the number of Unsatisfactory inspection scores due to missing weekly inspections for empty HWSSPs which will improve the installation's compliance posture. In addition, the Garrison will save thousands of sheets of paper per year due to the reduction in paperwork!

This will come as a welcome change to our ECOs, especially those who rarely generate Hazardous Waste but have been conducting weekly inspections on their empty HWSSPs for years.

It is important to note that even though there will be a

change in the frequency of inspections, it will still be required to maintain copies of previous inspections in the ECO files for the EPA required 3 years to show proof of historical compliance with our local regulations.

Here is a summary of the new requirement:



Beginning 01 OCT 2014, ECOs will no longer be required to conduct weekly inspections of the HWSSP if no Hazardous Waste is stored inside.

- **HWSSPs must be inspected weekly if there is Hazardous Waste stored inside.**
- **If no waste is stored inside the HWSSP, it must be inspected monthly as part of the monthly facility inspection.**
- **Weekly inspections of empty HWSSPs are no longer required.**
- **All inspections must be conducted using section C1 and C2 (if applicable) of the Environmental Compliance Inspection Checklist, USAG-HI Form 30.**
- **Retain copies of all inspections and HW Collection Logs for 3 years.**

Mandatory Senior Leader Environmental Compliance Training (SLECT) will be Tracked Monthly

Senior Leader Environmental Compliance Training (SLECT) is required by Policy Memorandum USAG-HI-4. The policy, signed by the Garrison Commander COL Richard A. Fromm, states that senior leaders' "support will determine how successful your environmental compliance program will be. In line with this, **each senior leader with environmental compliance**

responsibilities in platoon-level and above leadership positions, brigade, battalion, company executive officers, S-4 officers, logistics officers, and civilians in supervisory positions will attend the SLECT within 120 days of assuming these positions....The SLECT course provides senior leaders with a general overview of federal, state, and local environmental laws, regula-

tions, and policies and furnishes them with the tools vital to managing a successful environmental compliance program." The class is only 3 hours long and held monthly at the DPW training room on Schofield Barracks. While this training is mandatory, many units/activities have not sent the required personnel to the class. So, as an initiative to track compli-

ance with this requirement, commanders and directors will now be required to designate at least one SLECT-trained senior leader for each level of command listed on their monthly ECO update memorandum. The training calendar of SLECT classes and the new ECO monthly update memorandum can both be found on the Environmental Division's website.



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HO'OKAHI KAKOU "we are one"

1st Quarter FY15

Directorate of Public Works

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Army Recycle Center: 808.655.0011
Recycling Prog Spt: 808.656.3085
Sustainability (SEM): 808.656.3103
Env Inspections: 808.656.0866

Emergency Spill Hotline:
808.656.1111

UPCOMING TRAINING DATES:

14-16 OCTOBER	ECO Basic
21 OCTOBER	SLECT
23 OCTOBER	ECO Refresher
4-6 NOVEMBER	ECO Basic
18 NOVEMBER	SLECT
20 NOVEMBER	ECO Refresher
2-4 DECEMBER	ECO Basic
16 DECEMBER	SLECT
18 DECEMBER	ECO Refresher

All classes are held in the DPW Training Room at Schofield Barracks, building 2624.

Appointed military personnel must enroll through the Digital Training Management System (DTMS). All other applicants must submit applications on FM LTR 115-1 through your schools representative to the Command Soldier Training Program by fax to 655-1633. Call 655-1560 for more information.

All classes are subject to change. Please visit the DPW Environmental Training schedule at: <http://www.garrison.hawaii.army.mil/sustainability/Training.aspx> for the most up-to-date class schedule information.

We're on the Web! www.garrison.hawaii.army.mil/sustainability/environmental.aspx

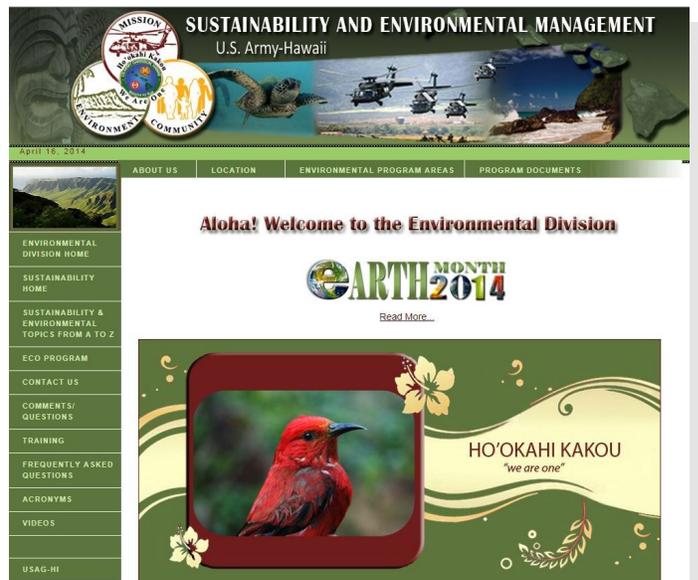
Sustainability and Environmental Management (SEM) Website is Your 24/7 Resource for U.S. Army-Hawaii Environmental Information

Thanks to the U.S. Army Sustainability and Environmental Management (SEM) website, information about the environmental programs and services available at U.S. Army Garrison Hawaii (USAG-HI) installations is available 24 hours a day, 7 days a week from your personal computer, tablet or smartphone. The website can be accessed from the main USAG-HI website at www.garrison.hawaii.army.mil. From there you can just click on the SEM link on the left of the page to have access to the many tools available to help USAG-HI commanders, directors and Environmental Compliance Officers (ECOs) manage

their environmental programs. Here is a quick look at what you will find:

- "A to Z" SEM Guide
- ECO Checklist
- Training Calendar
- Policies and Forms
- Points of Contact
- Answers to FAQs
- Online SEM Training
- Training Presentations
- AUL Forms

So go online and check it out today!



The Environmental Division website contains all of the resources ECOs need to manage their environmental programs.