

# ENVIRONMENTAL AUDIT REPORT

## NAVAL CONSTRUCTION BATTALION COMMAND GULFPORT, MS

22-26 MARCH 2010

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# 1.0 EXECUTIVE SUMMARY

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A combined Environmental Management System (EMS) audit and Environmental Compliance Assessment was conducted from 22-26 March 2010 at NCBC Gulfport, MS to determine the status of the installation's environmental compliance and environmental management system (EMS). An eight (8) person audit team comprised of staff from Naval Facilities Engineering Command (NAVFAC) and Commander Navy Installation Command (CNIC) conducted the audit, which included site visits and interviews with installation operational and management staff. The audit included a review of environmental compliance with federal, state, and local legal requirements and applicable environmental policies and instructions, as well as a review of the EMS documentation to determine continued conformance to ISO 14001:2004 and OPNAVINST 5090.1C CH-3.

## *Environmental Management System*

NCBC Gulfport has established, documented, implemented, and is maintaining and continually improving an EMS in accordance with the requirements of ISO 14001:2004 and OPNAVINST 5090.1C Chapter 3. Highlights of Noteworthy Practices and Positive Observations identified during the audit include:

- The installation has recently (January 27, 2010) been accepted as a leader in “The Mississippi Department of Environmental Quality (MDEQ) enhance program, a voluntary stewardship program that recognizes committed environmental leaders who accomplish goals beyond their legal requirements.”
- The installation promotes environmental stewardship base-wide. Guidance for the proper management and disposal of household hazardous waste and other environmental announcements, such as the Earth Day celebration, are posted on the installation's Environmental web portal.
- Development of a “Construction Environmental Inspection Guide” for contractors working on the installation enhances environmental compliance.
- Implementation of an aerosol can recharging system reduces hazardous waste.
- The NCBC Gulfport water supply received a 5 out of 5 rating in their last inspection conducted by the Mississippi State Department of Health.
- NCBC Gulfport has been selected the 2009 Federal Governmental Recycler of the Year by the Mississippi Department of environmental Quality. This is a true testimony to the stewardship of their personnel.
- The NEPA review of the new NEX is to install Convault ASTs instead of USTs. This recommendation reflects good engineering practice, as the high water table in this area makes it impractical to keep the sump pits clear of water, a federal requirement.

Installation may re-declare conformance with ISO14001 when Minor Non-Conformance and Non-Compliance findings have corrective actions defined and planned in a POA&M with senior leadership support and the POA&M is approved by Audit Team Lead.

The EMS Audit Team identified three (3) Noteworthy Practices, six (6) Minor Non-Conformances, and fourteen (14) Observations, as shown on Table 1 below. Summaries of each can be found in Section 4.0 of this report and detailed descriptions are located in Appendix D.

**Table 1 – Summary of EMS Non-Conformances**

<b>ISO 14001 Section</b>	<b>Noteworthy Practices</b>	<b>Major Non-Conformances</b>	<b>Minor Non-Conformances</b>	<b>Observations</b>
<b>4.1 General Requirements</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>4.2 Policy</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>4.3.1 Environmental Aspects</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>4.3.2 Legal and Other Requirements</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>
<b>4.3.3 Objectives, Targets, and Programs</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>
<b>4.4.1 Resources, Roles, and Responsibilities</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>
<b>4.4.2 Competency, Training and Awareness</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>
<b>4.4.3 Communication</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>
<b>4.4.4 Documentation</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>4.4.5 Control of Documents</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>4.4.6 Operational Control</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>
<b>4.4.7 Emergency Preparedness and Response</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>4.5.1 Monitoring and Measuring</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>
<b>4.5.2 Evaluation of Compliance</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>
<b>4.5.3 Nonconformity/Corrective &amp; Preventive Action</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>4.5.4 Control of Records</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>
<b>4.5.5 Internal Audit</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>4.6 Management Review</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>
<b>TOTAL</b>	<b>3</b>	<b>0</b>	<b>6</b>	<b>14</b>

### *Environmental Compliance Assessment*

The audit team identified twelve (12) Major Non-Compliances, nine (9) Minor Non-Compliances, fifteen (15) Observations and four (4) Noteworthy Practices. Table 2 provides a list of the compliance media audited, along with the number of associated findings. Additional information regarding each finding is provided in Section 3.0 of this report and detailed descriptions can be found in Appendix D.

**Table 2 – Summary of Environmental Non-Compliance Findings**

<b>Media</b>	<b>Major Findings</b>	<b>Minor Findings</b>	<b>Observations</b>	<b>Noteworthy Practices</b>
<b>Air, Ozone Depleting Substances (ODS)</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Asbestos, Lead Based Paints (LBP)</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>
<b>Hazardous Materials</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>0</b>
<b>Hazardous Waste</b>	<b>5</b>	<b>4</b>	<b>2</b>	<b>1</b>
<b>Petroleum, Tanks, Spill Prevention and Response Planning (SPCC, OHS)</b>	<b>4</b>	<b>2</b>	<b>5</b>	<b>1</b>
<b>Recycling Program (QRP)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>Pollution Prevention</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>
<b>Drinking Water</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>1</b>
<b>Stormwater</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>0</b>
<b>TOTAL</b>	<b>12</b>	<b>9</b>	<b>15</b>	<b>4</b>

The Audit Team gratefully acknowledges the support of the regional and installation environmental staff for their assistance in execution and coordination of this audit. Their support and cooperation was outstanding and ensured a smooth and successful review.

## 2.0 INTRODUCTION

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### 2.1 Freedom of Information Act

This External Environmental Audit report has been prepared for internal Navy use only. The Freedom of Information Act (FOIA) and information security requirements govern release of activity specific data and information to agencies outside the Navy. Consequently, the opinions, recommendations, and any unexecuted plans for addressing identified findings may be exempt from disclosure under the FOIA. Any request for this report, under a FOIA request or any equivalent host nation law, by any individual, organization or foreign government shall be referred to the Office of General Counsel, Commander Navy Region SE for review and release determination.

### 2.2 Audit Location and Brief Scope

This report presents the results of a combined External EMS Audit and Environmental Compliance Assessment conducted on 22-26 March 2010 at NCBC Gulfport, MS. An eight (8) person audit team composed of Naval Facilities (NAVFAC) Engineering Command and Commander Navy Installation Command (CNIC) personnel conducted the assessment, as requested by CNIC.

Located in Gulfport, MS, NCBC Gulfport was first established as an Advanced Base Depot on June 2, 1942 in Gulfport. The first Seabees were civilian construction workers who enlisted early in World War II to continue building for the Navy in the Pacific Theater and in Europe. The mission of the Center changed in March 1944 from a receiving organization to a U.S. Naval Training Center, and provided for training for base engineering, diesel, radioman, quartermaster and electrician's ratings. Realignment then created a single command of the Naval Training Center and the Advanced Base Depot. The depot became the U.S. Naval Storehouse in 1945 and the training center was decommissioned in 1946. In 1948 the station became custodian of national stockpile materials. Major units at NCBC Gulfport include the 20th Naval Construction Regiment, the NMCB 1, 7, 11, 74, 133 the Reserve Naval Construction Force the Naval Construction Training Center, and the Expeditionary Combat School (ECS).

The mission of NCBC Gulfport is to maintain and operate facilities and provide services and material in support of Naval Construction Force Units, to include Amphibious Construction Fleet Units, the Maritime Prepositioning Force (Enhanced), and other fleet and assigned organizational units deployed from or home-ported at CBC Gulfport, and to perform such other functions and tasks as may be assigned by higher authority.

## **2.3 Environmental Compliance Assessment Background**

OPNAVINST 5090.1C, Chapter 3, section 3-7.2 requires that an external Environmental Compliance Assessment be periodically conducted to evaluate compliance with applicable environmental regulations. The Budget Support Office, CNIC, has directed NAVFAC to conduct external Environmental Compliance Assessments at CNIC installations at intervals not to exceed every three years. This external Environmental Compliance Assessment meets this requirement.

## **2.4 EMS Background**

Executive Order 13514 of 5 Oct 2009 requires federal agencies to implement an EMS at every appropriate organizational level. OPNAVINST 5090.1C, CH-3 of 31 Aug 2007 requires that all appropriate facilities in the Navy have an EMS and that the EMS conform to standards provided under International Standards Organization (ISO) 14001:2004. NCBC Gulfport qualifies as an EMS appropriate facility. In accordance with the Navy EMS Declaration of Conformance Protocol, all Navy EMS appropriate facilities declared conformance with ISO 14001:2004 by the 30 September 2009 deadline. To ensure that Navy's appropriate facilities' EMS are operating as described, using on-going assessment and continual improvement to support overall performance, OPNAVINST 5090.1C – Chapter 3-6.2 requires that all EMS appropriate facilities validate ISO 14001:2004 conformance on an external audit cycle of once every three years. This External Environmental Audit meets this requirement.

## **2.5 EMS Legal Requirements**

The following legal requirements or drivers were followed during the External Environmental Audit:

- (a) ODUSD Memorandum of 5 April 2002, DOD EMS
- (b) ODUSD Memorandum of 16 July 2004, DOD EMS Self-Declaration Policy
- (c) Executive Order 13423 of 24 Jan 2007
- (d) OPNAVINST 5090.1C CH-3 of 31 Aug 2007
- (e) ISO 14001:2004, EMS Specification with Guidance for Use
- (f) ISO 19001:2002, Guidance for Quality EMS Auditing

## **2.6 Audit Scope and Methodology**

Audit activities were in accordance with ISO 14001:2004, ISO 19001:2002 and OPNAVINST 5090.1C CH-3 of 31 Aug 2007. They included:

- Review of appropriate documentation, records, reports, EMS Procedures, implementation manuals, Assessment Plans, POA&Ms and other relevant files.
- Interviews with various installation, tenant and contractor representatives.
- Site visits to host command, tenant commands, and contractors' operational areas.

For a facility to be in full conformance, EMS shall be implemented from fence-line to fence-line including all tenants. The scope of the EMS audit included all the components and elements of the EMS as identified in the ISO 14001:2004 standard as they apply to NCBC Gulfport. The scope is defined as discussed in NCBC Gulfport's EMS Manual. It was not possible to review the entire appropriate facility due to time and resource constraints; therefore, a sampling technique was used.

The compliance assessment was performed with the assistance of an installation specific checklist developed through Listbuilder. An updated checklist will be provided to the installation electronically for their future use.

## **2.7 Required Follow-up Action**

### **Environmental Compliance Assessment:**

Within 30 days of receipt of the finalized External Environmental Audit Report, NCBC Gulfport shall develop a plan of action with corresponding milestones (POA&M) to address the identified environmental compliance findings and to implement recommendations. The corrective action POA&M shall be submitted to the Audit Team Lead for approval. Status of corrective actions shall be reported to NAVFAC SE quarterly and to NAVFAC LANT annually.

NAVFAC SE and NAVFAC LANT are available to provide technical assistance, if needed, to correct the findings.

### **EMS Audit:**

For any findings of non-conformance, the following action is necessary:

- NCBC Gulfport shall propose corrective actions to the audit team within 30 days after receipt of the audit report and provide a POA&M with estimated completion dates.
- NCBC Gulfport must follow-up with the necessary documentation to verify implementation and completion of corrective actions.
- Once the non-conformance findings have been corrected and the appropriate documentation has been developed and submitted for final approval, a certification letter from the audit team will be issued declaring NCBC Gulfport in conformance with EMS requirements per ISO 14001:2004.
- Once the letter has been received the following procedures must be followed:
  - Commanding Officer, NCBC Gulfport shall prepare a Memorandum of EMS Declaration of Conformance thereby declaring their ISO 14001 conformance status.
  - Copies of the memorandum shall be provided to the EMS Management Representative, the EMS audit team leader, and the EMS Appropriate Facility's BSO.
  - The BSO shall provide a copy to CNO (N45).

As required by OPNAVINST 5090.1C, Chapter 3, Section 3-6.2, "Continuing Conformance", all Navy EMS Appropriate Facilities shall execute the protocol to validate ISO 14001:2004 conformance on an audit cycle of one-year internal and three-year external per ODUSD Memorandum of 16 July 2004, DOD EMS Self-Declaration Policy. Appropriate facilities with an externally registered EMS may use registration documents to meet this requirement.

## 3.0 COMPLIANCE AUDIT FINDINGS BY MEDIA

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This section provides a general overview of each environmental media audited, summarizes audit findings, and provides observations and recommendations, where identified. Non-Compliance Forms, which can be found in Appendix D, provide detailed descriptions of each finding. Appendix E includes a copy of the completed compliance checklists.

The findings identified in this report utilize the following naming convention:

*UIC#-Media Area-Finding Type-Finding#-Year*

The abbreviations and/or nomenclatures for the naming convention are defined below:

**UIC# = 62604** (NCBC Gulfport)

### **Media Areas:**

- AE = Air Emissions
- ASB = Asbestos
- HM = Hazardous Materials
- HW = Hazardous Waste
- POL = Petroleum Oils and Lubricants
- P2 = Pollution Prevention
- RE = Recycling
- SW = Solid Waste
- ST = Storage Tanks
- WW = Wastewater
- WQ = Water Quality (drinking water)
- WS = Storm Water

### **Finding Types:**

- MJ – Major
- MN – Minor
- NP – Noteworthy Practice
- OBS – Observation

## 3.1 Air Quality

### DISCUSSION:

NCBC Gulfport is currently permitted as a synthetic minor source of air pollution (Permit No. 1020-00080). The facility is considered a synthetic minor source of hazardous air pollutants (HAP) as represented in their current permit. NCBC Gulfport is located in Harrison County, Mississippi; an area currently classified by the EPA as attainment for all National Ambient Air Quality Standards (NAAQS) criteria pollutants [40 CFR 81.310]. Based on current projections there is a possibility that the Gulfport area may be designated as ozone non-attainment area in the future. New Source Performance Standards (NSPS) are federal air quality standards codified under 40 CFR Part 60 of the federal regulations that apply to specific categories of sources and emissions units. NCBC Gulfport is currently operating equipment covered by the following NSPS:

- 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (all engines manufactured after April 1, 2006).

NCBC Gulfport is also subject to the following National Emissions Standards for Hazardous Air pollutants (NESHAPs):

- 40 CFR 63 – Gasoline Distribution Facilities
- 40 CFR 63 – Reciprocating Internal Combustion Engines

The emission sources at NCBC Gulfport include engine testing operations, external combustion equipment, internal combustion equipment, surface coating operations, storage tanks / fueling stations, solvent use operations, fire fighting training, and abrasive blasting operations.

The following areas were visited NCTC, CED, 20<sup>th</sup> NCR, PWD, NEX gas station, and HVAC contractor. A review of records in the environmental office was also conducted.

### FINDINGS:

1. **62604-AE-MJ-1-2010:** Maintenance records for equipment containing greater than 50 lbs ODS don't meet the requirements of **40 CFR 82.156 and 40 CFR 82.166**. The observed maintenance record for the subject equipment didn't include the initial ODS charge, amount of ODS added to the equipment, the leak rate calculation, or the actual dates of the leak discovery and repair (gave just month, not day). EPA requires that subject equipment leaking greater than 15% be repaired within 30 days of discovery. Current recordkeeping form can't be used to confirm leak rate or repair date. According to shop supervisor, leaks are repaired as they are discovered but records don't confirm that.

**RECOMMENDATION:** NCBC Gulfport should establish and record an initial ODS charge for all subject equipment; record day and month of leak discovery and repair; and calculate and record the leak rate.

2. **62604-AE-MJ-2-2010:** ODS containing equipment/appliances evacuated for disposal at CED don't have verification forms signed by the technician that performed the evacuation/verification as required by **40 CFR 82.156 and 40 CFR 82.166**. The ODS is evacuated from equipment prior to disposal at CED and the equipment is stenciled as such, but no signed verification is included. EPA requires that the technician that performed the evacuation or verification to sign a statement stating so and provide their name and address. Appliances are stenciled as ODS free.

**RECOMMENDATION:** NCBC Gulfport should use a label or tag with a verification statement that will provide the technician with the space to sign.

## 3.2 Asbestos

### DISCUSSION:

An asbestos survey was originally conducted by Westinghouse in 1991 and was conducted again by PWC Pensacola. Naval Facilities Engineering Service Center (NFESC) prepared the Operations and Maintenance report in 1995.

### OBSERVATION:

1. **62604-ASB-OBS-1-2010:** Currently there is no staff person assigned and/or available to serve as points of contact on asbestos related matters. This is a Facilities/Safety issue that NCBC Gulfport must resolve as soon as possible. NCBC Gulfport personnel supervise the project and provide notification to the state as well as signature on manifests. The only person who was trained and certified to provide proper asbestos program management and supervision was advised not continue providing support the program due to lack of funds. The staff member works in the Safety Department. This person was responsible for all state notification and supervision of contractors. The funding issue must be resolved as soon as possible before NCBC Gulfport gets an inspection that may result in a Notice of Violation (NOV). Inspection, Supervisory and Management Planning Training is usually required for personnel working in this position.

**RECOMMENDATION:** Provide a single qualified point of contact so that asbestos work and management does not get interrupted due to loss of personnel.

**(No Findings Reported)**

### 3.3 Hazardous Materials (HM)

#### **DISCUSSION:**

NCBC Gulfport stores and uses hazardous materials at multiple locations for vehicle and facility maintenance as well as contingency war reserves.

The following facilities which store hazardous materials were visited during the EQA:

- (1) CED
- (2) NCTC, Bldg 70
- (3) CHRIMP/Hazmat Storage, Bldg 228
- (4) 20<sup>th</sup> Supply, Building 225
- (5) Marine Corps Reserve Center, Bldg 243
- (6) R-436
- (7) NEX AutoPort

The EQA site visits included spot checks for compliance with Material Safety Data Sheet (MSDS) availability, CHRIMP procedures, and compatible storage of hazardous materials.

#### **FINDINGS:**

1. **62604-HM-MJ-1-2010: (29 CFR 1910.1200).** A MSDS is required to be on file for each hazardous chemical stored and used. The MSDS booklet should be on file and readily accessible to workers on all shifts in the workplace for each hazardous material. At the 20<sup>th</sup> Supply, Bldg 225-B, the person on-site was not aware of where MSDS's were kept. He indicated the individual responsible for that was not in the office. This work center has a cabinet which includes aerosol paint cans and other HM.

**RECOMMENDATION:** There should be a periodic safety review of hazardous chemical usage at each work center and a review of the availability of MSDS's. Each work center should brief all personnel on where MSDS's are located. The MSDS booklet should be made available in a highly visible location.

2. **62604-HM-MN-1-2010: (CNRSE Inst 5090.1 dated 29 Oct 01 and COMFISC Inst 5090.1 dated 8 May 08).** During spot checks of haz-mat storage lockers, multiple containers of HM were found without CHRIMP bar codes. **CNRSE INST 5090.1** required comprehensive implementation of CHRIMP procedures at all CNRSE installations. Example locations include:

- Bldg 225-B, 20<sup>th</sup> Supply: Aerosol paints
- CED Hazmat bulk storage. Refrigerants such as R-407C and R-401B were not bar coded.

- NCTC: Heavy duty glass cleaner and a type of straw foam did not have CHRIMP bar codes.

**RECOMMENDATION:** Work centers should verify that HM containers without bar codes are included on their Authorized Use List and they should contact Supply personnel about obtaining CHRIMP bar codes. Work centers need to coordinate assistance visits with CHRIMP personnel.

3. **62604-HM-MN-2-2010: (COMFISC INST 5090.1 dated 8 May 08).** At multiple work centers, hazardous materials contained in storage lockers had expired shelf life based on their CHRIMP bar codes. Work centers that had expired shelf life materials included:

- NCTC – Multiple items had CHRIMP bar code expiration dates in 2004.
- Marine Reserve Center
- R-436, Bldg 241

**RECOMMENDATION:** Since most work centers are using these products, they need to check with CHRIMP to determine if the shelf life dates can be extended. Certain regulatory agencies could question whether or not materials with expired shelf lives could be considered waste. If the materials are no longer needed, they should be processed for disposal.

### **OBSERVATION:**

1. **62604-HM-OBS-1-2010: (29 CFR 1910).** 29 CFR 1910 and general safety guidelines require hazardous materials to be stored in a manner that will not create potential fire, explosion, or reaction hazards. At the CHRIMP warehouse, Bldg 228, materials are stored in compartments based upon who owns the stock (NFELC, CED, etc.) Leaks from individual compartments flow into spill containment vaults beneath floor grates. If incompatibles are stored in the same compartment, leaks would flow into the same floor vault. In one area, flammable drilling foam containers were stored above corrosive containers (ferric chloride). One drilling foam container had leaked and there was absorbent material on the floor. In another compartment, muriatic acid was stored with various other haz-mat and supplies. The unsigned **NCBC Gulfport Instruction 5090.6A** (CHRIMP) states work centers shall “segregate HM according to material classification (flammables, acids, corrosives, etc.) in separate lockers...”

**RECOMMENDATION:** Recommend a safety review of the storage of corrosives and flammables with multiple other hazardous materials and supplies within the same compartment. Some of these materials may require further segregation based on compatibility and hazard beyond the separation based upon ownership.

### 3.4 Hazardous Waste (HW)

#### **DISCUSSION:**

NCBC Gulfport is a Large Quantity Generator (LQG) of hazardous waste and does not have a RCRA Part B Permit, thus the installation may store hazardous wastes on-site for 90 days or less. NCBC Gulfport operates one <90-day Hazardous Waste Storage facility with multiple satellite accumulation areas throughout the installation.

The following facilities were visited during the EQA:

- (1) <90-day Hazardous Waste Storage Facility
- (2) CED
- (3) NCTC, Bldg 70
- (4) CHRIMP/Hazmat Storage, Bldg 228
- (5) 20<sup>th</sup> Supply, Building 225
- (6) Marine Corps Reserve Center, Bldg 243
- (7) R-436
- (8) NEX AutoPort

#### **NOTEWORTHY PRACTICE:**

1. **62604-HW-NP-1-2010:** CED has implemented a procedure for brake cleaner that has greatly reduced the number of aerosol cans which would have to be disposed of as HW. The brake cleaner is purchased in 55-gallon drums. There is a special apparatus attached to the top of the container which is used to re-fill specialized aerosol cans for re-use. This material was previously procured in individual aerosol cans. The new procedure has reduced procurement costs for CED and reduced the disposal costs and labor required to manage numerous used aerosol cans. CED should be commended for researching this cost-saving initiative.

#### **FINDINGS:**

1. **62604-HW-MJ-1-2010: (40 CFR 262).**
  - At the <90-day HW storage facility, a tri-wall box of hazardous waste non-flammable aerosol cans had a label with an accumulation start date of 13 May 09. NCBC Gulfport is a large quantity generator of HW without a RCRA permit and thus cannot legally store HW beyond 90-days. It is possible that this container may have been re-used with an old label remaining attached.
  - There was another tri-wall box inside the <90-day HW storage facility being used to collect hazardous flammable aerosol cans which had a label but no accumulation start date was affixed. The accumulation start date should be applied when a waste container begins collecting waste at a < 90-day storage area. Satellite accumulation

**RECOMMENDATION:** If aerosol cans will be collected in batches within the 90-day HW storage facility, NCBC Gulfport should explore collecting the cans in smaller containers that can be filled and disposed of within 90 days. The labels of each container should be checked and compliance verified during the weekly inspections of the HW storage facility. CHRIMP personnel indicated aerosol can puncturing was discontinued due to a safety/ventilation concern that the Fire Department identified at their puncturing location. The entire aerosol cans must now be disposed of intact as hazardous waste. The command may consider setting up a properly ventilated can puncturing location with appropriately trained personnel wearing applicable personal protective equipment. This could potentially save considerable waste disposal costs since only the residues must be disposed of as HW when the cans are punctured.

2. **62604-HW-MJ-2-2010: (40 CFR 262.34(a)(2-3)).** Waste containers at multiple facilities across the installation had missing or incomplete labels. These containers included:

- A drum of sand blast media outside the 90-day HW storage facility was labeled with a non-hazardous waste label; however, the actual contents of the drum were not on the label.
- A tri-wall box of POL absorbents inside the 90-day HW storage facility was labeled with a non-hazardous waste label; however, the actual contents of the box were not on the label.
- At the CED C-Shop, there was a drum with no label at their SAA. Personnel indicated the drum was used for anti-freeze.
- At the Marine Corps Reserve Center Bldg 243, there was a container marked with both anti-freeze and used oil stenciling. The actual contents were unknown and the drum will have to be tested.

**RECOMMENDATION:** HW Coordinators at the SAAs and the manager of the 90-day HW storage facility should utilize their checklists to routinely verify that each container has the proper labeling. Periodic spot checks and additional on the job training for tenant command coordinators may be required by the installation HW manager.

3. **62604-HW-MJ-3-2010: (40 CFR 273.15).**

- At the <90-day HW Storage facility, there were three containers of fluorescent light bulbs of various sizes being used to collect spent bulbs as they are turned in. Each container had a Universal Waste label, but no accumulation start date was affixed.

- At the <90-day HW storage facility, there was a 30-gallon drum of Ni-Cad batteries. The container had a Universal Waste label, but no accumulation start date was affixed.
- At the <90-day HW storage facility, there was a 55-gallon drum used to collect lead-acid batteries. The container had a label with an accumulation start date of 23 Nov 08 which is well beyond the one year regulatory time limit that universal waste can be accumulated. It appears the container was being re-used without the label being changed. Lead acid batteries do not have to be managed as universal wastes. These batteries can be managed as exempt recyclable spent lead acid batteries under 40 CFR Part 266, Subpart G.

**RECOMMENDATION:** Universal waste containers should be marked with the earliest date when the first universal waste was placed into the container. The inspection checklist for the <90-day HW facility should be used to verify that all containers are properly labeled. The universal waste accumulation start dates should be checked during the weekly inspection.

4. **62604-HW-MJ-4-2010: (40 CFR 265.37).** Large quantity generators are required to prepare a formal contingency plan that outlines the procedures necessary to respond to fires, explosions, or releases of HW. This plan must meet the requirements of Part 265, Subpart D. This plan must be submitted to local police and fire departments and emergency response authorities
  - 40 CFR 265.37 requires HW facility operators to make arrangements to familiarize police, fire departments, and emergency response teams with the properties of HW handled at the facility and associated hazards, etc.
  - Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority and agreements with any others to provide support should be documented.
  - Agreements with emergency response teams and emergency response contractors should be documented.
  - Arrangements to familiarize local hospitals with the properties of HW handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility should be documented.

NCBC Gulfport has chosen to incorporate their HW contingency plan into their SPCC plan. Environmental personnel indicate that this plan has not been submitted or coordinated with local police departments, fire departments, and hospitals outside the gate.

**RECOMMENDATION:** When the SPCC and/or OHS Plan are updated, these plans should be submitted to the appropriate local authorities outlined in 40 CFR Part 265. Document the coordination and arrangements with local authorities in these plans. The installation should ensure RCRA requirements are addressed in the plan.

5. **62604-HW-MJ-5-2010: (40 CFR 279.22).** 40 CFR 279 requires containers of used oil to be clearly labeled with the words “USED OIL.”
- At CED Bldg 402, there was a used oil drum beneath an oil filter crusher which was not labeled.
  - At NCTC Bldg 70 East Wing, there was a portable oil collection unit which was not labeled.
  - At R-436, a used oil aboveground storage tank did not have a complete label with the words “used oil.” (Temporary labels were applied.)

**RECOMMENDATION:** Consider weatherproof labels/placards/stencils for outdoor used oil tanks such as those at R-436. Also, HW coordinators should routinely check their accumulation areas for proper labeling of containers when reviewing their checklists. Additional spot checks may be required by the HW program manager to ensure personnel are following proper procedures.

6. **62604-HW-MN-1-2010: (OPNAV 5090.1C, Chapter 15-4.1(f)).** Per OPNAV 5090.1C, Chapter 15, personnel signing hazardous waste manifests shall be authorized in writing by the installation commander. During a spot check of hazardous waste manifests from 2009-10, multiple personnel have signed NCBC Gulfport HW manifests without written authorization from the installation commander. On 11 Feb 10, Darrin Hill signed multiple manifests for spent solvents picked up by Safety Kleen. In 2009, Anthony Cothorn and Jeffrey Gavitt also signed hazardous waste manifests. There was one instance in 2009 where a DRMO employee (Forrest Brown) signed the HW manifests without a co-signature from an authorized Navy representative. None of these personnel are listed on the 28 Aug 08 authorization letter signed by Capt Brown. Personnel signing manifests should have appropriate hazardous waste management training and training in proper DOT shipping standards. In addition to not having authorization to sign manifests from the CO, it is unclear whether all personnel signing manifests had the proper training.

**RECOMMENDATION:** Hazardous waste transporters that pick up HW aboard NCBC Gulfport should be briefed on the specific personnel authorized to sign manifests. All work centers aboard NCBC Gulfport should be briefed that personnel cannot sign HW manifests without written authorization from the CO and without appropriate training in HW and DOT rules.

7. **62604-HW-MN-2-2010: (OPNAV 5090.1C, Ch. 15-4.1(f) and 49 CFR 172.604).** OPNAV 5090.1C, Ch. 15 requires installations to include a 24-hour manned duty telephone number in the generator block on each manifest. In a spot check of manifests, the 1 Mar 10 HW manifest shipped to AES, Inc. (DRMO contractor) did not have a generator phone # listed. The EPA instructions for completing a HW manifest also require a phone number to be entered from which emergency response information can be obtained in the event of an incident during transportation. The emergency response phone number must:
- Be the number of the generator or the number of an agency or organization who is capable of and accepts responsibility for providing detailed information about the shipment;
  - Reach a phone that is monitored 24 hours a day at all times the waste is in transportation (including transportation related storage); and
  - Reach someone who is either knowledgeable of the hazardous waste being shipped and has comprehensive emergency response and spill cleanup/incident mitigation information for the material being shipped or has immediate access to a person who has that knowledge and information about the shipment.

**RECOMMENDATION:** NCBC Gulfport should coordinate with DRMO and any other providers of manifests to ensure an appropriate generator telephone number is listed on each HW manifest.

8. **62604-HW-MN-3-2010: (OPNAV 5090.1C, Ch. 15-5.7).** OPNAV 5090.1C requires every person who produces, packages, handles, treats, or transports HW to receive job-specific training regarding HW safety, packaging, labeling, documentation, transportation, and turn-in procedures. The training shall also address applicable Federal, State, and local laws and regulations. Each command shall maintain training records and documentation. During spot checks of two work centers, HW coordinator training documentation is not readily accessible. At NCTC, the NCTC Environmental Coordinator indicated the station Environmental office would maintain those records; however, Environmental personnel indicated the coordinators should have that documentation. At CED, the Environmental Coordinator had ready access to HAZCOM training records on ESAMS, but not hazardous waste training records.

**RECOMMENDATION:** The work centers and tenants should be briefed on training documentation recordkeeping procedures. There should be consistent procedures established through the EMS.

9. **62604-HW-MN-4-2010: (40 CFR 262.34).** At NCTC, Bldg 70 Light Shop, there was a glove box used for sandblasting parts on an intermittent basis. There was used blast material on the floor beneath the glove box. This material had not yet been characterized. In another regulatory jurisdiction, regulators cited an installation for

**RECOMMENDATION:** The glove box should be sealed to prevent fugitive emissions of media if possible. If not, blast media that collects on the floor after use should be cleaned up each day and either placed back into the unit for re-use or properly collected in a SAA.

**OBSERVATIONS:**

1. **62604-HW-OBS-1-2010: (OPNAV 5090, Chapter 15-5.7).** OPNAV 5090.1C requires every person who produces, packages, handles, treats, or transports HW to receive job-specific training regarding HW safety, packaging, labeling, documentation, transportation, and turn-in procedures. The training shall also address applicable Federal, State, and local laws and regulations. These OPNAV requirements go beyond what is required by EPA.
  - The HW coordinator at the Marine Corps Reserve Center, Bldg 243 indicated he had been in the position since approximately Aug 09. He indicated that he had not received HW training.
  - The HW coordinator and Environmental Coordinator at R-436, Bldg 241 indicated they had not received HW training although they had only been assigned HW duties for approximately one month.

**RECOMMENDATION:** OPNAV 5090, Ch. 15 does not specify a time requirement to attend HW training for SAA coordinators. It would appear prudent to follow the standard of completing initial training within six months after entering the SAA coordinator position. Prior to attending a training course, untrained SAA coordinators should work under the supervision of another individual in their organization that has been trained. (The six month period is allowed for those HW management personnel that are subject to the 40 CFR 265 training requirements.) NCBC Gulfport has CECOS conduct annual HW training for HW coordinators. Due to the rapid turnover of military billets, the installation HW manager may need to explore conducting periodic in-house SAA training or finding a local provider to supplement the annual CECOS course.

2. **62604-HW-OBS-2-2010: (Navy Listbuilder Checklist Management Practice (HW.1.2.US)).** The Navy EQA checklist states that individuals responsible for HW storage areas must be designated in writing. NCBC Gulfport has not instituted these procedures for their HW coordinators.

**RECOMMENDATION:** NCBC Gulfport should establish procedures for HW coordinators to be designated in writing from each work center, tenant, or department.

### 3.5 Pollution Prevention

#### **DISCUSSION:**

The P2 plan for the base was updated August 2009. P2 equipment that have been in use include cardboard box bailer, a solid waste sorting conveyor, a plastics recycler (#1 & #2 plastics), aqueous parts washers, etc. The Pollution Prevention (P2) Coordinator at NCBC Gulfport is vacant at this time. A transfer employee NAS New Orleans will fill the post on 1 April.

#### **FINDING:**

1. **62604-P2-MN-1-2010:** The P2 Plan is not signed, as required by OPNAVINST 5090.1C.

**RECOMMENDATION:** The CO should sign the implementing signature page of the revised P2 plan.

### 3.6 Recycling

#### **NOTEWORTHY PRACTICE:**

1. **62604-RE-NP-1-2010:** The recycling program is doing very well by segregating and marketing numerous waste streams which include: aluminum, petroleum, steels, brass, cardboard, paper, plastics, grease, cast iron and rubber. Over 763-tons has been diverted this fiscal year from landfills and the total sales are \$45,130. Personnel managing the recycling program are supported through Non-Appropriated Funding (NAF). Through community outreach, NCBC has shed a positive light on the public by hosting tours of the recycling facility for school children. This is a very generous and positive activity for NCBC personnel to be involved with and they should be commended for their efforts in meeting this objective.

**(No Findings Reported)**

### 3.7 Solid Waste

#### **DISCUSSION:**

Solid wastes generated by NCBC including food and non-hazardous industrial wastes are transported and disposed of by Waste Management, Inc. This contract is renewed on a yearly basis. Personnel assigned to manage solid wastes have numerous collateral duties.

**(No Findings Reported)**

### 3.8 Spill Prevention Control and Countermeasures (SPCC)

#### DISCUSSION:

The audit of the SPCC Program focused on areas that store petroleum products in:

- Aboveground storage tanks (AST), defined by 40 CFR 112 as a POL container with a capacity of 55 gallons or greater.
- Underground storage tanks (UST), defined by 40 CFR 280 and Mississippi Department of Environmental Quality Part 280 as a POL container with a capacity greater than 110 gallons.

The tank inventory list has 90 aboveground-storage tanks (AST) in service that store a variety of substances: diesel, JP-8, used oil, hydraulic oil, engine oil, elevator oil and used antifreeze. The capacities of these AST range from 60-12,000 gallons. There are 6 regulated underground storage tanks (340-01, -02, -03, 400-02, -03, -04) and 7 inactive AST tanks at the facility (219-01, 222-01, -02, 340-05, 400-12, -13, -14). There is one unregulated UST that was discovered at bldg 241 that stores product that is connected to an OWS.

**Table 3 - Containers Inspected and/or Reviewed Records During the Audit**

Storage Container (Tank ID)	Contents	Capacity (Gallons)	Location
1	Used Cooking Oil	150	McDonalds
70-02	Used Oil	1000	Bldg 70
215-02	Used Oil	528	Bldg 215
241-01	Used Oil	500	Bldg 241
241-02	Used Oil	500	Bldg 241
298-02	Gasoline	3000	Bldg 298
456-01	Gasoline	750	Bldg 456
456-02	Diesel	750	Bldg 750
367-02	Used Cooking Oil	300	Bldg 367
306-01	Oil	128	Bldg 306
309-01	Oil	70	Bldg 309
298-01	Gasoline	500	Bldg 298
460-01	Oil	219	Bldg 460
315-01	Oil	165	Bldg 315
340-05	Used Oil	250	Bldg 340
397-01	Used Oil	500	Bldg 397
398-01	JP-8	12,000	Bldg 398
398-02	Diesel	12,000	Bldg 398
400-11	Diesel	250	Bldg 400
400-05	Used Oil	500	Bldg 400
400-06	Hydraulic Oil	300	Bldg 400

Storage Container (Tank ID)	Contents	Capacity (Gallons)	Location
400-07	Hydraulic Oil	300	Bldg 400
400-08	Engine Oil	300	Bldg 400
400-09	Engine Oil	300	Bldg 400
400-10	Engine Oil	300	Bldg 400
402-02	Diesel	500	Bldg 402
437-01	Diesel	10,000	Bldg 437

Public Works (PW) is responsible for oversight of the repair, refueling, inspections, testing, and general maintenance of the installation's ASTs. With the exception of conducting inspections and general repair of the storage containers, all other functions are provided through contractor support.

PW Utilities conducts monthly inspections of the storage containers that they maintain, including valves, piping, and appurtenances associated with the storage containers. PW Environmental staff also performs spot checks on POL containers, which includes secondary containment, storm water, valves, housekeeping, spill control equipment, and overfill protection.

The refueling of the ASTs is performed by a local contractor who is overseen by PW personnel. The operation is performed by utilizing standard operating procedures, which minimizes the risk of fuel being released to the environment.

**NOTEWORTHY PRACTICE:**

1. **62604-ST-NP-1-2010:** A noteworthy practice was noted concerning the design of petroleum tanks. The environmental department noted that as a result of a NEPA review, the new NEX is to install ConVault ASTs instead of USTs. The high water table in this area makes it impractical to be able to keep the sump pits clear of water, which is required under federal regulations. Furthermore, Convault tanks have a two hour fire rating, are able to withstand a 50,000 pound explosion, and can withstand vehicle impacts. The specifications of AST Convault tanks make them ideal for military installations. The military fueling facility at bldg 398 has an excellent design. Recommend that the new NEX be based off this design.

**FINDINGS:** Six (6) findings (e.g. 4 Major and 2 Minor) were identified during the audit as described below. The Environmental Department submitted work requests to fix the findings and/or contacted contractors to look at the tank systems before the audit team completed the audit. These items will remain open until the work requests have been completed and the contractors have finished inspecting the tank systems.

1. **62604-ST-MJ-1-2010: (40 CFR 112.7)** All ASTs must be inspected regularly. ASTs at the following locations did not have inspection reports: 70-02, 456-01, 456-02, 340-05, 397-01, 398-01, 400-11, 400-05, 400-06, 400-07, 400-10, 400-12, and 400-

**RECOMMENDATION:** Recommend that these be added to the PM list of current tanks that are being inspected. The PW Utilities were notified during the audit to add these tanks to their current inspection list. The root cause of this finding is EMS 4.4.2 - Operational Control (DO-OPC01). There should be some documented procedure to make sure that all tanks are being inspected on a regular basis.

2. **62604-ST-MJ-2-2010: (40 CFR 112.7)** All ASTs must be properly maintained. The fill pipe connection and spill container at the top of the tank at bldg 402-02 (wash rack) is severely corroded. Also, the fill pipe connection/spill bucket at the top of the tank located at Bldg 456-01 (golf course) is also corroded. The fill pipe appears to still have thickness to keep it operational, but maintenance of tank is essential under SPCC requirements.

**RECOMMENDATION:** Recommend having a certified tank contractor look at tank to see if pipe and spill containment rust could be removed and repainted while keeping its integrity. If certified tank contractor does not believe integrity can be kept, then a new Convault tank should be planned in the budget as soon as possible. For golf course AST, if the certified tank contractor does not believe integrity can be kept, then the tank should be taken out of service after the golf course closes. For tank 402-02, the root cause of this finding is EMS 4.4.2 - Competency, Training and Awareness (DO-CTA01). Tank 402-02 was being inspected, but not properly. Additional training is needed to make sure tanks are properly inspected. For tank 456-01, the root cause of this finding is EMS 4.4.2 - Operational Control (DO-OPC01). The tank was not being inspected. There should be some documented procedure to make sure that all tanks are being inspected on a regular basis.

3. **62604-ST-MJ-3-2010:** One AST at the military gas station (bldg 398) has a water sensor probe that has malfunction. SPCC regulations require maintenance of ASTs.

**RECOMMENDATION:** Recommend getting the sensor checked out. The root cause of this finding is EMS 4.5.1 - Monitoring and Measurement (CK-MOM01). There should be some documented procedure to make sure that all probes and sensors are inspected on a yearly basis to ensure they are properly functioning.

4. **62604-ST-MJ-4-2010:** The grease waste oil AST at the McDonalds restaurant does not have a secondary containment. SPCC regulations require secondary containment on any container bigger than 55 gallons that contain oil product.

**RECOMMENDATION:** Recommend requesting McDonalds to get secondary containment for their grease waste oil. The root cause of this finding is EMS 4.4.2 - Competency, Training and Awareness (DO-CTA01). The personnel at

McDonalds are not aware of the regulation that AST require secondary containment.

5. **62604-ST-MN-1-2010:** The grease waste oil AST at the galley flexible secondary containment is falling down. SPCC regulations require secondary containment on any container bigger than 55 gallons that contain oil product.

**RECOMMENDATION:** Recommend having waste oil contractor replace this flexible secondary containment and single wall tank with a double wall tank. The root cause of this finding is EMS 4.4.2 - Competency, Training and Awareness (DO-CTA01). The personnel at the Galley are not aware of the regulation that AST require secondary containment. However, the recommendation is not inform the staff on AST regulation, but to install a double wall tank.

6. **62604-ST-MN-2-2010:** The OWS at Bldg 241 has an overflow tank that is not on list to be cleaned. Two feet of diesel fuel were discovered in the tank. The OWS should be properly maintained.

**RECOMMENDATION:** Recommend modifying OWS contract to include bldg 241 OWS to be cleaned. The root cause of this finding is EMS 4.4.2 - Operational Control (DO-OPC01). There should be some documented procedure to make sure that all OWS systems are being surveyed and maintained on a regular basis.

### **OBSERVATIONS:**

1. **62604-ST-OBS-1-2010:** The NEX tanks will be needed to come out of the ground after the new NEX is built. If funding is not budgeted now for FY12, money will not be available to remove the tanks.

**RECOMMENDATION:** Recommend budgeting money to remove tanks for 2012. The root cause of this finding is EMS 4.5.2 - Evaluation of Compliance (CK-E0C01). There should be some documented procedure to make sure that all projects are in or will be in compliance with applicable legal requirements.

2. **62604-ST-OBS-2-2010:** During the audit, it was noted that the UST inventory records for the NEX consistently shows negative values. The values are within tolerance, but expect values not to be in the negatives so consistently.

**RECOMMENDATION:** Recommend checking monitoring system to make sure it is accurately showing the correct inventory. Also, recommend tank and piping to have tightness tests done on them.

3. **62604-ST-OBS-3-2010:** During the audit, it was noted one UST at the NEX was emptied of approximately 200 gallons of water/fuel mixture because there was

**RECOMMENDATION:** Recommend checking to make sure contractor performed work. If so, recommend checking the water sensor in the tank to see if it is operating correctly.

- 4. 62604-ST-OBS-4-2010:** The contracting officer at NCBC Gulfport thought that the contract for the installation of the new lube containers was held up by Jacksonville contracting and vice versa. It is imperative that contracting actions are not delayed so mission objectives are not hindered.

**RECOMMENDATION:** Recommend that contracting offices improve communication to provide timely response to determine status of contracts.

- 5. 62604-ST-OBS-5-2010:** One tank at the NEX Gas station has water intruding into it. The molecular bonding of ethanol with water will cause damage to POVs. The gasoline supplier will no longer supply gasoline without ethanol starting 15 April 2010.

**RECOMMENDATION:** Recommend that the tank be repaired. If tank is not repaired by April 15, tank must be discontinued from service until repaired or replaced.

### **3.9 Wastewater**

#### **DISCUSSION:**

NCBC Gulfport does not treat its wastewater on-site. Instead, it discharges to the City of Gulfport for treatment. The City of Gulfport has determined that the normal discharge of the base's wastewater is within limitations of parameters that do not require an industrial pre-treatment permit. There are no point sources of discharge at NCBC Gulfport requiring a National Pollutant Discharge Elimination System (NPDES) permit in terms of wastewater.

**(No Findings Reported)**

### 3.10 Water Quality

#### **DISCUSSION:**

NCBC Gulfport operates a community water system subject to Safe Drinking Water Act requirements found under 40 CFR 141.

There are three wells at separate areas on the base that draw raw water from the Sparta Aquifer. The water is immediately chlorinated via gas chlorine stored in 150 lb. cylinders. From there, the water is distributed throughout the base via distribution pumps.

During the assessment, all three wells were inspected to assess their operation. Documents reviewed included their cross-connection/backflow prevention program, results of their previous inspections by the Mississippi Department of Health, and monthly operating reports.

A Minor Non-Compliance was initially created regarding the requirements for Sanitary Surveys of the potable water system. Upon further review of the OPNAV instruction guide, it became apparent that the Sanitary Surveys performed annually by the Mississippi Department of Health fulfills the requirement. The Minor Non-Compliance has been withdrawn from the report.

#### **NOTEWORTHY PRACTICE:**

1. **62604-WQ-NP-1-2010:** During the records review of the Drinking Water System, it was noted that the NCBC Gulfport water supply received a 5 out of 5 rating in their last inspection conducted by the Mississippi State Department of Health. This is noteworthy due to the various requirements to achieve such a score. The score is comprised of two categorical determinations. One assesses the operations and maintenance of the water system in the field to ensure that the system is run properly. The other assesses the managerial aspects of the drinking water system ensuring that records are properly maintained, reports are submitted on time, and sampling results are within regulatory parameters. The diligence exemplified by personnel in the environmental and facilities departments required to meet all these requirements for the perfect score is a noteworthy observation.

#### **OBSERVATIONS:**

1. **62604-WQ-OBS-1-2010:** NCBC Gulfport received a notice of violation (NOV) for the month of February 2010 due to its inability to sample and submit a round of bacteriological and chlorine results.

**RECOMMENDATION:** During the time of the field assessment, NCBC Gulfport was complying with the referenced regulation by distributing public notification flyers door to door throughout the base. Notifications have also been posted on the base website and newspaper.

2. **62604-WQ-OBS-2-2010:** The Safe Drinking Water Act (40 CFR 141.400) calls for public water systems with populations of 3,300 or more and use ground water to treat all of their ground water to at least 99.99 percent (4-log) treatment of viruses and continuously monitor their disinfection levels. It was noted during the drinking water assessment that the current population at NCBC Gulfport was 3,217 which is on the cusp of the threshold population of this rule. Housing units are being constructed that will eventually cause the base to exceed this number. This rule will require a more stringent disinfection method to achieve the 4-log level of treatment of viruses. It was recommended by the Mississippi Department of Health during their last inspection of the facility that a storage tank be added to the well yard in order to increase the contact time for disinfection and comply with the Ground water rule. The rule also requires reporting of the lowest disinfection residual of the day. In order for this to be properly recorded, continuous monitoring equipment needs to be installed at the wells.

**RECOMMENDATION:** It is recommended that plans be initiated to construct storage tanks at the wells to improve the level of disinfection and implement continuous monitoring by the time the base population exceeds the population threshold of 3,300.

**(No Findings Reported)**

## 4.0 EMS AUDIT FINDINGS BY ISO 14001 ELEMENT

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For the purposes of this audit report, a non-conformance is defined as a failure in some part of the documented EMS. A major non-conformance is the absence or total breakdown of an element to meet an EMS requirement, or a number of minor non-conformities against one requirement (A non-conformance that is likely to result in the failure of the EMS).

A minor non-conformance is a failure in some part of the documented EMS or a single observed lapse in conforming to one requirement of the EMS that is not likely to result in failure of the EMS. An observation meets the EMS Criteria, but is noted as a concern by the auditors that could lead to an environmental system weakness. A noteworthy practice is an EMS strength recognized by the audit team.

The scope of this Integrated EMS/Compliance Audit at NCBC Gulfport included an EMS conformance audit in addition to an environmental compliance audit. The scope of the EMS audit included all the components and elements of the EMS as identified in the ISO 14001:2004 standard as they apply to NCBC Gulfport. The scope was defined as discussed in the EMS Manual or Description Document of the appropriate facility. The audit plan was developed based on the Audit Team's review of documentation requested in the Pre-Visit Questionnaire, as well as results from previous audits. NCBC Gulfport declared EMS Conformance with ISO 14001 on 5 Aug 09. The Audit Team identified six (6) Minor EMS Non-Conformances and two (2) Observations. Detail information about these non-conformance findings is included in the following sections of this report.

The NCBC Gulfport's EMS Audit was conducted with a fenceline-to-fenceline approach and included sample surveys from departments, major commands, tenants, contractors and the Camp Keller Small Arms Range. OPNAVINST 5090.1C includes a requirement that an external EMS audit be conducted at a frequency no less than every three years, which is satisfied by this EMS audit.

Based on the results of this audit, NCBC Gulfport will be able to re-declare EMS conformance in accordance with the instructions outlined in section 2.7 of this report. Installation may re-declare conformance with ISO14001 when Minor Non-Conformances have corrective action defined and planned in a POA&M with senior leadership support and the POA&M is approved by Audit Team Lead.

## 4.1 General Requirements

### DISCUSSION:

NCBC Gulfport has established, documented, implemented, and is maintaining and continually improving an EMS in accordance with the requirements of ISO 14001:2004 and OPNAVINST 5090.1C Chapter 3. The EMS incorporates nearly all tenants and practices from “fence-line to fence-line.”

## 4.2 Environmental Policy

### DISCUSSION:

The NCBC Gulfport EMS Policy meets all of the ISO 14001 requirements. The policy commits environmental excellence, including to prevention of pollution, environmental compliance with environmental laws and continual improvement. The policy is kept up to date (30 December 2008), signed by the current Commanding Officer (CO) and posted on the base website for public access. The policy statement is introduced through environmental awareness training, which is mandatory for all new hires at the installation.

### NOTEWORTHY PRACTICES:

1. **62604-EMS-NP-1-2010:** The installation has recently (January 27, 2010) been accepted as a leader in “The Mississippi Department of Environmental Quality (MDEQ) enhance program, a voluntary stewardship program that recognizes committed environmental leaders who accomplish goals beyond their legal requirements.” This is a positive reflection of the installation’s commitment to environmental excellence, reflected in its environmental policy.
2. **62604-EMS-NP-2-2010:** The installation promotes environmental stewardship base-wide. Guidance for the proper management and disposal of household hazardous waste and other environmental announcements, such as the Earth Day celebration, are posted on the installation’s Environmental web portal.

### OBSERVATIONS:

1. **62604-EMS-OBS-1-2010** The “Environmental Policy Statement” is difficult to find on the base webpage, and its location is not particularly intuitive. Personnel must “drill down” through several links to find the current policy. Also the “Environmental Mission Statement” can be easily confused with the “Environmental Policy Statement.” Considering the other outdated information on the same page (i.e. references to the previous Deputy EPA Administrator Marcus Peacock; an “Environmental Quiz” from February 2008, and 2008 presidential election candidates) this appears to be an old statement which hasn’t been updated since fall, 2008. (See links below).

- Environmental Policy Statement:  
[http://www.cnrse-ems.org/users/limoyvanznnamlheumoffej/%7B2D2D0BEF-7616-4000-9E3D-C3C67F5B000C%7D\\_CBC\\_Gulfport\\_policy\\_feb09.pdf](http://www.cnrse-ems.org/users/limoyvanznnamlheumoffej/%7B2D2D0BEF-7616-4000-9E3D-C3C67F5B000C%7D_CBC_Gulfport_policy_feb09.pdf)
- Environmental Mission Statement:  
[https://www.cnic.navy.mil/Gulfport/Service\\_Organizations/Environmental/index.htm](https://www.cnic.navy.mil/Gulfport/Service_Organizations/Environmental/index.htm)

**RECOMMENDATION:** There should not be two different environmental statements. The “Environmental Mission Statement” should be updated and replaced by the actual Environmental Policy Statement and renamed as such. On the main page of the website are sections devoted to Safety, Disaster Preparedness, MWR, housing, etc. If the Environmental Policy could have similar visibility, access to the policy statement would be more intuitive and accessible.

**(No Findings Reported)**

### 4.3.1 Environmental Aspects

#### **DISCUSSION:**

With the assistance of an environmental contractor (Tetra Tech), Environmental Department personnel (PW-ED) conducted a “fence-line to fence-line” survey to identify all environmental practices conducted at the installation. Utilizing local knowledge and relevant documents, an environmental aspect analysis was conducted for each practice. Results of this analysis along with impact weighting factors (“significance” score) were input into the “EnviroManager” web-based software. The results of the data analysis provided the basis for determining the installation’s significant aspects. (See EMS Management Procedure, EMP-002)

#### **OBSERVATION:**

1. **62604-EMS-OBS-2-2010:** The same significance score was input to the aspect ranking for every location generating hazardous waste, whether that practice was a paint shop, conference center, base housing, or McDonalds. Identical weighting factors produced identical aspects scores (984) for every location that generates hazardous waste. A similar pattern is observed regarding other significant aspects identified, including all storm water locations related to construction activities (636), all storm water run-off locations (566), and all fuel/HAZMAT tanks (550). While EMP-002 may have been implemented formally, the reliability of the aspect ranking may be suspect due to input of identical parameters for each significance score.

**RECOMMENDATION:** This observation does not invalidate the aspect ranking procedure, however PW-ED should re-evaluate EMP-002 and the significance score input for each location and consider whether more discretion should be utilized to produce more accurate results for the ranking of significant aspects.

**(No Findings Reported)**

## 4.3.2 Legal and Other Requirements

### DISCUSSION:

The activity utilizes EMS Management Procedure EMP-003 to identify all legal and other requirements. Environmental requirements are identified through numerous environmental management plans and permits and through the review of pertinent Federal, state and local regulations, and OPNAVINST 5090.1C. Environmental expertise, training, and consultation are employed to supplement local environmental knowledge to identify the requirements. These requirements are then summarized in the “Environmental Plans Requirements” matrix, which is posted on the EnviroManager web portal.

### OBSERVATIONS

1. **62604-EMS-OBS-3-2010** The “Environmental Plans Requirements” matrix (Nov, 2009) that is posted on EnviroManager is not dated, and it is not the latest version (Feb, 2010), as indicated in EMP-003, V.A.5.
2. **62604-EMS-OBS-4-2010** Not all applicable federal, state, local and navy laws and regulations are maintained in the EnviroManager database, as indicated in EMP-003.

### RECOMMENDATIONS

- The recently deployed “Navy Listbuilder” web tool should be employed on a regularly-scheduled basis to ensure that all legal requirements identified are current and comprehensive. Listbuilder is a compliance checklist tool that is updated monthly and maintained by Construction Engineering Research laboratory (CERL), a division of the Army Corps of Engineers.
  - a. The Navy Listbuilder checklist can be accessed at:  
<http://www.cecer.army.mil/ListBuilder/index.cfm?page=naHome>.
  - b. Web-based training to learn the new Listbuilder tool may be accessed at any time through the “Advancing an Effective EMS” webpage located on the CECOS web portal:  
<https://www.netc.navy.mil/centers/csfe/cecos/index.cfm?fa=courses.custom&pg=coursedetail>
- The EnviroManager database should be updated to include links to all applicable federal/state/local laws and regulations as well as Navy policies, as described in EMP-003, B.1. Alternatively, the links could be posted on the Environmental Portal on the NCBC website with other environmental documentation, and EMP-003 updated accordingly.
- EMP-003 should be updated to incorporate the use of the Listbuilder web tool to update regulatory requirements on a prescribed schedule.

**(No Findings Reported)**

### 4.3.3 Objectives, Targets and Programs

#### **DISCUSSION:**

EMP-004 outlines the procedure to establish, communicate and maintain environmental Objectives and Targets (OT's). The installation has drafted OTs, including the timeframes by which they are to be achieved. These Objectives include:

1. Reducing the potential for receiving an NOV related to Construction Storm Water.
2. Reducing the potential of receiving an NOV related to Hazardous Waste Generation.
3. Improving compliance with Tank regulations.
4. Improving compliance with NEPA regulations.
5. Reducing the potential for receiving an NOV related to Industrial Storm Water.
6. Provide environmental training programs to the EQB subcommittee.
7. Reduce the potential for receiving an NOV related to Tank Management.

#### **FINDING:**

##### **1. 62604-EMS-MN-1-2010:**

- Objectives #3 and #7 from the OT's list involving tank inspections are redundant.
- Objective #6 from the OT's list concerning training programs for the EQA Subcommittee does not provide a clear objective.
- The means to accomplish OT's have not been established. Mission Improvement Programs (MIP's) and MIP Managers (MIPM's) have not been established to achieve OT's, as directed in EMP-004.
- The means to monitor and measure progress toward achieving the OTs have not been established. (Cf. Monitoring and Measurement Non-Conformance).
- EMP-004 commits to communicating OT's to all appropriate personnel, but the "2009 EMS Goals" cited on the NCBC Environmental portal are not consistent with current OT's. Installation personnel interviewed are not familiar with OT's.

#### **RECOMMENDATIONS:**

- Objectives #3 and #7 should be consolidated into one objective with multiple targets.
- Objective #6 may be modified to read "Improve Environmental Compliance" and the Target could describe the means of accomplishing that objective within a certain time-frame. For example, the target could be stated as "Provide environmental training programs to all members of the EQB subcommittee utilizing the ECATTS software and classroom instruction by the end of FY12."
- MIP's and MIPM's should be established according to EMP-004 to establish the means to monitor, measure and accomplish OT's.
- The Environmental Portal should be updated to reflect the current OT's and other means should be established to communicate OT's to all personnel.

## **OBSERVATION:**

1. **62604-EMS-OBS-5-2010:** All of the OT's address improving compliance with existing legal and other requirements, but none of them incorporates opportunities for P2 or minimizing risk to the environment due to the impact of significant aspects.

**RECOMMENDATIONS:** Consider adding OT's that include opportunities for P2 and/or minimizing risk to environmental impact of significant aspects.

### **4.4.1 Resources, Roles, Responsibility and Authority**

## **DISCUSSION:**

The installation has established EMP-005 to define and document the resources, roles, responsibilities and authorities related to the EMS. Organizational structure has been developed with organizational charts outlining lines of responsibilities. An EMS program Manager (EPM) has been assigned in writing, and roles and responsibilities have been assigned and communicated in order to facilitate effective environmental management. According to EMP-005, an environmental Quality Board (EQB) is established to ensure that the EMS is operating as intended as described in the EMS Management Plan and Procedures, champion the installation's EMS from top down to ensure staff are allotted adequate resources to implement the EMS, and to review and approve reports and recommendations provided by the EQB Sub Committee (EQB Sub). The EQB Sub is described as a cross-functional team which supports the EQB and the EPM in the development, implementation and maintenance of the EMS. The EPM provides guidance and recommendations for the EQB regarding the EMS, assisting with decision-making and communications with top management, and chairs the EQB Sub. The EMS Environmental Team (EET) is responsible for the overall maintenance of the EnviroManager database, overseeing internal assessments and compliance evaluations, reporting to the EQB-Sub and managing Mission Improvement programs (MIP's) to accomplish the established OT's. Other EMS roles/responsibilities (R&R) are outlined in EMP-005, including R&R for the Commanding Officer (CO, Executive Officer (XO), Department Heads, Supervisors and managers. Members of the EQB Sub are posted on the installation web portal.

## **FINDING:**

1. **62604-EMS-MN-2-2010:** ISO 14001:2004 requires an organization to establish roles, responsibilities and authorities in order to facilitate effective environmental management. This has been done in Environmental Management Procedures (EMP's) 001 and 005 of NCBC's EMS. In both EMP 001 and 005 the EQB is charged with championing the installation's EMS program from the top down and ensuring installation staff gain required support and resources for implementation of EMS activities. Additionally, the NCBC Gulfport Environmental Policy statement signed 30 December 2008 included a commitment to communicate and educate all personnel in their roles and responsibilities. It was apparent during field visits and random interviews conducted throughout the base that the awareness level was low

**RECOMMENDATION:** It is recommended that multiple communication media be used to convey Environmental Policy information as well as information regarding environmental aspects and corresponding targets and objectives.

#### **4.4.2 Training, Awareness, and Competence**

##### **DISCUSSION:**

The installation has established EMP-006 to provide a procedure to address EMS training, awareness and competence for all installation personnel including tenant commands and contractors. The procedure outlines the means of the training and requires that training records be maintained. All personnel are required to receive EMS Awareness (“Indoc”) Training through the EET, which records the training. Training to ensure environmental competency for all personnel that have the potential to cause significant environmental impacts is to be provided through the Environmental Compliance Assessment, Training, and Tracking System (ECATTS) and through the EET, as required. According to EMP-006, training requirements are to be reviewed annually by the EPM and EET.

##### **FINDINGS:**

- 1. 62604-EMS-MN-3-2010:** ISO 14001:2004 requires personnel whose work may create a significant impact receive adequate training to ensure they are competent. Hazardous Waste (HW) has been designated as a significant aspect by the CBC Gulfport EMS. The regulatory required HW Coordinator training documentation was not readily available for the HW Coordinator at NCTC and CED. Additionally, the HW Coordinator at MCRC (Bldg 243), the HW Coordinator at R-436, and the Environmental Coordinator at R-436 did not have their regulatory required training. Additionally, ISO 14001 requires that the organization establish, implement and maintained procedures to make its employees and members at each relevant function and level aware of the importance of conformance with the environmental policy, procedures and EMS requirements. Awareness training has been conducted and documented by the Environmental Division (EET), however, there was a lack of awareness amongst individuals interviewed regarding the installation’s Environmental Policy as well as what processes they dealt with that were associated with the installation’s significant aspects.

**RECOMMENDATION:** It is recommended that a Training Matrix be developed by the Environmental Division to track completion of training required by regulation as well as EMS competency and awareness training. It is also recommended that the Environmental Division consider implementing recurring Environmental Awareness training to improve environmental awareness at the process owner level.

### 4.4.3 Communication

#### **DISCUSSION:**

EMP-007 describes the procedure the installation has established to address internal and external communications related to its EMS and environmental issues. Communication roles and responsibilities are defined for various parties, including the EQB, EQB-Sub, EET, PWO and PAO. According to the procedure, the PW-ED receives and responds to communications from internal parties within their scope of responsibility and forwards those which are outside of that scope to the appropriate party. For external communications, the PAO maintains primary responsibilities and forwards to the CO those matters which they are not authorized to address. Any requests for information are reviewed and approved/denied by the PWO and PW-ED.

EMP-007 describes the various means of communicating information pertaining to the EMS internally through the Public Works Weekly Report, the Sea Bee Courier, the EnviroManager Internet web portal and through CO and EQB briefings, which are to be uploaded into EnviroManager. External communications are accomplished through EnviroManager, community meetings and news articles.

#### **OBSERVATIONS:**

1. **62604-EMS-OBS-6-2010:** The PW-ED is not defined in the communication procedure (EMP-007) or in the EMS description document (EMP-001). The Public Works office (PWO) is cited in EMP-007, but not defined in the EMS description document (EMP-001). Meeting minutes from the EQB were provided in written and electronic form, but were not found posted on EnviroManager.

**RECOMMENDATIONS:** EMP-001 and EMP-007 should be edited to include a definition for PW-ED and PWO, as necessary. However, if PW-ED is the Public Works Environmental Director, this may be the identical role as the EMS Program Manager (EPM). Meeting minutes from the EQB should be posted on EnviroManager, as directed in EMP-007, or the procedure modified if it is not desirable to post the EQB meeting minutes.

2. **62604-EMS-OBS-7-2010:** ISO 14001:2004, 4.4.3 and EMP-007 V.B.3 require the installation to determine whether to communicate externally concerning its significant environmental aspects and document that decision. However, documentation of this decision was not provided during the audit or observed in EQB meeting minutes.

**RECOMMENDATIONS:** The EQB should determine whether or not to communicate its significant environmental aspects externally and document this decision in meeting minutes.

**(No Findings Reported)**

#### **4.4.4 Documentation**

##### **DISCUSSION:**

The installation has established required EMS documentation, including a description of the EMS, its elements and Environmental Management Procedures which describe how these elements interact. An EMS Policy Statement has also been drafted that is current, signed by the current CO and meets the ISO 14001:2004 requirements. These documents are available for review and are posted on the EnviroManager webpage. Objectives and targets are also documented and available for review. Other documents are established and available for review, including environmental management plans, environmental assistance procedures (EAP's), and various records to monitor its significant environmental aspects, such as water and storm water reports, environmental inspection checklists, self-assessments, waste disposal tickets and tank reports. According to EMP-008a, these documents are managed by the EPM and EET.

**(No Findings Reported)**

#### **4.4.5 Document Control**

##### **DISCUSSION:**

The installation has established EMP-008b to describe the procedure for controlling all documents related to the EMS, including the Environmental Policy Statement, EMP's, Standard Operating Procedure (EAP's), standards, regulations, and technical specifications and environmental management plans. According to the procedure, the EPM is responsible to control and manage all documentation related to the EMS, with originals maintained in electronic form on EnviroManager. The EMP ensures that documents are dated, obsolete documents are discarded, current versions are available, and that EnviroManager website is updated by the EET with the most current documents.

##### **OBSERVATIONS:**

- 1. 62604-EMS-OBS-8-2010:** NCBC Environmental web portal and the EnviroManager website are not kept up to date. Several examples were noted:

##### **NCBC Environmental Web Portal:**

- "Base Instruction" is a link to a base instruction related to a solid waste management plan authorized by a previous CO of NCBC Gulfport, CDR William A. Oster.
- "Solid Waste" is a link to a base instruction regarding the 2003 Solid Waste Management Plan. Both are outdated and have been replaced by the April, 2009 "NCBC Integrated Solid Waste Plan," which is posted on the same page.
- POC on "Proper Drum Emptying" is given as Gary Broom, a former employee no longer working at the installation.
- A consumer confidence report is posted from 2008.
- The "Environmental Mission Statement" does not match the Environmental Policy Statement. This is perhaps an outdated environmental policy statement.

- The “Environmental Quiz” alludes to information over two years old, including the 2008 presidential election and officials from the previous presidential administration.
- The “Storm Water” link is routed to Earth911.com, a website devoted to environmental conservation including recycling, energy savings, and other means of community environmental stewardship, but not specifically “storm water.”
- The “Storm Water Pollution Prevention Plan for Construction Activities” link is routed to the Mississippi Department of Environmental Quality (MDEQ) Groundwater Assessment and Remediation Division.
- No document date is provided for any of the EAP’s
- The Integrated Pest Management Plan posted (April, 2009) has not been reviewed within one year, as required.
- “Mississippi Small Municipal Separate Storm Sewer System” is a link to the expired Storm Sewer System General Permit issued December 10, 2002 and expired November 30, 2007. The current permit issued January 5, 2009 is posted under the link, “State of Mississippi Small Municipal Separate Storm Sewer System MS4 General Permit.”
- The AST and UST inspection checklist documents are not dated and the point of contacts for the phone numbers 871-3116 and 871-3228 are unknown.
- The ConVault AST maintenance checklist is dated 2001.
- “Environmental Goals” posted here are not identical to the “Environmental Objectives” posted in EnviroManager.

**EnviroManager Website:**

- The EnviroManager database should be updated to include links to all applicable federal/state/local laws and regulations as well as Navy policies, as described in EMP-003, B.1. Alternatively, the links could be posted on the Environmental Portal on the NCBC website with other environmental documentation, and EMP-003 updated accordingly.
- NCBC Gulfport’s four top EMS goals are dated from 2009 and are not identical to the seven current Objectives and Targets for 2010.
- The Permits Register is not comprehensive and does not include the Storm Sewer System General (NPDES) Permit issued January 5, 2009.
- Numerous documents that are supposed to be posted according to EMP-3 (Legal Requirements Matrix), EMP-007 (EQB Meeting Minutes), EMP-13 (non-conformance tracker), and EMP-14 (Records Index) are not up-to-date or not found where they are expected to be.

**RECOMMENDATIONS:** The EPM and EET should determine the most appropriate place to post the documents and consolidate all documents in one location. Then the EPM should thoroughly review all documents and web links on the NCBC Environmental Page and the EnviroManager web portal to ensure that all obsolete documents/links are removed and only the most up-to-date versions are posted in the correct location(s) according to EMP-008b and all other applicable EMP’s (cited above).

**(No Findings Reported)**

## 4.4.6 Operational Controls

### **DISCUSSION:**

The installation has identified operations with significant environmental aspects and established operational controls to ensure that those operations are carried out under specified conditions. Environmental Management Plans, Emergency and Spill Response Plans, and Environmental Assistance Procedures (EAP's) and inspection checklists provide documented procedures to control operations where their absence could lead to deviation from the environmental policy, objectives and targets. According to EMP-009, these operational controls are evaluated by the EET, which reviews the Significant Aspect Register to determine if the existing operational controls for each of these operations and activities are adequate. In situation where there is a lack of supporting documentation or controls, the EET is responsible to implement the required controls for mitigating the environmental impacts of significant aspects, with approval from the EPM. All supporting documentation is to be located in the environmental division's central filing system.

### **NOTEWORTHY PRACTICE:**

1. **62604-EMS-NP-3-2010:** CBC Gulfport Environmental Division developed a "Construction Environmental Inspection Guide" that enhances contractor environmental compliance by formalizing the oversight and inspection process of the Engineer Techs and Construction Managers at the FEAD. This process, developed here at CBC Gulfport by the Environmental Division, is currently being formalized into a NAVFAC Business Management System (BMS) process for export to FEADs at other FECs.

### **FINDING:**

1. **62604-EMS-MN-4-2010:** ISO 14001 requires an organization to establish, implement, and maintain a documented procedure to control situations where their absence could lead to deviation from environmental policy, objectives and targets. Environmental Management Procedure (EMP) 009 has been established to document this procedure. EMP 009 calls for appropriate control procedures to be developed by the EET to meet this requirement. It was noted during field visits throughout the base that Environmental Assistance Procedures (EAPs) have been developed by the Environmental Division and posted on the Environmental Web Portal. However, the EAPs have not been completely disseminated throughout the base to all process owners.

**RECOMMENDATION:** It is recommended that EAP's be provided to all process owners as applicable and that they receive an appropriate level of training on the EAPs.

## 4.4.7 Emergency Preparedness and Response

### DISCUSSION:

The installation has established EMP-010 to define the framework for preparing and responding to emergencies and incidents at NCBC Gulfport and its tenant commands. According to the procedure, the EET works together with the NCBC Emergency Manager to prepare Emergency Management Plans to respond to all potential accidents and emergencies. Emergency Management Plans are to be maintained on the NCBC web page, at appropriate locations and are available to all installation personnel upon request. The NCBC Emergency Manager conducts drills periodically to test the effectiveness of the plans and to maintain personnel awareness. The EET assesses the effectiveness of the response and plans, periodically reviews these tests or actual emergencies, and proposes adjustments in the non-conformance tracker (EMP-012). If any changes are made to the emergency procedures, the Emergency Manager will notify the EMP.

(No Findings Reported)

## 4.5.1 Monitoring and Measurement

### DISCUSSION:

EMP-011 describes how the installation monitors and measures the key characteristics of its operations that can have a significant environmental impact. Parameters to be monitored and measured include: progress toward meeting NCBC's objectives and targets, and all functions, activities, processes, and services with related significant environmental aspects to ensure they are provided with appropriate operation control. This procedure must include the documenting of information to monitor conformity with the organization's environmental objectives and targets (OT's). The corresponding established procedure to accomplish this program is described in EMP-011, which indicates that a mission improvement plan (MIP) managed by the EET in conjunction with the EQB Subcommittee must be documented. The MIP must include "what parameters to monitor and measure; how such measurement is to occur (including frequency); record keeping; reporting of measurements, including deviations from normal operations."

### FINDING:

1. **62604-EMS-MN-5-2010:** MIP's have not been established according to EMP-011. Media program managers are collecting data in files to be consolidated into a tracking matrix at a later time, but the current process to track progress in meeting the OT's is not formalized.

**RECOMMENDATION:** The current procedure should be implemented or modified to reflect the most efficient and effective means to monitor and measure progress toward achieving the OT's. In either case, roles and responsibilities and the means for collecting data should be formally established and data tracking tools, such as spreadsheets, should be provided to accurately and easily monitor and measure progress toward achieving OT's.

## 4.5.2 Evaluation of Compliance

### **DISCUSSION:**

According to ISO 14001:2004 4.5.2, the installation has established EMP-012 to provide guidance for the periodic evaluation of compliance with applicable legal and other requirements. According to the procedure, NCBC Gulfport prepares an internal assessment plan (IAP), which provides a listed matrix of all required compliance inspections by media program on an annual basis. The IAP is established to indicate the responsible parties who carry out the inspections and when they will conduct those inspections annually. Appropriate resources to conduct the compliance evaluations must be provided by each EQB-Sub member at the scheduled dates, according to the EQB-Sub Self Assessment Schedule. According to EMP-012, all findings resulting from the inspections are to be logged into the non-conformance tracking database by the EET (cf. EMP-013). The EET is to annually review and maintain the IAP to ensure that it comprehensively addresses all major inspections. In addition to the EQB Self Assessments, the EET is required to perform (unspecified) regular inspections of tenant and supported commands.

### **FINDING:**

#### **1. 62604-EMS-MN-6-2010:**

- This ISO Element requires that the organization must establish, implement and maintain a procedure to periodically evaluate compliance with applicable legal requirements. According to EMP-012, these legal requirements are to be evaluated using the Internal Assessment Plan (IAP), “including a listed matrix of all required compliance inspections by media program.” However, this matrix has not been adequately established. The existing IAP merely provides a quarterly self assessment schedule for EQB-Sub members.

**RECOMMENDATION:** The IAP matrix must be established as described in EMP-012 to include all required compliance inspections by media program. To execute item #8 of the procedure, the EET should utilize the “Listbuilder” checklist tool to perform comprehensive environmental compliance inspections annually for all Tenant and Supported Commands. Also, “Environmental Assistance Procedures” and corresponding checklists should be provided to all process owners to perform their own process level inspections.

- EMP-012 requires identification of who will carry out process level inspections and who in environmental (EET) will provide oversight of the process level inspection; however, the IAP does not identify these persons.

**RECOMMENDATION:** Personnel who will conduct process level and EET oversight inspections must be identified.

- EMP-012 is not adequately implemented, as seven out of sixteen EQB Subcommittee members have not performed the required inspections. Site visits confirmed that inspections are ineffective for identifying and correcting compliance deficiencies.

**RECOMMENDATION:** The EET should ensure that process owners complete their process level inspections and corresponding checklists.

### 4.5.3 Nonconformance & Corrective and Preventive Action

#### **DISCUSSION:**

The installation's procedure to track non-conformances (NCF's), non-compliances (NCP's) and corrective and preventive actions (CA's, PA's) is provided in EMP-013. According to the procedure, as NCF's and NCP's are reported through the EQB Sub, EET, other NCBC personnel, or external/internal audits, the environmental program manager (EPM) tracks all non-conformances and non-compliances in a database. The EET is responsible to investigate and determine the root cause(s) and to implement the appropriate CA's and PA's. The EMP documents the measures proposed and briefs the EQB Sub. Once approval is granted, implementation is carried out by the responsible parties in coordination with the EET, which closes out the findings in EnviroManager.

#### **OBSERVATION:**

1. **62604-EMS-OBS-9-2010:** The database to track NCF's, NCP's, CA's and PA's is not posted on the EnviroManager web portal, as described EMP-013. Rather, the Environmental Director tracks these items in an Excel spreadsheet maintained

**(No Findings Reported)**

### 4.5.4 Control of Records

#### **DISCUSSION:**

EMP-014 describes the installation's procedure to identify, store, protect, retrieve, retain and dispose of records related to the installation EMS. The procedure provides an index of records, their storage location and time of retention. The EET is responsible to generate the index of EMS records to maintain all records in EnviroManager and/or paper format and to review the record maintenance process annually.

#### **OBSERVATION:**

1. **62604-EMS-OBS-10-2010:** The Environmental Records Index provided in EMP-014 and the Records Index posted on the EnviroManager web portal are not consistent, as several records listed in the procedure are not present on EnviroManager and vice versa.

**RECOMMENDATION:** The Environmental Records index in EMP-014 and/or EnviroManager should be revised to be consistent.

2. **62604-EMS-OBS-11-2010:** According to the Records Index provided in EMP-014, numerous environmental records are to be posted on the EnviroManager web portal. However, several of these records were not available.
  - a. Environmental CA's, NCF's and regulatory reports are not posted on the EnviroManager web portal, but are actually maintained in a spreadsheet by the Environmental Director.
  - b. Incident reports are not posted in EnviroManager, which redirects the user to the "Emergency Operations Center Incident Report."
  - c. EMS Audit results are not posted in EnviroManager, only a register of EMS Audits performed.

**RECOMMENDATION:** EMP-014 and/or EnviroManager should be revised to accurately reflect where/how all records will be stored and managed.

**(No Findings Reported)**

## **4.5.5 Internal Audit**

### **DISCUSSION:**

The installation has established EMP-015 to describe the procedure to conduct internal EMS Audits. According to the procedure, the internal audit is conducted by the EQB-Sub, or through a 2<sup>nd</sup> party designated by the EQB-Sub, such as a contractor or other military installation in the Region. A scope for the audit is determined by the EQB-Sub and the EET based on significant aspects and the results of previous audits. Data is to be collected through interviews, review of records, and physical inspections, and all information gathered is to be documented. According to the procedure, internal audits are to be conducted annually, except when a 3<sup>rd</sup> party review is conducted by CNIC every third year, and an annual report provided to the EQB, EQB-Sub.

### **OBSERVATION:**

1. **62604-EMS-OBS-12-2010:** According to the records provided by the installation, the most recent internal EMS audit was conducted on August 20, 2009 in FY09. The current external EMS audit was conducted in FY10. According to EMP-015, the installation may not be planning to conduct an internal EMS audit this fiscal year. However, according to OPNAV 5090.1C, Chapter 3-6.2.a., the installation is required to "conduct an internal EMS Audit at least once per year and brief findings of that audit in an EMS Management Review." Thus, the installation procedure seems to be in contradiction with OPNAV 5090.1C. What's more, if management reviews are conducted at least annually, as required by EMP-016, it is problematic to conduct that review if an internal EMS review has not been conducted during that same year.

**(No Findings Reported)**

## 4.6 Management Review

### **DISCUSSION:**

Procedure EMP-016 indicates that EMS management reviews are performed “at least annually to ensure the EMS’s continuing suitability, adequacy and effectiveness” as well as “address the possible need for changes to policy, objectives and other elements of the EMS.” According to the procedure, the EET will prepare a report for the EQB including results of annual EMS Reviews, internal assessments, regulatory inspections, progress on CA’s and PA’s and progress toward meeting OT’s and previous Management Review recommendations. The report will include recommendations for improvements to the EMS. The EQB will use the report to conduct their Management Review. The decisions and meeting minutes of the EQB will be documented and posted on the EnviroManager web portal under “Management Review Meetings Register.”

### **OBSERVATION:**

1. **62604-EMS-OBS-13-2010:** A register of EQB and EQB Subcommittee meetings is logged on the EnviroManager web portal; however there are no documents posted which correspond to these meetings, as indicated in EMP-016. Also, the register is not current, as the 13 November 2009 and 12 March 2010 EQB meetings are not posted in the register. The procedure is also missing the ISO 14001:2004 requirement in 4.6.b) that the Management Review include “communication(s) from external interested parties, including complaints.”

**RECOMMENDATION:** EMP-016 should be modified to include the ISO requirement in 4.6.b) regarding external communication. Meeting minutes and/or documentation of the Management Review should be posted on the EnviroManager web portal and the meeting register should be updated to reflect all meetings. If the installation does not wish to post documentation of the meetings, then EMP-016 should be revised accordingly.

2. **62604-EMS-OBS-14-2010:** The structure of the 13 July 2009 and 13 November 2009 Management Reviews closely follow the requirements of ISO 14001:2004, 4.6 and improves upon the Management Review procedure as described in EMP-016. A PowerPoint presentation was provided by the installation outlining the topics discussed at the meeting and included hand written notes by the EPM with additional documentation attached, however official meeting minutes and decisions from the annual Management Review were not provided, as described in EMP-016.

**RECOMMENDATION:** Official meeting minutes should be drafted for all Management Reviews, including the deliberations and decisions made by the EQB and managed as an official EMS Record, according to ISO 14001:2004, 4.5.4. Finally, the structure provided in the Management Review PowerPoint presentation should be reflected in EMP-016.

**(No Findings Reported)**

## 5.0 CONCLUSION

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NCBC Gulfport has demonstrated a commitment to EMS implementation and sustainability based on the Minor Non-Conformance findings and Observations identified by the Audit team. The installation may re-declare conformance with ISO14001 when Minor Non-Conformances and Non-Compliances have corrective actions defined and planned in a POA&M with senior leadership support and the POA&M is approved by Audit Team Lead. The installation has 30 days from receipt of this final audit report to develop and provide POA&M addressing remaining findings identified in the audit report to the Audit Team Lead for approval.

The audit team would like to express its gratitude to the NCBC Gulfport Leadership and Environmental Staff for the support they provided during the audit. The Environmental Staff should be commended for the level of professionalism and preparedness shown during the audit. The audit team congratulates NCBC Gulfport on having achieved so much with their environmental program and looks forward to working with them in the future.

**- END OF REPORT -**

**APPENDIX A**

**EMS AUDIT ANNOUNCEMENT LETTER**



**DEPARTMENT OF THE NAVY**  
NAVAL FACILITIES ENGINEERING COMMAND SOUTHEAST  
JACKSONVILLE, FL 32212-0030

5090  
Ser EV42/0016  
02 Feb 10

From: Commander, Naval Facilities Engineering Command Southeast (NAVFAC SE)  
To: Commanding Officer, Naval Construction Battalion Center (NCBC), Gulfport, MS

Subj: NOTIFICATION OF CNIC EXTERNAL ENVIRONMENTAL MANAGEMENT  
SYSTEM (EMS) AUDIT AND COMPLIANCE ASSESSMENT SITE VISIT

Ref: (a) OPNAVINST 5090.1C CH-3 of 31 Aug 07

Encl: (1) Environmental Audit Pre-Visit Questionnaire

1. Commander, Navy Installations Command (CNIC) has retained the services of NAVFAC SE to assist in conducting an External Environmental Management System Audit and Compliance Assessment on their behalf at NCBC Gulfport, MS, as required by reference (a). The audit will include a comprehensive evaluation of NCBC Gulfport environmental compliance program and an audit of its EMS. The site visit has been scheduled for 22-26 March 2010. The Audit Team will consist of personnel from the NAVFAC SE Environmental Business Line, led by Dennis Ashley, Team Leader and Lead Auditor. The Commanding Officer, Executive Officer and Department Heads, including Tenant organizations are encouraged to participate in the in-brief and out-brief to be scheduled by the NCBC Gulfport Public Works Department Environmental Division.

2. Per reference (a), the Commanding Officer shall ensure that pertinent records, procedures, and documentation are available for the Audit Team. Personnel shall also be available to be interviewed by the Audit Team. Enclosure (1) is our Environmental Audit Pre-Visit Questionnaire. Please have your staff respond to the questionnaire and provide the requested information prior to the site visit for the Audit Team review and site visit preparation. The information will facilitate the team's understanding of your operations and help to ensure that the compliance review and EMS audit are performed as efficiently and effectively as possible.

3. Thank you in advance for your support on this matter. Points of contact are Jose R. Negrón, P.E., Environmental Assessments Section Head at 904-542-6859, DSN: 942, e-mail: [jose.negron1@navy.mil](mailto:jose.negron1@navy.mil) or Dennis Ashley, 904-542-6871, email: [dennis.ashley@navy.mil](mailto:dennis.ashley@navy.mil).

  
C. R. DESTAFNEY  
By direction

Copy to:  
CNIC (N45)  
NAVFAC Atlantic (EV42)



**1 ENVIRONMENTAL PROGRAM MANAGEMENT**

1.1 List the Environmental Division staff and their individual program responsibilities:

Individual	Environmental Program Responsibilities

1.2 What was the date of the previous external audit conducted at the Facility?

1.3 Who is the POC for preparing the EQA report?

1.4 Has the Facility received any notice of violations (NOVs) / enforcement actions (ENFs)? <Yes / No>  
 If yes, what are they regarding?  
 If yes, include copies of the NOV/ENF.

1.5 Are there any environmental issues of particular sensitivity or unique to your Facility (e.g., noise concerns or water quality issues)? <Yes / No>  
 If yes, what are these environmental issues?

1.6 Are there any community action groups or other organizations lobbying on environmental issues? <Yes / No>  
 If yes, what are these groups/organizations and the associated environmental issues?

1.7 Has the Facility conducted internal environmental compliance assessments? <Yes / No>  
 If yes, where are the results of these assessments maintained?

1.8 Have regulatory authorities conducted an environmental evaluation at the Facility? <Yes / No>  
 If yes, where are the results of these evaluations maintained?

1.9 Are there any awards given within the Facility for environmental excellence? <Yes / No>

**ENVIRONMENTAL MANAGEMENT SYSTEMS**

1.10 Executive Order 100509 requires federal facilities to implement Environmental Management Systems (EMS). DOD metrics for EMS implementation are listed below. Please provide the date of your current versions of the following documents:

**EMS Policy** \_\_\_\_\_; available on website or via PAO? <Yes / No>; posted on bulletin boards? <Yes / No>

**Self-Assessment** \_\_\_\_\_

**Prioritized List of Aspects** \_\_\_\_\_; **Aspects Identification Procedure** \_\_\_\_\_

**Awareness Training Records** \_\_\_\_\_; **Awareness Training Procedure** \_\_\_\_\_

**Management Review** (e.g., meeting minutes) \_\_\_\_\_; **Management Review Procedure** \_\_\_\_\_

**1 ENVIRONMENTAL PROGRAM MANAGEMENT**

1.11 Provide the name, office, and phone # of the Facility POCs for EMS implementation:

EMS POC: \_\_\_\_\_, office: \_\_\_\_\_, phone: \_\_\_\_\_

EMS Management Representative: \_\_\_\_\_, office: \_\_\_\_\_, phone: \_\_\_\_\_

1.12 Has the EMS Cross Functional Team been established? <Yes / No> If yes, provide the names and offices of the team:

Name	Organization	Name	Organization

1.13 Where are EMS documents and records kept and maintained?

**POLLUTION PREVENTION**

1.14 Has the Facility established a pollution prevention (P2) program? <Yes / No>

If yes, who is the designated POC for the P2 program?

1.15 Have pollution prevention opportunity assessments (P2OAs) been conducted at the Facility? <Yes / No>

1.16 Has the Facility prepared a pollution prevention (P2) plan? <Yes / No>

If yes, when was the P2 plan last reviewed and updated?

If yes, where is the P2 plan kept (organization, installation, bldg)?

**ENVIRONMENTAL EFFECTS**

1.17 Has the Facility been involved in significant new operations, construction, training, or stationing? <Yes / No>

If yes, describe:

**PRIORITY AREAS**

1.18 What does the Facility consider to be the top three focus areas in their environmental program?

- 1.
- 2.
- 3.

## 2 AIR EMISSIONS

Primary POC / Phone: \_\_\_\_\_ Secondary POC / Phone: \_\_\_\_\_

2.1 Complete the following table with information on fuel-burning sources that are located at the Facility:

	Number	Installation	Bldg #	Capacity	Permit?
Steam Plant(s)					
Hot Water Plant(s)					
Incinerator(s)					

2.2 Is open burning conducted (e.g., fire fighter training, landfill management, other activity)? <Yes / No>

If yes, POC name/organization: \_\_\_\_\_, installation/bldg where burning is conducted: \_\_\_\_\_

2.3 Where are the following Facility facilities located?

	Organization / POC	Installation	Bldg #	Permit?
Fuel-dispensing facilities				
Bulk fuel storage and/or transfer facilities				
Spray-Paint Booth(s)				
Carpentry Shop(s)				
Dry Cleaning Facility				
Large stationary generators				

2.4 Are there buildings, or locations within buildings, that have automatic fire-suppression systems that use ozone depleting chemicals (e.g., halon)? <Yes / No>

If yes, POC name/organization: \_\_\_\_\_, kaserne/bldg: \_\_\_\_\_

2.5 Are there active units, support activities, or tenant organizations that perform maintenance and repair of air conditioning units? <Yes / No>

If yes, POC name/organization: \_\_\_\_\_, kaserne/bldg: \_\_\_\_\_

**3 DRINKING WATER**

**Primary POC / Phone:** \_\_\_\_\_ **Secondary POC / Phone:**  
 \_\_\_\_\_

3.1 Who has overall responsibility for the Facility's potable water system(s)?

3.2 Complete the following table with information regarding Facility potable water system(s):

Installation/Special Area	Water Source or Water Supplier	Population Served	Treatment Provided (e.g., Chlorine, Fluoride, None)

3.3 Does your facility operate drinking water wells? <Yes / No>  
 If yes, who is the POC for these wells?

3.4 Have any of the systems listed in 3.2 been privatized? <Yes / No>  
 If yes, which systems have been privatized (organization, installation, bldg)?

3.5 Are potable water system maps maintained at the Facility? <Yes / No>  
 If yes, where are these maps located (organization, installation, bldg)?

3.6 Are there any swimming pools in operation at the Facility? <Yes / No>  
 If yes, where are these located (organization, installation, bldg)?

**4 WASTEWATER**

**Primary POC / Phone:** \_\_\_\_\_ **Secondary POC / Phone:**  
 \_\_\_\_\_

4.1 Does the Facility operate on-site wastewater treatment plants? <Yes / No>  
 If yes, where are these plants located (installation, bldg)?  
 If yes, where are copies of the permit(s) maintained (organization, installation, bldg)?

4.2 Does the Facility discharge (either to a wastewater collection system or surface water) any wastewater resulting from industrial activities (e.g., electroplating, metal painting operations, dry cleaning)? <Yes / No>  
 If yes, where are these industrial facilities located (organization, installation, bldg)?

4.3 Does the Facility discharge wastewater or storm water directly to surface waters? <Yes / No>  
 If yes, where are these direct discharges located (installation, bldg)?

4.4 Which Facility organization(s) perform(s) monitoring of industrial discharges and direct discharges?

4.5 How many vehicle wash racks are currently in use throughout the Facility?

Organization	Installation	Bldg #	Equipped with an oil/water separator <u>and</u> a coalescence separator?

4.6 Are there oil/water separators located at the Facility other than the ones listed in 4.6? <Yes / No>  
 If yes, where are these separators located?

4.7 How many wastewater lagoons and/or retention ponds exist on property administered by the Facility?  
 Where are these lagoons/ponds located (installation, bldg)?

<b>5 HAZARDOUS MATERIAL</b>	
<b>Primary POC / Phone:</b> _____ <b>Secondary POC / Phone:</b> _____	
5.1	Where are the locations of Hazardous Material Storage Areas, i.e., greater than 200 kg of toxics or oxidizers (organization, installation, bldg)?
5.2	Is there a DRMO on the Facility that stores hazardous materials prior to redistribution/disposal? <Yes / No> If no, where is the nearest DRMO located?
5.3	Does the Facility have an established Hazards Material Management Program (HMMP)? <Yes / No> If yes, where is the HMMP issue/reissue facility located?
5.4	Does the Facility operate a Self-Help facility? <Yes / No> If yes, where is it located?
5.5	Where are the locations of bulk storage of flammables/combustibles (e.g., warehouses, indoor storage rooms, outdoor storage areas) on the Facility (organization, installation, bldg)?
5.6	Does the Facility store unique or extremely hazardous materials such as NBC products, Hydrazine, or other items requiring additional safety precautions in storage or handling? <Yes / No> If yes, where are these storage areas located (organization, installation, bldg)?
5.7	Does the Facility ship or transport hazardous materials by road, rail, or other means? <Yes / No> If yes, where is this shipping point (organization, installation, bldg)?
5.8	Which organization conducts inspections of hazardous material storage areas (e.g., Safety Office, Environmental, etc.)?
5.9	Approximately how many locations store more than 10 compressed gas cylinders at a given time? Where are these locations (organization, installation, bldg)?
5.10	How many locations store or handle acid (e.g., during vehicle battery maintenance)? Where are these locations (organization, installation, bldg)?

**6 HAZARDOUS WASTE**

**Primary POC / Phone:** \_\_\_\_\_ **Secondary POC / Phone:**  
\_\_\_\_\_

- 6.1 On the following page list all base operations, tactical units, and tenant organizations within the Facility that generate hazardous waste (including waste oil and waste antifreeze).
- 6.2 Does the Facility operate any Hazardous Waste Storage Areas (HWSAs) or Satellite Accumulation Areas (SAAs)?  
If yes, where are they located (installation, bldg)?
- 6.3 Is there a DRMO hazardous waste storage facility on site? <Yes / No>  
If yes, where is the facility (installation, bldg)?
- 6.4 Does the Facility have any permits? <Yes / No>  
If yes, where are the permitted facilities located (organization, installation, bldg)?
- 6.5 Is hazardous waste stored in underground storage tanks (USTs) at the Facility? <Yes / No>  
If yes, where are the USTs (organization, installation, bldg) and what type of waste are stored in each?
- 6.6 Are hazardous wastes recycled (indicate the correct response for each of the listed waste streams):  
waste oil?  
waste acid?  
waste antifreeze?
- 6.7 Where is the Auto Hobby Shop located (organization, installation, bldg)?
- 6.8 Where are other Craft Shop(s), such as an MWR Arts and Crafts, located (organization, installation, bldg)?
- 6.9 Are there any wet-chemical photographic shops located at the Facility? <Yes / No>  
If yes, where are these shops located (organization, installation, bldg)?
- 6.10 Do Facility personnel transport hazardous wastes off the installation by road, rail, or other means?  
If yes, describe this transport?



**7 SOLID WASTE**

**Primary POC / Phone:** \_\_\_\_\_ **Secondary POC / Phone:**  
 \_\_\_\_\_

7.1 Does the Facility operate a solid waste disposal facility? <Yes / No> **If the answer is “No”, skip to 7.4**  
 If yes, where is this facility located (organization, installation, bldg)?  
 Does the facility have a permit? <Yes / No>

7.2 Who is the POC for the landfill (organization, individual's name)?

7.3 Does the landfill accept the following waste items:  
 Wastewater treatment plant sludge?  
 Incinerator or air pollution control residues?  
 Animal carcasses?

7.4 Is incineration or any other type of thermal processing used by the Facility as a means of solid waste disposal?  
 <Yes / No>  
 If yes, where is this conducted (organization, installation, bldg)?  
 Does the facility have a permit? <Yes / No>

7.5 Has the Facility implemented a comprehensive recycling, resource recovery, and reuse program? <Yes / No>  
 If yes, who is responsible for this program: Organization: \_\_\_\_\_, POC: \_\_\_\_\_,  
 phone: \_\_\_\_\_

7.6 Where are the following facilities located?

	Organization / POC	Installation	Bldg #	Host Nation Permit?
Recycling center(s)				
Solid waste collection & transfer station				
Household hazardous waste collection point				
Non-operational vehicle lot				
Bulky waste storage area(s)				

**8 MEDICAL WASTE**

**Primary POC / Phone:** \_\_\_\_\_ **Secondary POC / Phone:**  
 \_\_\_\_\_

8.1 List the Facility facilities (and the associated POCs) that have the potential to produce pathogenic or infectious waste:

Facility	Installation	Bldg #	POC	Telephone
Hospital				
Health Clinic(s)				
Dental Clinic(s)				
Veterinary Clinic(s)				

8.2 Is medical waste stored at an interim central location prior to disposal? <Yes / No>  
 If yes, where is this location (organization, installation, bldg)?

8.3 Does the Facility operate a medical waste incinerator? <Yes / No>  
 If yes, where is the incinerator located (organization, installation, bldg)?  
 Does the facility have a Host Nation permit? <Yes / No>

8.4 Does the Facility conduct land burial of animals? <Yes / No>  
 If yes, who conducts the burial and where are the carcasses buried (organization, installation, bldg)?

8.5 Is medical waste disposal handled under contract to a company/organization that is licensed to perform such activities? <Yes / No>

8.6 Does the Facility generate any non-infectious medical waste that is classified as hazardous waste? <Yes / No>  
 If yes, who generates the waste and where is it generated (organization, installation, bldg)?

<b>9 PETROLEUM, OILS, &amp; LUBRICANTS (POL)</b>	
<b>Primary POC / Phone:</b> _____ <b>Secondary POC / Phone:</b> _____	
9.1	How many above-ground storage tanks are located at the Facility? How many of the listed tanks are provided with secondary containment?
9.2	What is the size of the largest above-ground storage tank? Where is this tank located (organization, installation, bldg)?
9.3	How many bulk fuel storage and transfer facilities exist at the Facility? Where are these storage and transfer facilities located (organization, installation, bldg)?
9.4	Where else is fuel dispensed at the Facility and what type of fuel (e.g., gasoline, diesel, JP-4, JP-8, etc.) is dispensed (organization, installation, bldg)?
9.5	Does the Facility operate any buried POL pipelines? <Yes / No> If yes, where are the pipelines located and who operates the pipelines (organization, installation, bldg)?

<b>10 ENVIRONMENTAL NOISE</b>	
<b>Primary POC / Phone:</b> _____ <b>Secondary POC / Phone:</b> _____	
10.1	Does the Facility currently have any restrictions on activities based on noise issues (e.g., quiet hours, regulated vehicle traffic patterns)? <Yes / No> If yes, what are these restrictions and where do they apply?
10.2	Does the Facility operate an airfield or helicopter pad? <Yes / No> If yes, where is it located (organization, installation, bldg)?
10.3	Does the Facility conduct training involving firing of live ammunition or detonation of ordnance? <Yes / No> If yes, where is the training conducted (organization, installation, bldg)?
10.4	Is the Facility currently involved in any active noise abatement projects? <Yes / No> If yes, where are they located (organization, installation, bldg)?

11 PESTICIDES	
<b>Primary POC / Phone:</b> _____ <b>Secondary POC / Phone:</b> _____	
11.1	Is a local pesticide contractor used for any pest management control activities? <Yes / No> If yes, does the contractor store pesticides at a location on the Facility (installation, bldg)?
11.2	Do Facility personnel apply pesticides? <Yes / No> If yes, how many applicators are DoD certified? _____ Host Nation certified? _____
11.3	Where does the Facility maintain pesticide storage and/or mixing areas (organization, installation, bldg)? Are these areas addressed in the Facility Spill Prevention and Response Plan?
11.4	Where is pest management equipment stored (organization, installation, bldg)?
11.5	Who is responsible for disposal of empty containers, outdated pesticides, excess pesticides, etc. (organization, installation, bldg)?
11.6	Does the Facility have a golf course located on the installation? <Yes / No> If yes, where is the golf course located (installation, bldg)? If yes, are pesticides applied by in-house personnel or contracted to a licensed applicator?

12 CULTURAL RESOURCES	
<b>Primary POC / Phone:</b> _____ <b>Secondary POC / Phone:</b> _____	
12.1	Has a survey of potential historic and cultural resources been conducted at the Facility? <Yes / No> If yes, did the survey address all Facility installations?
12.2	Does the Facility maintain an inventory of potential historic and cultural resources sites? <Yes / No> If yes, where is this inventory kept (organization, installation, bldg)?
12.3	Are there any historic and cultural resources sites on the Facility? <Yes / No> If yes, where are these sites located (installation, bldg)?
12.4	Are there any ongoing historic or cultural resources preservation or mitigation projects? <Yes / No> If yes, where are the projects occurring (installation, bldg)?

**13 NATURAL RESOURCES**

**Primary POC / Phone:** \_\_\_\_\_ **Secondary POC / Phone:**  
\_\_\_\_\_

13.1 Provide the date of the Facility's Integrated Natural Resources Management Plan: \_\_\_\_\_

Where is the plan kept (organization, installation, bldg)?

13.2 Has a survey of endangered or threatened species been conducted for locations within the Facility?

What areas did it cover?

Were any endangered or threatened species identified?

13.3 Are large forested areas within the Facility? <Yes / No>

If yes, describe these areas?

13.4 Have floodplains and wetlands been identified on the Facility? <Yes / No>

If yes, where are these located?

**14 POLYCHLORINATED BIPHENYLS (PCBs) & TERPHENYL (PCTs)**

**Primary POC / Phone:** \_\_\_\_\_ **Secondary POC / Phone:**  
\_\_\_\_\_

14.1 Does the Facility have any known PCB/T-contaminated items (i.e., greater than 50 mg/kg [ppm])? <Yes / No>

If yes, where are these items located (installation, bldg)?

14.2 Does the Facility store liquid PCB/Ts or PCB/T-laden oil that has been removed from equipment? <Yes / No>

If yes, where?

<b>15 ASBESTOS</b>		
<b>Primary POC / Phone:</b> _____ <b>Secondary POC / Phone:</b> _____		
15.1 Where (organization, installation, bldg) are asbestos containing wastes generated (e.g., motor pools performing asbestos-brake work)?		
15.2 Are there any ongoing asbestos abatement projects? <Yes / No> If yes, where are these projects occurring (installation, bldg)?		
15.3 Complete the following table regarding Department of Defense Dependent Schools (DoDDS) at the Facility:		
	Installation	Bldg #
Elementary School(s)		
Middle School		
High School		
15.4 Where (installation, bldg) are the Child Development Centers (CDCs) located at the Facility?		

<b>16 RADON</b>		
<b>Primary POC / Phone:</b> _____ <b>Secondary POC / Phone:</b> _____		
16.1 How many facilities have been identified with the following elevated levels:		
>200 pCi/L	_____	
>20 – 200 pCi/L	_____	
4 – 20 pCi/L	_____	
16.2 Based on the results indicated above, has the Facility initiated radon mitigation? <Yes / No> If yes, at what locations (installation, bldg)?		

<b>17 LEAD BASED PAINT</b>		
<b>Primary POC / Phone:</b> _____ <b>Secondary POC / Phone:</b> _____		
17.1 Does the Facility have a Lead Based Paint Risk Assessment? <Yes / No> If yes, where are the documents located?		
17.2 Based on the survey results, has the Facility initiated mitigation? <Yes / No> If yes, at what locations (installation, bldg)?		

**18 SPILL PREVENTION & RESPONSE PLANNING**

**Primary POC / Phone:** \_\_\_\_\_ **Secondary POC / Phone:**  
\_\_\_\_\_

18.1 Does the Facility have a spill plan? <Yes / No>  
If yes, when was the plan last updated?

18.2 Which organizations provide emergency response in the event of a spill of a hazardous substance?

18.3 Has the Facility conducted any spill response exercises to measure the effectiveness of its spill response activities? <Yes / No>  
If yes, when?

**19 UNDERGROUND STORAGE TANKS (USTs)**

**Primary POC / Phone:** \_\_\_\_\_ **Secondary POC / Phone:**  
\_\_\_\_\_

19.1 Has the Facility conducted a survey of all USTs and developed an UST inventory? <Yes / No>  
If yes, which office maintains the UST inventory?

19.2 How many USTs exist on the Facility?  
How many are equipped with release detection devices?

19.3 How many USTs are abandoned or out of service?  
Where are they located?

19.4 Are any USTs used to store hazardous waste or hazardous materials? <Yes / No>  
If yes, where and what type of waste or material?

19.5 What Facility organization is responsible for UST maintenance?

**ADDITIONAL INFORMATION**

## PRE-VISIT DOCUMENTS REQUEST

### Pre-Visit Documents Request

1. Environmental Policy
2. EMS Management Procedures / relevant environmental Base Instructions
3. Internal Environmental Compliance Evaluation (ECEs) Reports
4. External Environmental Quality Assessment (EQA) Report
5. Internal Assessment Plan (IAP)
6. Internal Assessment Reports/Documentation
7. List of Environmental Aspects and Impacts
8. List of High Risk Aspects (Significant Aspects)
9. Operational control procedures associated with significant aspects
10. List of Objectives and Targets and associated POA&Ms
11. Minutes from Management Review and implementation team meetings
12. Copy of last Internal EMS Audit Report
13. Register of Legal and Other Requirements
14. P2 opportunity reports
15. Environmental Management Plans for all applicable environmental media (i.e. Hazardous Waste Management Plan, Storm Water Pollution Prevention Plan, Pest Management Plan)
16. Base map(s), environmental telephone directory and website address
17. Organizational chart(s) for the installation and the Environmental Office
18. List of all commands and tenant activities
19. Installation's mission statement and description of operations
20. Any other pertinent information

**Please note that additional documents and/or records may be requested based on review of this pre-visit questionnaire and requested documents.**

**APPENDIX B**

**EMS AUDIT IN-BRIEF**



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# ***External Environmental Audit In-Brief for NCBC Gulfport***



**William P. Page, CNIC Lead, In-brief Presenter**  
**Dennis Ashley, Lead Auditor, NAVFAC Southeast**  
**22 March 2010**



# ***External Environmental Audit***

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- ***As directed by CNIC, a comprehensive external environmental audit will be conducted on 22-26, March 2010.***
  
- ***The purpose of the audit is to:***
  - ***evaluate compliance with applicable environmental requirements outlined in the state and federal regulations, OPNAVINST 5090.1C, and local instructions***
  
  - ***verify continued conformance with the ISO 14001:2004 EMS Standard***



# Audit Team Points of Contact

<b>Name</b>	<b>Primary Role</b>	<b>Organization</b>	<b>Email</b>
William Page	CNIC Representative	CNIC	William.p.page@navy.mil
Dennis Ashley	Lead & EMS	NAVFAC Southeast	dennis.ashley@navy.mil
Barry Sass	EMS	NAVFAC Atlantic	barry.sass@navy.mil
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Dana Latino	Petroleum	NAVFAC Southeast	dana.latino@navy.mil
Jim Pinto	Air	NAVFAC Southeast	james.pinto@navy.mil
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Troy Stewart	Haz-Mat, Haz-Waste, Solid waste	NAVFAC Southeast	troy.m.stewart@navy.mil



# Audit Results

➤ The results of the audit will be presented during the Out-brief as EMS non-conformances and non-compliances:

➤ EMS non-conformances will be categorized as:

- *Major Non-conformance*
- *Minor Non-conformance*
- *Observation*

➤ Non-compliances will be categorized as:

- *Major non-compliance: non-compliance with regulatory or FGS requirement*
- *Minor non-compliance: non-compliance with policy requirement*
- *Recommendations*

➤ Non-compliances will be linked to EMS non-conformances to the greatest extent possible



# ***Deliverables***

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- *Completed EMS and compliance checklists*
- *EMS Non-conformance and Non-compliance Forms noting non-conformances, non-compliances, and observations*
- *Out-brief summarizing findings and overall health of the environmental program (EMS and compliance)*
- *External Audit Report*
- *POA&M template to track progress towards resolution of findings*



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*Questions ?*

## **APPENDIX C**

### **EMS AND ENVIRONMENTAL COMPLIANCE ASSESSMENT TEAM**

**APPENDIX C – EMS and Environmental Compliance Assessment Team**

<b>NAME</b>	<b>COMMAND</b>	<b>MEDIA/ TITLE</b>	<b>PHONE</b>	<b>EMAIL</b>	<b>POC</b>	<b>PHONE</b>
BILL PAGE	CNIC	ENVIRONMENTAL DIRECTOR	202-433-4929	<a href="mailto:WILLIAM.P.PAGE@NAVY.MIL">WILLIAM.P.PAGE@NAVY.MIL</a>	NA	NA
DENNIS ASHLEY	NAVFAC SOUTHEAST	EMS/EQA TEAM LEADER	904-542-6871	<a href="mailto:DENNIS.ASHLEY@NAVY.MIL">DENNIS.ASHLEY@NAVY.MIL</a>	JEFF MUEHLMANN	228-871-2026
BARRY SASS	NAVFAC ATLANTIC	EMS	757- 322-4588	<a href="mailto:BARRY.SASS@NAVY.MIL">BARRY.SASS@NAVY.MIL</a>	JEFF MUEHLMANN	228-871-2026
TESFA ABRAHA	NAVFAC SOUTHEAST	ASBESTOS, LEAD PAINT, RADON, PCBS	904-542-6874	<a href="mailto:TESFA.ABRAHA@NAVY.MIL">TESFA.ABRAHA@NAVY.MIL</a>	LISA NOBLE TED INGRAM	228-871-2485 228-871-2373
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JENS SAPIN	NAVFAC SOUTHEAST	WATER/WASTEWATER/ STORMWATER	904-542-6885	<a href="mailto:JENS.SAPIN@NAVY.MIL">JENS.SAPIN@NAVY.MIL</a>	LISA NOBLE LORIE DUPLANTIER	228-871-2485 228-871-3118
TROY STEWART	NAVFAC SOUTHEAST	HAZMAT/HAZWST, SLD WST	904-542-6898	<a href="mailto:TROY.M.STEWART@NAVY.MIL">TROY.M.STEWART@NAVY.MIL</a>	TED INGRAM JERRY LASTER	228-871-2373 228-871-2720

**APPENDIX D**

**NCBC GULFPORT ACTIVITY  
POINTS OF CONTACT**

**APPENDIX D - Activity Points of Contact**

<b>NAME</b>	<b>ROLE</b>	<b>PHONE #</b>
CAPT Edward Brown	NCBC Gulfport Commanding Officer	(228) 871-3320
CAPT Chris LaPlatney	NCBC Gulfport Executive Officer	(228) 871-3321
CDR Romeo Coleman	NCBC Gulfport Public Works Officer	(228) 871-2200
Jeff Muehlmann	NCBC Gulfport ENV Program Manager/EMS Management Representative	(228) 871-2026
Lisa Noble	Petroleum and Air Management	(228) 871-2485
Ted Ingram	Solid, Hazardous Materials and Waste Management	(228) 871-2373
Lorie Duplantier	Water, Wastewater, Storm Water Management	(228) 871-3118
Jerry Laster	Hazardous Materials Handling	(228) 871-2720

**APPENDIX E**

**EMS NON-CONFORMANCE FORMS**

# EXTERNAL EMS AUDIT NON-CONFORMANCE REPORT FORM

Name of Naval Installation or Activity <b>NCBC Gulfport</b>		Date <b>3-26-10</b>	Non-Conformance Number <b>62604-EMS-MN-1-2010</b>
Ref. Document(s): <b>EMP-004</b> Objectives & Targets	ISO 14001 Element: <b>4.3.3</b>	Category: Major _____ Minor <u><b>X</b></u> Observation _____	
Location Audited: <b>Environmental Department</b>		Auditors: <b>Dennis Ashley</b>	

**Description of Non-Conformance / Observation:**

1. Objectives #3 and #7 from the OTs list involving tank inspections are redundant.
2. Objective #6 from the OTs list concerning training programs for the EQA Subcommittee does not provide a clear objective.
3. A Mission Improvement Program (MIP) and MIP Manager have not been established to achieve OTs. See Monitoring and Measurement Non-Conformance for discussion of the implications of this non-conformance regarding tracking progress to achieve OTs.

**Recommended Corrective and/or Preventive Actions:**

1. Objectives #3 and #7 should be consolidated into one objective with multiple targets.
2. Suggest that the objective may be "Improve Environmental Compliance" and the Target, should describe the means of accomplishing that objective within a certain time-frame. For example the target could be stated as "Provide environmental training programs to all members of the EQB subcommittee utilizing the ECATTS software by the end of FY2012."
3. A MIP and MIP Manager should be established according to EMP 004, or EMP 004 should be modified to reflect the most efficient and effective means to achieve OTs.

<p><b><u>Person(s) Responsible for the Corrective/Preventive Action</u></b></p> <p>_____ ECD _____ Name &amp; Signature</p>	<p><b><u>Approval of Corrective/Preventive Action</u></b></p> <p>_____ Date _____ Name &amp; Signature</p>
<p><b>Auditor</b></p> <p>_____ Name</p>	<p><b>Auditor</b></p> <p>_____ Date _____</p>

# CLOSING THE NON-CONFORMANCE

Actions Taken to Correct the Non-Conformance:

Post-Correction Comments:

Action Completed:

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Signature

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Lead Auditor Approval:

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Date

# EXTERNAL EMS AUDIT NON-CONFORMANCE REPORT FORM

<b>Name of Naval Installation or Activity</b> NCBC Gulfport		<b>Date</b> 25 Mar 10	<b>Non-Conformance Number</b> 62604-EMS-MN-2-2010
<b>Ref. Document(s):</b> ISO 14001 EMP 001 EMP 005 Environmental Policy	<b>ISO 14001 Element:</b> 4.4.1	<b>Category:</b> Major _____ Minor <u>X</u> Observation _____	
<b>Location Audited:</b> Homeland Security (Bldg 298), R-436 (Bldg 241), Golf Course, PWD, MCRC (Bldg 243), and Medical Clinic (Bldg 295)		<b>Auditors:</b> Barry Sass	
<b><u>Description of Non-Conformance / Observation:</u></b>			
<p>ISO 14001 requires an organization to establish roles, responsibilities and authorities in order to facilitate effective environmental management. This has been done in Environmental Management Procedures (EMP's) 001 and 005 of CBC's EMS. In both EMP 001 and 005 the EQB is charged with championing the installation's EMS program from the top down and ensuring installation staff gain required support and resources for implementation of EMS activities. Additionally, the CBC Gulfport Environmental Policy statement signed 30 December 2008 included a commitment to communicate and educate all personnel in their roles and responsibilities.</p> <p>It was apparent during field visits and random interviews conducted throughout the base that the awareness level was low regarding CBC's Environmental Policy as well as environmental aspects associated with their work and corresponding targets and objectives.</p>			
<b><u>Recommended Corrective and/or Preventive Actions:</u></b>			
<p>It is recommended that multiple communication media be used to convey Environmental Policy information as well as information regarding environmental aspects and corresponding targets and objectives.</p>			

<b><u>Person(s) Responsible for the Corrective/Preventive Action</u></b>	<b><u>Approval of Corrective/Preventive Action</u></b>
_____ ECD _____ Name & Signature	_____ Date _____ Name & Signature
<b>Auditor</b>	<b>Auditor</b>
_____ Name	_____ Date _____

# CLOSING THE NON-CONFORMANCE

Actions Taken to Correct the Non-Conformance:

Post-Correction Comments:

Action Completed:

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Lead Auditor Approval:

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# EXTERNAL EMS AUDIT NON-CONFORMANCE REPORT FORM

<b>Name of Naval Installation or Activity</b> NCBC Gulfport		<b>Date</b> 25 Mar 10	<b>Non-Conformance Number</b> 62604-EMS-MN-3-2010
<b>Ref. Document(s):</b> Training & Awareness	<b>ISO 14001 Element:</b> 4.4.2	<b>Category:</b> Major _____ Minor <u>X</u> Observation _____	
<b>Location Audited:</b> Homeland Security (Bldg 298), R-436 (Bldg 241), Golf Course, PWD, MCRC (Bldg 243), Medical Clinic (Bldg 295), NCTC, and CED		<b>Auditors:</b> Barry Sass Troy Stewart	
<b><u>Description of Non-Conformance / Observation:</u></b>			
<p>ISO 14001 requires personnel whose work may create a significant impact receive adequate training to ensure they are competent. HW has been designated as a significant aspect by the CBC Gulfport EMS. The regulatory required Hazardous Waste (HW) Coordinator training documentation was not readily available for the HW Coordinator at NCTC and CED. Additionally, the HW Coordinator at MCRC (Bldg 243), the HW Coordinator at R-436, and the Environmental Coordinator at R-436 did not have their regulatory required training.</p> <p>Additionally, ISO 14001 requires that the organization establish, implement and maintained procedures to make its employees and members at each relevant function and level aware of the importance of conformance with the environmental policy, procedures and EMS requirements. Awareness training has been conducted and documented by the Environmental Division, however, there was a lack of awareness amongst individuals interviewed regarding the installation's Environmental Policy as well as what processes they dealt with that were associated with the installation's significant aspects.</p>			
<b><u>Recommended Corrective and/or Preventive Actions:</u></b>			
<p>It is recommended that a Training Matrix be developed by the Environmental Division to track completion of training required by regulation as well as EMS competency and awareness training. It is also recommended that the Environmental Division consider implementing recurring Environmental Awareness training to improve environmental awareness at the process owner level.</p>			

<b><u>Person(s) Responsible for the Corrective/Preventive Action</u></b>	<b><u>Approval of Corrective/Preventive Action</u></b>
_____ ECD _____ Name & Signature	_____ Date _____ Name & Signature
<b>Auditor</b>	<b>Auditor</b>
_____ Name	_____ Date _____

# CLOSING THE NON-CONFORMANCE

Actions Taken to Correct the Non-Conformance:

Post-Correction Comments:

Action Completed:

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Lead Auditor Approval:

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Signature

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Date

# EXTERNAL EMS AUDIT NON-CONFORMANCE REPORT FORM

Name of Naval Installation or Activity <b>NCBC Gulfport</b>		Date <b>25 Mar 10</b>	Non-Conformance Number <b>62604-EMS-MN-4-2010</b>
Ref. Document(s): <b>Operational Controls EMP 009</b>	ISO 14001 Element: 4.4.6	Category:  Major _____ Minor <u>X</u> Observation _____	
Location Audited: <b>Homeland Security (Bldg 298), R-436 (Bldg 241), Golf Course, PWD, MCRC (Bldg 243), and Medical Clinic (Bldg 295)</b>		Auditors: <b>Barry Sass</b>	

**Description of Non-Conformance / Observation:**

ISO 14001 requires an organization to establish, implement, and maintain a documented procedure to control situations where their absence could lead to deviation from environmental policy, objectives and targets. Environmental Management Procedure (EMP) 009 has been established to document this procedure. EMP 009 calls for appropriate control procedures to be developed by the EET to meet this requirement.

It was noted during field visits throughout the base that Environmental Assistance Procedures (EAPs) have been developed by the Environmental Division, however, they have not been completely disseminated throughout the base to all process owners.

**Recommended Corrective and/or Preventive Actions:**

It is recommended that EAP's be provided to all process owners as applicable and that they receive an appropriate level of training on the EAP's.

<p><b><u>Person(s) Responsible for the Corrective/Preventive Action</u></b></p> <p>_____ ECD _____ Name &amp; Signature</p>	<p><b><u>Approval of Corrective/Preventive Action</u></b></p> <p>_____ Date _____ Name &amp; Signature</p>
<p><b>Auditor</b></p> <p>_____ Name</p>	<p><b>Auditor</b></p> <p>_____ Date _____</p>

# CLOSING THE NON-CONFORMANCE

Actions Taken to Correct the Non-Conformance:

Post-Correction Comments:

Action Completed:

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Lead Auditor Approval:

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Signature

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Date

# EXTERNAL EMS AUDIT NON-CONFORMANCE REPORT FORM

Name of Naval Installation or Activity: NCBC Gulfport		Date: 3-26-10	Non-Conformance Number 62604-EMS-MN-5-2010
Ref. Document(s): Monitoring/Measuring EMP 011	ISO 14001 Element: 4.5.1	Category: Major _____ Minor <u>X</u> Observation _____	
Location Audited: Environmental Department		Auditors: Dennis Ashley	
<b><u>Description of Non-Conformance / Observation:</u></b>			
<p>According to this element, the organization must establish, implement and maintain a procedure to monitor and measure the key characteristics of its operations that can have a significant environmental impact. This procedure must include the documenting of information to monitor conformity with the organization's environmental objectives and targets (OTs). The corresponding established procedure to accomplish this program is described in EMP-011, which indicates that a mission improvement plan (MIP) managed by the EET in conjunction with the EQB Subcommittee must be documented. The MIP must include "what parameters to monitor and measure; how such measurement is to occur (including frequency); record keeping; reporting of measurements, including deviations from normal operations." However, MIPs have not been established. The current process to track progress in meeting the OTs is not formalized. Media program managers are collecting data in files to be consolidated into a tracking matrix at a later time.</p>			
<b><u>Recommended Corrective and/or Preventive Actions:</u></b>			
<p>The current procedure should be implemented or modified to reflect the most efficient and effective means to monitor and measure progress toward achieving the OTs. In either case, roles and responsibilities and the means for collecting data should be formally established and data tracking tools, such as spreadsheets, should be provided to accurately and easily monitor and measure progress toward achieving OTs.</p>			

<b><u>Person(s) Responsible for the Corrective/Preventive Action</u></b>  _____ ECD _____ Name & Signature	<b><u>Approval of Corrective/Preventive Action</u></b>  _____ Date _____ Name & Signature
<b>Auditor</b>  _____ Name	<b>Auditor</b>  _____ Date _____

# CLOSING THE NON-CONFORMANCE

Actions Taken to Correct the Non-Conformance:

Post-Correction Comments:

Action Completed:

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Lead Auditor Approval:

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Date

# EXTERNAL EMS AUDIT NON-CONFORMANCE REPORT FORM

Name of Naval Installation or Activity: NCBC Gulfport		Date: 3-26-10	Non-Conformance Number 62604-EMS-MN-6-2010
Ref. Document(s): Evaluation of Compliance EMP-012	ISO 14001 Element: 4.5.2	Category:  Major _____ Minor <u>X</u> Observation _____	
Location Audited: Multiple (Base-Wide)		Auditors: Dennis Ashley	

**Description of Non-Conformance / Observation:**

1. This ISO Element requires that the organization must establish, implement and maintain a procedure to periodically evaluate compliance with applicable legal requirements. According to EMP-012, these legal requirements are to be evaluated using the Internal Assessment Plan (IAP), "including a listed matrix of all required compliance inspections by media program." However, this matrix has not been established.
2. The procedure requires identification of who will carry out process level inspections and who in environmental (EET) will provide oversight of the process level inspection. However, the IAP does not identify these persons.
3. The procedure is not adequately implemented, as seven out of sixteen EQB Subcommittee members have not performed the required inspections. Site visits confirmed that inspections are ineffective for identifying compliance deficiencies and correcting them.

**Recommended Corrective and/or Preventive Actions:**

1. The IAP matrix must be established as described in EMP-012 to include all required compliance inspections by media program. According to #8 of the procedure, the EET should utilize the "Listbuilder" checklist tool to perform comprehensive environmental compliance inspections annually, for all Tenant and Supported Commands. Also, "Environmental Assistance Procedures" and corresponding checklists should be provided to all process owners to perform their own process level inspections.
2. Personnel who will conduct process level and EET oversight inspections must be identified.
3. The EET should ensure that process owners complete their process level inspections and corresponding checklists.

<p><b><u>Person(s) Responsible for the Corrective/Preventive Action</u></b></p> <p>_____ ECD _____ Name &amp; Signature</p>	<p><b><u>Approval of Corrective/Preventive Action</u></b></p> <p>_____ Date _____ Name &amp; Signature</p>
<p><b>Auditor</b></p> <p>_____ Name</p>	<p><b>Auditor</b></p> <p>_____ Date _____</p>

# CLOSING THE NON-CONFORMANCE

Actions Taken to Correct the Non-Conformance:

Post-Correction Comments:

Action Completed:

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Lead Auditor Approval:

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Name

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Signature

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Date

**APPENDIX F**

**ENVIRONMENTAL NON-COMPLIANCE FORMS**

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-AE-MJ-1-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 82.156 40 CFR 82.166  (156 practice, 166 recordkeeping)	<u>ListBuilder Number(s)</u> AE.90.16.US AE.95.3.US	<u>Category:</u> <input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-6	<u>Associated EMS Element</u> 4.3.2 Legal & Other Reqs. 4.5.4 Control of Records	<u>Auditors(s):</u> James Pinto	
<p><u>Description of Non-compliance:</u></p> <p style="text-align: center;"><b><u>FACT</u></b></p> <p>Maintenance records for equipment containing greater than 50 lbs ODS don't meet EPA requirements</p> <p style="text-align: center;"><b><u>DISCUSSION</u></b></p> <p>The observed maintenance record for the subject equipment didn't include the initial ODS charge, amount of ODS added to the equipment, the leak rate calculation, or the actual dates of the leak discovery and repair (gave just month, not day). EPA requires that subject equipment leaking greater than 15% be repaired within 30 days of discovery. Current recordkeeping form can't be used to confirm leak rate or repair date. According to shop supervisor, leaks are repaired as they are discovered but records don't confirm that.</p> <p style="text-align: center;"><b><u>RECOMMENDATION(S)</u></b></p> <p>Establish and record an initial ODS charge for all subject equipment. Record day and month of leak discovery and repair. Calculate and record the leak rate.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u> NCBC Gulfport	<u>Non-compliance Number:</u> <p style="text-align: center;"><u>AIR-1</u></p>
<u>Person(s) Responsible for closing the Non-Compliance:</u>  <hr style="border: 0; border-top: 1px solid black;"/> Name and Signature <span style="float: right;">Date</span>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>  <hr style="border: 0; border-top: 1px solid black;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>  	
<u>Observations/Notes:</u>  	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>  <hr style="border: 0; border-top: 1px solid black;"/> Name and Signature <span style="float: right;">Date</span>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>  <hr style="border: 0; border-top: 1px solid black;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-AE-MJ-2-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 82.156 40 CFR 82.166  (156 practice, 166 recordkeeping)	<u>ListBuilder Number(s)</u> AE.90.14.US	<u>Category:</u> <input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-6	<u>Associated EMS Element</u> 4.3.2 Legal & Other Reqs 4.5.4 Control of Records	<u>Auditors(s):</u> James Pinto	
<p><u>Description of Non-compliance:</u></p> <p style="text-align: center;"><b><u>FACT</u></b></p> <p>Appliances evacuated for disposal at CED don't have verification forms signed by the technician that performed the evacuation/verification</p> <p style="text-align: center;"><b><u>DISCUSSION</u></b></p> <p>The ODS is evacuated from equipment prior to disposal at CED and the equipment is stenciled as such, but no signed verification is included. EPA requires that the technician that performed the evacuation or verification to sign a statement stating so and provide their name and address. Appliances are stenciled as ODS free. PWD ENVR planning to work with CED to obtain certification stickers.</p> <p style="text-align: center;"><b><u>RECOMMENDATION(S)</u></b></p> <p>Use a label or tag with a verification statement that will provide the technician with the space to sign.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u> NCBC Gulfport	<u>Non-compliance Number:</u> AIR-2
<u>Person(s) Responsible for closing the Non-Compliance:</u>  <hr style="border: 0; border-top: 1px solid black; margin-top: 10px;"/> Name and Signature <span style="float: right;">Date</span>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>  <hr style="border: 0; border-top: 1px solid black; margin-top: 10px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>  	
<u>Observations/Notes:</u>  	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>  <hr style="border: 0; border-top: 1px solid black; margin-top: 10px;"/> Name and Signature <span style="float: right;">Date</span>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>  <hr style="border: 0; border-top: 1px solid black; margin-top: 10px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 25 Mar 10	<u>Non-compliance Number:</u> <b>62604-HM-MJ-1-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 29 CFR 1910.1200	<u>ListBuilder Number(s)</u> HM.1.2.US	<u>Category:</u> <input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u>	<u>Associated EMS Element</u> 4.5.2, Evaluation of Compliance	<u>Auditors(s):</u> Troy Stewart	
<u>Description of Non-compliance:</u>  <p>A MSDS is required to be on file for each hazardous chemical stored and used. The MSDS booklet should be on file and readily accessible to workers on all shifts in the workplace for each hazardous material. At the 20<sup>th</sup> Supply, Bldg 225-B, the person on-site was not aware of where MSDS's were kept. He indicated the individual responsible for that was not in the office. This work center has a cabinet which includes aerosol paint cans and other HM.</p> <p><u>RECOMMENDATION(S):</u> There should be a periodic safety review of hazardous chemical usage at each work center and a review of the availability of MSDS's. Each work center should brief all personnel on where MSDS's are located. The MSDS booklet should be made available in a highly visible location.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 25 Mar 10	<u>Non-compliance Number:</u> <b>62604-HM-MN-1-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input checked="" type="checkbox"/> Other	<u>Regulatory Citations:</u> CNRSE Inst 5090.1 dated 29 Oct 01, COMFISC Inst 5090.1 dated 8 May 08	<u>ListBuilder Number(s)</u> HM.2.1.NA	<u>Category:</u> <input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u>	<u>Associated EMS Element</u> 4.5.1, Monitoring & Measurement	<u>Auditors(s):</u> Troy Stewart	
<u>Description of Non-compliance:</u>  <p>During spot checks of HAZMAT storage lockers, multiple containers of HM were found without CHRIMP bar codes. CNRSE INST 5090.1 required comprehensive implementation of CHRIMP procedures at all CNRSE installations.</p> <p>Example locations include:</p> <ol style="list-style-type: none"> <li>(1) Bldg 225-B, 20<sup>th</sup> Supply: Aerosol paints</li> <li>(2) CED HAZMAT bulk storage. Refrigerants such as R-407C and R-401B were not bar coded.</li> <li>(3) NCTC: Heavy duty glass cleaner and a type of straw foam did not have CHRIMP bar codes.</li> </ol> <p><b><u>RECOMMENDATION(S):</u></b>  Work centers should verify that HM containers without bar codes are included on their Authorized Use List and they should contact Supply personnel about obtaining CHRIMP bar codes. Work centers need to coordinate assistance visits with CHRIMP personnel.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 25 Mar 10	<u>Non-compliance Number:</u> <b>62604-HM-MN-2-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input checked="" type="checkbox"/> Other	<u>Regulatory Citations:</u> COMFISC INST 5090.1 dated 8 May 08	<u>ListBuilder Number(s)</u> HM.2.1.NA	<u>Category:</u> <input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u>	<u>Associated EMS Element</u> 4.5.1, Monitoring & Measurement	<u>Auditors(s):</u> Troy Stewart	
<u>Description of Non-compliance:</u> At multiple work centers, hazardous materials contained in storage lockers had expired shelf-lives based on their CHRIMP bar codes. Work centers that had expired shelf life materials included: (1) NCTC – Multiple items had CHRIMP bar code expiration dates in 2004. (2) Marine Reserve Center (3) R-436, Bldg 241  <u>RECOMMENDATION(S)</u> Since most work centers are using these products, they need to check with CHRIMP to determine if the shelf life dates can be extended. Certain regulatory agencies could question whether or not materials with expired shelf-lives could be considered waste. If the materials are no longer needed, they should be processed for disposal.			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC GULFPORT		<u>Date:</u> 23 MAR 10	<u>Non-compliance Number:</u> <b>62604-HW-MJ-1-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 262	<u>ListBuilder Number(s)</u> HW.55.1.US	<u>Category:</u> <input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-6	<u>Associated EMS Element</u> 4.5.2 Evaluation of Compliance	<u>Auditors(s):</u> Troy Stewart	
<p><u>Description of Non-compliance:</u></p> <p>(1) At the &lt;90-day HW storage facility, a tri-wall box of hazardous waste non-flammable aerosol cans had a label with an accumulation start date of 13 May 09. NCBC Gulfport is a large quantity generator of HW without a RCRA permit and thus cannot legally store HW beyond 90-days. It is possible that this container may have been re-used with an old label remaining attached.</p> <p>(2) There was another tri-wall box inside the &lt;90-day HW storage facility being used to collect hazardous flammable aerosol cans which had a label but no accumulation start date was affixed. The accumulation start date should be applied when a waste container begins collecting waste at a &lt; 90-day storage area. Satellite accumulation was not taking place, thus the date when the first aerosol can was placed inside the tri-wall would have to be applied.</p> <p><b>RECOMMENDATION:</b> If aerosol cans will be collected in batches within the 90-day HW storage facility, NCBC Gulfport should explore collecting the cans in smaller containers that can be filled and disposed of within 90 days. The labels of each container should be checked and compliance verified during the weekly inspections of the HW storage facility.</p> <p>CHRIMP personnel indicated aerosol can puncturing was discontinued due to a safety/ventilation concern that the Fire Department identified at their puncturing location. The entire aerosol cans must now be disposed of intact as hazardous waste. The command may consider setting up a properly ventilated can puncturing location with appropriately trained personnel wearing applicable personal protective equipment. This could potentially save considerable waste disposal costs since only the residues must be disposed of as HW when the cans are punctured.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 23 MAR 10	<u>Non-compliance Number:</u> <b>62604-HW-MJ-2-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 262.34(a)(2-3)	<u>ListBuilder Number(s)</u> HW.55.1.US	<u>Category:</u> <input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-6	<u>Associated EMS Element</u> 4.4.2, Competence, Training, & Awareness	<u>Auditors(s):</u> Troy Stewart	
<u>Description of Non-compliance:</u>  Waste containers at multiple facilities across the installation had missing or incomplete labels. These containers included: (1) A drum of sand blast media outside the 90-day HW storage facility was labeled with a non-hazardous waste label; however, the actual contents of the drum were not on the label. (2) A tri-wall box of POL absorbents inside the 90-day HW storage facility was labeled with a non-hazardous waste label; however, the actual contents of the box were not on the label. (3) At the CED C-Shop, there was a drum with no label at their SAA. Personnel indicated the drum was used for anti-freeze. (4) At the Marine Corps Reserve Center Bldg 243, there was a container marked with both anti-freeze and used oil stenciling. The actual contents were unknown and the drum will have to be tested.  Recommendation: HW Coordinators at the SAAs and the manager of the 90-day HW storage facility should utilize their checklists to routinely verify that each container has the proper labeling. Periodic spot checks and additional on the job training for tenant command coordinators may be required by the installation HW manager.			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <div style="text-align: center;">HW-2</div>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 23 Mar 10	<u>Non-compliance Number:</u> <b>62604-HW-MJ-3-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 273.15	<u>ListBuilder Number(s)</u> HW.280.2.US	<u>Category:</u> <input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-6	<u>Associated EMS Element</u> 4.5.2, Evaluation of Compliance	<u>Auditors(s):</u> Troy Stewart	
<u>Description of Non-compliance:</u>			
<u>UNIVERSAL WASTE:</u>			
<p>(1) At the &lt;90-day HW Storage facility, there were three containers of fluorescent light bulbs of various sizes being used to collect spent bulbs as they are turned in. Each container had a Universal Waste label, but no accumulation start date was affixed. Handlers of universal waste must be able to demonstrate that universal waste has not been accumulated for more than one year from the date of generation.</p> <p>(2) At the &lt;90-day HW storage facility, there was a 30-gallon drum of Ni-Cad batteries. The container had a Universal Waste label, but no accumulation start date was affixed.</p> <p>(3) At the &lt;90-day HW storage facility, there was a 55-gallon drum used to collect lead-acid batteries. The container had a label with an accumulation start date of 23 Nov 08 which is well beyond the one year regulatory time limit that universal waste can be accumulated. It appears the container was being re-used without the label being changed. Lead acid batteries do not have to be managed as universal wastes. These batteries can be managed as exempt recyclable spent lead acid batteries under 40 CFR Part 266, Subpart G.</p>			
<u>RECOMMENDATION:</u> Universal waste containers should be marked with the earliest date that any universal waste was placed into the container. The inspection checklist for the <90-day HW facility should be used to verify that all containers are properly labeled. The universal waste accumulation start dates should be checked during the weekly inspection.			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <div style="text-align: center; font-weight: bold;">HW-3</div>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 25 Mar 10	<u>Non-compliance Number:</u> <b>62604-HW-MJ-4-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 265.37	<u>ListBuilder Number(s)</u> HW.65.1.US	<u>Category:</u> <input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-2	<u>Associated EMS Element</u> 4.4.7, Emergency Preparedness & Response		
<u>Description of Non-compliance:</u>			
<p>HW CONTINGENCY PLAN – Arrangements with local authorities:</p> <p>Large quantity generators are required to prepare a formal contingency plan that outlines the procedures necessary to respond to fires, explosions, or releases of HW. This plan must meet the requirements of Part 265, Subpart D. This plan must be submitted to local police and fire departments and emergency response authorities.</p> <p>(1)40 CFR 265.37 requires HW facility operators to make arrangements to familiarize police, fire departments, and emergency response teams with the properties of HW handled at the facility and associated hazards, etc.</p> <p>(2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority and agreements with any others to provide support should be documented.</p> <p>(3)Agreements with emergency response teams and emergency response contractors should be documented.</p> <p>(4) Arrangements to familiarize local hospitals with the properties of HW handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility should be documented.</p> <p>NCBC Gulfport has chosen to incorporate their HW contingency plan into their SPCC plan. Environmental personnel indicate that this plan has not been submitted or coordinated with local police departments, fire departments, and hospitals outside the gate.</p> <p><b>RECOMMENDATION:</b> When the SPCC Plan is updated, this plan should be submitted to the appropriate local authorities outlined in 40 CFR Part 265. Document the coordination and arrangements with local authorities.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC GULFPORT		<u>Date:</u> 24 MAR 10	<u>Non-compliance Number:</u> <b>62604-HW-MJ-5-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 279.22	<u>ListBuilder Number(s)</u> PO.65.6.US	<u>Category:</u> <input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-6	<u>Associated EMS Element</u> 4.5.2, Evaluation of Compliance	<u>Auditors(s):</u> Troy Stewart	
<u>Description of Non-compliance:</u>  Used Oil Management:  40 CFR 279 requires containers of used oil to be clearly labeled with the words "USED OIL."  (1) At CED Bldg 402, there was a used oil drum beneath an oil filter crusher which was not labeled. (2) At NCTC Bldg 70 East Wing, there was a portable oil collection unit which was not labeled. (3) At R-436, a used oil aboveground storage tank did not have a complete label with the words "used oil." (Temporary labels were applied.)  <u>RECOMMENDATION(S):</u> (1) Consider weatherproof labels/placards/stencils for outdoor used oil tanks such as those at R-436. (2) HW coordinators should routinely check their accumulation areas for proper labeling of containers when reviewing their checklists. Additional spot checks may be required by the HW program manager to ensure personnel are following proper procedures.			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <div style="text-align: center; font-weight: bold;">HW-6</div>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 25 MAR 10	<u>Non-compliance Number:</u> <b>62604-HW-MN-1-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input checked="" type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> OPNAV 5090.1C Chapter 15-4.1(f)	<u>ListBuilder Number(s)</u> HW.2.1.NA	<u>Category:</u> <input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-2	<u>Associated EMS Element</u> 4.4.1, Resources, Roles, Responsibility, and Authority	<u>Auditors(s):</u> Troy Stewart	
<u>Description of Non-compliance:</u>			
<p><u>Signing HW manifests without CO authorization:</u></p> <p>Per OPNAV 5090.1C, Chapter 15, personnel signing hazardous waste manifests shall be authorized in writing by the installation commander. During a spot check of hazardous waste manifests from 2009-10, multiple personnel have signed NCBC Gulfport HW manifests without written authorization from the installation commander.</p> <p>On 11 Feb 10, Darrin Hill signed multiple manifests for spent solvents picked up by Safety Kleen. In 2009, Anthony Cothorn and Jeffrey Gavitt also signed hazardous waste manifests. There was one instance in 2009 where a DRMO employee (Forrest Brown) signed the HW manifests without a co-signature from an authorized Navy representative. None of these personnel are listed on the 28 Aug 08 authorization letter signed by Capt Brown.</p> <p>Personnel signing manifests should have appropriate hazardous waste management training and training in proper DOT shipping standards. In addition to not having authorization to sign manifests from the CO, it is unclear whether all personnel signing manifests had the proper training.</p> <p><u>RECOMMENDATION(S):</u></p> <p>Hazardous waste transporters that pick up HW aboard NCBC Gulfport should be briefed on the specific personnel authorized to sign manifests. All work centers aboard NCBC Gulfport should be briefed that personnel cannot sign HW manifests without written authorization from the CO and without appropriate training in HW and DOT rules.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <div style="text-align: center; font-weight: bold;">HW-8</div>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 25 Mar 10	<u>Non-compliance Number:</u> <b>62604-HW-MN-2-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input checked="" type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> OPNAV 5090.1C Ch. 15-4.1(f) 49 CFR 172.604	<u>ListBuilder Number(s)</u> HW.2.1.NA	<u>Category:</u> <input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-6	<u>Associated EMS Element</u> 4.5.2 Evaluation of Compliance 4.5.4 Control of Records	<u>Auditors(s):</u> Troy Stewart	
<u>Description of Non-compliance:</u>  <p><u>Generator telephone # on HW manifests:</u></p> <p>OPNAV 5090.1C, Ch. 15 requires installations to include a 24-hour manned duty telephone number in the generator block on each manifest.</p> <p>In a spot check of manifests, the 1 Mar 10 HW manifest shipped to AES, Inc. (DRMO contractor) did not have a generator phone # listed.</p> <p><u>RECOMMENDATION(S):</u></p> <p>NCBC Gulfport should coordinate with DRMO and any other providers of manifests to ensure an appropriate generator telephone number is listed on each HW manifest.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <div style="text-align: center;">HW-9</div>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-HW-MN-3-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input checked="" type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> OPNAV 5090.1C, Ch. 15-5.7	<u>ListBuilder Number(s)</u> HW.60.2.US	<u>Category:</u> <input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-3	<u>Associated EMS Element</u> 4.5.4 Control of Records	<u>Auditors(s):</u> Troy Stewart	
<u>Description of Non-compliance:</u>			
<u>Documentation of HW Training Records:</u>			
<p>OPNAV 5090.1C requires every person who produces, packages, handles, treats, or transports HW to receive job-specific training regarding HW safety, packaging, labeling, documentation, transportation, and turn-in procedures. The training shall also address applicable Federal, State, and local laws and regulations. Each command shall maintain training records and documentation.</p> <p>During spot checks of two work centers, HW coordinator training documentation is not readily accessible. At NCTC, the NCTC Environmental Coordinator indicated the station Environmental office would maintain those records; however, Environmental personnel indicated the coordinators should have that documentation. At CED, the Environmental Coordinator had ready access to HAZCOM training records on ESAMS, but not hazardous waste training records.</p>			
<u>RECOMMENDATION(S):</u>			
<p>The work centers and tenants should be briefed on training documentation recordkeeping procedures. There should be consistent procedures established through the EMS.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <div style="text-align: center;">HW-10</div>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-HW-MN-4-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 262.34	<u>ListBuilder Number(s)</u> HW.70.2.US	<u>Category:</u> <input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-6	<u>Associated EMS Element</u> 4.5.2, Evaluation of Compliance	<u>Auditors(s):</u> Troy Stewart	
<u>Description of Non-compliance:</u>  <p>At NCTC, Bldg 70 Light Shop, there was a glove box used for sandblasting parts on an intermittent basis. There was used blast material on the floor beneath the glove box. This material had not yet been characterized. In another regulatory jurisdiction, regulators cited an installation for having hazardous grit on the floor in a location where personnel could walk on the material and track hazardous constituents outside.</p> <p><u>RECOMMENDATION(S):</u> The glove box should be sealed to prevent fugitive emissions of media if possible. If not, blast media that collects on the floor after use should be cleaned up each day and either placed back into the unit for re-use or properly collected in a SAA.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <div style="text-align: center;">HW-11</div>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 3/24/10	<u>Non-compliance Number:</u> <b>62604-P2-MN-1-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input checked="" type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> OPNAVINST 5090.1C	<u>ListBuilder Number(s)</u>	<u>Category:</u> <input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-2	<u>Associated EMS Element</u> 4.4.5, Control Document, (DO-OPC01)	<u>Auditors(s):</u> Tesfa Abraha	
<p><u>Description of Non-compliance: POLLUTION PREVENTION PROGRAM PLAN</u></p> <p style="text-align: center;"><u>FACT</u></p> <p>The pollution prevention plan was updated in August 2009 and has not been signed by the CO.</p> <p style="text-align: center;"><u>DISCUSSION</u></p> <p>The CO is responsible to support the implementation of the pollution prevention policy. By signing the plan will reinforce the hazardous waste reduction, reuse, and reducing the trucking of the regulatory requirements in addition to allocating funds. The OPNAVINST 5090.1C requires the CO to review the P2 plan on at list annual bases.</p> <p style="text-align: center;"><u>RECOMMENDATION(S)</u></p> <p>The CO should sign the implementing signature page of the revised P2 plan.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <p style="text-align: center;">P2-1</p>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-ST-MJ-1-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 112.7	<u>ListBuilder Number(s)</u> PO.20.4	<u>Category:</u> <input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-6	<u>Associated EMS Element</u> 4.4.6 Operational Control 4.5.1 Monitoring & Measuring 4.5.3 Control of Records	<u>Auditors(s):</u> Dana Latino	
<u>Description of Non-compliance:</u>  <p style="text-align: center;"><u>FACT</u></p> <p>Federal regulation sited above requires all ASTs to be inspected regularly.</p> <p style="text-align: center;"><u>DISCUSSION</u></p> <p>ASTs at the following locations did not have inspection reports: 70-02, 456-01, 456-02, 340-05, 397-01, 398-01, 400-11, 400-05, 400-06, 400-07, 400-10, 400-12, and 400-13. Also, ASTs located at emergency generators (approximately 40) were not being inspected regularly.</p> <p style="text-align: center;"><u>RECOMMENDATION(S)</u></p> <p>Recommend that these be added to the PM list of current tanks that are being inspected</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <p style="text-align: center;"><b>62604-ST-MJ-1-2010</b></p>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-ST-MJ-2-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 112.7	<u>ListBuilder Number(s)</u> PO.20.4	<u>Category:</u> <input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-6	<u>Associated EMS Element</u> 4.4.6 Operational Control	<u>Auditors(s):</u> Dana Latino	
<u>Description of Non-compliance:</u>  <p style="text-align: center;"><b><u>FACT</u></b></p> <p>The fill pipe connection and spill container at the top of the tank at bldg 402-02 (wash rack) is severely corroded. Also, the fill pipe connection/spill bucket at the top of the tank located at Bldg 456-01 (golf course) is corroded.</p> <p style="text-align: center;"><b><u>DISCUSSION</u></b></p> <p>The fill pipe appears to still have thickness to keep it operational, but maintenance of tank is essential under SPCC requirements.</p> <p style="text-align: center;"><b><u>RECOMMENDATION(S)</u></b></p> <p>Recommend having a certified tank contractor look at tank to see if pipe and spill containment rust could be removed and repainted while keeping its integrity. If certified tank contractor does not believe integrity can be kept, then a new convault tank should be planned in the budget as soon as possible. For golf course AST, if the certified tank contractor does not believe integrity can be kept, then the tank should be taken out of service after the golf course closes.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <p style="text-align: center;"><b>62604-ST-MJ-2-2010</b></p>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-ST-MJ-3-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 112.7	<u>ListBuilder Number(s)</u> PO.20.4	<u>Category:</u> <input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-6	<u>Associated EMS Element</u> 4.4.6 Operational Control 4.5.1 Monitoring & Measuring	<u>Auditors(s):</u> Dana Latino	
<u>Description of Non-compliance:</u>  <p style="text-align: center;"><u>FACT</u></p> <p>One AST at the military gas station (bldg 398) has a water sensor probe that has malfunction.</p> <p style="text-align: center;"><u>DISCUSSION</u></p> <p>SPCC regulations require maintenance of ASTs.</p> <p style="text-align: center;"><u>RECOMMENDATION(S)</u></p> <p>Recommend getting the sensor checked out.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <p style="text-align: center;"><b>62604-ST-MJ-3-2010</b></p>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-ST-MJ-4-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 112.7	<u>ListBuilder Number(s)</u> PO.20.4	<u>Category:</u> <input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-6	<u>Associated EMS Element</u> 4.3.2 Legal & Other Requirements	<u>Auditors(s):</u> Dana Latino	
<u>Description of Non-compliance:</u>  <p style="text-align: center;"><b><u>FACT</u></b></p> <p>The grease waste oil AST at the McDonalds does not have secondary containment.</p> <p style="text-align: center;"><b><u>DISCUSSION</u></b></p> <p>SPCC regulations require secondary containment on any container bigger than 55 gallons that contain oil product.</p> <p style="text-align: center;"><b><u>RECOMMENDATION(S)</u></b></p> <p>Recommend requesting McDonalds to get secondary containment for their grease waste oil.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <p style="text-align: center;"><b>62604-ST-MJ-4-2010</b></p>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr/> Name and Signature <span style="float: right;">Date</span>	<hr/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr/> Name and Signature <span style="float: right;">Date</span>	<hr/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-ST-MN-1-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input checked="" type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> OPNAV 5090.1C, 13-5.3 Cf. 40 CFR 112.7	<u>ListBuilder Number(s)</u> PO.20.4	<u>Category:</u> <input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-6	<u>Associated EMS Element</u> 4.3.2 Legal and Other Requirements	<u>Auditors(s):</u> Dana Latino	
<u>Description of Non-compliance:</u>  <div style="text-align: center;"><b><u>FACT</u></b></div> <p>The grease waste oil AST at the galley flexible secondary containment is falling down.</p> <div style="text-align: center;"><b><u>DISCUSSION</u></b></div> <p>OPNAV requires installations to have a tank management plan which includes the inspection, maintenance and repair for all ASTs, including regulated and non-regulated ASTs that are likely to be included in future Federal, State, or local regulations. SPCC regulations in 40 CFR 112.7 require adequate secondary containment on any container bigger than 55 gallons that contain oil product.</p> <div style="text-align: center;"><b><u>RECOMMENDATION(S)</u></b></div> <p>Recommend having waste oil contractor replace this flexible secondary containment and single wall tank with a double wall tank.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <p style="text-align: center;"><b>62604-ST-MN-1-2010</b></p>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-ST-MN-2-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input checked="" type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> OPNAV 5090.1C, 13-5.3	<u>ListBuilder Number(s)</u> PO.20.4	<u>Category:</u> <input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-6	<u>Associated EMS Element</u> 4.4.6 Operational Control	<u>Auditors(s):</u> Dana Latino	
<p><u>Description of Non-compliance:</u></p> <p style="text-align: center;"><u>FACT</u></p> <p>The oil/water separator (OWS) at bldg 241 has an overflow tank (OFT) that is not on tank inventory to be maintained. Two feet of diesel fuel were discovered in the overflow tank.</p> <p style="text-align: center;"><u>DISCUSSION</u></p> <p>OPNAV 5090.1C, Chapter 13-5.3 requires that all storage tanks be identified in the installation's tank management plan, regulatory requirements identified, and that they be properly maintained and inspected. Because the OFT is connected to the OWS, it is evident that installation personnel did not consider that the tank should be included in the tank management plan. In fact, 40 CFR 112.1(D)(6) provides an exclusion for "any facility or part thereof used exclusively for wastewater treatment and not used to satisfy any requirement of this part. The production, recovery, or recycling of oil is not wastewater treatment for purposes of this paragraph."</p> <p>However, this exclusion may be dubious, since the OFT could be considered to be used for the "recovery... of oil" and therefore may be subject to regulation, according to 40 CFR 112.1.</p> <p style="text-align: center;"><u>RECOMMENDATION(S)</u></p> <p>The OFT connected to the OWS at bldg 241 should be included in the installation's tank inventory and properly inspected and maintained. The current contract for maintenance of the OWS should be modified to include cleaning the connected OFT.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <p style="text-align: center;"><b>62604-ST-MN-2-2010</b></p>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

**APPENDIX G**

**NOTEWORTHY PRACTICES & OBSERVATIONS**

**EXTERNAL AUDIT  
NOTEWORTHY PRACTICE/  
OBSERVATION/RECOMMENDATION  
FORM**

<u>Name of Naval Installation or Activity</u> NCBC Gulfport	<u>Date:</u> March 25, 2010	<u>Reference Number:</u> <b>62604-EMS-NP-1-2010</b>
	<u>Category:</u> <input type="checkbox"/> Observation <input checked="" type="checkbox"/> Positive Observation <input type="checkbox"/> Noteworthy Practice <input type="checkbox"/> Recommendation	
<u>Auditors(s):</u> Dennis Ashley		
<u>Description:</u>  The installation has recently (January 27, 2010) been accepted as a leader in “The Mississippi Department of Environmental Quality (MDEQ) enhance program... a voluntary stewardship program that recognizes committed environmental leaders who accomplish goals beyond their legal requirements.” This example of recognition by the State environmental regulatory agency is a positive indication that the environmental program exhibits healthy characteristics and should be acknowledged and praised for its efforts.		

**EXTERNAL AUDIT  
NOTEWORTHY PRACTICE/  
OBSERVATION/RECOMMENDATION  
FORM**

<u>Name of Naval Installation or Activity</u> NCBC Gulfport	<u>Date:</u> March 25, 2010	<u>Reference Number:</u> <b>62604-EMS-NP-2-2010</b>
	<u>Category:</u> <input type="checkbox"/> Observation <input checked="" type="checkbox"/> Positive Observation <input type="checkbox"/> Noteworthy Practice <input type="checkbox"/> Recommendation	
<u>Auditors(s):</u> Dennis Ashley		
<u>Description:</u>  The installation promotes environmental stewardship base-wide. Guidance for the proper management and disposal of household hazardous waste and other environmental announcements, such as the Earth Day celebration, are posted on the installation's Environmental web portal.		

# EXTERNAL AUDIT NOTEWORTHY PRACTICE/ OBSERVATION/RECOMMENDATION FORM

<u>Name of Naval Installation or Activity</u> CBC Gulfport	<u>Date:</u> 25 March 2010	<u>Reference Number:</u> <b>62604-EMS-NP-3-2010</b>
<u>Category:</u> <input type="checkbox"/> Observation <input type="checkbox"/> Positive Observation <input checked="" type="checkbox"/> Noteworthy Practice <input type="checkbox"/> Recommendation		
<u>Auditors(s):</u> Barry Sass		
<u>Description:</u>  <p>CBC Gulfport Environmental Division developed a “Construction Environmental Inspection Guide” that enhances contractor environmental compliance by formalizing the oversight and inspection process of the Engineer Techs and Construction Managers at the FEAD. This process, developed here at CBC Gulfport by the Environmental Division, is currently being formalized into a NAVFAC Business Management System (BMS) process for export to FEADs at other FECs.</p>		

# EXTERNAL AUDIT NOTEWORTHY PRACTICE/ OBSERVATION/RECOMMENDATION FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport	<u>Date:</u> 23 Mar 10	<u>Reference Number:</u> <b>62604-HW-NP-1-2010</b>
<u>Category:</u> <input type="checkbox"/> Observation <input type="checkbox"/> Positive Observation <input checked="" type="checkbox"/> Noteworthy Practice <input type="checkbox"/> Recommendation		
<u>Auditors(s):</u> Troy Stewart		
<u>Description:</u>  <p>Chief Lopez at CED has implemented a procedure for brake cleaner that has greatly reduced the number of aerosol cans which would have to be disposed of as HW. The brake cleaner is purchased in 55-gallon drums. There is a special apparatus attached to the top of the container which is used to re-fill specialized aerosol cans for re-use. This material was previously procured in individual aerosol cans. The new procedure has reduced procurement costs for CED and reduced the disposal costs and labor required to manage numerous used aerosol cans.</p> <p>Chief Lopez should be commended for researching this cost saving initiative.</p>		

# EXTERNAL AUDIT NOTEWORTHY PRACTICE/ OBSERVATION/RECOMMENDATION FORM

<u>Name of Naval Installation or Activity</u> NCBC GULF PORT	<u>Date:</u> 3/24/10	<u>Reference Number:</u> <b>62604-RE-NP-1-2010</b>
<u>Category:</u> <input type="checkbox"/> Observation <input type="checkbox"/> Positive Observation <input checked="" type="checkbox"/> Noteworthy Practice <input type="checkbox"/> Recommendation		
<u>Auditors(s):</u> Tesfa Abraha		
<u>Description: SOLID WASTE RECYCLING PROGRAM</u>  <p>The center for recycling program is located in building 275. At this center mixed paper, cardboard, plastics, cans, tin/steel, and scrap brass are compacted. The personnel managing the recycling program have a set of weekly pickup dates all over the base. They are also serving Stennis with their recycling program. The total profits since October 2010 is \$45,130 and this amount will be double as their brass crusher is fixed. The personnel that are doing the recycling program need to be commended for their well done job.</p> <p>NCBC Gulf Port has been selected the 2009 Federal Governmental Recycler of the Year by the Mississippi Department of environmental Quality. This is a true testimony to the stewardship of their personnel. They have also been actively participating during the earth day celebration by educating students and having a central collection point for recycling.</p>		

# EXTERNAL AUDIT NOTEWORTHY PRACTICE/ OBSERVATION/RECOMMENDATION FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport	<u>Date:</u> 25 Mar 2010	<u>Reference Number:</u> <b>62604-ST-NP-1-2010</b>
<u>Category:</u> <input type="checkbox"/> Observation <input checked="" type="checkbox"/> Positive Observation <input type="checkbox"/> Noteworthy Practice <input checked="" type="checkbox"/> Recommendation		
<u>Auditors(s):</u> Dana Latino		
<u>Description:</u>  Positive Observation:  A positive observation of the environmental department is that their NEPA review of the new NEX is to install convault ASTs instead of USTs. The high water table in this area makes it impracticable to be able to keep the sump pits clear of water which is required under federal regs. Furthermore, convault tanks have a two hour fire rating, are able to withstand a 50,000 pound explosion, and withstand vehicle impacts. The specification of AST convault tanks make them ideal for military installations.  The military fueling facility at bldg 398 is an excellently design setup. The new NEX should be based off this design.		

# EXTERNAL AUDIT NOTEWORTHY PRACTICE/ OBSERVATION/RECOMMENDATION FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport	<u>Date:</u> 24 MAR 10	<u>Reference Number:</u> <b>62604-WQ-NP-1-2010</b>
<u>Category:</u> <input type="checkbox"/> Observation <input checked="" type="checkbox"/> Positive Observation <input type="checkbox"/> Noteworthy Practice <input type="checkbox"/> Recommendation		
<u>Auditors(s):</u> Jens Sapin		
<u>Description:</u>  <p>During the records review of the Drinking Water System, it was noted that the NCBC Gulfport water supply received a 5 out of 5 rating in their last inspection conducted by the Mississippi State Department of Health.</p> <p>This is noteworthy due to the various requirements to achieve such a score. The score is comprised of two categorical determinations. One assesses the operations and maintenance of the water system in the field to ensure that the system is run properly. The other assesses the managerial aspects of the drinking water system that ensures records are properly maintained, reports are submitted on time, and sampling results are within regulatory parameters.</p> <p>The diligence exemplified by personnel in the environmental and facilities departments required to meet all these requirements for the perfect score is a noteworthy observation.</p>		

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 3/24/10	<u>Non-compliance Number:</u> <b>62604-ASB-OBS-1-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input checked="" type="checkbox"/> Other	<u>Regulatory Citations:</u> CNISINST 5100 N3 Dec 2006  OPNAVINST 5100.11J, 502a	<u>ListBuilder Number(s):</u> None	<u>Category:</u> <input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-2	<u>Associated EMS Element</u> 4.4.1, Resources, Roles, Responsibility, Authority (DO-RRA01)	<u>Auditors(s):</u> Tesfa Abraha	
<p><u>Description of Non-compliance:</u></p> <p style="text-align: center;"><b><u>FACT</u></b></p> <p>No Asbestos and lead based paint Program Manager/s supporting NCBC Gulf Port.</p> <p style="text-align: center;"><b><u>DISCUSSION</u></b></p> <p>The asbestos/LBP program was managed by safety office, but as of this fiscal year 2010 the asbestos program manager (Mrs. Bethy Long), was told by her supervisor not to support the program as there was no funds allocated for the program. As a result of this, documentation and notification of asbestos/LBP related activities, regulatory support, and oversight and direction of the program has stopped.</p> <p style="text-align: center;"><b><u>RECOMMENDATION(S)</u></b></p> <p>Appoint a single qualified point of contact for the asbestos/LBP program manager/s prior to major work stoppage. The person should be responsible for all the State notification, subsequent record keeping and supervision of contractors during renovation/demolition. A single mishap such as notification to state during renovation/demolition can cost the base a notice of violation. This will be serious in terms of money, work stoppage and navy's environmental stewardship. The accidental release of asbestos containing material will also damage the health of the personnel and the environment.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u> NCBC Gulfport	<u>Non-compliance Number:</u> ASB-1
<u>Person(s) Responsible for closing the Non-Compliance:</u>  <hr style="border: 0; border-top: 1px solid black; margin-top: 10px;"/> Name and Signature <span style="float: right;">Date</span>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>  <hr style="border: 0; border-top: 1px solid black; margin-top: 10px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>  	
<u>Observations/Notes:</u>  	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>  <hr style="border: 0; border-top: 1px solid black; margin-top: 10px;"/> Name and Signature <span style="float: right;">Date</span>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>  <hr style="border: 0; border-top: 1px solid black; margin-top: 10px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-HM-OBS-1-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 29 CFR 1910	<u>ListBuilder Number(s)</u> HM.1.4.US  HM.2.2.US	<u>Category:</u> <input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u>	<u>Associated EMS Element</u> 4.5.2, Evaluation of Compliance	<u>Auditors(s):</u> Troy Stewart	
<u>Description of Non-compliance:</u>			
<p>29 CFR 1910 and general safety guidelines require hazardous materials to be stored in a manner that will not create potential fire, explosion, or reaction hazards.</p> <p>At the CHRIMP warehouse, Bldg 228, materials are stored in compartments based upon who owns the stock (NFELC, CED, etc.) Leaks from individual compartments flow into spill containment vaults beneath floor grates. If incompatibles are stored in the same compartment, leaks would flow into the same floor vault. In one area, flammable drilling foam containers were stored above corrosive containers (ferric chloride). One drilling foam container had leaked and there was absorbent material on the floor.</p> <p>In another compartment, muriatic acid was stored with various other haz-mat and supplies.</p> <p>The unsigned NCBC Gulfport Instruction 5090.6A (CHRIMP) states work centers shall “segregate HM according to material classification (flammables, acids, corrosives, etc.) in separate lockers...”</p> <p><b><u>RECOMMENDATION(S):</u></b> Recommend a safety review of the storage of corrosives and flammables with multiple other hazardous materials and supplies within the same compartment. Some of these materials may require further segregation based on compatibility and hazard beyond the separation based upon ownership.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-HW-OBS-1-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input checked="" type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> OPNAV 5090, Chapter 15-5.7	<u>ListBuilder Number(s)</u> HW.1.4.NA	<u>Category:</u> <input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u>	<u>Associated EMS Element</u> 4.4.2, Competence, Training, & Awareness	<u>Auditors(s):</u> Troy Stewart	
<u>Description of Non-compliance:</u>			
<p><b><u>TRAINING:</u></b></p> <p>OPNAV 5090.1C requires every person who produces, packages, handles, treats, or transports HW to receive job-specific training regarding HW safety, packaging, labeling, documentation, transportation, and turn-in procedures. The training shall also address applicable Federal, State, and local laws and regulations. These OPNAV requirements go beyond what is required by EPA.</p> <p>(1) The HW coordinator (SGT Slayden) at the Marine Corps Reserve Center, Bldg 243 indicated he had been in the position since approximately Aug 09. He indicated that he had not received HW training.</p> <p>(2) The HW coordinator (CM2 Tadlock) and Environmental Coordinator (Chief Sepulvado) at R-436, Bldg 241 indicated they had not received HW training although they had only been assigned HW duties for approximately one month.</p> <p><b><u>RECOMMENDATION(S):</u></b></p> <p>OPNAV 5090, Ch. 15 does not specify a time requirement to attend HW training for SAA coordinators. It would appear prudent to follow the standard of completing initial training within six months after entering the SAA coordinator position. Prior to attending a training course, untrained SAA coordinators should work under the supervision of another individual in their organization that has been trained. (The six month period is allowed for those HW management personnel that are subject to the 40 CFR 265 training requirements.)</p> <p>NCBC Gulfport has CECOS conduct annual HW training for HW coordinators. Due to the rapid turnover of military billets, the installation HW manager may need to explore conducting periodic in-house SAA training or finding a local provider to supplement the annual CECOS course.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 25 Mar 10	<u>Non-compliance Number:</u> <b>62604-HW-OBS-2-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input checked="" type="checkbox"/> Other	<u>Regulatory Citations:</u> NA	<u>ListBuilder Number(s)</u> HW.1.2.US	<u>Category:</u> <input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u>	<u>Associated EMS Element</u> 4.4.1, Resources, Roles, Responsibility, and Authority	<u>Auditors(s):</u> Troy Stewart	
<u>Description of Non-compliance:</u>  <p>The Navy EQA checklist states that individuals responsible for HW storage areas must be designated in writing. NCBC Gulfport has not instituted these procedures for their HW coordinators.</p> <p><b>RECOMMENDATION:</b> NCBC Gulfport should establish procedures for HW coordinators to be designated in writing from each work center, tenant, or department.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-ST-OBS-1-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> MDEQ 280.70(c)	<u>ListBuilder Number(s)</u> ST.95.2	<u>Category:</u> <input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u>	<u>Associated EMS Element</u>	<u>Auditors(s):</u> Dana Latino	
<u>Description of Non-compliance:</u>  <p style="text-align: center;"><b><u>FACT</u></b></p> <p>The NEX tanks will need to come out of the ground after the new NEX is built.</p> <p style="text-align: center;"><b><u>DISCUSSION</u></b></p> <p>If funding is not budgeted now for FY2012, money will not be available to remove the tanks.</p> <p style="text-align: center;"><b><u>RECOMMENDATION(S)</u></b></p> <p>Recommend budgeting money to remove tanks for 2012.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <p style="text-align: center;"><b>62604-ST-OBS-1-2010</b></p>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-ST-OBS-2-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input checked="" type="checkbox"/> Other	<u>Regulatory Citations:</u>	<u>ListBuilder Number(s)</u>	<u>Category:</u> <input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-5	<u>Associated EMS Element</u> 4.5.1 Monitoring & Measuring	<u>Auditors(s):</u> Dana Latino	
<u>Description of Non-compliance:</u>  <p style="text-align: center;"><b><u>FACT</u></b></p> <p>The USTs inventory records for the NEX consistently shows negative values.</p> <p style="text-align: center;"><b><u>DISCUSSION</u></b></p> <p>The values are within tolerance, but expect values not to be in the negatives so consistently.</p> <p style="text-align: center;"><b><u>RECOMMENDATION(S)</u></b></p> <p>Recommend checking monitoring system to make sure it is accurately showing the correct inventory. Also, recommend tank and piping to have tightness tests done on them.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <p style="text-align: center;"><b>62604-ST-OBS-2-2010</b></p>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-ST-OBS-3-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input checked="" type="checkbox"/> Other	<u>Regulatory Citations:</u>	<u>ListBuilder Number(s)</u>	<u>Category:</u> <input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-2	<u>Associated EMS Element</u> 4.4.3 Communication	<u>Auditors(s):</u> Dana Latino	
<u>Description of Non-compliance:</u>  <p style="text-align: center;"><b><u>FACT</u></b></p> <p>The contracting officer at NCBC Gulfport thought that the contract for the installation of the new lube containers was held up by NAVFAC SE contracting and vice versa.</p> <p style="text-align: center;"><b><u>DISCUSSION</u></b></p> <p>It is imperative that contracting actions are not delayed so mission objectives are not hindered.</p> <p style="text-align: center;"><b><u>RECOMMENDATION(S)</u></b></p> <p>Recommend that contracting offices improve communication to provide timely response to determine status of contracts.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <p style="text-align: center;"><b>62604-ST-OBS-3-2010</b></p>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr/> Name and Signature <span style="float: right;">Date</span>	<hr/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr/> Name and Signature <span style="float: right;">Date</span>	<hr/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 Mar 10	<u>Non-compliance Number:</u> <b>62604-ST-OBS-4-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input checked="" type="checkbox"/> Other	<u>Regulatory Citations:</u>	<u>ListBuilder Number(s)</u>	<u>Category:</u> <input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-5	<u>Associated EMS Element</u> 4.5.1 Monitoring & Measuring	<u>Auditors(s):</u> Dana Latino	
<u>Description of Non-compliance:</u>  <p style="text-align: center;"><u>FACT</u></p> <p>One UST at the NEX was emptied of approximately 200 gallons of water/fuel mixture because there was approximately 1 inch of water on the bottom of the tank.</p> <p style="text-align: center;"><u>DISCUSSION</u></p> <p>Records showed no change of water level at the bottom of the tank.</p> <p style="text-align: center;"><u>RECOMMENDATION(S)</u></p> <p>Recommend checking to make sure contractor performed work. If so, recommend checking the water sensor in the tank to see if it is operating correctly.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <p style="text-align: center;"><b>62604-ST-OBS-4-2010</b></p>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr/> Name and Signature <span style="float: right;">Date</span>	<hr/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr/> Name and Signature <span style="float: right;">Date</span>	<hr/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 23 Mar 10	<u>Non-compliance Number:</u> <b>62604-ST-OBS-5-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input checked="" type="checkbox"/> Other	<u>Regulatory Citations:</u> NA	<u>ListBuilder Number(s)</u> NA	<u>Category:</u> <input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-4	<u>Associated EMS Element</u> 4.4.6 Operational Control	<u>Auditors(s):</u> Dana Latino	
<u>Description of Non-compliance:</u>  <p style="text-align: center;"><b><u>FACT</u></b></p> <p>The gasoline supplier will no longer supply gasoline without ethanol starting 15 April 2010.</p> <p style="text-align: center;"><b><u>DISCUSSION:</u></b></p> <p>One tank at the NEX Gas station has water intruding into it. The molecular bonding of ethanol with water will cause damage to POVs.</p> <p style="text-align: center;"><b><u>RECOMMENDATION:</u></b></p> <p>Recommend that the tank be repaired. If tank is not repaired by April 15, tank must be discontinued from service until repaired or replaced. The gasoline supplier will no longer supply gasoline without ethanol starting 15 April 2010.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u> <p style="text-align: center;"><b>62604-ST-OBS-5-2010</b></p>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
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# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 24 MAR 10	<u>Non-compliance Number:</u> <b>62604-WQ-OBS-1-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 141.31	<u>ListBuilder Number(s)</u> WQ.30.3.US	<u>Category:</u> <input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u> EMS-5	<u>Associated EMS Element</u> 4.4.6 Operation Control 4.5.1 Monitoring & Measuring	<u>Auditors(s):</u> Jens Sapin	
<u>Description of Non-compliance:</u>  <p>Citation noted above requires that public water systems must send reports to the state on any failure to comply with applicable biological, turbidity, radioactivity, and chemical standards, and on any failure to comply with monitoring requirements that apply. It requires the public water system, within 10 days of completing public notification requirements for the initial public notice and any repeat notices, submits to the primacy agency a certification that it has fully complied with the public notification regulations.</p> <p>NCBC Gulfport received a notice of violation (NOV) for the month of February 2010 due to its inability to sample and submit a round of bacteriological and chlorine results.</p> <p>During the time of the field assessment, NCBC Gulfport was complying with the referenced regulation by distributing public notification flyers door to door throughout the base. Notifications have also been posted on the base website and newspaper.</p> <p>The recommendation is to proceed with current action and submit the report of completion of public notification as soon as the notifications are completed.</p>			

## CLOSING THE NON-COMPLIANCE

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<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
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# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC GULFPORT		<u>Date:</u> 24 MAR 10	<u>Non-compliance Number:</u> <b>62604-WQ-OBS-2-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 141.400	<u>ListBuilder Number(s)</u> WQ.15.11.US WQ.15.13.US	<u>Category:</u> <input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u>	<u>Associated EMS Element</u>	<u>Auditors(s):</u> Jens Sapin	
<u>Description of Non-compliance:</u>			
<p>Citation noted above notes that public water systems with populations of 3,300 or more and use ground water are required to treat all of their ground water to at least 99.99 percent (4-log) treatment of viruses and continuously monitor their disinfection levels.</p> <p>It was noted during the drinking water assessment that the current population at NCBC Gulfport was 3,217 which is on the cusp of the threshold population of this rule. Housing units are being constructed that will eventually cause the base to exceed this number.</p> <p>This rule will require a more stringent disinfection method to achieve the 4-log level of treatment of viruses. It was recommended by the Mississippi Department of Health during their last inspection of the facility that a storage tank be added to the well yard in order to increase the contact time for disinfection and comply with the Ground water rule.</p> <p>The rule also requires reporting of the lowest disinfection residual of the day. In order for this to be recorded, continuous monitoring equipment needs to be installed at the wells.</p> <p>It is recommended that plans be initiated to construct storage tanks at the wells to improve the level of disinfection and implement continuous monitoring by the time the base population exceeds the population threshold of 3,300.</p>			

## CLOSING THE NON-COMPLIANCE

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<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 23 MAR 10	<u>Non-compliance Number:</u> <b>62604-WS-OBS-1-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> MDEQ, WPC-1, Section IV (A) (13) (18)	<u>ListBuilder Number(s)</u> WA.10.2.MS	<u>Category:</u> <input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u>	<u>Associated EMS Element</u>	<u>Auditors(s):</u> Jens Sapin	
<u>Description of Non-compliance:</u>  <p>Referenced citation above calls for the discharger to keep “the facility in good working order and operate, as efficiently as possible, any facilities or systems of control installed to achieve compliance with the discharge permit.”</p> <p>During the site visits to the storm water outfall sites, there appeared to be some areas that contained debris (Outfall 2 East, Outfall 1 North, Outfall 4 North) and excessive vegetation (Outfall 1 North, Outfall 3 North, Outfall 4 North). Recommend removing debris and dredging out accumulated vegetation.</p> <p>This is not a major issue violating a regulation but a recommendation to implement best management practices in regard to the outfalls.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>  	<u>Non-compliance Number:</u>  
<u>Person(s) Responsible for closing the Non-Compliance:</u>  	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>  
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>  	
<u>Observations/Notes:</u>  	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>  	<u>Environmental Confirmation of Corrective/Preventive Action:</u>  
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 23 MAR 10	<u>Non-compliance Number:</u> <b>62604-WS-OBS-2-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 403.5(a) and 403.5(c)(2)	<u>ListBuilder Number(s)</u> WA.25.1US	<u>Category:</u> <input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u>	<u>Associated EMS Element</u>	<u>Auditors(s):</u> Jens Sapin	
<u>Description of Non-compliance:</u>  <p>Referenced citation requires that, “pollutants must not be discharged into a publically owned treatment works (POTW) which would cause pass through or interference.”</p> <p>The oil water separators (OWS) at Buildings 253 and 254 (Dozer and Crane areas) are not covered and open to inflow from rainfall. The “As-Built” indicate that flow from these OWS’s goes to the base sanitary sewer system and eventually, to the POTW (City of Gulfport) for treatment in their wastewater treatment facility. As a result, there is a potential to overload the POTW with a heavy rainstorm.</p> <p>It is recommended that best management practices (BMP’s) are implemented to ensure that the OWS’s are valved off and not discharging to the POTW during rain events.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 23 MAR 10	<u>Non-compliance Number:</u> <b>62604-WS-OBS-3-2010</b>
<u>Reference Documents:</u> <input checked="" type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input type="checkbox"/> Other	<u>Regulatory Citations:</u> 40 CFR 403.5(b)	<u>ListBuilder Number(s)</u> WA.25.2.US	<u>Category:</u> <input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u>	<u>Associated EMS Element</u>	<u>Auditors(s):</u> Jens Sapin	
<u>Description of Non-compliance:</u>			
<p>Referenced citation instructs that, "solid or viscous pollutants in amounts that will cause obstruction to the flow are not being discharged to the public owned treatment works (POTW). Examples are: fish cleaning stations, pieces of metals, rubber, and wood from shops, sand and sediment"</p> <p>The oil water separators (OWS) at Buildings 253 and 254 (Dozer and Crane areas) are susceptible to sand and sediment accumulation due to the earth moving activities conducted in these areas. During the site visits, excessive amounts of sand and sediment were observed at these areas.</p> <p>It is recommended that periodic cleaning be conducted on the OWS's.</p>			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

# EXTERNAL AUDIT NON-COMPLIANCE FORM

<u>Name of Naval Installation or Activity</u> NCBC Gulfport		<u>Date:</u> 25 MAR 10	<u>Non-compliance Number:</u> <b>62604-WS-OBS-4-2010</b>
<u>Reference Documents:</u> <input type="checkbox"/> Regulation <input type="checkbox"/> OPNAV <input checked="" type="checkbox"/> Other	<u>Regulatory Citations:</u> Best Management Practice	<u>ListBuilder Number(s)</u> WA.10.4.US	<u>Category:</u> <input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Observation/ Recommendation
<u>Associated EMS N.C.</u>	<u>Associated EMS Element</u>	<u>Auditors(s):</u> Jens Sapin	
<u>Description of Non-compliance:</u>  Referenced citation instructs that, “even where not covered by NPDES permits, storm water discharges should be uncontaminated...”  It was noted during the field assessment that sand/sediment had made its way to the storm water channel adjacent to the Dozer Field in two distinct areas.  It is recommended that storm water runoff counter measures be installed in this area to preserve the quality of the storm water being discharged.			

## CLOSING THE NON-COMPLIANCE

<u>Name of Naval Installation or Activity</u>	<u>Non-compliance Number:</u>
<u>Person(s) Responsible for closing the Non-Compliance:</u>	<u>Environmental Approval of Corrective/Preventive Action Plan:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>
<u>Actions Taken to correct the Non-compliance:</u>	
<u>Observations/Notes:</u>	
<u>Responsible Person's Confirmation of Corrective/Preventive Action:</u>	<u>Environmental Confirmation of Corrective/Preventive Action:</u>
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name and Signature <span style="float: right;">Date</span>

**APPENDIX H**

**EMS AUDIT OUT-BRIEF**



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# ***External Environmental Audit Out-Brief for NCBC Gulfport***



**William P. Page, CNIC Lead, Out-brief Presenter**  
**Dennis Ashley, Lead Auditor, NAVFAC Southeast**  
**26 March 2010**



# ***External Environmental Audit***

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- ***As directed by CNIC, a comprehensive external environmental audit was conducted on 22 thru 26, March 2010.***

***The purpose of the audit was to:***

- ***Evaluate compliance with applicable Federal, State, and OPNAVINST 5090.1C, environmental regulations and requirements***
- ***Verify continued conformance with the ISO 14001:2004 EMS Standard***



# ***Strengths & Noteworthy Practices***

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- ***Dedicated proactive Environmental Staff***
- ***Development of a “Construction Environmental Inspection Guide”***
- ***Implementation of a brake cleaner aerosol can recharging system***



# EMS Non-conformances by Element

<i>ISO 14001 Section</i>	<i>Major Non-conformance</i>	<i>Minor Non-conformance</i>	<i>Positive Observation</i>
<i>Policy 4.2</i>	<i>0</i>	<i>0</i>	<i>1</i>
<i>Objectives, Targets, and Programs 4.3.3</i>	<i>0</i>	<i>1</i>	<i>0</i>
<i>Resources, Roles, and Responsibilities 4.4.1</i>	<i>0</i>	<i>1</i>	<i>0</i>
<i>Competency Training and Awareness 4.4.2</i>	<i>0</i>	<i>1</i>	<i>0</i>
<i>Operational Control 4.4.6</i>	<i>0</i>	<i>1</i>	<i>1</i>
<i>Monitoring and Measuring 4.5.1</i>	<i>0</i>	<i>1</i>	<i>0</i>
<i>Evaluation of Compliance 4.5.2</i>	<i>0</i>	<i>1</i>	<i>0</i>
<b>TOTAL</b>	<b>0</b>	<b>6</b>	<b>2</b>

**Installation can re-declare conformance upon development and approval of a POA&M which addresses all Minor Non-Conformances**



# Summary of Non-compliances by Media

<b>Media</b>	<b>Major Findings</b>	<b>Minor Findings</b>	<b>Observations</b>	<b>Noteworthy Practices</b>
<i>Air, Ozone Depleting Substances (ODS)</i>	2	0	0	0
<i>Drinking Water</i>	0	1	2	1
<i>Stormwater</i>	0	0	4	0
<i>Hazardous Waste</i>	5	4	2	1
<i>Petroleum, Tanks, Spill Prevention and Response Planning (SPCC, OHS)</i>	4	4	4	0
<i>Polychlorinated Biphenyls (PCB)</i>	0	0	0	0
<i>Asbestos, Lead Based Paints (LBP)</i>	1	0	0	0
<i>Recycling Program (QRP)</i>	0	0	0	1
<i>Hazardous Materials</i>	1	2	1	0
<i>Pollution Prevention</i>	0	0	1	0
<b>TOTAL</b>	<b>13</b>	<b>11</b>	<b>14</b>	<b>3</b>



# ***Findings of critical concern***

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- ***Management of Asbestos and Lead Based Paint Programs***
  - *No current program established to manage asbestos and lead based paint*
  - *Recommend Installation take appropriate actions to remedy the situation*
  
- ***EMS & Environmental Compliance Communication***
  - *Communication of EMS roles, responsibilities, and goals*
  - *Recommend increasing Command focus and leverage to drive and improve EMS and compliance*



# Remaining Actions

- ***Audit Team to provide copy of outbrief, non-compliance, non-conformance and noteworthy practices forms to the Installation, today***
- ***By 14 April 2010, Audit Team Lead to provide the draft audit report to IEPM for review and comment***
- ***By 21 April 2010, IEPM to submit comments to Audit Team Lead. Disputes between the Installation and the Audit Team will be resolved by CNIC HQ N45.***
- ***By 26 April 2010, Audit Team Lead to submit draft final report to CNIC HQ; CNIC HQ will issue final audit report.***
- ***Installation has 30 days from receipt of final audit report to develop and provide POA&M addressing remaining findings identified in the audit report to the Audit Team Lead for approval.***
- ***Installation may re-declare conformance with ISO14001 when***
  - ***Minor non-conformances have corrective action defined and planned in a POA&M with senior leadership support***
  - ***POA&M is approved by Audit Team Lead***



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*Questions ?*

**APPENDIX I**

**ABBREVIATIONS AND ACRONYMS**

## APPENDIX I – Abbreviations and Acronyms

1.1.1.1.1 Term/Acronym	1.1.1.1.2 Definition
<b>Aspect</b>	A characteristic of a practice that can cause, in normal operation or upset mode, an impact to an environmental or other resource. Each practice may have several aspects.
<b>1.1.1.1.3 BSO</b>	Budget Support Officer
<b>CNIC</b>	Commander, Naval Installations Command
<b>CNO</b>	Chief of Naval Operations
<b>CO</b>	Commanding Officer
<b>Conformance</b>	Adherence to Navy and Regional EMS criteria.
<b>Compliance</b>	Adherence to Federal, state, local, DoD, Navy, Regional and other applicable legal, regulatory, or policy requirements.
<b>DoD</b>	Department of Defense
<b>EMP</b>	Environmental Management Procedure
<b>EMS</b>	Environmental Management System
<b>Environmental Records</b>	Environmental records furnish objective evidence of activities performed or results achieved. Records are statements of fact for a given point in time. They address historical activity and must be maintained for a specified or indefinite period of time; their contents are not subject to change. Examples of environmental records include training records; manifests or bills of lading; communication records; required reports; compliance assessment results; minutes of meetings; etc.
<b>Environmental Requirement</b>	Legislation, regulation, or policy issued by any executive, Federal, state, local, DoD or Navy authority that addresses environmental considerations and requires action by personnel operating aboard CNRMA-HR.
<b>EO</b>	Executive Order
<b>EOC</b>	Emergency Operations Center
<b>EPA</b>	Environmental Protection Agency
<b>EQA</b>	Environmental Quality Assessment
<b>EQMB</b>	Environmental Quality Management Board
<b>FRT</b>	Facility Response Team
<b>Impact</b>	An effect of a practice's aspect on an environmental or other resource. Each practice may have several impacts
<b>Internal Assessment</b>	A systematic, documented, objective, and comprehensive environmental compliance review of installation processes, facilities, and practices to be completed within a 12-month period. Installation personnel or their designees conduct the internal assessment. (OPNAVINST 5090.1C, Chapter 3).
<b>Internal Assessment Plan (IAP)</b>	The host activity's plan, coordinated with tenants, that describes how a comprehensive internal assessment will be accomplished within the "fenceline" over the course of a year (OPNAVINST 5090.1C, Chapter 3).
<b>1.1.1.1.4 ISO</b>	International Standards Organization
<b>1.1.1.1.5 NAVFAC</b>	Naval Facilities Engineering Command
<b>1.1.1.1.6 NAVFAC SE</b>	NAVFAC Southeast
<b>1.1.1.1.7 NAVFAC LANT</b>	NAVFAC Atlantic Division
<b>1.1.1.1.8 NCBC</b>	Naval Construction Battalion Command
<b>NOSC</b>	Navy On-Scene Commander

1.1.1.1.1 Term/Acronym	1.1.1.1.2 Definition
<b>Operational Controls</b>	<p>Procedures, with designated responsibilities and frequencies, implemented to control a practice's aspects or to prevent or mitigate the impacts of those aspects. Practice control is achieved through effective:</p> <ul style="list-style-type: none"> <li>• Training and awareness (see <i>EMP-07, Training, Awareness, and Competence</i>)</li> <li>• Internal communication (see <i>EMP-08, Communication</i>)</li> <li>• Operational control (including replacing, changing, or eliminating the practice as well as following prescribed operation instructions)</li> <li>• Emergency preparedness and response (see <i>EMP-12, Emergency Preparedness and Response</i>)</li> <li>• Compliance inspection and sampling and analysis, (see <i>EMP-13, Monitoring and Measurement</i>)</li> <li>• Record control, (see <i>EMP-15, Records</i>).</li> </ul> <p>Some practice controls are required by regulation or policy. Many more are not "required," but are judged by an installation to be necessary to achieve the above purposes or to otherwise minimize risks to mission.</p>
<b>PAO</b>	Public Affairs Office
<b>POA&amp;M</b>	Plan of Actions and Milestones
<b>Practice</b>	<p>A unit process that supports a military mission and can impact environmental resources. (It is the ability to impact an <i>environmental resource</i> that is key to defining a practice. However, practices may also impact <i>other resources</i>.) Practices include operation of specific pieces of industrial equipment or industrial areas (e.g., AST-001, Solvent Tank XYZ, hazardous waste storage area B) and associated physical controls, but they also include non-industrial activities such as administrative and training functions.</p>
<b>Practice Owner</b>	The person, office, or department responsible for day-to-day operation of a practice.
<b>P2</b>	Pollution Prevention
<b>PWO</b>	Public Works Officer
<b>ROC</b>	Regional Operations Center
<b>SEA</b>	Significant Environmental Aspect
<b>Senior Management</b>	NCBC Gulfport Commanding Officer (CO), Executive Officer, Public Works Officer, COs/Officers-In-Charge of tenant commands and contractor management staff
<b>SMT</b>	Spill Management Team
<b>SPCC Plan</b>	Spill Prevention, Control, and Countermeasure Plan
<b>SOP</b>	Standard Operating Procedure

## **APPENDIX J**

## **PHOTO LOG**



Tri-wall Boxes Containing Aerosol Cans at <90-day HW Facility – One of these HW containers had an accumulation start date exceeding 90 days (Finding HW-1)



One Container Outside HW Storage Facility had a Non-Hazardous Waste Label but no labeling of the actual contents (sand blast media) – Finding HW-2



Tri-Wall Boxes with Non-Hazardous Labels that did not indicate actual contents which were POL absorbents at <90-day HW facility (Finding HW-2)



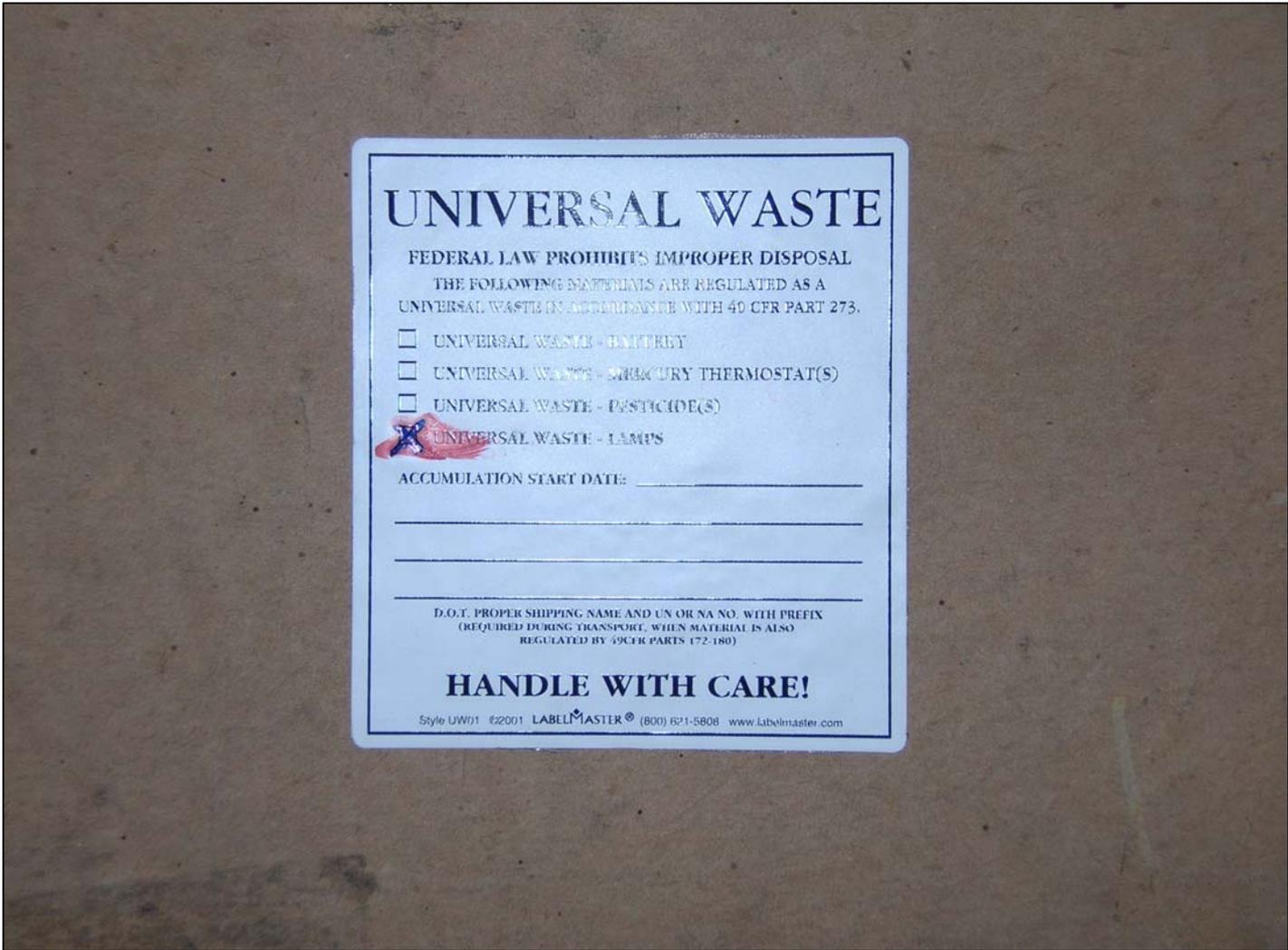
SAA Drum at CED C-shop with no label  
(Personnel indicated container was designated for anti-freeze)  
Finding HW-2



At Marine Corps Reserve Center Bldg 243 – Container marked with both anti-freeze and used oil stenciling – actual contents unknown; Container also did not have spill containment (Finding HW-2)



Container of Universal Waste Ni-Cad Batteries at HW Storage Facility which did not have an Accumulation Start Date (Finding HW-3)



Fluorescent Lamp Box Label at HW Storage Facility which did not have Accumulation Start Date as required for Universal Wastes (Finding HW-3)



NCTC Bldg 70 – Portable oil collection unit requires Used Oil Label (Finding HW-6)



Used Oil Tank at R-436 Requiring a new weather-resistant label (Finding HW-6)



Refillable Aerosol Cans of Brake Cleaner at CED  
Noteworthy Practice HW-12



Recommend Safety Review of Corrosives and Flammables with Multiple other materials and supplies in the same compartments at CHRIMP warehouse (Finding HM-1)



Several Containers at CED Haz-mat Bulk Storage were not bar-coded through CHRIMP (Finding HM-3)

# Storm Water Outfall #1



# Storm Water Outfall #2



# Storm Water Outfall #3



# Storm Water Outfalls #4 & 5



# Supply Well #2; Chlorine Room



# Supply Wells #4 & #5

