

ER 200-2-3 REVISION

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- Current ER is more than 6 years old
- Significant Programmatic Changes since 2010
- Incorporate Lessons-learned and interim policy updates
- Expand coverage to include all USACE facilities

Focus-areas for Policy Revisions

Environmental Compliance System of Record	Sustainability Requirements (Acquisition, Vehicle Fleet, etc.)
New Hazardous Waste Generator Regulations	Energy Independence and Security Act (Covered Facilities) Compliance
Solid Waste and Diversion (Recycling)	Management Review and Managers' Internal Control Program
Environmental Permits <ul style="list-style-type: none">• Hydropower dams• Hydropower BMP's	Environmental Liabilities
Environmental Compliance Assessment Process and Environmental Management Systems	ERGO / Safety Assessments



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MSC	PDT Member (Primary)	PDT Member (Alternate)
LRD	Tanner, Kyle	
MVD	Seal, Mike	Holder, Randy (MVD)
NAD	Russell, Kimberly	
NWD	Harlon, Will	
POD	Noah, Michael	
SAD	Haskell, Eric	
SPD	Stock, Keley	
SWD	Gramlich, Jason	
ERDC	Rowland, Kelly (CRREL)	Banks, Cynthia (WES)



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ER 200-2-3 REVISION: INITIAL TIMELINE

April 2017: HQ USACE shares an initial mark-up version of the ER with MSC-designated representatives – the “ER Revision Team”

May-June 2017: HQ leads a series of web meetings with the ER Revision Team to expand and refine policy updates

July 2017: table-top review and final revision of ER 200-2-3, **planned for 10-14 July 2017 in Omaha** (hosted and facilitated by the Environment and Munitions Center of Expertise)

September-October 2017: Initiate MSC-level formal coordination of the revised ER



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PROPOSED UPDATES (1 OF 9)

- Chapter 1. Introduction: Expand “applicability” to include all USACE facilities (CW OPS, Logistics and ERDC)
- Chapter 2. Environmental Compliance for Civil Works Operations:
 - Consider clarifying and strengthening the “stop-work” authority of “Operations Staff” for contractors or grantees actions
 - Identify ERGO as the USACE Internal Control for environmental compliance
- Chapter 3. CW Operations ECC Network:
 - Consider expanding the definition of Environmental Compliance to include energy and sustainability, or...
 - Consider spelling-out “Environmental Compliance, Energy and Sustainability” as the scope of ECC responsibilities



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PROPOSED UPDATES (2 OF 9)

- Chapter 4. USACE Environmental Management System (EMS):
 - Clarify the role of ER 200-2-3 as the USACE EMS policy, and that...
 - Execution ER 200-2-3 = implementation and operation of the USACE EMS
 - Integrate the Manager's Internal Control Program and the Internal Controls Evaluation Process (a.k.a. DA 11-2) into Roles and Responsibilities and Management Review
- Chapter 5. Environmental Compliance Assessments:
 - Consider adding a requirement for OPM signature on the annual Summary of Uncorrected Findings – analogous to the requirement for the OPM to “certify in writing” the validity of the Pre-visit Questionnaire (PVQ)
 - Update language to reflect CPTrack terminology, e.g., Project Site Survey vs. PVQ



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PROPOSED UPDATES (3 OF 9)

- Chapter 6. Regulatory Inspections and Notices at USACE Civil Works Operations Controlled Property:
 - Consider expanding applicability to all USACE facilities
- Chapter 7. Hazardous Materials Management:
 - Update link to DLA's Hazardous Materials Information Resource System
- Chapter 8. Petroleum, Oils and Lubricants Management
 - Update link to DLA's Hazardous Materials Information Resource System



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PROPOSED UPDATES (4 OF 9)

- Chapter 8. Petroleum, Oils and Lubricants Management:
 - Incorporate POL Management Practices as specified for hydropower dams in CECW memo of January 2016
 - Housekeeping practices
 - Capture and recycle / reuse / dispose leaked lubricants
 - Use Environmentally Acceptable Lubricants
 - During overall or replacement of equipment, consider installing equipment that will reduce or eliminate use of lubricants
 - Develop and implement an Oil Accountability Plan that accounts annually for lubricants added to and contained within equipment, as well as lubricants removed, recovered or disposed.



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PROPOSED UPDATES (5 OF 9)

- Chapter 9. Waste Management:
Reorganized into 3 main subsections
 - [Solid] Waste – general policy
 - Non-hazardous solid waste – Incorporated full text of USACE Solid Waste Diversion and Materials Management policy (April 2017 Draft)
 - 50% solid waste diversion goal
 - 60% construction and demolition waste diversion goal
 - Personal Property Management requirements
 - Scrap metal management
 - Retention and use of proceeds from sales of recyclable materials
 - Hazardous Waste



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PROPOSED UPDATES (6 OF 9)

- Chapter 10. Spill Reporting and Response:
 - Need to reevaluate guidance (not currently “policy”) on spill response teams/capabilities for
 - No USACE Response Team
 - USACE First Responder In-house Team
 - Non-USACE Response Team
- Chapter 11. Permits: Consider formalizing CECW guidance for vertical coordination prior to any facility applying for a permit
- Chapter 12. Recordkeeping:
 - Need to update data tracking/storage in CPTrack and FEM (instead of OMBIL) for tanks, EPCRA status, permits, regulatory actions, hazardous waste generator status, etc.



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PROPOSED UPDATES (7 OF 9)

- Chapter 13. Environmental Contamination and Reporting Requirements:
 - Updated Legacy Contamination Survey (LCS) reporting requirements
 - Requires LCS documentation in the Environmental Compliance System of Record, i.e., CPTrack
 - Eliminated timeline for completion of LCS – formerly “the first external assessment after the date of the ER”
 - Replaced deadline with requirement to evaluate and document potential for legacy contamination in an LCS for all USACE lands and waters
- Chapter 14. Real Estate: *No proposed changes*



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PROPOSED UPDATES (8 OF 9)

- Chapter 15. Environmental Training for Civil Works Operations:
 - Need to locate or create a list of “environmental training requirements for Civil Works Operations activities” – which is supposedly already in the ERGO manual
 - Proposed to eliminate general (EC) training requirements for ALL Civil Works Operations personnel whose duties may impact the environment (...because I don’t see this happening in the field)
 - Changed ECC General Training to “Foundational Training”
 - ERPA or ERPA CW (Prospect #398)
 - ERGO-CPTrack
 - Hazardous Waste Manifest training
 - Sustainability and Energy Course



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PROPOSED UPDATES (9 OF 9)

- Chapter 16. Budgeting for Environmental Compliance:
 - Updated Work Category Codes for business line-specific environmental compliance requirements
 - Eliminated rhetorical (non-policy) text regarding perceptions of the relative priority of EC requirements vs. other requirements



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Questions ?

Concerns ?

Suggestions ?



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