



**FINAL REPORT
ON ANALYSIS OF BASE-LEVEL
ENVIRONMENTAL COMPLIANCE CONTRACTS**

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EXECUTIVE SUMMARY

Problem:

The Air Force Audit Agency and the Air Force Inspector General have completed studies on environmental compliance surveillance. These studies and audits identified numerous discrepancies throughout the contracting and surveillance process. SAF/AQCO is concerned that contract procedures for environmental compliance contracts are not ensuring that our contractors are meeting regulatory and contract environmental compliance requirements.

Objective(s):

1. Assess environmental compliance contract procedures at operational contracting squadrons and offices. Identify problems and determine if current environmental contract practices are effective in meeting Air Force, federal, and state environmental compliance regulations.
2. Provide examples of best practices identified during the study.
3. Provide recommendations for incorporation into Air Force environmental programs.

Methodology:

We started by identifying issues impacting acquisition planning. This included initial planning by the base environmental team for contract supported environmental projects. We reviewed performance work statements (PWS) and statements of work (SOW) from 15 bases to determine if specification language identified and standardized contractor compliance responsibilities for Federal laws and regulations. We next visited 12 operational bases and Air Logistics Centers representing five MAJCOMs and interviewed contracting, environmental, and legal personnel to identify problems, issues, and best practices.

Conclusions:

We concluded that contracting is providing satisfactory support for base compliance projects, however, the base environmental program and contracting can better support environmental compliance by having CE develop standardized core requirements, correct environmental regulatory references, and boilerplate specification packages. We emphasize the need to use the environmental project team concept comprising CE, both design and surveillance personnel, environmental flight, bioenvironmental, safety, legal, and contracting. Procedures and training standards for surveillance personnel are inadequate. Training standards and courses to improve environmental knowledge of contracting personnel are inadequate.

Recommendations:

There are 11 recommendations identified in this final report. We have summarized the recommendations into the following:

1. USAF/CE develop policy for correct environmental regulatory references;

2. USAF/CE develop standard core requirements, boilerplates and checklists for environmental compliance contracts.
3. USAF/CE establish project team procedures to include contracting and quality assurance evaluators
4. USAF/CE verify that an environmental assessment was completed and current for services and construction packages being submitted to contracting
5. SAF/AQC establish an environmental contracting specialist position for operational squadrons that support large environmental programs, as well as provide administrative support to Air Force Center for Environmental Excellence contracts and delivery orders on each respective base
6. Review contract forms and other related documentation for the purpose of adding environmental sections for better review, compliance and communication of Air Force requirements
7. Develop environmental job performance standards for environmental contracting specialists, as well as general GS-1102 series and military contracting personnel
8. AETC develop an environmental contracting course to provide an overview of environmental programs operational contracting organizations support
9. Require each contracting organization to have a contracting specialist complete certified HAZWOPER and Asbestos training.
10. Obtain copies of the Environmental Compliance Assessment Management Program protocols for contracting organizations.
11. Require contracting commanders to attend AFIT environmental commander courses.

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CHAPTER ONE

INTRODUCTION

BACKGROUND

Environmental compliance contracts are those contracts which are developed and awarded for the sole purpose of bringing the Air Force into compliance with one or more environmental requirements. Compliance contracts are normally low dollar, time sensitive, and have the potential for high dollar liabilities.

The Air Force relies on contractors to perform a wide range of environmental compliance tasks and to comply with federal, state, and local environmental laws and regulations. Specifically developed environmental compliance contracts include asbestos and lead abatement contracts, underground storage tank removal and replacement, and PCB removal/retrofill. In addition, many standard service, construction, and commodity contracts have environmental compliance requirements that impact contractor performance. Contract development and administration of environmental compliance projects are challenging our contracting organizations because of the number, complexity and constant changes of environmental laws, policies, and procedures. Contract specialists share major responsibilities for contractor performance with CE design and inspection staffs, CE environmental flight (CEV), or for Air Logistics Centers and a few operational bases environmental management offices (EMOs), as well as bioenvironmental and safety. Requirements for environmental compliance add to the contract administrator's responsibilities and create potential discrepancies resulting in environmental regulatory action, cost overruns, delays in project completion, and possible mission impact.

PROBLEM STATEMENT

The Air Force Audit Agency and the Air Force Inspector General have completed studies on a variety of environmental issues ranging from environmental compliance surveillance to Installation Restoration Program (IRP) management. These studies and audits identified numerous discrepancies throughout the contracting process. SAF/AQCO is concerned that contract procedures for environmental compliance contracts fail to ensure that our contractors are meeting regulatory and environmental compliance requirements.

OBJECTIVES

1. Assess environmental compliance contracts from acquisition planning to administration and close-out at operational contracting squadrons and offices.

Identify problems and determine if current environmental contract practices are effective in meeting Air Force, federal, and state environmental compliance regulations.

2. Provide examples of best practices identified during the study.

3. Provide recommendations for incorporation into Air Force environmental programs.

METHODOLOGY

We started by identifying issues that impact contracts during acquisition planning. This included initial planning by the base environmental team for contract supported environmental projects. We reviewed performance work statements and statements of works from 15 bases to determine if specification language that identified contractor compliance responsibilities for federal and state laws and regulations was defined and standardized. We next visited 12 operational bases and Air Logistics Centers representing five MAJCOMs. We interviewed contracting, environmental, and legal personnel to identify problems and issues. An environmental compliance questionnaire, see (Attachment 1), was developed and used during the base visits to determine what issues impacted environmental compliance type contracts. Best practices and recommendations were noted during the base visits.

CHAPTER TWO

OVERVIEW OF THE BASE ENVIRONMENTAL PROGRAMS

Air Force installations have environmental programs that meet regulatory requirements for clean up, compliance, conservation and pollution prevention. These may vary in scope due to regulations established by federal, state, and local environmental agencies, as well as the age of the base and mission. Even with this degree of diversity for each base program, Air Force bases share a fairly common set of general environmental requirements designed to meet these regulatory requirements, as well as DoD and Air Force instructions. These requirements are broken out by environmental category:

Clean up:

- Preliminary Assessments and Site Inspections
- Remedial Investigations and Feasibility Studies
- Remedial Designs and Remedial Actions
- Field Oversight and Quality Assurance/Surveillance
- Treatability Studies Innovative Technology Selection

Compliance:

- Management Action Plan Development and Update
- Environmental Baseline Surveys
- Resource Conservation and Recovery Act Facility Assessments and Inspections
- Air Compliance Surveys and Plans
- Noise Compliance Surveys and Plans
- Drinking, Waste, Storm Water
- Pesticide Compliance Surveys and Plans
- PCB Abatement, Retrofill, Disposal, and Replacement
- Radon Studies
- Asbestos Abatement, Disposal, and Plans
- Lead Abatement, Disposal and Plans

Conservation

- Environmental Impact Statements
- Socioeconomic Impact Studies
- Environmental Assessments
- National Environmental Policy Act Consultations
 - Biological Assessments
 - Wildlife studies
 - Historical Field Surveys
 - Archaeological Field Surveys

Air Conformity Determinations
Wetlands
Land Use
Cultural Resources

Pollution Prevention

Opportunity Assessments
Emergency Planning
Community Right to Know
Hazardous Material Management
Hazardous Waste Tracking and Disposal
Recycling/Recovery/Reuse
Pest Management
Radiological
Solid Waste Studies and Disposal

Each base environmental organization can obtain project support through a variety of contracting methods provided by Federal, DoD, or Air Force service agencies, centers, MAJCOMs as well as local base support. These agencies and centers provide support for base environmental clean up, compliance, conservation and pollution prevention projects.

1. The Air Force Center for Environmental Excellence (AFCEE)
2. The Army Corp of Engineers Regional Divisions
3. Navy Regional Engineering Divisions
4. Department of Energy (DOE) (HAZWRAP, variety of services)
5. U.S. Fish and Wildlife Service (conservation support)
6. U.S. Geological Survey (USGS) (clean up)
7. General Services Administration (compliance)
8. MAJCOM contracts (AFMC, ACC, AMC)
9. Base support (All MAJCOMs)

This menu of available services gives environmental flights and environmental management offices maximum flexibility to choose services designed to meet their needs. Many of these environmental service centers/agencies reduce base environmental workload by either assisting or developing project statement of works, contracts, and delivery orders.

Most Base Installation Restoration Programs are currently using AFCEE and the Corp of Engineers for the completion of their projects. A small percentage of IRP work goes to federal agencies such as Department of Energy and USGS. The use of federal agencies is dwindling due to Economy Act requirements. The IRP program is designed to identify, investigate, and clean up past environmental contaminated sites.

Bases also use the service centers and agencies for completion of the long list of studies, plans, and certifications associated with Federal, DoD, and Air Force environmental regulations. In addition, both the Corp of Engineers and AFCEE have contracts for Underground Storage Tank removal.

Air Force Material Command bases use their base resources to complete a wide range of environmental projects. AFMC does use AFCEE and the Army Corp of Engineers, however, most AFMC bases have large staffs of environmental specialists as well as environmental contracting flights that provide direct contracting support. These bases also have a variety of innovative A&E and IDIQ contracts supporting their base programs. Visits to Wright-Patterson, McClellan, and Kelly AFBs showed that the environmental contracting flights either supported or were directly assigned and located at the environmental management office. This along with other environmental players including bioenvironmental, safety and public affairs resulted in the creation of solid project teams.

Operational contracting squadrons are confronted with providing support to highly diversified and complex base environmental programs. Each base's environmental contracting requirements are determined by CE/CEV or EMOs. Plans varied with each civil engineering organization. Operational contracting squadron support varied with CE/CEV program objectives and use. Some contracting squadrons have active but an overall minor role in support of the environmental program. The majority of the environmental work has gone to the service centers. Examples include: Edwards, Beale, and Vandenberg AFBs.

Each of the bases visited operated their own unique environmental programs. For example, Beale AFB has a \$16 million environmental program. The largest amount of their budget goes to AFCEE and the Corp of Engineers for remediation projects. Other projects for compliance and conservation go to AFCEE, the MAJCOM, and US Department of Fish and Wildlife. The operational contracting office supports the environmental program with contracts for asbestos, lead based paint, demolition of buildings, and underground storage tanks. Beale also has A&E IDIQ contracts with environmental specifications in support of environmental programs and studies.

A number of base environmental programs place more emphasis on operational contracting to support the majority of their compliance and pollution prevention programs. Depending on personnel experience and program planning, contracting acquired major responsibilities supporting the base environmental program. Bases that had well-developed well-planned programs experience relatively smooth contract solicitation and administration.

F.E. Warren AFB uses the U.S. Geological Survey for their remediation work, though they are starting to use AFCEE for more of this type of work. The operational

contracting squadron provides a variety of contracts in support of the base environmental program. In the construction flight there are large dollar contracts for the missile field's underground storage tank replacement program. The construction flight has an asbestos abatement contract. Almost every renovation contract has asbestos or lead specifications. Other contracts and blanket purchase agreements include: testing and sampling, hazardous material disposal and site surveys. Warren is one of the few operational bases interviewed that has a full-time environmental contracting specialist.

McChord AFB has completed approximately 95% of their Installation Restoration clean up projects using the Department of Energy. McChord has active projects with the operational contracting squadron for compliance, such as asbestos projects, lead paint, and underground storage tanks. They also have an active pollution prevention program focusing on a unique recycling contract with an 8a firm. McChord also has numerous conservation projects for natural and cultural resources. Finally McChord is one of the few bases that has implemented an affirmative procurement program for the purchase of environmentally friendly products.

Travis AFB relies on the operational contracting squadron for a number of their environmental requirements. The construction flight has renovation contracts with asbestos and lead paint requirements, and soil contamination issues. They have contracts for oil water separator and underground storage tank projects. Services use fixed priced contracts and BPAs to support hazardous waste disposal, asbestos surveys, and emergency response and disposal.

CHAPTER THREE

ACQUISITION PLANNING

Effective environmental contract administration starts with acquisition planning. Developing complete and accurate statements of work and performance work statements reduces the risk of contractor interpretation, changes and modifications, conflicts, disputes, and potential legal action. Each base civil engineering and environmental flight are responsible for the development of their own specifications. This is time consuming for CE and contracting. Specification reviews are long tedious processes. The specification review process is complicated by the lack of specification preparation experience in the CEV, limited manning, limited technical experience and a general lack of understanding of what requirements are going to be for the contract. Contracting's lack of environmental knowledge also increases the problem. In many cases, CEV has gone to AFCEE or the Corp of Engineers because it simplifies their responsibilities. Developing standardized specification boilerplates for core base environmental projects can reduce the time requirements for both parties.

Contracting personnel in construction and services are not only involved in the cradle to grave process for a variety of environmental compliance contracts, but also construction contracts for renovation or demolition that include compliance requirements for abatement. To better assist contract specialists, we have developed presolicitation compliance checklists to provide operational contracting a guide for review of these requirements. The checklists are found in Attachment 2. In addition, an excellent source for checklists for specific environmental compliance requirements is found in the Environmental Compliance Assessment and Management Program checklists.

ENVIRONMENTAL COMPLIANCE BOILERPLATES

Contracting issues develop as a result of a variety of factors that impact sound contracts. Problems identified by contracting organizations include:

- large workloads that are taxing civil engineering and contracting personnel
- projects that lack adequate design time
- inconsistent use of environmental project teams for design and administration
- inadequate PWSs and SOWs that fail to provide complete government requirements as well as environmental regulatory provisions
- long contracting PWS reviews
- on-site surveillance that fails to identify compliance issues
- undefined CE specification review responsibilities
- contracting personnel who are unfamiliar with environmental requirements

These problems are magnified by each base's CE organization having to develop their own SOWs and PWSs. A solution that may reduce many of these problems is to have HQ USAF/CE/CEV accomplish or task MAJCOM CEs, AFCEE, or Air Force Civil Engineering Support Agency (AFCESA) to develop boilerplate specification packages and review checklists for common type compliance requirements.

Environmental compliance boilerplate requirements can include: asbestos and lead abatement, underground storage tank removal, and PCBs. General environmental language should be developed for hazardous materials, hazardous waste, recycling, and affirmative procurement for general services contracts. Additional boilerplates may include identification of requirements for the various compliance, conservation and pollution prevention plans, surveys, and programs specified by Air Force and environmental regulatory agencies. These specification boilerplates can be used for individual base requirements and incorporated into IDIQ type Architect and Engineering (A&E) service contracts, or can be used by service centers such as Air Force Center for Environmental Excellence (AFCEE) or MAJCOMs for their environmental contracts.

The development of environmental boilerplates will reduce specification development time currently being experienced by base environmental flights. Standardized boilerplates can reduce the review time between CE and contracting. Training can be tailored for contracting specialists who are working these projects. Checklists can be developed to enhance the review process. Figure 1-1 provides an overview of standard boilerplates that could support base environmental programs. The boilerplates are a guide. Bases must still tailor these specifications to meet local and state requirements, as well as keep them up-to-date. The development of these boilerplates may help in relieving AFCEE of the responsibility for award and administration of smaller, less complex base compliance requirements.

Many base IRP shops are using smaller contracts and blanket purchase agreements (BPA) with local contractors for requirements such as individual well sampling and hazardous waste testing and analysis. Development of boilerplates for simple small dollar requirements provides a flexible and cost effective alternative to support the IRP program.

BASE ENVIRONMENTAL BOILERPLATE SPECIFICATIONS

ENVIRONMENTAL SERVICES A&E

A&E CONTRACT FOR BASE STUDIES, PROGRAMS, PERMITS
NOT IDENTIFIED FOR SUBMITTAL TO AFCEE

COMPLIANCE

ASBESTOS
LEAD BASED PAINT
PCBS
UNDERGROUND STORAGE TANKS

POLLUTION PREVENTION

RECYCLING
HAZARDOUS MATERIAL
PHARMACY OPERATION
EMERGENCY SPILL
RESPONSE AND DISPOSAL

CLEAN UP

TESTING AND SAMPLING
TEST WELL SAMPLES

Figure 1-1

LAWS AND REGULATIONS:

We examined environmental and standard construction contracts with performance work statements to determine if there was some form of standardization with Federal environmental laws and regulations. We did not review state and local environmental regulations due to their individual characteristics. It is important; however, for base CE to review state and local regulations continually for currency. There is no standardized format for federal environmental regulations. Formats that were identified included: specific Code of Federal Regulation requirements identified with the specific environmental laws with the most common structure found within asbestos requirements, identification of specific federal environmental laws, and reference to abide to all federal, state, and local regulations. There were limited cases where there was no reference to environmental requirements.

The Air Force Inspector General recommended in their Functional Management Review¹ that MAJCOM CEVs develop policy to ensure all environmental contract specifications and PWSs contain adequate and correct references to environmental laws and regulations. The FMR also recommended those boilerplate specifications for environmental compliance projects be developed to insure quality and consistency.

¹ Environmental Compliance Project Specifications and Contract Quality Assurance Evaluation (QAE)
6 April 95, P.N. 95-607

The lack of standardized regulations incorporated into specification packages has created confusion for contracting personnel who lack training or expertise to determine what laws should be in the PWS/SOW and what would be the results if the contractor does not comply. Contracting personnel need to have a general understanding of Federal laws and regulations that apply to standard environmental compliance contracts. Discussions with specific bases also identified the necessity of knowing the major state and local environmental regulations as these have had a direct impact on contract performance. Based on the review of PWSs and documents prepared by the Air Force Legal Services Agency, Environmental Law and Litigation Division, we have included a list of laws and regulations that should be listed in specific environmental compliance contracts, see Attachment 3. A good source of information on these regulations is the Environmental Compliance Assessment and Management Program (ECAMP).

Contracting personnel expressed a need to understand what Air Force regulations impact environmental compliance. Attachment 4 lists the Air Force/civil engineering environmental related publications that establish policy for base environmental programs.

THE TEAM PROCESS.

The lack of an environmental project team concept for base project development and surveillance is a major issue that impacts contracting support. CE, CEV, contracting, bioenvironmental, safety, legal, surveillance personnel, and other organizations that may have responsibilities such as the logistics group need to be integrated into environmental project teams. At many bases, contracting is left out of the planning process until the paperwork and specifications are ready and are being submitted for solicitation. This results in delays due to specification review requirements, determination of contract types, incomplete packages, etc. Bases that employed the team process throughout the life of the project integrated environmental requirements effectively using all base assets. Contract administration and surveillance were performed more efficiently due to the participation of both contracting and QAEs throughout the project's life.

Contracting's role as advisor for procurement actions is highlighted by active participation in the Environmental Protection Committees and subcommittees. Here contracting can make a difference by recommending the most efficient and responsive contracting types and methods to accomplish the project.

MODIFICATION OF EXISTING FORMS TO INCORPORATE ENVIRONMENTAL REQUIREMENTS

Environmental compliance impacts almost all contracting construction and service procurements. Many Air Force contracting forms lack references to environmental requirements. A good example is the Air Force Form 3035. We recommend that

SAF/AQCO review Air Force contracting forms incorporating environmental requirements that provide better guidance to contractors and base personnel.

ENVIRONMENTAL CONTRACTOR RESPONSIBILITY DETERMINATION USING STATE ENVIRONMENTAL REGULATORY AGENCIES

Many states have databases identifying contractors with a history of environmental violations. We have requested the assistance of the Environmental Council of the States to determine if states can provide objective data on environmental contractor performance. This would be in the form of contractor history of state notice of violations, penalties, administrative actions, etc.. The results of this survey will not be available until after the report is published. We will transmit results to SAF/AQCO when completed.

SERVICE CONTRACTS.

Common service contracts found at most operational bases lacked distinct environmental specifications outlining contractor responsibilities for identifying hazardous material use, disposal, and requirements for Material Safety Data Sheets. Standard specifications in all service contracts would alert prospective contractors to their responsibilities to identify hazardous material use on base to the appropriate environmental agency, such as the Hazardous Material Pharmacy. Standard statement of work formats should add an environmental section. The basis for this section would be an environmental analysis using the AF Form 813 Request for Environmental Assessment.

CHAPTER FOUR

REVIEW OF CONTRACT ADMINISTRATION PROCEDURES FOR ENVIRONMENTAL COMPLIANCE CONTRACTS

We developed a questionnaire, see (Attachment 1), to determine what problem areas and best practices were taking place on operational bases. The questionnaire covered both presolicitation and contract administration issues. From responses, we identified the following issues:

- CE and CEV inspectors conduct environmental compliance contract surveillance for construction projects such as abatement, renovations, and repairs of facilities and underground storage tank removals. Quality Assurance Evaluators (QAE) are responsible for environmental services, such as demolition, testing and sampling, and hazardous waste disposal. Additional oversight is performed by Bioenvironmental and Safety. Inspectors and environmental QAEs need to coordinate their surveillance plans through the CEV or EMO before conducting on-site surveillance. Identifying environmental compliance requirements before contractor performance starts results in better surveillance. Other surveillance members such as bioenvironmental and safety should also coordinate with CE/CEV when inspecting sites.

- Contractor performance for construction is documented using inspector log books. This is one of the primary documents used to record on-site contractor performance. The quality of the information is based on the inspectors technical expertise and documentation supporting the project. Contract administrators rarely review these logs for completeness. One idea that would enhance surveillance of environmental compliance projects is the development of general inspector review lists to supplement the logs. Examples of these review lists were obtained from Professional Act (PRO-ACT) Program and are found in Attachment 5. These checklists identify specific compliance requirements such as employee certification, safety standards, and equipment for inspector review.

- Environmental service contracts rely on structured contractor surveillance using the Quality Assurance Surveillance Plan (QASP) developed by the QAE. The QASP is developed using quality, safety, and abatement plans submitted by the contractor. The degree of surveillance is based on the technical expertise of the QAEs and supporting engineers. QASPs are also developed by the QAE as requirements for service contracts in accordance with AFI 64-108. The use of AFI 64-108 varied with each base. Operational bases used AFI 64-108 in service contracts for environmental projects. However, many environmental service contracts had waivers from AFI 64-108 due to unique requirements that did not fit the instruction.

- Operational bases use a variety of contract types to support environmental projects. Bases use large dollar centralized and decentralized BPAs, IDIQs, A&Es and individual firm-fixed priced contracts to support environmental and specific compliance projects. Some are innovative such as the use of competitive IDIQ contracts at Wright-Patterson AFB. Crossfeeding results of these types of contracts can enhance the contracting squadron's ability to support base environmental programs.

- The BPAs provide CE/CEV with excellent flexibility to meet immediate small dollar environmental requirements such as spill response and disposal, hazardous waste testing and sampling, hazardous waste disposal, test well drilling, and small surveys for asbestos and lead. Call order limitations ranged from \$2500 to \$25,000. BPA surveillance and administration are questionable for complex requirements. Specifications, cost control, and contractor responsibilities are not well defined. This may result in excessive costs and loss of Government rights and protection

- We reviewed Air Force Armed Services Board of Contract Appeal cases for environmental compliance cases to determine what the primary causes of the litigation were. We sought environmental compliance cases dating from 1985 to the present. Litigation centered around the following issues:

- Defective or incomplete specifications
- Differing site conditions
- Conflict with other government contracts
- Failure to adequately prepare or turnover a site to the contractor
- Safety issues
- Contractor fines for non compliance.

The types of cases for defective specifications and differing site conditions started to drop around the 1992-1993 time frame. This could be a result of increase knowledge and experience of environmental compliance requirements. Even with this data, the Air Force Legal Services Agency, Environmental Law and Litigation Division are working numerous environmental litigation issues.

CHAPTER FIVE

MANNING

A number of operational contracting offices that support extensive environmental programs support these requirements by the use of environmental contracting specialist positions. These positions provide extensive support to CEV and EMOs. These specialists are able to respond to environmental compliance regulatory actions for long-term as well as immediate actions and projects. Bases questioned that identified environmental contracting specialists include: F.E. Warren, Plattsburgh, McClellan, Kelly, and Wright-Patterson AFBs,

Contracting offices that support large environmental programs would benefit from the addition of an environmental contracting specialist. This person would be responsible for all local environmental specific requirements as well as providing support to flights with projects with supplemental environmental requirements such as construction. This person would also be responsible for training contracting personnel on environmental responsibilities of our base contractors. This person would also be the installation contracting point of contact in support of centralized contract requirements such as Air Force Center for Environmental Excellence, Army Corp of Engineers, federal agencies, and associate agencies with contracts such as the Air Logistic Centers for contract logistics support contracts, laboratory contracts and similar examples. Attachment 6 is a draft job description statement for this position.

Contracting specialists require a basic understanding of environmental requirements that impact contracting divisions and branches. McClellan AFB developed an occupational template of environmental job performance requirements that contracting organizations can use when developing their training requirements. The basic format is modified to incorporate total environmental requirements. The job performance requirement listing is found in Attachment 7.

CHAPTER SIX

TRAINING

Training is one of the top issues identified as a problem by contracting personnel. Most squadrons surveyed attempted to develop some form of environmental expertise. Contracting specialists who have attended environmental training explained that there was a lack of standardized training for contracting personnel. Courses ranged from EPA and AFIT courses to commercial courses for certification for asbestos and Hazardous Waste Operations and Emergency Response (HAZWOPER). The majority of contracting personnel did not have any form of training. Many contracting personnel felt that they lacked the general knowledge necessary to address potential environmental problems in their contracts. This lack of knowledge affected the review process for solicitation packages and performance work statements; contractor responsibility and experience evaluation; negotiation preparation and actual discussions; and contract administration.

Many contracting personnel have attended Environmental Contracting, ENV 418, currently in inventory at AFIT. They were looking for a course that addresses environmental issues and their incorporation into the contracting process. Most contracting personnel who have taken the course commented that they did not receive any real benefit from attending. For contracting the problem with this course is it is designed to provide contracting background to the CE environmental community, not to contracting specialists. The majority of the materials being presented are basic contracting tools and methods that an environmental specialist needs to know, but is no more than a simple review for contracting personnel.

Contracting personnel interviewed voiced the need for some form of standardized training that covers awareness and understanding of the base environmental program. To address this problem, we developed a strawman environmental course curriculum that is found in Attachment 8. Contracting personnel require a course that provides them with background information on environmental laws and regulations, describes the environmental programs that impacts our bases, and incorporates these requirements into our contracting procedures. Contracting personnel better support base environmental programs when they have an understanding of the environmental programs and processes and can incorporate them into the acquisition process.

Contracting personnel who work remediation and compliance contracts are confronted with situations where they are not allowed access to a contractor site to evaluate contractor performance or associate issues. This is because they have not received EPA certified HAZWOPER training. This training is essential for administrative contracting personnel who are required to be on sites with potential hazardous waste contamination. This 40 hour course provides information on first response, hazardous risk assessments, personnel protective equipment, control and

containment of releases, decontamination, operating procedures, and a glossary of terms.

Another course that will provide benefits to contracting personnel is Asbestos Certification Training. This course teaches contracting personnel the regulatory procedures for abatement of asbestos, including equipment, procedures, safety issues, and applicable regulations. A large percentage of today's construction renovation projects have some form of asbestos abatement specifications identified.

Two useful courses for contracting commanders are the "Commanders Environmental Leadership Course" (ENV 002) and "Commanders Environmental Management Course, (ENV 400) taught by AFIT. ENV 002 course is designed to introduce commanders to the concepts and management objectives of Air Force environmental programs. It provides an overview of environmental issues, legislation, and policies impacting Air Force installations. The ENV 400 course is based on General McPeak's five environmental goals: environmental restoration; compliance with environmental laws; pollution prevention; environmental impact analysis as part of the planning and decision making processes; and stewardship of natural resources. The course emphasizes a team approach to solving environmental problems is emphasized.

There are 4,012 environmental courses identified in the DoD Environmental Catalog. Six course relate to some form of environmental contracting. Environmental contracting courses listed include:

ENV 418, Environmental Contracting	AFIT
Government Environmental Contracting	Federal Publications Inc.
Environmental Remediation Contracting	Federal Publications Inc.
Environmental Clean up Contracting	George Washington
University	
with the Federal Government	
Pollution Prevention in the Acquisition Process	Army Logistics
Management College	
ROICC Environmental Clean-Up Administration Seminar	Naval School Civil Engineer
Corps	

Three contracting courses focus on clean up and remediation. Two are general environmental courses, and one deals with pollution prevention in the acquisition process. These courses maybe useful if contracting personnel are working remediation contracts.

Other courses are available through AFIT/ENV that will give contracting personnel specific information on base environmental programs. These courses are designed for environmental specialists. These include:

ENV 021 Installation Restoration Program Course

ENV 022 Pollution Prevention Program Operations and Management Course

ENV 521 Hazardous Waste Management
ENV 020 Environmental Compliance Assessment and Management Program Course
ENV 419 Environmental Planning Programming and Budgeting
ENV 101 Environmental Management

CHAPTER SEVEN

CONCLUSIONS AND RECOMMENDATIONS

CONCLUSIONS

We concluded that contracting is providing satisfactory support for base compliance projects. We identified the following best practices currently being used by bases.

Strategic Business Plans. Two bases visited had strategic environmental business plans in place. The plans outlined requirements for environmental compliance and remediation. Scope and impact on the base was identified as well as contract types. This improves contracting's ability to support base environmental programs by providing a wide variety of A&E, IDIQ, and requirements types contracts that were timely and responsive to the environmental program needs. This would also benefit the DoD service centers, such as AFCEE, to better identify future contract and project requirements.

Environmental Contracting Specialists. Three AFMC contracting directorates as well as F.E. Warren and Plattsburgh AFBs have full time environmental contracting specialists for Defense Environmental Restoration Account (DERA) and non-DERA Projects. These specialists are either directly assigned to the environmental management flight or directly assist CEV. Environmental experience and limited training resulted in better contract support to the base environmental program. In a number of cases these specialists corrected problems through contract action that would have resulted in notice of violations and penalties being assessed to the base.

Participation In the Environmental Compliance Assessment and Management Program (ECAMP) Program. Two contracting offices supported the ECAMP program by providing augmentees or assisting during the inspection process. ECAMP results provided contracting organizations with a better understanding of the impact of the environmental program on the installation. It also provided contracting with advanced notice of possible procurement actions supporting the environmental program.

Competition Using Environmental Service IDIQs. An innovative approach used at Wright-Patterson AFB is the use of multiple IDIQ contracts for immediate environmental response and other programs. Competition is based on IDIQ contractors submitting proposals. Contractors are able to provide immediate response in the event of spills or other fast actions.

Use of Letter Contracts for Emergency Response and Disposal. Plattsburgh AFB has a boilerplate letter contract with a listing of emergency response contractors in the event of hazardous substance spill, environmental emergency, or disposal.

RECOMMENDATIONS:

1. Support the Air Force Inspector General's recommendations identified in "Environmental Compliance Project Specifications and Contract Quality Assurance Evaluation (QAE)." 6 April 95, P.N. 95-607, to have USAF/CEV develop policy for correct environmental regulatory references. (OPR USAF/CEV)
2. USAF/CEV develop standard base environmental compliance core requirements and associated boilerplate specifications and checklists for environmental services, compliance, pollution prevention, and conservation programs. (OPR: USAF/CEV)
3. Support the use of Environmental Project Teams to include: CE, CEV, bioenvironmental, Safety, Logistics, as needed, contracting, CE inspectors and QAEs into the CE design and surveillance process for environmental compliance projects. (OPR USAF/CE)
4. CE include some form of environmental assessment when submitting services and construction packages to contracting. This assessment should identify potential environmental requirements and verify actions to be taken to maintain compliance. This can include something as simple as the AF Form 813 to an up-to-date environmental assessment. (OPR: USAF/CEV)
5. Establish an environmental contracting specialist position for operational squadrons that support large environmental programs, as well as providing administrative support to Air Force Center for Environmental Excellence contracts and delivery orders. (OPR: SAF/AQCO)
6. Review contract forms and other related documentation for the purpose of adding environmental sections for better review, compliance, and communication of Air Force requirements.(OPR: SAF/AQCO)
7. Develop environmental job performance standards and training plans for environmental contracting specialists, as well general GS-1102 series requirements. (OPR: SAF/AQCO)
8. Develop an environmental contracting course for GS-1102 personnel to provide an overview of environmental programs that operational contracting organizations support. (OPR: SAF/AQCO)

9. Require each contracting organization to have a contracting specialist complete certified HAZWOPER and Asbestos training. (OPR: SAF/AQCO)

10. Obtain copies of the Environmental Compliance Assessment Management Program protocols for contracting organizations. (OPR: USAF/CEV)

11. Require contracting commanders and senior contracting leadership to attend “Commanders Environmental Leadership Course” (ENV 002), or “Commanders Environmental Management Course,” (ENV 400), within one year of assuming command. (OPR: SAF/AQCO)

ATTACHMENT ONE

**ENVIRONMENTAL COMPLIANCE
QUESTIONNAIRE**

ATTACHMENT ONE

ENVIRONMENTAL COMPLIANCE QUESTIONNAIRE

1. Analysis Objective: The objective of this survey is to determine whether adequate planning and implementation of critical requirements into the contracting process for both Air Force environmental compliance contracts and contracts with environmental compliance requirements are taking place. The results will help ensure contractors are meeting requirements specified in the contract and meeting all federal, state, and local environmental laws and regulations.

Contract

Title: _____

Contract

Number: _____

Date of

Award: _____

Contract

Type: _____

Number of

Modifications: _____

Award

Amount: _____

Final close-out dollar

amount: _____

1. Contract Planning

1a. What environmental issues were identified during acquisition planning for this contract?

Comments: There were clear differences between bases that had well-organized base environmental teams (CEV, CE, BEE, Safety, etc.) and those that did not. Well-organized teams established specific processes for environmental specification development and review. Two bases used a joint effort by CE and CEV/EMO as well as other key players to develop strategic long range plans that identified total environmental base requirements. In many cases, well-organized bases experienced similar problems as bases with less well developed environmental programs. However, the well-organized bases were able to address these problems faster with better results. Problem areas identified during personnel interviews included:

- There was a lack of long range forecasting and planning of base environmental projects, this hampered contracting's ability to provide flexible contract types to meet environmental requirements. It also resulted in delays caused by lengthy specification reviews.

- Air Force policy does not clearly define the use of DoD and Air Force service centers, MAJCOM contracts, federal service agencies, and base resources. Base programs all varied in their use of available environmental organizations. A number of bases use the service centers such as AFCEE and the Corp of Engineers for almost all of their IRP and large compliance dollar work. Others, such as the Air Logistics Centers, use their own environmental contracting support for the majority of their projects as well as service centers and agencies. Base environmental programs varied with individual base requirements. Base contracting support for environmental programs ranged from almost complete support for the entire environmental program to specific requirements such as compliance for abatement in construction and services projects, small dollar requirements for testing and sampling, and limited A&E support.

- Many bases did not establish clear responsibilities for specification development and review. This resulted in incomplete specifications, delays, and contractor confusion with specification interpretation.

- The lack of standardized specifications for common environmental projects resulted in increased workloads due to development taskings and variations in the quality of packages being submitted to contracting.

- There is a lack of standard procedures for emergency requirements such as spill response and hazardous waste disposal. Processes and contract methods ranged from in house resources and teams to Blanket Purchase Agreements, IDIQs, and letter contracts with emergency response contractors.

- Regulatory interference impacted contract development and administration. Changes in environmental laws, delays due to regulatory review of packages, and environmental issues in specific geographic regions, such as water issues in San Antonio and Florida, and air issues in California, all contributed to delays in completing projects.

1b. Are applicable environmental laws and regulations available for review at either the contracting squadron/office, CEV/environmental management office, or legal?

YES NO

Comments: Environmental flights have a variety of environmental resources available to research applicable environmental laws. Most had hard copies but many were upgrading to CD-ROM environmental law files. Most contracting personnel have not used these products and services. The majority of contracting personnel interviewed did not know of the research capabilities of AFCEE's PROACT program. PROACT would be beneficial for contracting personnel who have environmental questions.

1c. Were legal reviews conducted and results clarified or incorporated into the solicitation/contract?

YES NO

Comments: Legal was involved in environmental contract reviews. Environmental comments and legal interpretation of required laws and regulations incorporated into contracts varied with the experience of the legal staff. Larger organizations such as the Air Logistics Centers had full-time legal personnel assigned to the environmental staff that helped the review process. Even with a full-time environmental legal staff there were differences in interpretation of laws and associated requirements. The Air Force Environmental Litigation Center has developed environmental compliance regulation packages for legal reviews.

1d. Was an environmental assessment/study/report/survey that defined the scope of work or identified potential environmental issues for the project completed? Did contracting receive copy?

YES NO Do Not Know

Comments: Environmental assessments, impact statements, and surveys have a direct impact on the success of many environmental projects, as well as standard construction or services projects. Outdated and/or poorly prepared environmental assessments have been responsible for major delays and in some cases cancellation of projects. Contracting normally does not receive a copy of an assessment, survey, or an AF Form 813 “Request for Environmental Impact Analysis.” Contracting offices that had verification of the completion of current assessments supporting the acquisition found that administration was easier because quantities and locations of contamination were identified in the specifications and the specifications had sections that addressed each type of contaminant. Contractors could meet requirements without questions of differing conditions and interpretation of quantities and locations.

1e. Did this assessment give you a better understanding what environmental issues were impacting this project? Should it be included when the project is submitted to CONS?

YES NO

Comments: Environmental contracting flights working these issues commented that complete assessments made contract administration easier. An excellent example is McClellan AFB. Their asbestos and lead abatement requirements identify estimated quantities, test sample locations and types of contaminant. This has reduced the number of differing site conditions. Other bases commented that they had a lack of understanding of what was in the assessment, its accuracy and currency.

1f. Are the following issues addressed during project development and acquisition planning:

- (1) Applicable federal and state environmental regulations YES NO
- (2) DoD and Air Force regulatory requirements YES NO

- (3) Review of applicable environmental assessments YES NO
- (4) Contractor qualifications YES NO
- (5) Hazardous material storage, transport, and disposal YES NO
- (6) Potential health and safety issues YES

NO

- (7) Required reports, manifests, or documentation YES NO
- (8) Site close out procedures YES NO

Comments: Bases surveyed acknowledged that most environmental issues associated with the project were addressed during acquisition planning. Whether they were accurately stated in the SOW or PWS is open to interpretation. Most contracting personnel questioned, stated there have been improvements with planning and specifications development from a few years before. The base’s environmental learning curves are improving with expertise and projects completed.

2. Review of SOW and Submittals:

2a. Did the SOW /PWS identify required environmental laws and regulations required for contract performance?

- YES NO

Comments: Specifications outlining environmental regulations varied with each base. As stated earlier, some identified all applicable Code of Federal Regulations (CFR) while others provided the general CFR title, for example, 29 CFR for safety and 40 CFR for environmental. Still others identified the title of the applicable law and finally, some still simply reference that contractors will comply with all federal, state, and local laws.

2b. Does the contracting squadron/office have review checklists that verify the applicable environmental laws and regulations are incorporated into the SOW/PWS? If not, would checklists of this type be beneficial?

- a. YES NO
- b. YES NO

Comments: One base surveyed had environmental requirements identified in their construction review checklists and these were incomplete. Most contracting personnel interviewed said that checklists would be helpful, but a number of contracting personnel pointed out that contracting should not be responsible for formal reviews of environmental specification packages. These should be complete

2c. Did the SOW/PWS identify actual and potential environmental requirements and conditions?

YES NO

Comments: Yes, however, specification content and structure varied with each base.

2d. Did the SOW/PWS require submittal of all regulatory certifications and training requirements of contractor personnel that will be working environmental compliance requirements?

YES NO

Comments: Specifications outlining requirements for certification and training varied with each base. The majority identified certification requirements for contractor employees that work asbestos and lead abatement projects.

2e. Did the SOW/PWS specify environmental permits if required? Who was responsible for obtaining them?

YES NO

Comments: Permits and license requirements varied. Most specifications required contractors to acquire all permits and licenses for the project. Some identified specific permits such as disposal.

2f. Based on the scope and complexity of the project did the SOW/PWS identify contractor requirements for environmental project plans, safety plans, quality plans, hazardous material transportation and disposal plans, etc.? Did the contract administrator review these for understanding and contractor performance?

YES NO

Comments: There are many types of environmental and safety plans being requested by bases from contractors. Most were complex and not easy for contracting to understand. Other plans were the foundation for QAE surveillance.

2g. Were these plans identified as submittals?

YES NO

Comments: Plans are submitted as either CDRLs or submittals.

2h. Did all base organizations with environmental responsibility review and sign off on the project?

YES NO

Comments: This was a major problem identified at a number of bases as well as in the IG report. CEV, CE Engineering, Bioenvironmental, and Safety did not have an established plan for the review of specifications with environmental requirements. There was a lack of a cohesive team concept for environmental projects and projects with environmental requirements which resulted in delays and in some cases deficient specifications. Bases with well-developed environmental teams had solid specification packages, well-defined surveillance plans and procedures, and an overall efficient operation that was acknowledged by contracting personnel. Issues that relate to this problem included: staffing shortages, inexperienced personnel, and the lack of a standardized plan for review and surveillance by the environmental team.

2i. Who developed the SOW/PWS?

- (1) developed by the local base design staff
- (2) Architect and Engineering firm
- (3) Major Command boilerplate or SOW
- (4) Air Force or DOD Environmental Agency
- (5) State EPA Office
- (6) other

Comments: The majority of SOWs and PWSs reviewed were designed by CE. A&E projects reviewed had environmental requirements identified.

2j. Was the contractor determined to be qualified to perform the contract? How was this accomplished?

YES NO

Comments: Contractor qualifications were determined in accordance with the Federal Acquisition Regulations. This included verification of certifications, licenses work history, and references.

2k. Was federal or state environmental regulatory agencies contacted to verify contractor responsibility?

YES NO

Comments: No, however the idea has merit.

3. Regulatory Compliance

3a. Was the Contracting Officer (CO) notified when federal and/or state regulatory personnel inspected a contractor operated site?

YES NO

Comments: Rare. Regulators normally contacted the base environmental offices and flights. Instances where the contracting officer was notified of regulatory personnel inspecting contractor sites occurred when the regulators had a direct impact on contractor operations or contractors had a direct impact on regulatory compliance or emergency response.

3b. Was the regulator's findings reviewed by contracting to determine impact on contractor performance and potential government risk?

YES NO

Comments: No

3c. Were there instances where contractor performance resulted in regulatory penalties, notices of violation (NOV), or other administrative actions being assessed against the base? Did the CO review these NOVs for potential contract impact?

YES NO

Comments: Bases interviewed did not have this problem. However there are cases of contractor performance resulting in fines, penalties, and NOVs for the base.

3d. Do existing FAR, DoD, and AF Supplements protect the Air Force from possible legal or environmental regulatory action?

YES NO

Comments: The uncertainty and scope of many environmental projects makes FAR interpretation difficult. CEV would like immediate contractor response for emergencies, accidents, spills, disposal etc. Contracting support for these requirements varied from IDIQ contracts, letter contracts, and BPAs.

3e. Has regulatory oversight been a problem with base contractors?

YES NO

Comments: Operational bases surveyed did not have this problem. Limited actions have been a problem at Kelly and McClellan AFBs.

4. Contract Inspection

4a. Is the CE/EM inspector or QAE assigned to the contract experienced or trained to inspect the project?

YES NO

Comments: Bases are training their inspectors and QAEs, Experience has improved. Turnover continues to be a problem at a number of bases.

4b. If there was a question as to the inspector's experience, was it brought to the attention of CE for clarification?

YES NO

Comments: No, Bases rely on the surveillance resources that are available. If there is a question of experience CE allocates resources to train inspectors and QAEs.

4c. Did the inspector require environmental certification training to conduct proper surveillance?

YES NO

Comments: Most are trained, certifications were not verified by contracting.

4d. Were environmental requirements for inspection identified in the inspector's surveillance plan?

YES NO

Comments: For services there is a Quality Assurance Surveillance Plan. For construction, inspectors rely on contractor plans and performance schedules. Log books are the primary documents for on-site surveillance.

4e. Did the contractor's work schedule reflect any environmental milestones?

YES NO

Comments: Environmental milestones are normally identified in the contractor's work schedule. Surveillance was an issue with environmental services.

4f. Were regulatory actions required by the contract identified for surveillance?

YES NO

Comments: Yes

4g. Did the Inspector/QAE verify that the contractor was performing in accordance with identified federal and state environmental regulations?

YES NO

Comments: Contracting has limited capability to determine if the inspector was verifying that the contractor was performing in accordance with environmental regulations.

4h. Based on the CO/CA review, were the inspector's documentation and logs adequate to protect the government in the event of a dispute or potential legal action?

YES NO

Comments: Contracting did not see logs until close out.

4i. Did contracting personnel visit the job site to observe contractor performance, perform labor checks, and evaluate QAE/inspector surveillance?

YES NO

Comments: Yes. Two administrators commented that did not have access to the site because they lacked HAZWOPER training.

4j. Did the inspector track contractor progress based on the contractor's schedule?

YES NO

Comments: Yes

4k. Was the QAE/inspector on-site enough to determine that the contractor was performing in accordance with environmental regulations?

YES NO

Comments: This was difficult to verify. Problems required inspectors to visit the site more often. Some bases commented that bioenvironmental, CEV, and safety also visited the site to conduct inspections.

4l. Did the contractor provide written notice in advance when working in areas deemed to be hazardous?

YES NO

Comments: Contractors contacted both the base and federal and state regulatory agencies.

4m. Does the inspector verify amounts of hazardous waste removed and stored from the site?

YES NO

Comments: This depended on the base. McClellan required contractors to submit all hazardous waste to DRMO for disposal. Tracking the amount was extremely accurate. Other bases relied on the contractor to dispose of waste in accordance with environmental regulatory requirements.

4n. Are contractor personnel trained to be on-site when working with hazardous wastes? Does CEV/CONS have proof of training?

YES NO

Comments: Contractor employee certification was identified in the specifications and many cases required as a submittal to CEV.

5. Contract Administration

5a. Does the contract have a single responsible point of contact?

YES NO

Comments: Specifications identified a project manager.

5b. Is compliance with on-site work standards and contract requirements verified?

YES NO

Comments: This is confirmed by the inspector.

6. Contract Modifications

6a. How many modifications have been negotiated for this project?

- (1) None
- (2) 1-5
- (3) 6-10
- (4) 11-20
- (5) 20+

Comments: Modifications averaged from 1-5 per contract.

6b. How many of these were undefinitized contractual actions?

- (1) None
- (2) 1-5
- (3) 6-10
- (4) 11-20
- (5) 20+

Comments: None identified.

6c. What were the reasons for the modification?

- (1) Differing site conditions (Additional Work)
- (2) Deletion of work
- (3) Regulatory changes
- (4) Funding
- (5) Administrative changes
- (6) Other

6d. Due to these changes was the CO forced to suspend work? What has been the results?

YES NO

Comments: In cases of differing site conditions that have a safety and health issue the contracting officer will suspend work for the specific area of work. CE will conduct a technical review and determine the appropriate method to fix the problem. Asbestos and lead contamination response are determined by the capabilities and tools available from each base. Some bases have their own in-house capabilities. These resources will be mobilized and the site is abated. Others have asbestos IDIQ contractor abate the site. Finally, contracting will request the contractor to abate the problems, normally through a subcontractor.

6e. Was funding available within a reasonable period of time?

YES NO

Comments: Each base is different based on MAJCOM funding and local budgets. A number of bases did comment that funding delays impacted contract completion. Some projects were so close to the statutory funding limit that they literally had to delete work to shift funds to complete the project.

6f. Was there a question as to the modification being within the scope of the contract?

YES NO

Comments: For most standard compliance projects the answer is no. However, there are cases where scope is a major issue. For compliance and remediation contracts scope may be an issue based on certainty of the specifications. If the specifications have trouble identifying the types of contaminants, quantities, location, and possible migration routes scope of work may be hard to determine.

6g. Did the suspension of work result in a termination for convenience?

YES NO

Comments: There was a few individual cases, but nothing to establish a trend.

6h. Were modifications required due to environmental regulatory orders?

YES NO

Comments: Yes. California and Texas bases had problems keeping current with state and local regulatory changes. This resulted in modifications for a number of their projects. A major issue are the regulatory time lines established for completion of projects. This puts pressure on both CE and the contractor to complete projects.

7. Disputes and Litigation

7a. Did disputes occur due to interpretation of environmental regulations.

YES NO

Comments: Yes, however the frequency of disputes has dropped with the increase of experience of the bases and technical qualifications of the contractors.

7b. Did the dispute impact contract performance?

YES NO

Comments: Work stopped due to differing site condition, or interpretation of specifications.

A review of Air Force Armed Services Board of Contract Appeal cases for environmental was conducted to determine what the primary causes of the litigation were. We sought environmental compliance cases dating from 1985 to the present. Litigation centered around the following issues:

1. Defective or incomplete specifications

2. Differing site conditions
3. Conflict with other government contracts
4. Failure to adequately prepare or turnover a site to the contractor
5. Safety issues
6. Contractor fines for non compliance.

The types of cases for defective specifications and differing site conditions started to drop around the 1992-1993 time frame. There are indications that the Air Force is improving on their compliance contract preparation and administration

8. Contract Closeout

8a. Was the contractor required to submit documentation to the federal and or state regulatory agencies for review and or approval?

YES NO

Comments: Contractor submittals to the regulatory agencies depended on the complexity and impact on environment and population. Contractors could be required to submit on site work and safety plans, as well as tests, samples, and certificates.

8b. Was this documentation reviewed by the contracting officer and placed in the contract file or the location identified where it was located?

YES NO

Comments: The primary environmental file is at CEV/EMO. Some contracting offices had environmental certifications in their contract files.

8c. Did the CO receive all manifests and associated documentation for the disposal of hazardous materials? If not, was another organization identified for receipt of these documents and identified in the contract file?

YES NO

Comments: These documents are located in the CEV files.

8d. Did final contract close out procedures identify potential long range environmental regulatory violations the base would incur as a primary responsible party.

YES NO

Comments: None observed.

9. Training

9a. Have you received environmental training, necessary to have an understanding of the contract requirements?

YES NO

Comments: No consistency in training. Some contracting specialists attended AFIT courses. Others attended commercial, Army, and EPA courses. The majority lacked any type of environmental training.

9b. Identify the types of training you have attended

- (1) Locally developed environmental training
- (2) Commercial contractor course
- (3) College or technical institution
- (4) AFIT course
- (5) EPA course
- (6) DOD course
- (7) Federal agency course
- (8) State course
- (9) Other

Comments: Training varied with each base.

9c. What type of environmental training is needed to administer these types of contracts?

Comments: A basic introduction on the environmental program to include: contract issues associated with environmental support, contract preparation and administration. Additional courses that were recommended are HAZWOPER and asbestos training.

9d. Is there a need for a formal environmental course for contracting specialists?

YES NO

Comments: Yes

ATTACHMENT TWO

**ENVIRONMENTAL COMPLIANCE
PRESOLICITATION
REVIEW CHECKLIST**

ATTACHMENT TWO

CONTRACTING ENVIRONMENTAL PRESOLICITATION CHECKLISTS

The following checklists are for use by contracting specialists for general reviews of applicable projects. They are not designed to verify every environmental compliance requirement. They are designed for the contracting officer/buyer to review the performance work statement and identify requirements that may be missing from the PWS. They are designed to provide an overview of the project during the review process and translate the review into questions that can result in more complete packages.

General Requirements for All Construction Contracts with Environmental Requirements:

	YES	NO
1. Acquisition Plan/Acquisition Strategy Panel. Were environmental issues addressed and added to the milestone chart if needed?		
2. Has the CO obtained a statement from the requiring activity that this acquisition complies with all federal, state, and local environmental laws and regulations (Attach an example of environmental compliance letter)?		
3. Does the solicitation include requirements for hazardous warning labels and Material Safety Data Sheets DODFARSUP 223.302-303?		
3a. Is there a statement requiring Material Safety Data Sheets be sent to bioenvironmental or the Hazardous Material Pharmacy?		
4. Does the PWS include specifications for the disposal of hazardous waste?		
4a. Are contractor disposal operations coordinated through, CEV, bioenvironmental, and DRMO, if required.		
4b. Are storage and disposal of hazardous materials coordinated through the fire department, Hazardous Material Pharmacy, and CEV?		
5. Storage and disposal of toxic and hazardous materials DODFARSUP 223.71. Does the PWS or contract specify the types, conditions, and quantities of hazardous or toxic materials that may be temporarily accumulated or stored in connection with the contract (DODFARSUP 252.223-7006)?		
6. Has an environmental impact statement, environmental assessment or Air Force Form 813 been completed for the project. Is it current?		

7. Has an environmental assessment been included with the project package to determine the environmental impact on the project?
8. If there is an environmental requirement identified in the PWS are federal, state, and local environmental regulations listed.
9. Does the project require the contractor to provide various plans to include: Health and Safety plans?
10. Has the project been coordinated through the required environmental organizations to include the Environmental Flight, Bioenvironmental, Safety, Fire Department, Hazardous Material Pharmacy, if required?
11. Are point of contacts identified in the PWS in the event of a spill or accident taking place on base. This can include, fire department, safety, spill response teams, bioenvironmental, CEV, and contractors, if contract is in place?
12. Does the PWS explain contractor responsibilities to contact required federal and or state regulators as identified in environmental regulations?
13. Are contractor affirmative procurement requirements identified in the performance work statement?

Asbestos Abatement Checklist

For construction contracts for the abatement of asbestos or service contracts that have asbestos abatement as one of the requirements, such as demolition, this checklist can apply.

YES

NO

1. Are the following environmental regulatory standards identified:

a. Federal regulations: Code of Federal Regulations (CFRs), United State Codes (USCs) or identified environmental laws. Examples include:

- (1) 29 CFRs
- (2) 40 CFRs
- (3) See Attachment 5 for environmental regulation listing

b. State asbestos and associated environmental regulations as required

c. Local asbestos and associated environmental regulations as required

d. Professional references as required. Examples include:

- (1) American National Standards Institute (ANSI)
- (2) American Society for Testing and Materials (ASTM)
- (3) Compressed Gas Association (GA)
- (4) National Fire Protection Association (NEPA)
- (5) National Institute for Occupational Safety and Health (NIOSH)

e. DoD and Air Force regulations as required.

2. Is an environmental assessment or Air Force Form 813 required for this project? Has it been completed? Is it current?

3. Does the PWS require the contractor to submit the following:

a. Negative air pressure systems for airborne control of asbestos fibers.

b. Examples of equipment identified for use:

- (1) Respirators and cartridges
- (2) High Efficiency Particulate Air (HEPA) vacuums and air filters
- (3) HEPA filter exhaust ventilation equipment
- (4) Protective clothing and personnel protection equipment
- (5) Transportation used to haul waste

- (6) Containment and disposal of waste materials
- (7) Air sampling pumps
- (8) Encapsulant
- (9) Pressure differential air monitoring devices
- (10) Disposal containers
- (11) Sheet plastic
- (12) Wetting agents

Note: Equipment may vary with each project

c. Air sampling schedules

d. Action and emergency plans and reports to include:

- (1) Asbestos Hazardous Abatement Plan
- (2) Accident Prevention Plan
- (3) Emergency Contingency Plan
- (4) Hazardous Waste Management Plan

(5) Airborne monitoring results

e. Asbestos certification requirements to include:

- (1) Certified industrial hygienist
- (2) Testing laboratory
- (3) Respiratory protection devices

4. Are contractor employees required to have training certificates from a certified trainer?

5. Are required federal, state, and local licenses identified?

6. Is there a requirement for competent person/trained supervisor to be on site?

7. Does the PWS require the contractor to notify federal, state, or local regulatory authorities when asbestos work starts on site?

8. Are emergency base notifications and procedures identified in the PWS?

9. Are estimated asbestos quantities, types and sample locations identified? If not is consideration given to establishing asbestos add on line items to better identify contract costs in the event additional quantities are discovered?

10. Is there an asbestos description of work to include sections covering isolation, demolition, storage and handling, disposal, and inspection?

11. Is there a list of environmental definitions?

12. Are asbestos medical requirements addressed?

13. Is there a section requiring a hazardous communication program to include:

14. Is there a section identifying safety equipment?

15. Is there a section identifying asbestos work procedures?
16. Is there a section identifying personal protection?
17. Is there a requirement for a certified hygienist?
18. Are decontamination procedures outlined?
19. Are clean up procedures identified?
20. Are asbestos clearance procedures identified?
21. Are asbestos disposal and landfill requirements listed?
22. Are disposal and manifest documentation requirements identified

Lead-Base Paint Checklist

For contracts for the removal of lead-base paint and construction and service contracts that have requirements for lead-base paint removal this checklist can apply.

YES

NO

d. Action and emergency plans and reports as

1. Are the following environmental lead regulatory standards identified:

a. Federal regulations: Code of Federal Regulations (CFRs), United State Codes (USCs) or identified environmental laws. Examples include:

- (1) 29 CFRs
- (2) 30 CFRs
- (3) 40 CFRs
- (4) 49 CFRs
- (5) See Attachment for additional regulations

b. State lead-base paint and associated environmental regulations as required?

c. Local lead-base paint and associated environmental regulations as required?

d. Professional references as required. Examples include:

- (1) American National Standards Institute (ANSI)
- (2) American Society for Testing and Materials (ASTM)
- (3) Gypsum Association (GA)
- (4) Steel Structures Painting Council (SSPC)
- (5) Underwriters Laboratories (UL)

e. DoD and Air Force regulations as required.

2. Does the performance work statement identify the contractor to submit the following:

a. Negative air pressure systems for airborne control of lead particles

b. Examples of equipment to include:

- (1) Respirators and cartridges
- (2) High Efficiency Particulate Air (HEPA) vacuums and air filters
- (3) HEPA filter exhaust ventilation equipment
- (4) Protective clothing and personnel protection equipment
- (5) Transportation used to haul lead waste
- (6) Containment and disposal of waste materials
- (7) Air sampling pumps
- (9) pressure differential air monitoring devices

c. Air sampling schedules

necessary to include:

- (1) Lead-based paint abatement plan
- (2) Accident Prevention Plan
- (3) Emergency Contingency Plan
- (4) Hazardous Waste Management Plan
- (5) Airborne monitoring results
- (6) Health and Safety Plan

e. Lead base paint certification requirements to include:

- (1) Certified industrial hygienist
- (2) Testing laboratory
- (3) Respiratory protection devices

3. Are contractor employees required to have training certificates from a certified trainer?

4. Are required federal, state, and local licenses identified?

5. Are required federal, state, and local licenses identified?

6. Does the PWS require the contractor to notify federal, state, or local regulatory authorities when lead-base paint work starts on site?

7. Are emergency base notifications and procedures identified in the PWS to include fire department, safety, bioenvironmental, CEV, spill response teams, contractors, if under contract?

8. Is an environmental assessment or Air Force Form 813 required for this project? Has it been completed? Is it current?

9. Are estimated lead paint quantities and sample locations identified? If not, is consideration given to establishing asbestos add-on line items to better identify contract costs in the event additional quantities are discovered?

8. Is there a lead-base paint description of work?

9. Is there a list of environmental definitions?

10. Are lead-base paint medical requirements listed?

11. Is there a section requiring a hazardous communication program?

12. Does the PWS identify safety equipment?

13. Does the PWS identify work procedures?

14. Are personal protection equipment requirements identified?

15. Is there a requirement for a certified hygienist?

16. Are decontamination procedures outlined

17. Are clean up procedures identified

18. Is lead-paint disposal procedures identified. Is the responsible base organization identified for coordination and disposal.

19. Is the contractor required to submit disposal documentation to CEV?

Pollution Prevention

For contracts for the removal of lead-base paint and construction and service contracts that have requirements for lead-base paint removal this checklist can apply.

YES

NO

1. Has the SOW/PWS been reviewed to determine if pollution prevention requirements exist?
2. Is there a list of definitions describing potential pollution prevention requirements?
3. Does the PWS/SOW require the contractor to abide all Federal, state, and local pollution prevention laws, examples of the following include:
 - a. National Environmental Policy Act of 1969, PL 91-190
 - b. The Clean Air Act, November 1977 as amended, PL 95-95
 - c. The Federal Water Pollution Control Act, 1977 as amended, PL 95-271
 - d. The Safe Drinking Water Act of 1977, PL 95-190
 - e. The Noise Control Act of 1972, PL 95-574
 - f. Federal Insecticide, Fungicide and Rodenticide Act Amendments, 1972, PL 92-516
 - g. Toxic Substance Control Act, 1976, PL 94-469
 - h. Resource conservation and Recovery Act of 1976, PL 94-580
 - i. Solid Waste Disposal Act Amendments of 1980, PL 96-482
 - j. National Historic Preservation Act, Part 85-665, 1966
 - k. Hazardous Material Transportation Act
4. Are notification requirements and points of contacts identified in the event of an accident or spill?
5. Does the PWS/SOW identify requirements to protect water resources to include:
 - a. Not pouring chemicals or other wastes into storm or sewer lines
 - b. Abiding by all Federal, state and local water laws concerning pollution of rivers and streams
6. Are hazardous material procedures identified that include:
 - a. Submittal of Material Safety Data Sheets
 - b. Registering hazardous materials with the hazardous material flight/pharmacy
 - c. Proper storage procedures
 - c. Procedures for the disposal of hazardous waste and associated documentation

ATTACHMENT THREE

**ENVIRONMENTAL COMPLIANCE FEDERAL
LAWS AND REGULATIONS**

ATTACHMENT THREE

ENVIRONMENTAL COMPLIANCE FEDERAL LAWS AND REGULATIONS,

Asbestos Contracts

Federal agencies involved with regulations pertaining to asbestos include the following:

Environmental Protection Agency (EPA)
Occupational Safety and Health Administration (OSHA)
Food and Drug Administration (FDA)
Consumer Product Safety Commission (CPSC)
Department of Transportation (DOT)

EPA and OSHA are the primary Federal agencies that have promulgated regulations to prevent contamination of the environment and to protect asbestos workers and the general public from asbestos exposure.

Federal Statutes that apply to asbestos

Clean Air Act, Section 112, 42 U.S.C. 7412

Toxic Substances Control Act, Subchapter II, 15 U.S.C. 2641-2656, (Asbestos Hazardous Emergency Response Act)

Occupational Safety and Health Act, Section 6, 29 U.S.C. 655

Contract Work Hours and Safety Standards Act, Section 107, 40 U.S.C. 333

Hazardous Materials Transportation Act, 40 U.S.C.

Federal regulations incorporated into performance work statements

29 C.F.R. 1910.1001, Asbestos, 10 Aug. 1994 (applies to all occupational exposures to asbestos covered by OSHA, except construction work and shipyard work)

29 C.F.R. 1915.1001, Asbestos, 10 Aug. 1994 (applies to asbestos exposure in all shipyard employment work)

29 C.F.R. 1926. 1101 Asbestos, 10 Aug. 1994 (applies to all construction, including alteration, repair, maintenance, renovation, demolition, or salvage of structures that contain asbestos and installation of asbestos products)

40 C.F.R. 141 Asbestos

40 C.F.R. Part 61, Subpart M, Asbestos National Emission Standards for Hazardous Air Pollutants, Nov. 20, 1990

40 C.F.R. Part 61, Subpart M, Appendix A - Interpretive Rule governing roof removal operations, June 17, 1994

40 C.F.R. Part 763, Subpart E, July 30, 1982, Asbestos containing materials in schools

49 C.F.R. 172.101, Oct. 1 1993; 173.216, Dec. 21 1990; 177.844, Dec. 20, 1991, Asbestos Transportation

Lead Based Paint

The Federal agencies involved with regulations pertaining to lead based paint include the following:

Environmental Protection Agency
Occupational Safety and Health Administration
Department of Transportation

EPA and OSHA are the primary Federal agencies that have promulgated regulations to prevent contamination of the environment and to protect lead based paint workers and the general public from lead exposure.

Federal Statutes:

Hazardous Material Transportation Act, 49 U.S.C.

Occupational Safety and Health Act, 29 U.S.C.

29 CFR 1910 Occupational Safety and Health Standards

29 CFR 1910.20 Access to Employee Exposure and Medical Records

29 CFR 1910. 133 Eye and Face Protection

29 CFR 1910. 134 Respiratory Protection

29 CFR 1926 Safety and Health Regulations for Construction

29 CFR 1926. 21 Safety, Training, and Education

29 CFR 1926. 51 Sanitation

29 CFR 1926. 55 Gases, Vapors, Fumes, Dusts, and Mists

29 CFR 1926. 57 Ventilation

29 CFR 1926. 59 Hazard Communications

29 CFR 1926. 62 Lead

29 CFR 50 Appendix G, National Ambient Air Quality Standard for Lead

30 CFR 11 Respiratory Protective Devices; Testes for Permissibility Fees

40 CFR 260 Hazardous Waste Management Systems: General

40 CFR 261 Identification and Listing of Hazardous Waste

40 CFR 262 Generators of Hazardous Waste

PCB Removal and Disposal

The Federal agencies involved with regulations pertaining to PCB removal and disposal include the following:

Environmental Protection Agency

Occupational Safety and Health Administration

Department of Transportation

Federal Statutes:

Toxic Substances Control Act, section 6(e), 15 U.S.C. 2605(e)

Occupational Safety and Health Act, section 6 29 U.S.C. 655

Hazardous Materials Transportation Act, 49 U.S.C. 1801

Federal Regulations

40 C.F.R. Part 761, Subpart C, Marking PCBs and PCB items

40 C.F.R. Part 761, Subpart D, PCBs Storage and Disposal

40 C.F.R. Part 761, Subpart G, PCB Spill Cleanup Policy

40 C.F.R. Part 761, Subpart K, PCB Waste Disposal Records and Reports

40 C.F.R. 261.8 PCB Wastes Regulated under the Toxic Substances Control Act

40 C.F.R. Part 223, Subpart 223. 70 Hazardous Waste Disposal

49 C.F.R. Parts 171, 172, 173, 177, Hazardous Material Transportation Requirements

Pollution Prevention/Recycling Regulations

The Environmental Protection Agency is the Federal agency involved with regulations pertaining to pollution and recycling regulations:

Federal Statutes:

Pollution Prevention Act of 1990

Clean Air Act Amendments of 1990

Resource Conservation and Recovery Act

Emergency Planning and Community Right-to-Know Act of 1986

Superfund Amendments and Reauthorization Act of 1986

National Defense Authorization Act for Fiscal Year 1993

Public Law 97-214, 10 U.S.C. Section 2577, Disposal of Recyclable Materials

ATTACHMENT FOUR

**CIVIL ENGINEERING ENVIRONMENTAL
AIR FORCE INSTRUCTIONS**

ATTACHMENT FOUR

AIR FORCE CE ENVIRONMENTAL REGULATIONS

<u>Publication Number</u>	<u>Publications Title</u>	<u>Former Publication</u>
Compliance AFI 32-7040	Air Quality Compliance	AFP 19-5
AFI 32-7041	Water Quality Compliance	AFP 19-5
AFI 32-7042	Solid & Hazardous Waste Compliance	AFP 19-5, AFR 19-11
AFI 32-7044	Storage Tank Compliance	No Former Publication
AFI 32-7045	Environmental Compliance Assessment and Management Program	AFR 19-6
AFI 32-7047	Compliance Tracking and Reporting	No Former Publication
General Procedures AFI 32-7001	Environmental Budgeting	No Former Publication
AFI 32-7002	Environmental Information Management System	No Former Publication
AFI 32-7003	Environmental Research and Development	No Former Publication
AFI 32-7004	Environmental Education and Training	No Former Publication
AFI 32-7005	Environmental Protection Committees	AFR 19-8
AFI 32-7006	Environmental Program in Foreign Countries	No Former Publication

ATTACHMENT FIVE

**INSPECTOR SURVEILLANCE REVIEW
CHECKLIST**

ATTACHMENT FIVE

**PRO-ACT
ASBESTOS MANAGEMENT FIELD CHECKLIST
MARCH 2, 1995**

GENERAL INFORMATION

1. Establish identity of Owner/operator(s):

- * Owner name: _____
- * Main contact person and title: _____
- * Mailing Address: _____

- * Telephone Number: _____

2. Prime Contractor/Sub-Contractor (Provide the following information for each contractor related to the demolition/renovation job):

- * Company Name: _____
- * Main contact person and title: _____
- * Mailing Address: _____

- * Telephone Number: _____

- * Contractor's responsibilities at job: _____
- * Number of employees involved in job: _____

- * Number of on-site employees trained
in asbestos removal: _____
- * Name of Supervisor: _____
- * What type of asbestos training
has the supervisor had ? _____
- * Date of last training: _____

Activity Description (Check all that apply):

- * Type of activity:
 - Demolition ..
 - Ordered demolition ..
 - Planned renovation ..
 - Nonscheduled operation ..
 - Emergency renovation ..

- * Describe type of abatement occurring (e.g., removal, encapsulation, etc.):

- * Estimate the approximate amount (linear feet or surface area) of asbestos present in the facility: _____

- * Describe the facility being demolished/renovated including the size, age and prior use: _____

4. Type of Asbestos Containing Material (ACM):

- * Insulation:
 - Pipe felt ..
 - Air cell ..
 - Pre-molded ..
 - Asbestos cement ..
 - Block ..

- * Surfacing Materials
 - Plaster ..
 - Spackling compound ..
 - Stucco ..
 - Joint compound ..

- * Spray On:
 - Acoustical ..
 - Decorative ..
 - Insulative ..

- * Miscellaneous:
 - Ceiling tiles ..

- * Category I Nonfriable ACM:
 - Packings ..
 - Gaskets ..
 - Asphalt roofing products ..

- * Resilient Floor Coverings:
 - Vinyl/asbestos tile ..
 - Asphalt/asbestos tile ..
 - Linoleum ..

- * Category II Nonfriable ACM:
 - Extrusion panels ..
 - Putties ..
 - Clapboards/shingles ..
 - (transite) ..
 - Sealants ..
 - Millboard ..
 - Adhesives (mastics) ..
 - Vinyl wallpaper ..
 - Concrete/asbestos pipe ..
 - Pegboard ..
 - Paints and coatings ..
 - Laboratory bench tops ..
- * Others: _____

5. REMOTE OBSERVATIONS

- A. Visible emissions to the outside air?
If yes, describe specific location (e.g., door, window, waste storage area).

- B. Are vehicles being used to haul suspect ACM properly marked?

- C. Is suspect ACM debris contained within the removal area?

6. DEMOLITION/RENOVATION PREPARATION

- A. Outside Structure
 - * Compressor (if applicable)
 - * Air supply
 - * Water lines
 - * Water filtering unit
 - * Decon Construction:
 - Two Stage
 - Three Stage
 - * Signs Posted

- * Isolation barriers erected
- * Waste Receptacle:
 - Truck & Trailer
 - Bin
- B. Inside Structure
 - * Pre-cleaning performed:
 - Wet Wipe
 - HEPA Vac
 - Combination of both
 - * Walls, floors, windows and stationary objects plasticized and secured
 - * Building partially occupied:
 - Isolation barriers erected
 - Air Monitoring occupied side
 - * Decon Construction:
 - Double airlock at all entrance and exit to removal areas
 - * HVAC System shut-down
 - Occupied area (if applicable)
 - Removal area only
 - Filters removed
 - * Electricity Shut-off:
 - Generator supplied electricity
 - Other

7. EMISSION CONTROL PROCEDURES

- A. Portion of facility containing ACM adequately wet during wrecking?
- B. Visible dust emissions?
- C. Category I nonfriable ACM not in poor condition and not friable?
- D. Is the facility being demolished by intentional burning?
- E. Unit/section removal?
 - * ACM adequately wet when exposed?
 - * Lowered to floor and ground level without disturbing ACM?
- F. Stripping in place?

- * ACM adequately wet while being stripped and until collected and contained or treated in preparation for disposal?
 - * Lowered to floor and ground level without disturbing ACM?
 - * Transported to ground via leak-tight chutes or containers if removed or stripped >50 feet above ground level and not removed as units or in sections?
- G. Is one of the following emission control techniques in use?
- * Local exhaust ventilation and collection system?
 - * Glove-bag system
 - * Leak-tight wrapping
 - * Are there visible emissions to the outside air?
- H. Is Category I nonfriable ACM being sanded, ground or abraded? If yes:
- * Are visible emissions produced?
 - * Is the ACM adequately wet?
 - * Is the local exhaust and ventilation and collection system being used?
- I. Are large facility components being removed without the ACM being stripped? If yes:
- * Is the ACM being disturbed or damaged in any way?
 - * Is the component encased in a leak tight wrapping and labeled appropriately during all loading and unloading operations and during storage?
- J. Is there a water or wetting agent supply?
- K. Is water or a wetting agent observed being sprayed on suspect ACM during:
- * Removal of units or sections?
 - * Stripping?
 - * Demolition?
- L. Is there visible dust (airborne or settled) or dry suspect ACM debris in the immediate vicinity of the operations?
- M. Upon examination of some removed ACM, does the full depth of the ACM appear to have been wetted?

- N. Is the ACM awaiting containerization adequately wet throughout?
- O. Is the ACM in bags or other containers adequately wet?
- P. Are there any open or ripped waste bags in the waste storage area?
Are the contents of these bags adequately wet?
- Q. Negative air used during removal and cleanup?
- R. Clean air samples taken < 24 hours?
- S. Clean air samples taken > 24 hours?

8. WASTE DISPOSAL

- A. Is the waste receptacle:
 - * Covered and locked?
 - * DOT label affixed?
- B. Is there apparent leakage around the receptacle?
- C. Are 6 mil plastic bags used for waste?
- D. Tears and cuts observed?
- E. Drum lined with 6 mil poly used with DOT label?
- F. Drum leakage observed?
- G. Bag/drum combination used?
- H. Drums and bags sealed?
- I. Are containers of ACM destined for off-site transport labeled with the name of the waste generator and the location of its generation?
- J. Are vehicles used in the transport of ACM marked appropriately during loading and unloading?
- K. Are appropriate waste shipment records maintained?

9. OSHA REQUIREMENTS

- A. Containment Barrier?
- B. Respiratory protection?
- C. Decontamination unit?
- D. Glove bag?
- E. Secondary containment in place where glove bags are used?
- F. Signs posted?
- G. Number of cfm rating of local exhaust ventilation units: _____

- H. Estimated size of containment area: _____
- I. Hygienist on-site: _____

- J. On-site representative: _____
- K. Weather conditions: _____

10. Sources:

- 1. U.S. EPA Region IV, Air, Pesticides & Toxics Management Division, Air Enforcement Branch, Source evaluation & Asbestos Section, Field Data Collection Checklist.
- 2. Georgia Department of Natural Resources, Environmental Protection Division, Asbestos licensing & Certification Unit, Cleanup Inspection Checklist.
- 3. U.S. Air Force Environmental Compliance and Management Program (ECAMP), Asbestos Management.

**PRO-ACT
LEAD-BASED PAINT FIELD CHECKLIST
MARCH 2, 1995**

GENERAL INFORMATION

1. Establish identity of Organization(s):

- * Organization name: _____
- * Main contact person and title: _____
- * Mailing Address: _____

- * Telephone Number: _____

2. Prime Contractor/Sub-Contractor (Provide the following information for each contractor related to the lead-based paint abatement job):

- * Company Name: _____
- * Main contact person and title: _____
- * Mailing Address: _____

- * Telephone Number: _____
- * Contractor's responsibilities at job: _____
- * Number of employees involved in job: _____

- * Number of on-site employees trained
in lead-based paint abatement: _____

- * Name of Supervisor: _____
- * What type of lead-based paint abatement
training has the supervisor had ? _____
Date of last training: _____

3. Activity Description (Check all that apply):

- * Type of abatement activity:
 - Replacement ..
 - Encapsulation ..
 - Paint removal ..
 - Reversal ..

4. Facility Personnel and Contractor Training and Protection:

- * Training:
 - Lead-based paint abatement training ..
 - Deleader training ..
 - Deleader-supervisor training ..

- * Training Certification:
 - 29 CFR 1910.120 ..
 - 29 CFR 1910.1025 ..
 - 29 CFR 1926 ..

- * Certificate of Training Completion:
 - State Department of the Environment ..
 - State Occupational Safety and Health ..

5. ABATEMENT PLANNING AND IMPLEMENTATION

- A. Obtained necessary permits for abatement and disposal of waste?
- B. Notified occupants and residents of adjacent units?
- C. Relocated residents, as necessary?
- D. Satisfied reporting requirements by federal, state, and local agencies?
- E. Conducted preconstruction conference?
- F. Corrected pre-existing conditions that would impede abatement or cause it to fail?
- G. Implemented initial procedures for environmental protection and containment of lead dust and debris?
- H. Posted warning signs?
- I. Provided a worker changing area?

J. Ensured all workers involved in this project have taken a qualifying training course and have received a certificate of completion within 5 years before the start of this project?

K. Method of Containment:

* Interior Abatement:

1. All furniture and packed personal items removed from the work area?
2. Work area sealed off from other areas of the building?
3. Opening seams of kitchen cabinets and refrigerators sealed?
4. Floors covered with plastic sheeting?
5. Carpet removed for cleaning or replacement?

* Exterior Abatement:

1. Entire surface of exterior floor been covered?
2. Materials used to cover/seal surfaces consist of plastic sheeting, at least 6 mm thick, duct tape or equivalent water proof tape, and staples of industrial size?
3. Sheeting extends at least 3 feet per story with a minimum of 5 feet and a maximum of 20 feet if abatement produces non-liquid waste?

6. TASKS DONE DURING ABATEMENT

A. Performed continuous on-site supervision?

B. Limited access to work area?

C. Performed maintenance of the containment system for lead dust and debris?

D. Performed daily cleanup?

E. Ensured that on-site storage of waste prior to disposal?

F. Ensured that on-site personnel were wearing the proper Personal Protective Equipment (PPE)

* Ensured proper protective clothing was provided and worn by workers?

* Ensured appropriate respiratory protection was provided and worn by workers?

G. Multi-family dwellings:

* If lead abatement project is in the common area, was passage provided to private living areas where the residents would not have to go through the work area?

* If the only access to private living areas is through the abatement project work area, did the abatement personnel clean the work area with a HEPA vacuum at the end of each work day?

H. Ensured personal breathing zone samples are conducted?

7. TASKS DONE AFTER ABATEMENT

A. Broke down the containment system?

B. Performed first round of final cleanup?

C. Notified inspectors of readiness for inspection?

D. Obtained approval of inspector to repaint abated surfaces as needed?

E. Performed final round of cleanup?

F. Notified inspector of readiness for clearance testing?

G. Performed clearance testing (Date)?

* If deteriorated surfaces or visible amounts of dust are observed, dust samples were taken no sooner than 24 hours after completion of final cleanup activities?

H. Obtained final certification (Date)?

I. Disposed of abatement debris?

- J. Was the lead waste removed from the site within 48 hours of completion of the cleanup?

- K. Perform Recordkeeping:
 - * Management reports and final certification
 - * Testing reports and summary of abatement project and methods
 - * Name and address of contractor
 - * Reports prepared for other agencies
 - * Permits
 - * Reports associated with disposal

- L. Satisfied federal, state, and local reporting requirements?

- M. Returned occupants to units?

**PRO-ACT
HAZARDOUS WASTE CHECKLIST
MARCH 2, 1995**

GENERAL INFORMATION

1. Establish identity of Organization/operator(s):

- * Owner name: _____
- * Main contact person and title: _____
- * Mailing Address: _____

- * Telephone Number: _____

2. Prime Contractor/Sub-Contractor (Provide the following information for each contractor related to the hazardous waste disposal job):

- * Company Name: _____
- * Main contact person and title: _____
- * Mailing Address: _____

- * Telephone Number: _____
- * Contractor's responsibilities at job: _____
- * Number of employees involved in job: _____

- * Number of on-site employees trained
in hazardous waste disposal operations: _____

- * Name of Supervisor: _____
- * What type of hazardous waste disposal
training has the supervisor had ? _____
Date of last training: _____

3. HAZARDOUS WASTE DETERMINATION AND NOTIFICATION

- A. Has the facility completed a hazardous waste determination for each solid waste produced to include a landban determination?
- B. Method used for determination:
 - * Listed as hazardous waste in 40 CFR Part 261, Subpart D ?
 - * Process for materials knowledge ?
 - * Tested for characteristics as identified in Part 261, Subpart C?
- C. Is notification of all waste streams generated correct and complete?
- D. Is notification of all waste management (TSD) methods correct and complete?

4. SATELLITE ACCUMULATION AREA

- A. Are containers in good condition?
- B. Is the waste compatible with the containers?
- C. Are containers marked "Hazardous Waste" and labeled to identify the contents?
- D. If waste accumulation has exceeded 55 gallons:
 - * Has container holding excess amount been marked with beginning date of excess accumulation?
 - * Have excess amounts remained in satellite are over 3 days?

5. RECORD KEEPING AND REPORTING

- A. Does the facility maintain the following records and reports, if applicable, for three years or five years for landban documentation:

- * Waste shipping manifests and landban documentation?
 - * Monthly off-site shipment summaries (out-of-state only)?
 - * Monthly waste receipt summaries (TSD facilities only)?
 - * Records of hazardous waste activities?
 - * Analytical results of hazardous waste and landban determinations?
 - * Annual reports?
- B. Does facility use waste manifests when shipping hazardous and Class I waste off-site?
- C. Are waste manifests properly completed and signed?
- D. Are off-site disposal facilities RCRA-permitted or operating under interim status standards?
- E. Does the facility mix restricted waste which have different treatment standards?
- F. Were restricted wastes shipped off-site to an authorized TSDF?
- G. Did the facility provide the following information along with each hazardous waste manifest:
- * Manifest document number?
 - * EPA waste identification code?
 - * Applicable treatment standards for each waste, and adequate reference of the standards, or 5-letter treatment code, if allowable?
 - * Waste analysis date, if available?

6. PRE-TRANSPORT REQUIREMENTS

- A. Are hazardous wastes packaged in accordance with Department of Transportation requirements (49 CFR Parts 173, 178, 179) before being offered for transport?
- B. Are hazardous waste packages labeled and marked in accordance with 49 CFR Part 172 before being offered for transport?
- C. Is each container of 110 gallons or less marked with the following hazardous waste warning label before being offered for transport?

HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency. Generator's Name and Address: __
 Manifest Document No. _____

- D. Are vehicles transporting hazardous wastes placarded in accordance with DOT regulations (49 CFR Part 172 Subpart F)?

7. Sources:

Georgia Department of Natural Resources, Environmental Protection Division,
Standards Applicable to Transporters of Hazardous Waste.
Texas A&M Univ (TEEX-OES), Generator Checklist.

ATTACHMENT SIX

**ENVIRONMENTAL CONTRACTING
SPECIALIST JOB DESCRIPTION**

ATTACHMENT SIX

ENVIRONMENTAL CONTRACTING SPECIALIST JOB DESCRIPTION

CIVILIAN PERSONNEL POSITION

POSITION NUMBER

ORGANIZATION

POSITION TITLE

Environmental Contracting Specialist

CLASSIFICATION CLASSIFIED BY DATE

- Performs preaward and postaward activities for a variety of environmental contracts which are environmentally/manpower funded to include services, construction, and commodities related to the Environmental Compliance, Conservation, Pollution Prevention and the Installation Restoration Programs (IRP). These contracts are established using a variety of contracting methods to include sealed bid, negotiation, Architect and Engineering (A&E), multiple award, or source selection procedures. This position serves as the Contract Specialist with responsibility and authority to plan, direct, and administer installation environmental contracts. The employee is responsible for a variety of contracts that frequently require special handling provisions or specialized terms and conditions. Typical requirements include specialized environmental compliance, pollution prevention, conservation, and clean up equipment, supplies, construction, commodities, and services ranging from standard items that are complicated by urgency to complex sophisticated compliance and clean up requirements. The employee will be responsible for contract administration duties and liaison duties in support of Air Force Center for Environmental Excellence delivery orders and contracts on the installation. This position also provides environmental training support to the installation contracting organization. This employee serves as the contracting liaison to all installation environmental committees and program managers.

PREAWARD FUNCTIONS

- Provides guidance to technical personnel or lower grade Contract Specialists involved in environmental statement of work or data reviews. Formulates or approves the contracting approach to be taken that will best satisfy the environmental requirement. Reviews environmental requirements/specifications/assessments to determine the most appropriate method of procurement. Develops acquisition plans by reviewing previous history, market conditions, environmental administrative actions/notice of violations, environmental assessments and specifications. Develops special clauses, terms, and conditions applicable to the contract. Determines adequacy and completeness of the description in coordination with technical experts from other base, government, environmental regulatory agencies.

- Prepares presolicitation documents to include bid schedules, solicitation packages and obtains required reviews. Determines sources to be solicited, conducts prebid conferences and effects necessary coordination with other government personnel; prepares amendments, processes protests, determines responsiveness of bids, determines the responsibility of the apparent low bidder based on the analysis of financial and technical information gained during the preaward survey, conducts bid openings and records results, and awards or recommends award of the contract.

- In negotiated procurements the employee plans the procurement action with technical, legal, and contract pricing personnel. Develops the statement of work and data requirements to determine the type of contract best suited to the requirement, and develops special clauses, terms, and conditions applicable to the requirement. Determines the sources to be solicited, prepares determinations and findings, conducts proposal conferences, receives and evaluates proposals in conjunction with other technical personnel, prepares award documents and either acts as Contracting Officer within specified limits or makes presentation to the Base Contracting Officer or source selection authority when appropriate. Responds to inquires, including formal protests and environmental regulatory agencies.

GENERAL SKILL	1ST SKILL	2ND SKILL	3RD SKILL
PAY	50% CMJ DAT	40% CML DAD	10% CML UMM

SENSITIVITY: Noncritical Sensitive FLSA: Exempt

I certify that this is an accurate statement of the major duties and responsibilities of this position and its organizational relationships, and the position is necessary to carry out government functions for which I am responsible. This certification is made with the knowledge that this information is used for statutory purposes relating to appointment and payment of public funds, and that false or misleading statements may constitute violations of such statutes or their implementing regulations.

SIGNATURE AND TITLE OF SUPERVISOR DATE REAUDIT CERTIFICATION
 DATE
 SUPERVISOR
 CLASSIFIER

POSTAWARD FUNCTIONS

- Monitors contractor performance in relation to the completion schedule, ensures timely submission of technical progress reports, detects and corrects labor standards violations, take appropriate action to keep contractor performance in compliance with contract and environmental requirements. Recommends action concerning problem situations such as incomplete specifications or delinquent government furnished equipment/services. Issue change orders resulting from changes in requirements, defective specifications, changed site conditions, environmental regulatory changes, or changes in the government technical analysis. Negotiates settlements for such changes; approves contract payments; assesses damages for non-performance; issues show cause or cure notices; terminates contracts for default or convenience; negotiates settlements; and prepares replies to other involved agencies, appeal boards, congressional inquires or environmental regulatory agencies.

Factor 1 - Knowledge Required by the Position - Level 6 [950 Points]

- Knowledge of contracting principles and procedures applicable to preaward and or postaward actions sufficient to procure and or administer contracts for a variety of specialized equipment, services, and or construction. This includes skills in negotiating, sole source contracts, basic ordering agreements, letter contracts, and modifications.

- Knowledge of fixed-price, cost, time and materials, indefinite quantity (IDIQ), requirements, A&E, multiple award, task order, negotiation, letter, 8(a) and source selection contracting principles and procedures applicable to the preaward and postaward functions sufficient to procure and administer environmental compliance, clean-up/restoration, conservation, and pollution prevention contracts which may include construction, services and commodities clauses and provisions.

- Knowledge of price, cost, and profit analysis sufficient to review environmental contractor proposals and bids. Perform price analysis using previous price history, commercial price lists, market prices, and catalogs and price lists to assure reasonableness of bids and proposals. For cost analysis knowledge of historical costs, reports from auditors or technical specialists, contractor cost breakdowns regarding labor, materials, overhead and profit, or other evaluation criteria and selection processes where the information is usually available.

- Knowledge of market conditions and forces interested in an capable of performing a specific contract, including those where a limited number of sources are available, sufficient to identify potential contractors, to evaluate bids or proposals for responsiveness, and to negotiate sole source environments.

- Knowledge of the characteristics of environmental services, construction, and commodities as well as a basic understanding of environmental laws and regulations sufficient to evaluate bid responsiveness and responsibility of the bidders; and to analyze the contractor's ability to perform the contract.

- Knowledge of hazardous waste safety procedures while on contractor's work site. Basic understanding of environmental abatement procedures and processes.

Factor 2. Supervisory Controls - Level 2-3 [275 Points]

- Supervisor makes assignments in terms of contracting actions to be performed. Assistance is provided for unprecedented contracting methods/types. The employee initiates necessary coordination with requirement offices, accounting and legal offices, audit agencies, staffs of other agencies, and with contractors to obtain supporting documentation and resolve conflicts.

- Work is accomplished independently in accordance with established procedures, practices, and precedents. The employee exercises initiative and judgment in the development and coordination of the procurement plan, coordinating with the requirements office, accounting, legal, environmental, Bioenvironmental, other staff agencies, and others, both in and out of government to resolve differences.

- Completed work is reviewed through established supervisory channels, formal review procedures, and when appropriate, the Source Selection Evaluation Team (SSET).

Factor 3. Guidelines - Level 3-3 [275 Points]

- Guidelines include agency policies and procedures, department regulations, Federal Acquisition Regulations, Code of Federal Regulations, United States Codes, Comptroller General Decisions, and Contract Appeal Board decisions and state regulations. While these guidelines are generally applicable to environmental work, the employee must exercise judgment in making adaptations to deal with such problems as the urgency for various goods or requirements which are unique to a particular project. Past contracting actions are not always available for use as guidelines. This requires the employee to use originality in handling requirements and developing recommendations. The employee exercises judgment and initiative to identify those aspects of regulations which apply to the particular procurement, develops justifications for adopting a contractual posture, tailors provisions to meet special requirements, and develops criteria or justifications involving contractor actions and claims. The employee also use special clauses, clearances, and determinations applicable to certain procurements, such as construction, environmental services, and environmental restoration.

Factor 4 Complexity - 4-4 [225 Points]

- The employee is responsible for the full range of pre and postaward contracting activities involved in the acquisition of environmental services, construction, and commodities. The employee uses a combination of fixed price, cost, A&E, IDIQ, Requirements, task order, letter, source selection, negotiated with special provisions and incentives. Some of the contracts include such complexities as:

- inclusion of special provisions, e.g. government furnished property, quality assurance inspections, on-site certifications, and similar terms and conditions:

- limited competition because of urgency or quantity specified;

- emergency response for accidents, spills and disposal with little or no warning;

- negotiated contract changes to accommodate changes in mission requirements, defective specifications environmental regulatory changes, or similar problems;

- cost analysis required on initial pricing or contract modifications

- contractual periods of more than one year.

- Contract requirements involve compliance with all federal, state, and local environmental laws and regulations for specific environmental projects as well as renovation, alteration, construction, abatement, and remediation to existing facilities and sites in support of the installation environmental program. Unexpected conditions may be encountered during the execution of a particular contract which the contractor had not been made aware, and which may require negotiated changes.

- Difficulty in contract administration is due to the various commodities the contract specialist must deal with, and the various contract clauses applicable to each type.

Factor 5 Scope and Effect - [150 Points]

- The primary purpose of the work is to assure that formal contracting services are provided to the Installation Environmental Team. This includes both the initial procurement of a variety of requirements and the subsequent administration of their delivery.

- Work has an impact on the efficiency and timeliness of environmental requirements and economic impact on the private companies involved.

Factor 6 Personal Contacts - Level 6-3 [60 Points]

- Contacts are with requisitioning personnel, personnel of other government agencies including regulators, Air Force Center for Environmental Excellence contracting and technical personnel, local and national firms, small businesses, small disadvantaged businesses and 8(a) firms. Typical contacts with these firms include: officers, technical experts, attorneys, auditors, sales representatives, and their bonding company representatives. Contacts occur in moderately unstructured settings, with roles and authorities established during the negotiation or discussion.

Factor 7. Purpose of Contacts - Level 7-3 [120 Points]

- The purpose of contacts with external groups is to conduct conferences, obtain information necessary for preaward evaluations, conduct fact-finding, negotiate contracts and modifications, and resolve numerous problems arising during contract administration. Contacts with internal group are to advise on developing specifications and evaluation criteria for contractual actions, to evaluate proposals, and to prepare prenegotiation positions. The employee must be skillful in dealing with

personnel with highly divergent points of view and must be persuasive in the preaward and or postaward phases of the contract cycle.

Factor 8. Physical Demands - Level 8-1 [5 Points]

- The work is primarily sedentary, involving no special physical demands

Factor 9 Work Environment - Level 9-1 [5 Points]

- The employee's work is normally performed in an office setting, although there will be the use of classrooms and conference rooms for presentations and classes as well as visits to contractor's facilities and work sites as required.

ATTACHMENT SEVEN

**CONTRACTING ENVIRONMENTAL JOB
PERFORMANCE REQUIREMENTS**

ATTACHMENT SEVEN

ENVIRONMENTAL CONTRACTING JOB REQUIREMENTS

DISCIPLINE: ENVIRONMENTAL CONTRACTING SPECIALIST	DATE
AFFECTED AFSCS/SERIES: 64P SERIES, GS-1102, GS-1105, GS-1106	
JOB PERFORMANCE REQUIREMENTS	SOURCE PREREQUISITE COMMENTS

1. Understand the importance of the Air Force Environmental Safety, Occupational Health (ESOH) visions, goals, and policy

2. Understand base-specific ESOH requirements and policies

3. Identify and implement federal, state, and local ESOH and Federal Acquisition Regulations throughout the project and contract.

4. Understand federal, state, local, and Air Force hazardous waste disposal policies and regulations

5. Be aware of ESOH functional responsibilities and their importance to the overall environmental program. Be aware of their locations and telephone numbers.

6. Understand the responsibilities of the Environmental Protection Committee and associated subcommittee in planning and overseeing projects and procurements

7. Understand the operation and scheduling of the Environmental Compliance Assessment Management Program and the organizations that assess and track actions

8. Comprehend the importance of the National Environmental Policy Act (NEPA) on the Air Force planning function and the importance of the environmental impact statement or assessment on Air Force construction and services projects

9. Comprehend that the following laws are incorporated by NEPA into the planning process:
- Resource Conservation and Recovery Act (RCRA)

- Clean Water Act (CWA)
 - Toxic Substance Control Act (TSCA)
 - Clean Air Act (CAA)
 - Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)
 - Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
 - Emergency Planning and Community Right-to-Know (EPCRA)
 - Endangered Species Act
 - National Historic Preservation Act (NHPA)
 - Archaeological Resources Protection Act
 - Pollution Prevention Act
 - Federal Facilities Compliance Act (FFCA)
 - Hazardous Material Transportation Act (HMTA)
 - Occupational Safety and Health Act (OSHA)
- (See the "Environmental Contracting Reference Guide" AFLMA PN: LC943372 for a synopsis for the above laws)

10. Understand environmental incident response responsibilities and risks for base personnel and contractors.

11. Understand responsibilities for the base waste management program

12. Understand the requirements and responsibilities of the Hazard Abatement Program as it relates to project scheduling, funding and oversight

13. Explain the duties and responsibilities related to Environmental Safety and Occupational Health

14. Explain the basic requirements associated with site remediation to include: Comprehensive Environmental Response, Compensation and Liability Act, Defense Environmental Restoration Program (DERP), and the Installation Restoration Program (IRP) requirements

15. Understand the roles and responsibilities of the Remedial Program Manager (RPM) and his responsibilities associated with CERCLA, DERP, and IRP.

16. Know the requirements for hazard notification as outlined in the Hazard Abatement Program, AFI 91-301 and Air Force Occupational and Environmental Safety, Fire Prevention and Health (AFOSH) Program

17. Comprehend the applicable personal protective equipment required for environmental work

18. Know emergency points of contacts for environmental emergencies to include:

- a. Safety
- b. Civil Engineering Operations and Engineering
- c. CE Environmental Flight or Environmental Management Office
- d. Legal
- e. Bioenvironmental
- f. Fire Department
- g. Wing Occupational Health and Safety Committee
- h. Public Affairs
- i. Logistics Group

19. Understand the impact of notice of violations (federal and state EPA and OSHA) on the base and how they are assigned and managed within the Air Force

20. Understand personal criminal and civil liabilities under ESOH

21. Understand contracting and contractor responsibilities associated with the Air Force Pharmacy Program

22. Be aware of federal and state natural and cultural resource requirements to include: the Endangered Species Act, National Historic Preservation Act, and Archaeological Resources Protection Act

23. Apply and enforce generic ESOH clauses

24. Understand the importance ESOH issues such as worker safety, transportation, hazardous material and hazardous waste regulations in the contractor workplace.

25. Understand the requirements established under the Air Force Federal Affirmative Procurement Program

26. Identify available environmental training courses beneficial to contracting personnel

27. Perform environmental training on specific topics to the contracting organization or selected division or branches

28. Perform selected contract administration and coordination in support of Air Force Center for Environmental Excellence Contracts or Delivery Orders

DISCIPLINE: SERVICES CONTRACTING SPECIALIST
AFFECTED AFSCS/SERIES: 64P SERIES, GS-1102, GS-1105, GS-1106
JOB PERFORMANCE REQUIREMENTS SOURCE

DATE
PREREQUISITE

PAGE 1

COMMENTS

1. Understand the importance of the Air Force ESOH visions, goals, and policy
2. Understand base-specific ESOH requirements, policies, and programs
3. Identify and implement federal, state, and local ESOH and Federal Acquisition Regulations throughout base projects and contracts.
4. Understand federal, state, local, and Air Force hazardous waste disposal policies and regulations
5. Be aware of ESOH functional responsibilities and their importance to the overall environmental program. Be aware of their locations and telephone numbers.
6. Understand the operation and scheduling of the Environmental Compliance Assessment Management Program and the organizations that assess and track actions
7. Comprehend the importance of the National Environmental Policy Act (NEPA) on the Air Force planning function and the importance of the environmental impact statement or assessment on Air Force construction and services projects
8. Comprehend that the following laws are incorporated by NEPA into the planning process:
 - Resource Conservation and Recovery Act (RCRA)
 - Clean Water Act (CWA)
 - Toxic Substance Control Act (TSCA)
 - Clean Air Act (CAA)
 - Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)
 - Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

- Emergency Planning and Community Right-to-Know (EPCRA)
 - Endangered Species Act
 - National Historic Preservation Act (NHPA)
 - Archaeological Resources Protection Act
 - Pollution Prevention Act
 - Federal Facilities Compliance Act (FFCA)
 - Hazardous Material Transportation Act (HMTA)
 - Occupational Safety and Health Act (OSHA)
- (See the "Environmental Contracting Reference Guide" AFLMA PN: LC943372 for a synopsis for the above laws)

9. Understand environmental incident response responsibilities and risks for base personnel and contractors.

10. Understand responsibilities for the base waste management program

11. Understand the requirements and responsibilities of the Hazard Abatement Program as it relates to project scheduling, funding and oversight

12. Understand Air Force and contractor duties and responsibilities in regards to hazardous material usage, storage, disposal, and inventory with base agencies

13. Explain the basic requirements associated with site remediation to include: Comprehensive Environmental Response, Compensation and Liability Act, Defense Environmental Restoration Program (DERP), and the Installation Restoration Program (IRP) requirements

14. Understand the roles and responsibilities of the Remedial Program Manager (RPM) and his responsibilities associated with CERCLA, DERP, and IRP.

15. Understand requirements for hazard notification as outlined in the

Hazard Abatement Program
found in AFI 91-301

16. Know the applicable
personal protective equipment
if required

17. Know emergency
points of contacts for
environmental emergencies to
include:

- a. Safety
- b. Civil Engineering
Operations and
Engineering
- c. CE Environmental
Flight or Environmental
Management Office
- d. Legal
- e. Bioenvironmental
- f. Fire Department
- g. Wing Occupational
Health and Safety
Committee
- h. Public Affairs
- i. Logistics Group

18. Be aware of notice of
violations (federal and state
EPA and OSHA) and potential
impact on personnel,
programs and resources

19. Understand personal
criminal and civil liabilities
under ESOH

20. Understand contracting
and contractor responsibilities
associated with the Air Force
Hazardous Material Pharmacy
Program

21. Be aware of federal and
state natural and cultural
resource requirements to
include: the Endangered
Species Act, National Historic
Preservation Act, and
Archaeological Resources
Protection Act

22. Understand the
importance of the
environmental impact
statement or assessment on
Air Force and services
projects

23. Apply and enforce
Generic ESOH Clauses

24. Understand the importance ESOH issues such as worker safety, transportation, hazardous material and hazardous waste regulations in the contractor workplace.

25. Understand contracting types and methods available to environmental customer to support emergency and long term responses and projects for services to include:

- a. Firm Fixed Price
- b. Cost
- c. Time and Materials
- d. Indefinite Quantity
- e. Requirements
- f. Blanket Purchase Agreements
- g. A&E contracts for services

26. Understand the requirements established under the Air Force Federal Affirmative Procurement Program

DISCIPLINE: CONSTRUCTION CONTRACTING SPECIALIST
AFFECTED AFSCS/SERIES: 64P SERIES, GS-1102, GS-1105, GS-1106
JOB PERFORMANCE REQUIREMENTS SOURCE

DATE

PREREQUISITE

COMMENTS

1. Understand the importance of the Air Force Environmental Safety, Occupational Health (ESOH) visions, goals, and policy

2. Understand Base-specific ESOH requirements and policies

3. Identify and implement federal, state, and local ESOH and Federal Acquisition Regulations throughout the project and contract.

4. Understand federal, state, local, and Air Force Disposal policies and regulations

5. Be aware of ESOH Functional Responsibilities and their importance to the overall environmental program.

- a. Safety
- b. Civil Engineering Operations and Engineering
- c. CE Environmental Flight or Environmental Management Office
- d. Legal
- e. Bioenvironmental
- f. Public Affairs
- g. Logistics Group

6. Be aware of the Environmental Compliance Assessment Management Program

7. Comprehend the importance of the National Environmental Policy Act (NEPA) on the Air Force planning function and the importance of the environmental impact statement or assessment on Air Force construction and services projects

8. Comprehend that the following laws are incorporated by NEPA into the planning process:

- Resource Conservation and Recovery Act (RCRA)
- Clean Water Act (CWA)
- Toxic Substance Control Act (TSCA)
- Clean Air Act (CAA)

- Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)
- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
- Emergency Planning and Community Right-to-Know (EPCRA)
- Endangered Species Act
- National Historic Preservation Act (NHPA)
- Archaeological Resources Protection Act
- Pollution Prevention Act
- Federal Facilities Compliance Act (FFCA)
- Hazardous Material Transportation Act (HMTA)
- Occupational Safety and Health Act (OSHA)
(See the "Environmental Contracting Reference Guide" AFLMA PN: LC943372 for a synopsis for the above laws)

9. Understand environmental incident response responsibilities and risks

10. Be aware of responsibilities for the hazardous waste management program

11. Understand the requirements and responsibilities of the Hazard Abatement Program

12. Understand Employer and employee duties and responsibilities

13. Be aware of the Installation Restoration Program

14. Understand requirements for hazard notification

15. Be aware of applicable personal protective equipment]

16. Know emergency points of contacts for ESOH functional responsibilities. Be aware of their locations and telephone numbers

a. Safety

- b. Civil Engineering
Operations and
Engineering
- c. CE Environmental
Flight or Environmental
Management Office
- d. Legal
- e. Bioenvironmental
- f. Wing Occupational
Health and Safety
Committee
- g. Public Affairs
- h. Fire Department
- i. Logistics Group

17. Understand the potential impact on personnel, programs and resources when NOV's are issued

18 Understand personal criminal and civil liabilities under ESOH

19 Understand contracting and contractor responsibilities associated with the Air Force Pharmacy Program

20 Be aware of federal and state natural and cultural resource requirements to include: the Endangered Species Act, National Historic Preservation Act, and Archaeological Resources Protection Act

21. Understand the importance of the environmental impact statement or assessment on Air Force construction and services projects

22. Apply and enforce Generic ESOH Clauses

24. Understand the importance ESOH issues such as worker safety, transportation, hazardous material and hazardous waste regulations in the contractor workplace.

25 Understand the requirements established under the Air Force Federal Affirmative Procurement Program

26. Understand contracting types and methods available to environmental customers to support emergency and long term responses and projects for construction to include:
a. Firm Fixed Price
b. Cost
c. Time and Materials

- d. Indefinite Quantity
- e. Requirements
- f. Blanket Purchase Agreements
- g. A&E contracts for services

27 Understand the requirements established under the Air Force Federal Affirmative Procurement Program

DISCIPLINE: COMMODITIES CONTRACTING SPECIALIST
AFFECTED AFSCS/SERIES: 64P SERIES, GS-1102, GS-1105, GS-1106
JOB PERFORMANCE REQUIREMENTS SOURCE

DATE

PREREQUISITE

COMMENTS

1. Understand the importance of the Air Force Environmental Safety, Occupational Health (ESOH) visions, goals, and policy

2. Understand Base-specific ESOH requirements and policies

3. Identify and implement federal, state, and local ESOH and Federal Acquisition Regulations throughout the project and contract.

4. Understand federal, state, local, and Air Force hazardous waste disposal policies and regulations

5. Be aware of ESOH Functional Responsibilities and their importance to the overall environmental program.

- a. Safety
- b. Civil Engineering Operations and Engineering
- c. CE Environmental Flight or Environmental Management Office
- d. Legal
- e. Bioenvironmental
- f. Public Affairs
- g. Logistics Group

6. Understand the operation and scheduling of the Environmental Compliance Assessment Management Program and the organizations that assess and track actions

7. Comprehend the importance of the National Environmental Policy Act (NEPA) on the Air Force planning function and the importance of the environmental impact statement or assessment on Air Force construction and services projects

8. Comprehend that the following laws are incorporated by NEPA into the planning process:

- Resource Conservation and Recovery Act (RCRA)
- Clean Water Act (CWA)
- Toxic Substance Control Act

- (TSCA)
- Clean Air Act (CAA)
- Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)
- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
- Emergency Planning and Community Right-to-Know (EPCRA)
- Endangered Species Act
- National Historic Preservation Act (NHPA)
- Archaeological Resources Protection Act
- Pollution Prevention Act
- Federal Facilities Compliance Act (FFCA)
- Hazardous Material Transportation Act (HMTA)
- Occupational Safety and Health Act (OSHA)
- (See the "Environmental Contracting Reference Guide" AFLMA PN: LC943372 for a synopsis for the above laws)

9. Understand environmental incident response responsibilities and risks for base personnel and contractors.

10. Explain the duties and responsibilities related to Environmental Safety and Occupational Health

11. Explain the basic requirements associated with site remediation to include: Comprehensive Environmental Response, Compensation and Liability Act, Defense Environmental Restoration Program (DERP), and the Installation Restoration Program (IRP) requirements

12. Understand the roles and responsibilities of the Remedial Program Manager (RPM) and his responsibilities associated with CERCLA, DERP, and IRP.

13. Know the requirements for hazard notification as outlined in the Hazard Abatement Program, AFI 91-301 and Air Force Occupational and Environmental Safety, Fire Prevention and Health (AFOSH) Program

14. Comprehend the applicable personal protective equipment required for environmental work

15. Know emergency points of contacts for environmental emergencies to include:

- a. Safety

- b. Civil Engineering
 - Operations and Engineering
- c. CE Environmental Flight or Environmental Management Office
- d. Legal
- e. Bioenvironmental
- f. Fire Department
- g. Wing Occupational Health and Safety Committee
- h. Public Affairs
- i. Logistics Group

16. Understand the impact of notice of violations (federal and state EPA and OSHA) on the base and how they are assigned and managed within the Air Force

17. Understand personal criminal and civil liabilities under ESOH

18. Understand contracting and contractor responsibilities associated with the Air Force Pharmacy Program

19. Be aware of federal and state natural and cultural resource requirements to include: the Endangered Species Act, National Historic Preservation Act, and Archaeological Resources Protection Act

20. Apply and enforce generic ESOH clauses

21. Understand the importance ESOH issues such as worker safety, transportation, hazardous material and hazardous waste regulations in the contractor workplace.

22. Understand the requirements established under the Air Force Federal Affirmative Procurement Program

23. Identify available environmental training courses beneficial to contracting personnel

24. Perform environmental training on specific topics to the contracting organization or selected division or branches

25. Understand the requirements established under the Air Force Federal Affirmative Procurement Program

26. Understand contracting types and methods available to environmental customers to support emergency and long term responses and projects for commodities to include:

- a. Firm Fixed Price
- b. Cost
- c. Time and Materials
- d. Indefinite Quantity
- e. Requirements
- f. Blanket Purchase

Agreements
g. IMPAC Card

ATTACHMENT EIGHT

**INTRODUCTION TO ENVIRONMENTAL
CONTACTING COURSE**

ATTACHMENT EIGHT

INTRODUCTION TO ENVIRONMENTAL CONTRACTING

COURSE OBJECTIVE: The objective of the course is for each student to have an understanding of the unique requirements to support environmental contracting projects. From this information the student will plan, organize and administer environmental contracts in support of installation mission requirements.

STUDENT MATERIALS:

Environmental Contracting Reference Guide
Guide for Achieving Environmental Excellence
Environmental Readings
Environmental Restoration Contracting Strategies Analysis

STUDENT OUTLINE GUIDE

LESSON OBJECTIVE: Provide an overview of the Air Force Environmental Program to contracting personnel. Identify key contracting issues and lessons-learned that will result in better contracting support.

HOMEWORK: Complete prior to class.

SEMINARS: Review prior to class.

REFERENCES: Sources for additional information.

MAIN POINTS: Classifying and defining levels of learning.

Know - the remembering of previously learned materials
Comprehend - the ability to grasp the meaning of the material
Apply - the ability to use learned materials

SAMPLES OF BEHAVIOR:

<u>Knowledge</u>	<u>Comprehension</u>	<u>Application</u>
- define	- compare	- change
- describe	- contrast	- construct
- identify	- distinguish	- demonstrate
- list	- differentiate	- develop
- name	- explain	- produce
- select	- give examples	- solve
- state	- summarize	- use

INTRODUCTION TO ENVIRONMENTAL CONTRACTING

This study guide and workbook (SW) is designed to guide you through your study assignments in the most logical sequence for easy understanding. Answer the exercise questions and complete each problem or work assignment in the sequence given, and it will help you understand and retain the key points covered in material you have studied.

COURSE CONTENTS

<u>UNIT</u>	<u>TITLE</u>	<u>PAGE</u>
1	Orientation	1-1
2	Environmental Overview	2-1
3	Environmental Regulators and DoD Players	3-1
4	Installation Environmental Programs	4-1
5	Pollution Prevention	5-1
6	Environmental Compliance	6-1
7	Environmental Conservation	7-1
8	Environmental Clean up	8-1
9	Environmental Contracting Issues	9-1
10	Technical Sources	10-1

These materials are designed to provide general information on the DoD environmental program. They are not designed for specific use on the job. However, because it identifies basic documents regulating government contracting for environmental service, this SW may serve as an informal research tool for contracting specialists, logistics, and civil engineering personnel.

COURSE ORIENTATION AND INTRODUCTION

INTRODUCTION:

Welcome to the Introduction to Environmental Contracting Seminar. This seminar covers the major programs and contracting requirements associated with the installation environmental program. The seminar consists of 72 classroom hours. The following are the chapters and specific topic areas to be covered.

COURSE NUMBER-TITLE	BODIES OF KNOWLEDGE	INDIVIDUAL TOPICS/SUBTOPICS
ENVIRONMENTAL CONTRACTING	ENVIRONMENTAL OVERVIEW	ENVIRONMENTAL GOALS ENVIRONMENTAL QUALITY ENVIRONMENTAL LAWS ENVIRONMENTAL HISTORY THE ENVIRONMENTAL PILLARS ENVIRONMENTAL PROTOCOLS ENVIRONMENTAL CONTRACTING OVERVIEW
ENVIRONMENTAL CONTRACTING	FEDERAL, STATE, LOCAL, DOD, AND AIR FORCE ENVIRONMENTAL PLAYERS	ENVIRONMENTAL PROTECTION AGENCY(EPA) DEPARTMENT OF TRANSPORTATION OCCUPATIONAL SAFETY HEALTH ADMINISTRATION (OSHA) STATE ENVIRONMENTAL AGENCIES DEPARTMENT OF DEFENSE SERVICE CENTERS: ARMY CORP OF ENGINEERS NAVY AIR FORCE CENTER FOR ENVIRONMENTAL EXCELLENCE (AFCEE), DEFENSE REUTILITIZATION MANAGEMENT OFFICE (DRMO) WING OCCUPATIONAL HEALTH AND SAFETY BOARD
ENVIRONMENTAL CONTRACTING	INSTALLATION ENVIRONMENTAL PROGRAMS	BASE COMPREHENSIVE PLAN, ENVIRONMENTAL PROTECTION COMMITTEE, ENVIRONMENTAL OPERATING PLANS AND INSTRUCTIONS, BASE ENVIRONMENTAL OFFICES, (CEV, EMO), BIOENVIRONMENTAL,

		PUBLIC AFFAIRS, ENVIRONMENTAL COMPLIANCE ASSESSMENT AND MANAGEMENT PROGRAM (ECAMP) FINANCIAL MANAGEMENT
ENVIRONMENTAL CONTRACTING	POLLUTION PREVENTION ISSUES	POLLUTION PREVENTION DEFINED, THE AIR FORCE POLLUTION PREVENTION PROGRAM, HAZARDOUS MATERIALS/HAZARDOUS WASTE, SOLID WASTE PROGRAM, HAZARDOUS MATERIAL FLIGHT/PHARMACY, RECYCLING, ENERGY CONSERVATION, POLLUTION PREVENTION CONTRACTING ISSUES
ENVIRONMENTAL CONTRACTING	ENVIRONMENTAL COMPLIANCE	RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) HAZARDOUS WASTE MANAGEMENT, ASBESTOS, LEAD BASED PAINT, POLYCHLORINATED BIPENYLS (PCBs), UNDERGROUND STORAGE TANKS COMPLIANCE CONTRACTING ISSUES
ENVIRONMENTAL CONTRACTING	ENVIRONMENTAL CONSERVATION	CONSERVATION ISSUES CONSERVATION DEFINED CONTRACTING ISSUES ENDANGERED SPECIES HISTORIC PRESERVATION LAND MANAGEMENT ARCHEOLOGICAL RESOURCES LEGACY PROGRAM
ENVIRONMENTAL CONTRACTING	ENVIRONMENTAL RESTORATION	FEDERAL LEGISLATION, DEFENSE ENVIRONMENTAL RESTORATION PROGRAM, THE INSTALLATION RESTORATION PROGRAM (IRP) CLEAN UP CONTRACTING ISSUES
ENVIRONMENTAL CONTRACTING	CONTRACTING ISSUES	CONTRACTING OVERVIEW, CONTRACTING REQUIREMENTS,

		AFFIRMATIVE PROCUREMENTS, CONTRACTING STRATEGIES, CONTRACT TYPES, CONTRACT CLAUSES, CONTRACT SPECIFICATIONS, CONTRACT LEGAL REQUIREMENTS.
ENVIRONMENTAL CONTRACTING	TECHNICAL SOURCES	PROFESSIONAL ACTION CONTRACT (PRO-ACT), HOTLINES, EDUCATION AND TRAINING SOURCES

ENVIRONMENTAL CONTRACTING STUDENT OUTLINE GUIDE

COURSE TITLE: Introduction to Environmental Contracting

SECTION TITLE: ENVIRONMENTAL OVERVIEW

LESSON OBJECTIVES:

1. Identify the major tasks required by federal environmental laws that impact installation programs
2. Define the four pillars and environmental protocols

STUDENT INSTRUCTIONAL MATERIALS AND READINGS:

1. Environmental Contracting Reference Guide, Chapter 1
2. Guide to Environmental Excellence Chapter 1
3. Environmental Handout 1-1

REFERENCES: Identified Federal Environmental Laws

MAIN POINTS/ SAMPLES OF BEHAVIOR

1. Explain the key environmental historical events that have impacted DoD's programs.
2. Summarize the primary environmental laws, executive orders, and DoD regulations.
3. Explain the four environmental pillars.
4. Identify common problems with environmental contracting.
5. Comprehend the importance of the environmental protocols.

TOPIC AREAS TO BE PRESENTED AND DISCUSSED:

ENVIRONMENTAL GOALS
ENVIRONMENTAL QUALITY
ENVIRONMENTAL LAWS
ENVIRONMENTAL HISTORY
THE FOUR ENVIRONMENTAL PILLARS
ENVIRONMENTAL PROTOCOLS
ENVIRONMENTAL CONTRACTING OVERVIEW

AUDIOVISUAL AIDS: Slide or transparency set, Environmental overview

TRAINING METHOD: Informal lecture: (8 hrs)

ENVIRONMENTAL CONTRACTING STUDENT OUTLINE GUIDE

COURSE TITLE: INTRODUCTION TO ENVIRONMENTAL CONTRACTING

TITLE: FEDERAL, STATE, LOCAL, DOD, AND AIR FORCE ENVIRONMENTAL PLAYERS

LESSON OBJECTIVES:

1. Explain the responsibilities and authority of the environmental federal, state, and local regulators.
2. Identify the federal service agencies that provide environmental services to installation programs
3. Summarize the key requirements of the Economy Act on contracts with federal service agencies
4. Explain the capabilities of the DoD and Air Force service centers
5. Identify the installation's responsibilities supporting DoD or Air Force service centers

READINGS:

1. Environmental Contracting Reference Guide, Chapter 2
2. Environmental Handout 2-1

REFERENCES: Identified Federal Environmental Laws, Air Force Instructions

MAIN POINTS/ SAMPLES OF BEHAVIOR

1. Define the roles of the major federal, state, and local environmental regulators
2. Identify the federal service agencies and services they provide
3. Explain the importance of the Economy Act contracts with Federal Service Agencies

TOPIC AREAS TO BE PRESENTED AND DISCUSSED

ENVIRONMENTAL PROTECTION AGENCY (EPA)
DEPARTMENT OF TRANSPORTATION (DOT)
OCCUPATIONAL SERVICES AND HEALTH ADMINISTRATION (OSHA)
STATE ENVIRONMENTAL AGENCIES
FEDERAL SERVICE AGENCIES

DEPARTMENT OF DEFENSE SERVICE CENTERS:

ARMY CORP OF ENGINEERS
NAVY
DEFENSE REUTILIZATION AND MANAGEMENT OFFICE
DOD ENVIRONMENTAL SERVICE CENTERS TO INCLUDE:
AIR FORCE CENTER FOR ENVIRONMENTAL EXCELLENCE
ARMY CENTER FOR ENVIRONMENTAL EXCELLENCE
NAVY

AUDIOVISUAL AIDS: Slide or transparency set, Federal, State, Local, DoD, and Air Force Environmental Players

TRAINING METHOD: Informal lecture: (8 hrs)

ENVIRONMENTAL CONTRACTING STUDENT OUTLINE GUIDE

COURSE TITLE: INTRODUCTION TO ENVIRONMENTAL CONTRACTING

SECTION TITLE: INSTALLATION ENVIRONMENTAL PROGRAMS

LESSON OBJECTIVES:

1. Identify the responsibilities of the major installation committees and programs
2. Explain the major environmental plans operating instructions and associated documents

READINGS:

1. Environmental Contracting Reference Guide, Chapter 3
2. Guide to Environmental Excellence Chapter 2
3. Environmental Handout 3-1
4. AFI 32-7001 Environmental Budgeting
5. AFI 32-7005 Environmental Protection Committee

REFERENCES: Environmental Laws and Air Force Instructions

MAIN POINTS/ SAMPLES OF BEHAVIOR

1. Identify the responsibilities of the environmental protection committee
2. Identify the major responsibilities of the Civil Engineering Flight/Environmental Management Office
3. Identify the key players of the installation environmental team.
4. Comprehend the importance of installation environmental plans and operating instructions environmental protocols

TOPIC AREAS TO BE PRESENTED AND DISCUSSED:

BASE COMPREHENSIVE PLAN,
ENVIRONMENTAL PROTECTION COMMITTEE
ENVIRONMENTAL OPERATING PLANS AND INSTRUCTIONS,
BASE ENVIRONMENTAL OFFICES, CEV, EMO, BIOENVIRONMENTAL, PUBLIC
AFFAIRS
ENVIRONMENTAL COMPLIANCE ASSESSMENT AND MANAGEMENT PROGRAM
(ECAMP)
FINANCIAL MANAGEMENT

AUDIOVISUAL AIDS: Slide or transparency set,

TRAINING METHOD: Informal lecture: (8 hrs)

ENVIRONMENTAL CONTRACTING STUDENT OUTLINE GUIDE

COURSE TITLE: INTRODUCTION TO ENVIRONMENTAL CONTRACTING

SECTION TITLE: POLLUTION PREVENTION ISSUES

LESSON OBJECTIVE:

1. Understand installation requirements for the Air Force Pollution Prevention Program
2. Explain contract requirements in support of the Pollution Prevention Program

READINGS:

1. Environmental Contracting Reference Guide, Chapter 5
2. Guide to Environmental Excellence
 Managing the Hazardous Waste Program
3. Environmental Handout 4-1

REFERENCES: AFIs, ECAMP

MAIN POINTS/ SAMPLES OF BEHAVIOR

1. Explain the responsibilities of the installation pollution prevention program
2. Summarize the key requirements for contracting to support a hazardous waste flight
3. Summarize contracting's responsibilities in support of the installation's hazardous waste program
4. Identify pollution prevention requirements in construction and services contracts

TOPIC AREAS TO PRESENTED AND DISCUSSED:

POLLUTION PREVENTION DEFINED,
THE AIR FORCE POLLUTION PREVENTION PROGRAM
HAZARDOUS MATERIALS
HAZARDOUS WASTE,
SOLID WASTE PROGRAM
HAZARDOUS MATERIAL FLIGHT/PHARMACY
RECYCLING,
ENERGY CONSERVATION
POLLUTION PREVENTION CONTRACTING ISSUES

AUDIOVISUAL AIDS: Slide or transparency set,

TRAINING METHOD: Informal lecture: (8 hrs)

ENVIRONMENTAL CONTRACTING STUDENT OUTLINE GUIDE

COURSE TITLE: INTRODUCTION TO ENVIRONMENTAL CONTRACTING

TITLE: ENVIRONMENTAL COMPLIANCE

LESSON OBJECTIVE:

1. Understand the requirements for Air Force environmental compliance
2. Explain contracting responsibilities in support of compliance contracts

READINGS:

1. Environmental Contracting Reference Guide, Chapter 7
2. Guide to Environmental Excellence
 - Managing Air Quality
 - Managing Drinking water
 - Managing Special Pollutants
 - Managing Underground Storage Tanks
3. Environmental Handout 5-1

REFERENCES: AFIs

MAIN POINTS/ SAMPLES OF BEHAVIOR

1. Explain the responsibilities of the Air Force compliance program
2. Summarize the key requirements for contracting to support asbestos, lead-based paints, underground storage tanks, and PCBs
3. Summarize contracting's responsibilities in support of the installation's clean air and clean water programs
4. Identify compliance requirements in construction and services contracts

TOPIC AREAS TO BE PRESENTED AND DISCUSSED:

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) HAZARDOUS WASTE
MANAGEMENT
ASBESTOS
LEAD BASED PAINT
POLYCHLORINATED BIPENYLS (PCBs)
UNDERGROUND STORAGE TANKS
COMPLIANCE CONTRACTING ISSUES
CLEAN AIR REQUIREMENTS
CLEAN WATER ISSUES

AUDIOVISUAL AIDS: Slide or transparency set,

TRAINING METHOD: Informal lecture: (8 hrs)

ENVIRONMENTAL CONTRACTING STUDENT OUTLINE GUIDE

COURSE TITLE: INTRODUCTION TO ENVIRONMENTAL CONTRACTING

TITLE: ENVIRONMENTAL CONSERVATION

LESSON OBJECTIVE:

1. Understand the requirements for Air Force conservation
2. Explain contracting responsibilities in support of installation conservation programs

READINGS:

1. Environmental Contracting Reference Guide, Chapter 7
2. Guide to Environmental Excellence
3. Environmental Handout 6-1

REFERENCES: AFIs

MAIN POINTS/ SAMPLES OF BEHAVIOR

1. Explain the responsibilities of the Air Force conservation program
2. Identify key requirements of:
 - Endangered species acts
 - Historic preservation acts
 - Land management programs
 - Archeological resource acts
3. Be able to incorporate these requirements into the acquisition process

TOPIC AREAS TO BE PRESENTED AND DISCUSSED:

CONSERVATION ISSUES
CONSERVATION DEFINED
CONTRACTING ISSUES
ENDANGERED SPECIES
HISTORIC PRESERVATION
LAND MANAGEMENT
ARCHEOLOGICAL RESOURCES
LEGACY PROGRAM

AUDIOVISUAL AIDS: Slide or transparency set,

TRAINING METHOD: Informal lecture: (8 hrs)

ENVIRONMENTAL CONTRACTING STUDENT OUTLINE GUIDE

COURSE TITLE: INTRODUCTION TO ENVIRONMENTAL CONTRACTING

TITLE: ENVIRONMENTAL RESTORATION

LESSON OBJECTIVE:

1. Understand the requirements for DoD environmental restoration
2. Identify the Installation Restoration Program process
3. Know the capabilities of the DoD service centers to contract for environmental clean up

READINGS:

1. Environmental Contracting Reference Guide, Chapter 6
2. Environmental Handout 6-1
3. Environmental Restoration Contracting Strategies Guide

REFERENCES: AFIs

MAIN POINTS/ SAMPLES OF BEHAVIOR

1. Explain the responsibilities of the Air Force Installation Restoration Program (IRP)
2. Identify the contract sources available to support the installation IRP program
3. Summarize contracting's responsibilities in support of the installation's Installation Restoration program
4. Identify responsibilities of AFCEE in support of installation clean up requirements
5. Explain installation responsibilities in support of AFCEE contracts and deliveries

TOPIC AREAS TO BE PRESENTED AND DISCUSSED:

FEDERAL LEGISLATION

DEFENSE ENVIRONMENTAL RESTORATION PROGRAM

THE INSTALLATION RESTORATION PROGRAM (IRP)

CLEAN UP CONTRACTING ISSUES

AUDIOVISUAL AIDS: Slide or transparency set,

TRAINING METHOD: Informal lecture: (8 hrs)

ENVIRONMENTAL CONTRACTING STUDENT OUTLINE GUIDE

COURSE TITLE: INTRODUCTION TO ENVIRONMENTAL CONTRACTING

TITLE: ENVIRONMENTAL CONTRACTING ISSUES

LESSON OBJECTIVE:

1. Understand the requirements for environmental contracting support

READINGS:

1. Environmental Contracting Reference Guide, Chapter 8
2. Environmental Handout 7-1
3. Environmental Restoration Contracting Strategies Guide

REFERENCES: FAR

MAIN POINTS/ SAMPLES OF BEHAVIOR

1. Explain the contracting methods and types best able to meet environmental requirements
2. Explain presolicitation issues associated with environmental projects
3. Summarize environmental Federal Acquisition Regulations
4. Identify key requirements in environmental performance work statements
4. Identify environmental contract administration issues.
5. Develop administration procedures in support of AFCEE delivery orders

TOPIC AREAS TO BE PRESENTED AND DISCUSSED:

CONTRACTING OVERVIEW
ACQUISITION PLANNING
CONTRACTING REQUIREMENTS
CONTRACT TYPES
AFFIRMATIVE PROCUREMENTS
CONTRACTING STRATEGIES
CONTRACT CLAUSES
CONTRACT SPECIFICATIONS
CONTRACT LEGAL REQUIREMENTS

AUDIOVISUAL AIDS: Slide or transparency set,

TRAINING METHOD: Informal lecture: (8 hrs)

ENVIRONMENTAL CONTRACTING STUDENT OUTLINE GUIDE

COURSE TITLE: INTRODUCTION TO ENVIRONMENTAL CONTRACTING

TITLE: ENVIRONMENTAL TECHNICAL SOURCES

LESSON OBJECTIVE:

1. Identify technical sources available to enhance contracting support
2. Identify educational courses available for environmental topics

READINGS:

1. Environmental Contracting Reference Guide, Chapter 9
2. Environmental Handout 8-1
3. AFIT Environmental Education Guide

REFERENCES:

MAIN POINTS/ SAMPLES OF BEHAVIOR

1. List the major technical environmental sources available to answer questions
2. Identify environmental education sources

TOPIC AREAS TO BE PRESENTED AND DISCUSSED:

PRO-ACT,
EPA, DOD HOTLINES,
EDUCATION AND TRAINING SOURCES
ESSENTIAL COURSES FOR SITE VISITS

AUDIOVISUAL AIDS: Slide or transparency set,

TRAINING METHOD: Informal lecture: (8 hrs)

NARRATIVE

COURSE NUMBER INTRODUCTION TO ENVIRONMENTAL CONTRACTING

1. Course. Program Data

a. This course training plan is a result of a tasking between SAF/AQC and 345 TTS, or Air Force Institute of Technology, School of Logistics Nov. 1995.

b. The course is developed based on recommendations from SAF/AQCO, and the AFLMA/LGC Project LC9500210

c. The course will be conducted by the XXXXXXXXX. It provides training for the Department of Defense (DoD) and Air Force contracting personnel, military and civilian, in the subject area of environmental contracting. The scope of training includes understanding the environmental process and laws, environmental regulators and DoD programs, installation environmental programs, pollution prevention programs, environmental compliance programs, environmental conservation, environmental clean up, environmental contracting issues and technical sources.

d. Instructional Design for the 10 units of Introduction to Environmental Contracting are established as follows

Group Paced - XXXXXXXXXXXX

e. Security Classification: Unclassified

2. CONTROL DOCUMENTS:

a. Course Training Standard (CTS) XXXXXXXXXXXX was completed XXXXX 1995. It applies to the Introduction to Environmental Contracting Course XXXXXX

b. Course Chart, XXXXXX is included as Annex A of the training plan. This course chart outlines the major units of instruction which will fully support the training required to achieve the CTS Behavioral Statements. Approval of this course training plan will also constitute approval of the tentative course chart.

3. STUDENT TRAINING REQUIREMENTS AND SCHEDULING CONSTRAINTS:

Total Trained Personnel Requirements (TPR) for this course for FYXX is currently XXX. The course is programmed for a maximum and program group size of 20 students. Course size can vary with classroom size or training location.

The course will operate with a shift group limit of one. There are no other unusual or unique scheduling constraints known at this time.

4. MANPOWER AND PERSONNEL:

a. Manpower. New manpower data will provided as directed

b. Instructor Personnel. Personnel selected for instructor duty must have a minimum of one year experience working environmental contract issues.

5. FACILITIES:

a. Training. Facilities for conducting this course currently exist within the Contracting/Acquisition Training Flight. One classroom and sufficient office administrative space are available. No additional space or training facilities are required.

b. Support. No additional maintenance or base support facilities are required to support this course.

6. EQUIPMENT

a. The course will require the following materials:

- (1) Overhead projector and screen
- (2) Computer overhead screen projector
- (3) Television and VCR
- (4) Computer DX 486/16 or better, printer

7. INSTRUCTIONAL MATERIALS:

a. The materials used in the development of this course include XXXXXX Introduction to Environmental Contracting and additional Air Force, DoD, and Federal materials. This course was developed and will be maintained by the XXXXXXXXXX, with assistance by local faculty members. Materials will be funded by XXXXXXXX.

8. COMPROLLER:

9. Environmental Impact

10. Interservice Training:

In accordance with AFR 50-18

11. RESPONSIBILITIES:

There are no unique responsibilities in this training plan not otherwise covered by regulations or other directives.

12. WARTIME COURSE IMPACT:

This is not a wartime course