



Environmental Times

A newsletter for Coast Guard environmental management and compliance

Compliance Assistance Initiative

OVERVIEW

The Coast Guard is obligated to safeguard our nation's environment and natural resources. Each Commanding Officer is responsible for ensuring that their unit, whether a shore facility or a vessel, is in continuous compliance with federal, state, and local environmental laws, regulations, and international treaties.

Recently there has been a downward trend in compliance with several major environmental laws dealing with clean air, clean water, hazardous material and hazardous waste (HM/HW), and other ecological indicators.

The issue of declining compliance is a serious concern particularly for the Coast Guard, which finds itself in the unique position as both a regulator and a regulated entity of environmental laws and regulations. Noting a pattern over the last three years, environmental compliance evaluations have shown an overall increase in class 1 and 2 findings – which indicate current or potential violations of the law, respectively. Included within this decline of compliance is a notable increase in repeat findings, especially in areas dealing with the Clean Water Act and HM/HW management. The litany of root causes for this recent spike in noncompliance includes expanded mission related activities, shortage of a properly trained professional environmental staff dedicated to unit compliance, a notable lack of general environmental awareness, and limited command support and resource commitments.

One of the main problems, which was identified and discussed in a recent Environmental Management Board (EMB) meeting, is that small units that typically exist under the new Sector organizations have little or no dedicated environmental expertise on-site. The EMB approved a proposal developed by the Coast Guard's Division of Environmental Management to provide compliance assistance through contract support. The Compliance Assistance Initiative (CAI) is a Headquarters-funded FY06 prototype project to provide multi-media environmental compliance support for units without dedicated environmental staff to help them meet their day-to-day environmental compliance requirements.

As this effort is a prototype, only a limited number of units will be covered in the initial phase, however the expectations are high that a continual and integrated CAI support system for environmental compliance will eventually span across the entirety of the Coast Guard.

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and more...

From the Editor, a Call for Articles

The Environmental Times is a quarterly publication designed to keep Coast Guard personnel apprised of environmental issues impacting Coast Guard facilities, operations, planning, and policy making. We have received wonderful feedback from our readers, and we thank all our contributors.

We encourage you to share your stories and successes as environmental stewards. We are looking for articles describing innovative solutions and planning strategies designed to address your environment concerns. We welcome your contributions on environmental best practices, policy, achievements and awards, information resources (online or hard copy), and upcoming conferences.

Please submit your articles to Martin Nguyen at U.S. Coast Guard Headquarters (Martin.Nguyen@uscg.mil). Thank you for your continued support!

The CAI is a two-part plan aimed at remedying at least some of the Coast Guard compliance problems. Part one is to raise awareness by reinforcing the concept that “**compliance is not optional but mandatory.**” This will be accomplished through multiple venues including ALCOASTs, reissuing the Commanding Officer’s Guide, increased training, and message marketing efforts. Part two will use existing FY06 OE funding to establish a support contract that would provide recurring on-site compliance assistance visits, as well as online help desk environmental support and training. The initial phase will be directed to operational units with little or no dedicated environmental expertise that are not in compliance. As an indicator of the CAI’s performance, there will be monthly assessments and reports conducted as a quality assurance measure. The Commanding Officer will still however be ultimately responsible and accountable for unit compliance. Although these efforts will not completely eliminate the Coast Guard’s compliance problems, this prototype program is a welcome step in the right direction towards improving unit compliance.

CONTRACTS

The CAI will provide contractor labor and supplies to conduct compliance assistance visits at selected Coast Guard units. The visits will consist of an initial facility assessment and rotating on-site shop level support designed to assist facility personnel in achieving and maintaining a higher level of environmental compliance. The CAI visits are needed to achieve and maintain compliance with the Resource Conservation and Recovery Act (RCRA), Clean Air Act (CAA), Clean Water Act (CWA), Toxic Substances Control Act (TSCA), Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and Emergency Planning and Community Right-to-Know Act (EPCRA), among other laws and regulations. Contractors will also provide basic on-site environmental management training and establish an easily accessible environmental compliance help desk.

Initially, the CAI will focus on PACAREA and LANTAREA Sectors – mostly smaller units lacking billeted environmental personnel. A draft list of units to be covered under the FY06 prototype effort is being finalized.

POTENTIAL PROBLEMS

Even if a unit receives assistance through the CAI, it would only cover the basic day-to-day laws where operational units have the greatest liability for fines and other sanctions and does not necessarily cover the full spectrum of related environmental laws / requirements, such as the National Environmental Policy Act (NEPA), Marine Mammal Protection Act (MMPA), and Endangered Species Act (ESA), that Sectors may also find themselves responsible for. This means that gaps may still exist and there is no guarantee that the CAI effort will receive funding beyond FY06. It is, however, the Coast Guard’s goal to achieve and maintain full environmental compliance as soon as possible.

We Need Your Help!

As a result of the Coast Guard’s IT migration, the e-mail addresses for all Coast Guard personnel have changed (or will soon be changing). Please help us ensure that you still receive the Environmental Times newsletter by submitting your new e-mail address to Martin Nguyen at U.S. Coast Guard Headquarters (Martin.Nguyen@uscg.mil). Thank you for your continued support!

The Coast Guard’s Commanding Officers and staffs face many challenges in attaining this goal including increased post 9/11 OPTEMPO; assignment of complex environmental responsibilities as collateral duty; and lack of available training resulting in a lack of command awareness, commitment, and support. The CAI has been designed to address the most common causes for environmental non-compliance and costly violations. The ultimate goal of the CAI is to provide a baseline environmental profile at smaller units that emulates programs from units that are already successful. By doing so, the Coast Guard will be well on its way to full compliance.

Office of the Federal Environmental Executive Honors Outstanding Federal Electronics Stewardship

On April 21, 2006, Federal employees from across the United States gathered at the Eisenhower Executive Office building in Washington, DC, to accept Federal Electronics Recycling and Reuse Challenge Awards for their outstanding electronics stewardship efforts. These awards recognized Federal employees and facilities for leading by example and recycling, reusing, or donating their used computers and other electronic equipment to local schools or Hurricane relief efforts in the Gulf area.

“Each Federal employee has the opportunity to make a significant contribution to promote the management of our electronic assets in an environmentally sound and energy efficient manner,” said Mr. Ed Piñero, the Federal Environmental Executive. “These voluntary efforts can collectively make a big difference by implementing practices, technological applications, and methodologies that will gain long term benefits for economic performance and our environmental and natural resource conservation efforts.”

In the award’s first year, 15 winners were selected from 11 agencies and 70 facilities who participated in the Challenge. The program successfully reused and recycled approximately two million pounds of electronics during the five-month period between November 11, 2005 (America Recycles Day) and April 22, 2006 (Earth Day). The Department of Energy was recognized for reusing and recycling over half a million pounds of electronics from their participating facilities.

ELECTRONICS CHALLENGE	RECYCLING 2005-2006	& REUSE CHALLENGE
WINNER:		
Medium Facility – 151 to 1,000 employees		
East, Military: DHS, U.S. Coast Guard, Engineering Logistics Center, Baltimore, MD		

A special award was also presented to the Federal Emergency Management Agency (FEMA) and Environmental Protection Agency (EPA) for their electronic recycling efforts in the Hurricane Katrina-affected areas. As a result of the devastation caused by Hurricane Katrina, EPA’s Region 6 coordinated with FEMA and to date have properly disposed of 10 million pounds of discarded electronics in New Orleans and surrounding areas.

ARSC Wins White House Closing the Circle Award

ALCOAST 370/06 was released in July formally announcing the Aircraft Repair and Support Center (ARSC) winning a White House Closing the Circle (CTC) Award. The Commandant's message recognized the ARSC for demonstrating exemplary environmental stewardship by lowering their hazardous waste stream using cornstarch as a blast media for paint removal from aircraft parts. The message also challenges each Coast Guard employee and Command to demonstrate environmental stewardship by incorporating environmental considerations into their strategies, plans, and daily actions. The White House notice with all CTC winners can be found at: www.ofee.gov/ctc/2006CTCfinalpr.pdf. (POC: Ken Malmberg, (202) 475-5691)

ARSC Team Wins White House Environmental Award / ALCOAST 370/06

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FM COMDT COGARD WASHINGTON DC//G-C//
TO ALCOAST
BT
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ALCOAST 370/06
COMDTNOTE 5090
SUBJ: ARSC TEAM WINS WHITE HOUSE ENVIRONMENTAL AWARD

A. COMDT COGARD WASHINGTON DC 131504Z DEC 13/ALCOAST 619/05

1. I AM PLEASED TO ANNOUNCE THAT COAST GUARD AIRCRAFT REPAIR AND SUPPLY CENTER (ARSC) HAS WON A WHITE HOUSE CLOSING THE CIRCLE (CTC) AWARD. THE CTC AWARDS RECOGNIZE OUTSTANDING ACHIEVEMENTS OF FEDERAL EMPLOYEES AND THEIR FACILITIES FOR DEMONSTRATING EXEMPLARY ENVIRONMENTAL STEWARDSHIP. ARSC WAS RECOGNIZED FOR SIGNIFICANTLY LOWERING THEIR PRODUCTION OF HAZARDOUS WASTE BY USING CORN STARCH AS THEIR DRY BLAST MEDIA FOR PAINT AND COATING REMOVAL. COMPETITION FOR THIS AWARD WAS FORMIDABLE AND ARSC WAS THE ONLY UNIT WITHIN DHS TO WIN ONE OF THE 16 AWARDS PRESENTED BY THE WHITE HOUSE. BZ AND CONGRATULATIONS TO ARSC.

2. AS AN ENFORCER OF ENVIRONMENTAL LAWS, THE COAST GUARD IS UNIQUELY POSITIONED TO EXHIBIT STRONG ENVIRONMENTAL LEADERSHIP. I CHALLENGE EACH COAST GUARD EMPLOYEE AND COMMAND TO DEMONSTRATE ENVIRONMENTAL STEWARDSHIP BY INCORPORATING ENVIRONMENTAL CONSIDERATIONS IN YOUR COMMAND STRATEGIES, YEARLY



PLANNING AND DAILY ACTIONS. IN THIS WAY WE WILL LEAD BY EXAMPLE, BE A GOOD NEIGHBOR AND FULFILL OUR ENVIRONMENTAL MARITIME STEWARDSHIP ROLE.

3. INTERNET RELEASE AUTHORIZED.

4. ADMIRAL T.W. ALLEN, COMMANDANT, SENDS.

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The 2007 White House Closing the Circle (CTC) Awards

The Office of the Federal Environmental Executive is pleased to announce the 2007 White House Closing the Circle (CTC) Awards. This program recognizes outstanding achievements by Federal employees and their facilities for efforts that resulted in significant contributions to, or have made a significant impact on, promoting environmental stewardship.

The award categories for 2007 will include:

- Waste / Pollution Prevention
- Recycling
- Green Purchasing
- Environmental Management Systems
- Sustainable Design / Green Buildings
- Alternative Fuels And Fuel Conservation
- Electronics Stewardship

Its that time of year... Nominations for the 2007 White House CTC Awards will be accepted beginning on January 2, 2007 until January 31, 2007.

Nominations will be accepted beginning on January 2, 2007 until January 31, 2007. Nominations can be from an individual Federal employee or teams / groups of Federal employees (including teams of Federal and contract employees). Partnerships between Federal facilities or Federal employees and non-Federal entities, such as surrounding local communities or non-profit organizations, are encouraged and will be considered for award. Nominations in the Waste / Pollution Prevention, Recycling, and EMS categories can be for programs involving either hazardous or non-hazardous waste / materials.

For more details, please visit the [Office of the Federal Environmental Executive \(OFEE\) website](#) after November 1, 2006, or contact Juan Lopez by [email](#) or by telephone at (202) 343-9481.

USCG / CCG Green Facility Partnerships

Some suggestions for maximizing our opportunities for bilateral cooperation regarding the U.S. Coast Guard / Canadian Coast Guard Agreement signed last year are outlined below. These are substantive suggestions for actions to be taken that address overt aspects of pollution, media by media, and work practices and acquisition practices. The ultimate goal of this agreement is the development of best practices through collaboration.

1. Maximize opportunities for bilateral cooperation in environmental protection, particularly through:
 - Mutual development of environmental management systems that monitor and measure unit performance, compliance attainment, and cost reduction; and
 - Discussing and itemizing “green” operational support activities that include procurement, boat repair, buoy repair, paints, coatings and solvent use, and waste reduction and recycling.
2. *Air Pollution* – Share systems of information regarding reducing air pollution emissions from all assets, ashore and afloat. Address specific pollutants, work practices, content standards, and other ways of reducing the aggregation of air pollutants as they are produced by operations, repairs, maintenance, and other activities.
3. *Water Pollution* – Share existing information about reducing runoff problems that result from storm water events, and that affect drinking water supplies and create other pollution problems.

4. *Land Pollution* – Compare procedures for disposal practices, curtailment of fuel spills, solid waste disposal, hazardous waste treatment, storage and disposal, and combined effects on land use that result from shore based activities.
5. The two parties can share lessons learned by discussing environmental awards, including our own Superior Performance Award and the White House Closing the Circle Award. Other national award programs should also be shared when possible, so the Canadians can see the breadth of programs that are in place in the U.S. We would like to examine the success of their award programs as well.

Coast Guard Lighthouse National Register of Historic Places (NRHP) Nominations



An intensive effort to nominate 90 U.S. Coast Guard-owned historic lighthouses to the National Register of Historic Places (NRHP) has been underway for approximately three years. The NRHP is a program administered by the U.S. National Park Service. It provides official recognition by the Federal government for buildings, structures, sites, and other properties that are significant in American history. A substantial number of USCG lighthouse properties have been listed on the National Register. Work to list others is in process or slated for the future. There are two major requirements for a property to be listed on the National Register. It must meet criteria established by the National Park Service for evaluating historical significance, and a nomination package must be prepared in accordance with established standards for NRHP documentation. This work includes background research on the property's construction and history, along with a field survey to record existing conditions and take photographs for archival purposes. The documentation package must be signed by USCG Federal Preservation Officer, reviewed and signed by the State Historic Preservation Officer of the state where the lighthouse is located, and public notification must be accomplished. After all necessary signatures are obtained and any public comments compiled, the finalized nomination package is sent to the National Park Service in Washington, DC. Following review and acceptance by the NRHP office, the nominated lighthouse is included in an official public notification of properties approved for listing. The effort to nominate USCG-owned historic lighthouses to the National Register will continue until all have been evaluated for historicity, and listed on or determined eligible for listing on the NRHP. This process has been completed for more than 30 lighthouses, and work on 40 more is underway. Twenty additional lighthouses will be evaluated and documented, and their nomination packages prepared, over the next three years. Work accomplished recently has focused on lighthouse properties in Michigan, Wisconsin, Indiana, Maine, New York, New Jersey, and Delaware. They include a variety of lighthouse types. Some examples are Passage Island Light Station, Staten Island Range Rear Light, Romer Shoal Light Station, Alpena Light, Middle Island Light, and Muskegon Pierhead Light and Muskegon South Breakwater Light (see photos).



The Hazardous Waste Manifest System

The EPA recently revised the [Uniform Hazardous Waste Manifest](#) used to track hazardous waste from a generator's site to the site of its disposition. **Starting September 5, 2006, the new Uniform Hazardous Waste Manifest must be used for all hazardous waste shipments.**

Handlers of waste (i.e., generators, or treatment, storage, or disposal facilities) must obtain the new forms from any [source](#) that has been approved by the [EPA Manifest Registry](#) to print and distribute the form. **Please note that existing forms must be used for hazardous waste shipments initiated before September 5, 2006.**

A number of states have additional [requirements](#) regarding the use of the new Uniform Hazardous Waste Manifest. Some states require copies to be submitted to the state, and/or have state-specific waste codes in addition to the federal hazardous waste codes required to be entered on the new manifest.

WHAT GUIDANCE IS AVAILABLE FOR USING THE NEW MANIFEST FORM?

There is a new training video available at: www.pneac.org/hazwastemanifest. This training video introduces the new manifest form, highlights the differences between the new and the previous manifest form, and provides specific instructions to generators, transporters, and treatment / storage / disposal facilities for completing the new manifest.

- [Manifest Example: Designated Facility to Destination State](#)
- [Continuation Sheet Example](#)
- [Instructions for completing the hazardous waste manifest](#)
- [Management method codes used with the hazardous waste report](#)
- [Links to state manifest requirements](#)

The Hazardous Waste Manifest System is a set of forms, reports, and procedures designed to seamlessly track hazardous waste from the time it leaves the generator facility where it was produced, until it reaches the off-site waste management facility that will store, treat, or dispose of the hazardous waste. The system allows the waste generator to verify that its waste has been properly delivered, and that no waste has been lost or unaccounted for in the process.

The key component of this system is the Uniform Hazardous Waste Manifest which is a form prepared by all [generators](#) who transport, or offer for transport, hazardous waste for off-site treatment, recycling, storage, or disposal. Currently, the manifest is a paper document containing multiple copies of a single form. When completed, it contains information on the type and quantity of the waste being transported, instructions for handling the waste, and signature lines for all parties involved in the disposal process. The manifest is required by both Department of Transportation (DOT) and EPA. Each party that handles the waste signs the manifest and retains a copy for themselves. This ensures critical accountability in the transportation and disposal processes. Once the waste reaches its destination, the receiving facility returns a signed copy of the manifest to the generator, confirming that the waste has been received by the designated facility.

Summary of Hazardous Waste Manifest Changes

EPA's new Hazardous Waste Manifest must be used for shipments of hazardous waste beginning September 5. The following is a list of some comparisons and significant changes:

GENERAL CHANGES

- A Uniform Hazardous Waste Manifest is required for most shipments of federally regulated RCRA waste. *Change: Only one version can be used anywhere in the U.S.*
- States are banned from creating their own versions. Some new fields are added including: generator site address, import / export, discrepancy categories, rejected loads, and alternate facility. The new form is printed on white paper. Colors previously used on state forms are banned. States were allowed to print their own instructions on manifests including state waste codes, mailing addresses for manifests, and other state information. *Change: States may not include instructions on the national manifest and must develop other ways to provide that information.*
- Shipments rejected by a receiving facility or containers with residues must be properly managed. *Change: New manifest has space for load rejection information (i.e., cause, destination, receipt date, alternate facility, and reference to other manifest, if used). Time periods are set for retention time by the treatment storage or disposal facility (TSD) (60 days) and generators (same as accumulation time).*

- States may require submission of manifests. *Change: States where the generator is located may also require submission of manifests by the TSDF in a different receiving state.*
- Some states collected handling codes on manifests. *Change: EPA requires use of the Biennial Report Hazardous Waste Management Report Method Codes by all TSDFs on all manifests.*
- Manifests were printed by states and many private printers. *Change: The [new manifest](#) must be used on and after September 5. It may be printed only by registered sources [approved by EPA](#).*

GENERATORS

- Generators are responsible for accurately completing the manifest and signing the waste minimization certification. *Change: The certification is moved to the regulations. "Offerors" who prepare waste for shipment per DOT may sign manifests for the generator (e.g., transporters, contractors, or TSDFs rejecting waste).*
- Waste could be rejected back to the generator. *Change: Generators receiving rejected waste or containers with residue are required to sign the manifest and note discrepancies. There is a time limit for holding the waste before shipping it off-site. EPA allows the accumulation time that applies to the generator (90/180/270 days).*
- Many states incorporated a copy page for generators to submit to the state. *Change: EPA dropped that page, so generators in states that require submission of a manifest must submit a legible photocopy.*

TRANSPORTERS

- Import / export information was required on the manifest. *Change: A section is added for this information and for the transporter to sign off on exports.*

TREATMENT STORAGE OR DISPOSAL FACILITIES (TSDF)

- TSDFs identified discrepancies on manifests. *Change: The manifest form provides five types of check boxes for discrepancies in addition to a narrative field.*
- Rejected loads could be sent to the generator or an alternate facility. *Change: Procedures require use of a new manifest in many cases, limit holding time of rejected waste, and require TSDFs to link old and new manifests by manifest numbers.*
- Some containers and bulk containers held a residue after removing waste. *Change: TSDFs are obligated to determine if a container holds a residue that exceeds the definition of an empty container.*
- TSDFs must manifest non-empty containers to the generator or an alternate facility and link the manifests by manifest numbers.
- TSDFs must submit manifests to their state, if so required. *Change: Federal regulations now require TSDFs to submit manifests to their state and the generator's state as well, if required by that state.*

New Manifest Form Required for All Hazardous Waste Handlers

On September 5, 2006, all hazardous waste generators and treatment, storage, and disposal facilities must use EPA's standardized hazardous waste manifest form. Since 1980, the manifest form has provided a complete paper trail of a waste's progress from generation to disposal. It also identifies the type, amount, and toxicity of hazardous waste being shipped. The standardized form that is being implemented today, will save waste handlers and regulators time and money, while guaranteeing the continued, safe management of hazardous waste.

The standardized form reduces or eliminates many of the variables in state requirements. EPA's new manifest form also provides check boxes and adds fields that allow for better tracking of complicated shipments, such as container residues, rejected wastes, and interstate shipments.

The new form also makes it easier to collect data for hazardous waste reporting. EPA has ensured uniformity by authorizing printers and providing them with precise specifications. Like the old form, each standardized form carries a unique preprinted manifest tracking number.

The standardized form also allows multi-state waste handlers to register and use their own manifest forms everywhere they do business.

EPA estimates about 139,000 businesses in approximately 45 industries ship about 12 million tons of hazardous wastes annually. These businesses use between two and five million hazardous waste manifests.

Information on the Standardized Manifest Form: www.epa.gov/epaoswer/hazwaste/gener/manifest/.

List of EPA-approved printers for the forms: www.epa.gov/epaoswer/hazwaste/gener/manifest/registry/printers.htm.

ASTM Standards Available for Download

ASTM standards are now available for download via IP authentication. The standards may be downloaded from enterprise.astm.org. Field units are encouraged to make use of this service.

EPA Publishes General Conformity Regulations for PM 2.5 at Federal Activities

The EPA took *final action* to amend its regulations relating to the CAA requirement that federal actions conform to the appropriate state, tribal, or federal implementation plan for attaining clean air (general conformity) to add *de minimis* emissions levels for particulate matter with an aerodynamic diameter equal or less than 2.5 microns (PM2.5).

Special Notation on Vessel Shipping Papers for Aerosols [IMDG Code 5.4.1.5.8]

International Maritime Dangerous Goods (IMDG) Code 5.4.1.5.8 indicates that there is a special notation required on the transport document (i.e., shipping paper) for certain aerosols being shipped by vessel. Specifically, if the aerosol's capacity is more than one liter that information must be documented on the shipping paper. Shippers who offer large aerosols by vessel must comply with this special notation requirement.

GAO Report 06-390: Securing Wastewater Facilities

Utilities Have Made Important Upgrades but Further Improvements to Key System Components May Be Limited by Costs and Other Constraints

WHY GAO DID THIS STUDY

Wastewater facilities provide essential services to residential, commercial, and industrial users, yet they may possess certain characteristics that terrorists could exploit to impair the wastewater treatment process or to damage surrounding infrastructure. For example, large underground collector sewers could be accessed by terrorists for purposes of placing destructive devices beneath buildings or city streets.

GAO was asked to determine:

- What federal statutory authorities and directives govern the protection of wastewater treatment facilities from terrorist attack,
- What steps critical wastewater facilities have taken since the terrorist attacks of September 11, 2001 (9/11) to ensure that potential vulnerabilities are addressed, and
- What steps the EPA and the Department of Homeland Security (DHS) have taken to help these facilities in their efforts to address such vulnerabilities.

WHAT GAO FOUND

Federal law does not address wastewater security as comprehensively as it does drinking water security. For example, the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 required drinking water facilities serving populations greater than 3,300 to complete vulnerability assessments, but no such

requirement exists for wastewater facilities. While federal law governing wastewater security is limited, Homeland Security Presidential Directive 7 (HSPD 7) designated EPA as the lead agency to oversee the security of the water sector, including both drinking water and wastewater. The directive tasked EPA with several responsibilities, including the development of mechanisms for information sharing and analysis within the water sector.

Our survey of over 200 of the nation's large wastewater facilities shows that many have made security improvements since 9/11. Most facilities indicated they have completed, have under way, or plan to complete some type of security assessment. Similarly, more than half of responding facilities indicated they did not use potentially dangerous gaseous chlorine as a wastewater disinfectant. Survey responses show that other security measures taken after 9/11 have generally focused on controlling access to the treatment plant through improvements in visual surveillance, security lighting, and employee and visitor identification. Little effort, however, has been made to address collection system vulnerabilities, as many facilities cited the technical complexity and expense involved in securing collection systems that cover large areas and have many access points. Others reported that taking other measures, such as converting from gaseous chlorine, took priority over collection system protections.

While EPA and DHS have initiatives to address wastewater facility security, efforts to provide critical and threat-related information would benefit from closer coordination. EPA and DHS fund multiple information services designed to communicate information to the water sector—specifically, EPA funds the Water Information Sharing and Analysis Center (WaterISAC) and its Water Security Channel, while DHS funds the Homeland Security Information Network (HSIN). EPA, DHS, and other industry experts are concerned that these multiple information services may overlap and produce inefficiencies. For example, a substantial part of the two million dollar annual grant EPA uses to fund the WaterISAC is dedicated to purchasing computer services likely available through DHS and HSIN at no cost. A Water Sector Coordinating Council was established by the water sector to help determine the appropriate relationship among these information services. A preliminary review is under way to examine options for improving coordination between the WaterISAC, the Water Security Channel, and HSIN; however, the scope and time frame for completion of this review is unclear.

WHAT GAO RECOMMENDS

GAO is recommending that EPA work with DHS to identify areas where the WaterISAC and HSIN could be better coordinated, focusing on:

- How duplications and overlap could be addressed, and
- How water systems' access to critical information could be improved. GAO also recommends that EPA help identify time frames to complete these tasks.

EPA and DHS generally agreed with the report.

GAO Report 06-390: www.gao.gov/new.items/d06390.pdf.

U.S. Coast Guard Engineering and Logistics Directorate (CG-4)

The Engineering and Logistics Directorate (CG-4) develops, deploys, and maintains the resources necessary to sustain the capabilities to meet operation requirements that support the five Coast Guard strategic goals of safety, protection of natural resources, mobility, maritime security, and national defense. CG-4 provides technical, logistics, and engineering support for all Coast Guard operating programs (e.g., search and rescue). This includes performing or assisting in planning, design, construction, acquisition, renovation, maintenance, and outfitting and alteration of cutters, boats, aircraft, motor vehicles, aids to navigation, and shore facilities. Engineering and logistics maintenance responsibility also includes complete life-cycle support: installation, operations, maintenance, and ultimately replacement.

CG-4 is composed of 2,083 people – 157 located in Coast Guard Headquarters and 1,928 located at three Headquarters units (the Aircraft Repair and Supply Center, Engineering Logistics Center, and Coast Guard Yard). The Directorate is responsible for managing an annual budget of 1.2 billion dollars.

CG-4 is a diverse organization consisting of military and civilians from many different backgrounds and disciplines. CG-4 has managers, engineers, environmental specialists, scientists, logisticians, technicians, and information technology specialists... all vital to our ability to do our job. From the Assistant Commandant for Engineering and Logistics to the field technician repairing a piece of mission critical equipment, our team's many capabilities distinguish the engineering and logistics organization as a vital asset that enables the Coast Guard to attain its strategic and performance goals.

MISSION: To develop and support the systems which enable the men and women of the Coast Guard to be *Semper Paratus*... today and tomorrow

VISION: The Engineering and Logistics Team provides effective, affordable capability for our customers, and into the future

The men and women of CG-4 ensure the Coast Guard's complex infrastructure is always ready to provide the necessary capability to the operational community to meet the Coast Guard's missions.

Training Requirements for Universal Waste Handlers [40 CFR 273.16 and 273.36]

The scope of training required depends on your handler status. According to [40 CFR 273.16](#), a small quantity handler (i.e., generators and sites that store no more than 5,000 kg of universal waste at any time) must inform all employees who handle or have responsibility for managing universal waste how to manage the waste properly. The information must describe proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.

According to [40 CFR 273.36](#), large quantity handlers (i.e., generators and sites that store at least 5,000 kg of universal waste at any time) must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies.

Retention of Labels on Containers [29 CFR 1910.1201]

At [29 CFR 1910.1201](#), Occupational Safety and Health Administration (OSHA) requires employers who receives packages of hazardous material which are required to be marked, labeled, or placarded in accordance with the DOT's Hazardous Materials Regulations (49 CFR Parts 171 through 180) to retain those markings, labels, and placards on the package until the packaging is sufficiently cleaned of residue and purged of vapors to remove any potential hazards.

In addition to packages, this requirement also applies to freight containers, rail freight cars, motor vehicles, or transport vehicles that are required to be marked or placarded in accordance with the Hazardous Materials Regulations.

The DOT markings, placards, and labels must be maintained in a manner that ensures that they are readily visible.

For non-bulk packages which will not be reshipped, the provisions of this section are met if a label or other acceptable marking is affixed in accordance with the Hazard Communication Standard ([29 CFR 1910.1200](#)).

Introducing CG-443's New Website

Environmental Management (CG-443) is pleased to introduce our [new website](#). The website currently presents information on 19 topics covering the areas of Restoration, Compliance, and Planning and NEPA. The topics included on the website are presented below. The website also includes hyperlinks to helpful websites including the EPA's Air Pollution website and the ASTM Standards website.

<u>RESTORATION</u>	<u>COMPLIANCE</u>	<u>PLANNING AND NEPA</u>
ATON	Compliance Documents	NEPA Overview
Environmental Compliance and Restoration	EMS Primer	NEPA Hot Topics and Documents
Environmental Guide for SAFR	Ozone Depleting Substances	Regulations and USCG Forms
Historic and Cultural	P2-Recycling	
HW	Training	
Lighthouse Divestiture	Buying Green	
Remediation Alternatives for SAFR		
Shore Facility Environmental Liability Policy	EPA Air Pollution Site	
UST	ASTM Free Downloads	
UST Compliance Report 2005		

Interstate Technology & Regulatory Council (ITRC) Internet-Based Training Courses for September-October 2006

The Interstate Technology & Regulatory Council (ITRC) offers a wide variety of Internet-based training courses on innovative environmental technologies and approaches specific to the areas of site characterization, monitoring, and remediation as well as other environmental topics. ITRC is a state-led coalition working together with industry and stakeholders to achieve regulatory acceptance of environmental technologies. ITRC is a program of the Environmental Research Institute of the States (ERIS), a nonprofit corporation operating in support of the Environmental Council of the States (ECOS).

These courses are ideal for members of the environmental community (e.g., regulators, federal agency representatives, responsible parties, consultants, stakeholders, etc.) with interest in the learning more about the appropriate evaluation / implementation of innovative environmental technologies and approaches.

COURSE REGISTRATION AND INFORMATION

Registration: Register for courses at clu-in.org/studio/seminar.cfm or www.itrcweb.org. To register, click on *Internet-based Training*. Course registration opens four to six weeks prior to each course offering.

Cost: These ITRC courses are sponsored by ITRC and EPA with no cost to the participant. The courses are delivered via our partnership with the EPA Office of Superfund Remediation and Technology Innovation (OSRTI) on their website at www.clu-in.org/studio/.

Associated Guidance Documents: Associated guidance documents are available at www.itrcweb.org. You can download the ITRC guidance documents that are the basis for the training materials by clicking on *Guidance Documents*.

Contact Information: If you have questions after completing the online registration, call the ITRC Training Program at (402) 201-2419 or send an e-mail to training@itrcweb.org.

UPCOMING COURSE DATES (REGISTRATION OPENS FOUR TO SIX WEEKS IN ADVANCE)

<u>COURSE</u>	<u>DATE</u>	<u>TIME</u>
Remediation Process Optimization Advanced Training	9/12/06	2:00 PM – 4:15 PM EST
Perchlorate: Overview of Issues, Status, and Remedial Options	9/19/06	2:00 PM – 4:15 PM EST
Triad Approach: A New Paradigm for Environmental Project Management (<i>Registration expected to open in mid-August</i>)	9/21/06	11:00 AM – 1:15 PM EST
Planning and Promoting Ecological Land Reuse of Remediated Sites (<i>New</i>)	9/28/06	11:00 AM – 1:15 PM EST
What's New with In-Situ Chemical Oxidation?	10/5/06	11:00 AM – 1:15 PM EST
Site Investigation and Remediation for Munitions Response Projects	10/12/06	11:00 AM – 1:15 PM EST
Guidance for Characterization, Design Construction, and Monitoring of Mitigation Wetlands	10/19/06	11:00 AM – 1:15 PM EST
Environmental Management at Operational Outdoor Small Arms Firing Ranges	10/31/06	2:00 PM – 4:15 PM EST

Note: All dates / times are subject to change – check www.itrcweb.org for the most up-to-date information.

Register for an ITRC training course today. Course details are available at www.itrcweb.org or go directly to clu-in.org/studio/seminar.cfm (you may need to scroll down to find the course of interest). (POC: ITRC Training Program, Website: www.itrcweb.org, Phone: 402-201-2419, E-mail: training@itrcweb.org)

CG-441 News

Global Air Transportation Execution System (GATES): Responded to and authorized request from Sector Charleston for permission to use the Department of Defense's (DOD's) cargo and tracking system. GATES is the Air Mobility Command's (AMC) aerial port operations and management information system designed to support automated cargo and passenger processing, the reporting of in-transit visibility data to the Global Transportation Network, and billing to AMC's financial management directorate. Some Coast Guard units already use the system to track its supplies and passenger traffic which transit the Defense Transportation System (DTS). CG-441 provides AMC-required Headquarters-level endorsement for Coast Guard units to access GATES. (POC: Jim Christ, (202) 475-5654)

Logistics Transformation (CG-442) News

CFO - FUIRP Metrics: The latest Field Unit Inventory Repositioning Project (FUIRP) Progress metrics can be viewed at:

cgcentral.uscg.mil/uscg_docs/portal/MyCG/Editorial/20060710/CFO_Remediation_Metrics_10JUL06_%241152560483074.xls.

CFO - Field Unit Demand Based Allowance List Data Compilation: The Data Analysis division is developing a datamart online analytical processing "cube" that will allow for validation of class-wide demand data that will

enable proxy class-wide "allowance" lists. Data mapping is in progress – the cube is expected to be available for testing soon. (POC: John Simeoni, (202) 267-6295)

Environmental Management (CG-443) News

Dry Cargo Residue Discharges Public Meeting: The Coast Guard hosted a public meeting July 6, 2006 to facilitate public comments and identify the range of issues and propose new alternatives that should be discussed in the Environmental Impact Statement (EIS) for the development of proposed new regulations for the discharge of dry cargo residue in the Great Lakes. G-PSO-4 is developing the permanent regulations based on the current "Interim Enforcement Policy" that allows the practice of sweeping superfluous dry cargo residue from cargo holds and decks into the Great Lakes. G-PSO and CG-443 presented information on the history of the rulemaking, the development of alternatives, and NEPA procedures. Scientists Dr. Jamie Maughan and Dr. Deb Swackhammer then presented information on the Coast Guard's scientific plan that is intended to characterize the sweepings including toxicity. The Coast Guard then opened the floor to public comments. Some comments focused on the legality of the practice under MARPOL and possibly the CWA as well as possible environmental impacts to the largest fresh water reserve. Other comments suggested that the impacts of the practice are benign. The Coast Guard solicited public comments on the scope of issues to be addressed in the "Dry Cargo Residue Discharges in the Great Lakes" EIS until July 31, 2006. Additional information can be found on the [DOT Docket](#) under simple search docket number 19621. (POC: Susan Hathaway, (202) 475-5688)

Natural Resources Compliance Course: Ms. Zante Capuno (CG-443) attended the Natural Resources Compliance Course which was held by Department of Navy Civil Engineering Corps Officers School on June 19 – 24, 2006. Ms. Capuno, the USCG's representative to the Interservice Environmental Education Review Board (ISEERB) Conservation Pillar Committee, attended the course as a Technical Content Reviewer (TCR). The TCR process is an evaluation of all training materials, both knowledge and performance, and it records in real-time all instructional presentations. The purpose of conducting a TCR is to validate the curriculum and supporting materials, and to determine their effectiveness in attaining the course objectives. The TCR team members (from each military service) serve as primary judges of the adequacy of the course. The course offered instructions in specific natural resources laws, regulations, policies, Executive Orders, DOD and USCG instructions, and other guidance, noting Service-specific requirements. The course addressed stewardship, preservation, and process; fish, game, and wildlife management laws; protection of wetlands, waterways, and other protected ecological areas; forest and land use management laws; and interservice cooperation. This course is approved by the ISEERB and as such is sufficient for Coast Guard needs. (POC: Zante Capuno, (202) 475-5689)

Audit NFR Resolution: CG-443 is developing responses to 27 follow-up questions to the lighthouse estimation submittal. The questions involve the estimating approach, how the cost model was developed and used, and when the Coast Guard would systematically survey all lighthouses that that may represent environmental liabilities.

CG-443 provided KPMG a walkthrough of the small arms firing range estimation methodology and process on July 21, 2006. (POC: Russell Frum, (202) 267-1944)

St. Paul, Alaska Fuel Spill: A July 1, 2006 C-130 mishap in St. Paul, Alaska resulted in approximately 1,000 gals of JP-5 fuel being spilled near the runway. The spill is near St. Paul's (pop. 532) sole groundwater aquifer and there is danger of migration into the aquifer. The village is also predominantly native population.

CEU Juneau is leading the cleanup effort and has begun emergency actions to ascertain the extent of damage and prevent imminent danger. The CEU has ongoing cleanup activities at the St. Paul LORAN Station and over the years has developed a good working relationship with the state and local governments. The airport is a public use facility and owned by the state.

Because the spill is not on Coast Guard-owned property and cannot be considered a current or formerly used site, CG-443 has told the field that EC&R monies are not appropriate for use here (per the FRMM - 5.O.2). CG-443 does not have any available 30 funds at this time. Beyond the immediate actions taken by the CEU using local 30 funds, an additional \$200,000 (best estimate at this time) will be necessary to avoid further damages to the site and water supply.

It is imperative that the Coast Guard complete the cleanup as soon as possible. The longer the fuel is allowed to remain, the deeper it will migrate increasing the potential for aquifer damage and final cleanup costs. If the fuel does reach the aquifer and cause damage, the Coast Guard could be required to replace the town's water supply, which could become very expensive. If it is perceived that the Coast Guard is dragging its feet on the cleanup, the town may retain their own cleanup firm and present the Coast Guard with the bill. Since the town and/or their cleanup firm would have no or little incentive to restrict expenses, their final cleanup cost could be much greater than the Coast Guard's managed effort. (POC: Russell Frum, (202) 267-1944)

Environmental Assessment (EA) for the Decommissioning and Excessing of the USCGCs STORIS (WMEC-38) and ACUSHNET (WMEC-167): The Draft Environmental Assessment (EA) for the proposed decommissioning and excessing of the USCGC STORIS (WMEC-38) and the USCGC ACUSHNET (WMEC-167) was expected to be released for public comment in September. The Coast Guard, U.S. General Services Administration (GSA), the State Historic Preservation Officer (SHPO) of Alaska, and the public work cooperatively on historic preservation issues. A large effort to reach potentially interested parties for input on both the NEPA and Section 106 consultation under National Historic Preservation Act processes was conducted. A Draft Memorandum of Agreement (MOA) that addresses historic preservation issues will accompany the announcement for the availability of the EA. (POC: Susan Hathaway, (202) 475-5688)

Concurrent Clearance on the Relocation of the Response Boat – Medium (RB-M) Project Residence Office (PRO): CG-443 reviewed and concurred with the authorization to relocate the Response Boat-Medium (RB-M) Project Residence Office (PRO) to Seattle, Washington utilizing space provided for in the RM-M Production contract. This action has been reviewed for environmental impact as required by NEPA and determined to be categorically excluded. (POC: Zante Capuno, (202) 475-5689)

Nationwide Automatic Identification System (NAIS) Project Update: The USCG held a public meeting on August 9, 2006 to discuss the Draft Programmatic Environmental Impact Statement (PEIS) for the implementation of the Nationwide Automatic Identification System (NAIS) project. A Notice of Availability and Public Meeting for the PEIS was published recently in the Federal Register and other local newspapers. CG-443 was represented by Ms. Zante Capuno. (POC: Zante Capuno, (202) 475-5689)

Contract Kick-Off Meeting for Lighthouse National Register Assessments: The kick-off meeting for the CG-443 contract with Historical Research Associates, Inc. (HRA) of Seattle, Washington, was held on July 13, 2006. This contract is for work to prepare National Register of Historic Places nominations for six USCG lighthouses. They are Portsmouth Harbor (New Castle) in New Hampshire, Coney Island (Nortons Point) in New York, Point Loma (New) Light in California, and three lights in Minnesota. The three Minnesota lights are Duluth Harbor North Breakwater Outer Light, Duluth Harbor South Breakwater Outer Light, and Grand Marais Light. The kick-off meeting was convened by means of a conference-call to the HRA office. CG-443 was represented by Mr. Edward Wandelt, Mr. Mark Zill, and Dr. Daniel Koski-Karell. This meeting provided an opportunity for CG-443 personnel to address questions and inquiries from the contractor. CG-443 also provided guidance concerning the schedule for the lighthouse visits. HRA had proposed to visit the Minnesota lighthouses lastly, possibly as late as December. CG-443 advised that they be visited first due to the early onset of inclement weather in the western Lake Superior region. (POC: Dr. Daniel Koski-Karell, (202) 475-5683)

USCG and Canadian Coast Guard (CCG) Green Facility Partnership: Mr. Ed Wandelt received a call from Mr. Jack Cole of the Canadian Coast Guard (CCG) who stated that Admiral Allen would be having a bilateral summit with the Commissioner of the CCG in September. In particular, the green facility partnership between Base Prescott and ISC Boston was mentioned as a possible agenda item pursuant to the "Joint Statement of Intent to Further Develop Bilateral Cooperation Between the United States Coast Guard and the Canadian Coast Guard" signed on June 16, 2005. Specifically the 3rd bullet reads: "maximize opportunities, as appropriate, for bilateral cooperation in maritime safety and security, and in environmental protection". With the impending meeting in September between the CCG Commissioner and Admiral Allen, we have an opportunity to revitalize the effort that has already begun. CG-443 will coordinate on our end to see if we can somehow incorporate our work as either a background topic or agenda issue for the meeting. (POC: Ed Wandelt, (202) 267-2369)

Northern Atlantic Right Whale Ship Strike Reduction Strategy: The National Oceanic and Atmospheric Administration (NOAA), National Marine Fisheries Service (NMFS) recently published the Draft Environmental Impact Statement (DEIS) to implement the operational measures to reduce the occurrence and severity of vessel

collisions with the North Atlantic Right Whale resulting in serious injuries and deaths. The Ship Strike Reduction Strategy addresses the lack of recovery of the North Atlantic Right Whale population by reducing the likelihood and threat of ship strike related deaths and serious injuries to the species. The USCG has a long history of working with NMFS and other interagency partners to help develop this strategy. While enforcement strategies need to be finalized, the USCG has been supportive of the initiative. The DEIS was published in the Federal Register and NMFS sought public comments through September 5, 2006. Per DHS policy, the USCG does not comment to the docket, but rather, submits an interagency memorandum to the action agency for their consideration. G-LEL is the lead on coordinating USCG's input to NMFS. CG-443 disseminated the information and copy of the DEIS to the field and will forward any input from the field to G-LEL. (POC: Zante Capuno, (202) 475-5689)

Federal Energy Regulatory Commission (FERC) Liquefied Natural Gas (LNG) Terminal Environmental Impact Statement (EIS) for Crown Landing: The Federal Energy Regulatory Commission (FERC) is the lead federal agency for preparing an Environmental Impact Statement (EIS) and approving the siting, design, and operation for a shore-side Liquefied Natural Gas (LNG) terminal, and the Coast Guard acts as a cooperating agency to FERC for preparation of the EIS. The Coast Guard also issues a Letter of Recommendation (LOR) for waterway suitability which in and of itself is subject to NEPA review. CEU Cleveland and MLCA reviewed the Crown Landing EIS to see if the Coast Guard can adopt the EIS for our own action (the LOR) and compliance with NEPA. G-PSO is expecting internal Coast Guard review comments on the FERC's EISs. Depending on review comments, the program's requirements and other factors, it is possible that the Coast Guard may find the EIS *insufficient* for issuing the LOR. This would mean supplemental NEPA analysis, potentially significant delays for these high visibility and administration backed projects, and additional resources. Preparing for this possibility, G-PSO has begun preparing a Digest for G-C and Secretary Alert for DHS. CG-443 will prepare a Digest to CG-4 when the final review comments and recommendations are received.

OMB Scorecard Ratings: In the first installment of DHS's OMB scorecards, the USCG rated an average score of YELLOW (out of a Red / Yellow / Green ranking system developed by a DHS workgroup). The scorecard has six areas (i.e., Real Property, Personal Property, Environmental Sustainability, Records Management, Safety and Health, and Mail) for which the DHS CAO and SASO's are responsible. Mr. Orner (CG-4A) is the Coast Guard SASO. The scorecard was also briefly addressed in the last Environmental Management Board meeting.

The "Environmental Sustainability" portion contains five separate sub-areas. While CG-443 has responsibility for Parts 1 (EO 13148/EMS) and 5 (Environmental Compliance / Audits), the other areas fall into other office's functional responsibilities. For example, Part 2 (EO 13101 / Green Procurement) falls under CG-851, Part 3 (Federal Electronic Challenge / Green Electronics Procurement) falls under CG-631, and Part 4 (Green Buildings / Standards) falls under CG-431. Mr. Orner has scheduled a meeting this week to discuss his concerns and coordinate the future direction and input to the semi-annual reports to DHS and OMB. (POC: T.J. Granito, (202) 475-5682)

Note: Because the MOU on Sustainable Green Buildings was signed in January 2006, after this initial assessment, no agency could achieve green for the initial rating period. Additionally, agencies were not rated on or held accountable for meeting Energy Star® / energy-efficient or bio-based procurement preference requirements in this initial assessment because statutory requirements don't become effective until FY 2007.

Welcome Aboard to the Environmental Management Division's (EMD) Newest Intern!

Coming from The Washington Center (TWC), Ms. Linh Cao is the fall 2006 intern with the internal Environmental Management Division at the USCG Headquarters. Ms. Cao is a senior at the University of California, Los Angeles (UCLA) in the department of mathematics. She expresses interest in teaching and wants to pursue a career in education. Additionally, Ms. Cao is fascinated with public policy and understanding the intricate dynamics of the U.S. Coast Guard. In particular, she greatly admires and supports the Coast Guard's mission to protect and serve the public. For the internship, Ms. Cao will conduct research and assist senior staff of the EMD in developing Coast Guard environmental policy, program management, and guidelines. Ms. Cao believes the USCG will provide her with a wealth of professional development experiences that will help her for many years to come. She is excited to be a part of this amazing organization and hope to contribute to the USCG mission.



Homeland Security



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<p>Commandant (CG-443) U.S. Coast Guard Office of Engineering and Logistics 2100 2ND St. SW Washington, DC 20593-0001</p> <p>Web Site: www.uscg.mil/systems/qse/uscg-environmental.htm</p>	<p>Martin Nguyen U.S. Coast Guard CG-443 Environmental Management (202) 475-5685 Martin.Nguyen@uscg.mil</p>	<p>Stephanie Muska Potomac Management Group, Inc. (703) 836-1037 smuska@potomacmgmt.com</p>
<p><i>This publication is distributed in electronic format only. If you would like to be added to the electronic mailing list, please contact Martin Nguyen.</i></p>		

The Environmental Times is a quarterly publication designed to keep Coast Guard personnel apprised of environmental issues impacting Coast Guard facilities, operations, planning, and policy making. We encourage you to share your stories and successes as environmental stewards.