

ERGO 101 OVERVIEW

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ACRONYMS TO KNOW

ERGO = Environmental Review Guide for Operations

CPTrack = Compliance and Processes Tracking

Has anyone in the room other than the panel been involved in ERGO?



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PURPOSE OF ERGO

- Enhance USACE environmental compliance with laws and regulations at Federal, state, and local levels as well as Executive Orders (EOs).
- Improve USACE environmental management.
- Build supporting financial programs and budgets.



PURPOSE OF ERGO (CONT)

- Assure managers that their environmental programs are being implemented effectively in accordance with USACE goals and objectives.
- Being environmentally responsible.
- Avoid negative public relations of noncompliance.
- Be a good neighbor.

NOT how we want to be perceived



POLICY

ER 200-2-3, Environmental Compliance Policies, 29 October 2010 (Chapter 5)

- Assessments are required at **most** Corps Projects and Outgrants every year!
 - There are Corps Projects which are not assessed in ERGO
 - Some Projects can skip internals (more later)
 - District ECCs work with Real Estate to determine which outgrants need to be assessed (minor vs. major).
- Policy updates are in Cycle Letters (Cycle 6 is most recent) available in the CP Track library.
 - The source of the metrics

ER 200-2-3 revision/update being started,
what are your improvement suggestions?



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ASSESSMENT TYPES

External

- Every 5 yr
- Organized by District ECC in coordination with Real Estate and Project ECC
- Team consists of folks NOT from the Project Site.
- Entered into CPTrack
- Legacy Contamination Surveys

Internal

- Every year external is not done
- Organized and coordinate by Project ECC from initial planning through chain of command to the District ECC
- **District** may defer if Project Site documents having met ER 200-2-3, para 5-3b(2))



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POLICY: WHO DOES WHAT?

- District ECC sets the 5-year ERGO schedule and updates/adapts that schedule as needed
 - Schedule options (*more later*):
 - External
 - Internal
 - District-By
 - None*
- District ECC organizes the External assessments
- District ECC finalizes the contents of the External assessment



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POLICY: WHO DOES WHAT?

- Project Site ECC organizes and implements the Internal Assessment
- Coordinates with Real Estate
- Enters the internal assessment findings of noncompliance
- Project Site ECC Finalizes the Internal Assessment
- Documents correction of noncompliance

Does your District have Project Site ECCs?

Is there 1 Project Site ECC per Project or does one Project Site ECC cover more than 1 Project?

How is someone “designated” a Project Site ECC in your District?

Does Real Estate participate in your District?



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SETTING THE SCHEDULE

- None (no assessment) – no environmental aspects, impacts, or regulatory requirements present
- Externals – every 5 years (District ECC)
- Internals
 - Project ECC coordinates w/ District ECC before starting.
- District-Bye
 - Formal District-level evaluations can be used to skip internal assessments. These include meeting performance metrics, lack of regulatory enforcement or questionable practices, new regulatory requirements and time. (ER 200-2-3 Ch.5-3)
- Outgrants
 - District ECC coordinates with Real Estate
 - Whether you assess outgrants is based on site activities that may trigger envr. regulations or impacts



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THE TOOLS

U.S. TEAM Guide
State Supplements
ERGO Supplement



Contain the standards/requirements used to determine compliance during ERGO external and internal compliance assessments

Compliance Process and Tracking (CPTrack) Application

- Where ERGO findings of noncompliance and their correction are documented



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ERGO PROTOCOLS/MEDIA

Main Intro. (MM)

Air Emissions (AE)

Cultural Resources (CR)

EMS (EM)

Haz. Materials (HM)

Hazardous Waste (HW)

Natural Resources (NR)

Other Env. Issues (OO)

- NEPA (O1)
- Env. Noise (O2)
- Cleanup (O3)
- Pollution Prev. (O4)
- Waste Munitions (O6)

Pesticides Mgt. (PM)

Petroleum, Oils, & Lubricants
(PO)

Solid Waste (SO)

Storage Tanks (ST)

Toxic Substances (TT)

- PCBS (T1)
- Asbestos (T2)
- Radon (T3)
- Lead-based Paint (T4)

Wastewater (WA)

Water Quality (WQ)

How do we know which of these areas
to look at during an assessment?



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PREPARATION: THE ASSESSMENT TEAM

BEFORE the assessment, members of an ERGO External Assessment team should:

- Review the Project Site Survey in CPTrack
- Review any Outgrant PVQs which are available
- Review the Internal Assessment report from the prior FY
- Review assigned protocols/media (i.e., air, tanks, etc.)
- Research local requirements for your protocol/media
- Gather equipment needed:
 - Safety Equipment (i.e., steel-toed shoes, safety hat)
 - Electronics (digital cameras, laptops)
 - Admin supplies (pen & paper)



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PREPARATION: THE ASSESSMENT TEAM

Additional pre-visit resources to consult:

- Reports of any inspections/NOVs/ENFs by regulators since the last ERGO assessment.
 - EPA's ECHO
- Project Overview / Brochure / Website
- State Regulatory Agency Website
 - Look for upcoming regulatory changes
 - Review State Supplements



PREPARATION: THE PROJECT SITE

Gather paperwork the assessment team will need to review so it is readily available

- If possible, provide electronic versions of permits and plans to the assessment team leader in advance.

Ensure people will be onsite the day/week of the assessment (no vacations!)

Go into CPTrack and close any open findings which have been fixed!

- If this is not done, they will automatically carryover into the new assessment and it is a pain to deal with.



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ON-SITE: IN-BRIEF



Start the In-brief:

- Be on time
- Conduct indoors if at all possible - fewer distractions
- Explain the reason why the ERGO team is there
- Introduce team members, have them identify which protocol/media they are responsible for
- Outline the schedule for the visit
- Emphasize the positive nature of the ERGO process
- Request Paperwork
- Emphasize that there will be findings!



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ON-SITE: INFORMATION GATHERING

Gather information through:

- Paperwork Review (i.e., read permits, plans, check manifests).
- Project Tour
 - Don't be led by Project personnel, go where you need/want to go.
- Interview people
 - Talk to management as well as people other than management.
 - Open-ended questions.



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ON-SITE: INFORMATION GATHERING (CONT.)

Take extensive notes to use when determining/confirming if there is a finding or noncompliance.

- You may not know at initial look whether or not a situation is compliant or noncompliant

Determine if sampling is appropriate based on information gathered (i.e., visit 100 transformers or 10 transformers?)



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ON-SITE: PHOTOS

Use digital photos to document the finding where appropriate.

Take low resolution photos to avoid bogging down CPTrack when retrieving the report.

Document photos in your notes.



The CPTrack Library has a guidance document on 5 different ways you can ensure your photos are sized appropriately for CPTrack.



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ON-SITE: DOCUMENTATION

- As time permits, enter findings directly into CPTrack or write findings on paper versions of the Finding Sheet for later entry into CPTrack.
- Abide by the Snapshot in Time policy.
 - Even if it was fixed in your presence, it is still a finding of noncompliance.
 - The fact that the finding was fixed while you are onsite will be documented in CPTrack.



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ON-SITE: OUT-BRIEF

Contents of the Out-brief:

- Thank the Project for their time and efforts
- Reiterate attendees of the ERGO process
- Detail when the Draft report will be completed
- Give verbal kudos



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ON-SITE: OUT-BRIEF

Contents of the Out-brief

- Review findings (as much as possible) and suggested solutions.
- If you are unsure about a potential finding, bring it up, but explain further research is needed.



POST-ASSESSMENT

After receiving notice that all findings have been entered, the Project Site should generate the assessment report in CPTrack to review all findings and confirm they are accurate and understandable.

- Recommend generating the report in PDF if planning to email.
- For Outgrants, generate the report in MSWord and include space in the report for their answers.



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POST-ASSESSMENT

The Project Site:

- Implements their Corrective Actions (CAs).
- Updates CPTrack when a finding is corrected at the time of the correction.
- Works with Real Estate and the Outgrants so Outgrant findings get closed.
 - In CPTrack you can create a report with only the findings for a particular Outgrant, include a field for the Outgrants response, and save it as an MSWord file to email the Outgrant and Real Estate.



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DISCUSSION...



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Finding Title: Asbestos containing material is not clearly identified.

Description: Three (total of 10 sq.ft.) pieces of potentially asbestos containing gasket material stamped KM 245 are located in the gasket storage closet. It was not apparent that this gasket material had been identified as non-asbestos.

Compliance Management Unit: POWER HOUSE

Building/Location: Gasket area.

Criterion: T2.2.2.US. Risk management techniques should be promoted in environmental efforts.

Severity Ranking: Management Practice

Recommendations: Determine if the gasket is still in use, if not - dispose of the gasket as asbestos containing waste. If the gasket is required send a sample in for analytical and use the gasket appropriately if asbestos.



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Finding Title: Inappropriate management of solid waste.

Description: A large pile of chipped asphalt located north of building #2 is accumulating and not being disposed of in a timely manner. Bulky wastes are required collected a minimum of once every 3 months according with ER1130-2-540, para 2-2d(1).

Compliance Management Unit: LEFT BANK STORAGE BUILDING

Building/Location: South of building #2.

Criterion: SO.10.1.US. All solid wastes and all materials separated for recycling are required to be stored according to specific guidelines.

Citation: 40 CFR 243.100(b), 243.100(i), and 243.200-1

Severity Ranking: Finding

Recommendations: Reuse or dispose of material.



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Finding Title: Inappropriate storage of compressed gases.

Description: 30 pound acetylene tank is stored on its side unsecured on shelf about 4' off of the floor.

Compliance Management Unit: Lost Lake Oil and Gas Field (Outgrant)

Building/Location: Shop

Criterion: HM.45.1.US. The in-plant storage, handling, and utilization of all compressed gases in cylinders, portable tanks, rail tankers, or motor vehicles must be done according to the Compressed Gas Association Pamphlet P-1-1-1965

Citation: 29 CFR 1910.101(b)

Recommendations: Secure acetylene tank upright, at ground level, with a chain, at least 20' from oxygen tank.



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Finding Title: Spill Prevention Control and Countermeasure (SPCC) is not thoroughly implemented.

Description: Drains for the berms at both Batteries were open and not actively draining at the time of the inspection. The SPCC plans dated 3/27/2012 both detail the process for draining the secondary containment and require employees to be present until the containment is drained and then to shut off the drains. This is not occurring.

Compliance Management Unit: (Redacted - Outgrant)

Building/Location: Batteries

Criterion: **PO.20.2.US.** Onshore facility drainage is required to meet specific parameters.

Citation: 40 CFR 112.1(b), 112.1(d), 112.8(b), and 112.12(b)

Severity Ranking: Finding

Recommendations: Train employees in the proper draining of secondary containment as required by the SPCC plans. Create a record of each drain event and close drains following water removal.



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Finding Title: Bulk petroleum storage container (i.e., AST) containment is inadequate.

Description: Three 55-Gallon drums of oil are stored without secondary containment as required in the SPCC Plan.

Compliance Management Unit: Project

Building/Location: 1st Floor near elevator

Criterion: **PO.20.4.US.** Bulk storage containers of oil are required to meet specific parameters.

Citation: 40 CFR 112.1(b), 112.1(d), 112.7(i), 112.8(c), 112.12(c)

Severity Ranking: Finding

Recommendations: Place drums on portable secondary containment or move into the oil storage room.



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Finding Title: PCB concentration unknown

Description: High Voltage Bushings on project may contain TSCA regulated concentrations of PCBs without being properly tested. PCB Concentrations must be established by certain methods (40 CFR 761.1(b)(4) and 761.2(b)).

Compliance Management Unit: Powerhouse

Building/Location: Six bushings are stored in the Turbine Storage Building, but there are also bushings in service in the electric power distribution system.

Criterion: T1.1.2.US. PCB Concentrations must be established by certain methods

Citation: 40 CFR 761.1(b)(4) and 761.2(b)

Severity Ranking: Finding

Recommendations: Make determinations about PCB concentration for all bushings manufactured prior to 1979.



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UNIVERSAL WASTE

CONTENTS FLUORESCENT
LIGHT BULBS

ACCUMULATION START DATE July 15

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

US ARMY CORPS OF ENGINEERS
BONNEVILLE LOCK & DAM
CASCADE LOCKS, OR 97014
(541) 374-8138
EPA ID# DRO140113218

BRUCK SIGNMARK® DIV



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Finding Title: Universal waste storage exceeds the quantity/time limitations.

Description: Waste fluorescent lamps are stored longer than 1 year without disposal.

Compliance Management Unit: Navigation Lock 1 & 2

Building/Location: New Nav Lock Level 2

Criterion: HW.280.2.US. Small quantity handlers of universal waste are required to meet specific accumulation time limits.

Citation: 40 CFR 273.15

Severity Ranking: Finding

Recommendations: Ship Universal Waste Lamps prior to one year accumulation time limit.



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