

MEMO

DRAFT v1

To: West Point Environmental Compliance Officers

Subject: Identification of Environmental Aspects for the West Point Environmental Management System

From: West Point Environmental Management System Management Representative/Cross Functional Team

All:

Pursuant to Executive Order 13148, the Department of the Army (DA) requires appropriate facilities to identify their significant environmental aspects as one of the steps in developing and implementing the Environmental Management System (EMS). West Point has begun the process of identifying its significant environmental aspects, and this process relies on input from all of you, the West Point Environmental Compliance Officers (ECOs).

ECO input on West Point's activities, products, and services, together with their related environmental aspects and impacts, will provide the foundation for further West Point EMS Cross Functional Team (CFT) review, and selection of those West Point environmental aspects that are significant.

The attached template (Appendix A) and instructions (page 2) will allow you to compile this information, which will then be reviewed by the West Point EMS CFT. The "Guidance for ECOs on Identifying Environmental Aspects" is designed to help you to identify/relate to appropriate candidate activities, products, and services within your purview here at West Point.

Please complete and return Appendix A for your area of responsibility to me by 15 February 2005. Please contact me directly if you require any additional information and/or clarification on this request.

Mr. John Sturtz

Environmental Management System Management Representative
West Point EMS Cross Functional Team Chair

WEST POINT ENVIRONMENTAL COMPLIANCE OFFICER INSTRUCTIONS FOR IDENTIFYING ENVIRONMENTAL ASPECTS

1. Survey all activities, products, and services in your area of responsibility and list those that have the possibility of interacting with the environment.
2. Use Appendix A to record those activities, products, and services that you believe should be further evaluated by the West Point EMS Cross Functional Team (CFT). The CFT will determine which of the activities, products, or services you have listed are significant.
3. Appendices B and C provide samples of environmental aspects and impacts (respectively) to help you with your entries into the table in Appendix A.
4. Use the following criteria to ascertain which activities, products, and services should be included in Appendix A:
 - a. **ECOs will use a spreadsheet (see Appendix A) to create a baseline list with associated aspects (see Appendix B) and impacts (see Appendix C).**
 - b. **The following criteria will be followed by ECOs to create the baseline list in each of their respective areas:**
 1. **Activities, products, or services to be included:**
 - Those that have obvious regulatory or other requirements,
 - Those that have visible impacts on the environment, and
 - Those that may not have visible impacts but are known to potentially cause harm to the environment or human health.
 2. **Activities, products, or services that need not be included:**
 - Those that have minor and temporary impact on the environment,
 - Those that have been previously declared by qualified, competent experts to be insignificant, and
 - Those that do not satisfy any of the criteria in #1 above.
 - c. **ECOs may use one or more approaches and sources in developing the lists of relevant activities, products, and services that have the possibility of interacting with the environment.**

The following are potential sources of such information:

- Operations plans
- Records of past emergencies or other environmental incidents

The information gathered from these sources can be augmented by information gathered from experienced and knowledgeable personnel. Two approaches are commonly used to gather this additional information from personnel: **Brainstorming and the Physical Walk-through.**

These approaches may be applied separately or combined depending on the complexity of the area being considered.

- **Brainstorming:** Brainstorming is most effective when participants have a detailed understanding of West Point's activities, operations, processes, products, and services. Typically, the brainstorming team will review West Point's operations and reflect on the likely sources of environmental interactions (aspects). Brainstorming should first consider the daily work activities conducted at West Point and then move on to consider intermittent activities.
- **Physical Walk-through:** A walk-through of all areas and operations serves as a visual "trigger" to ensure that activities that should be included in the analysis are not overlooked. This effort requires that sufficient time be allowed for a thorough survey of the activities. Typically the walk-through team would visit each work area within West Point, and visually identify all of the activities, operations, processes, products, and services that could contribute to its significant aspects. After the walk-through, the team would compare its list of "contributors" against the initial list and make any necessary adjustments.

GUIDANCE FOR WEST POINT ECOs ON IDENTIFYING ENVIRONMENTAL ASPECTS

1. Do you have operations, activities, or products that interact with the environment, ecology, or natural/cultural resources at West Point?
2. Do you have any on-going or planned effluents, emissions, spills, or waste generated?
3. Do you have the potential for unplanned effluents, emissions, spills, or waste?
4. What maintenance or cleaning materials and substances that you use interact with the environment?
5. Do you have operations that use large amounts of electrical energy?
6. Do you have operations that use a large quantity of water?
7. Do you use non-renewable resources?
8. Does anything else come to mind that might interact with the environment?

APPENDIX B

Sample Environmental Aspects

- **Air Emissions** (ODS [CFCs in building chiller systems], VOCs [fugitive emissions from vehicle fueling operations and painting activities], criteria pollutants [facility emergency generators], dust, vehicle exhaust, aircraft exhaust, odor)
- **Non-hazardous waste generation** (scrap, pallets, cardboard, paper, rags)
- **Hazardous waste generation** (degreasing solvents, waste paints, used oil, hazardous batteries [lead-acid, lithium, NiCd], empty chemical containers, fluorescent bulbs)
- **Radiation emissions** (use/disposal of sealed sources, use/disposal of isotopic solutions, generation of ionizing or nonionizing radiation)
- **Biological waste generation** (sharps, infectious substances, autoclave wastes)
- **Material spills/leaks to water or ground** (fuel, hydraulic leaks, POL, storage tanks)
- **Toxic substances releases** (PCBs, asbestos, lead based paint)
- **Pesticide application** (grounds maintenance)
- **Liquid discharges (point and non-point) to surface and/or ground waters** (industrial wastewater contributions from painting operations, metal etching/plating, small photographic activities, vehicle maintenance areas, sewage, and storm water)
- **Energy consumption** (electricity, petroleum products, and alternative fuels)
- **Water consumption** (water usage, water quality)
- **Natural resource and raw material consumption** (timber, minerals)
- **Ecological disturbance** (hydrological alteration, vegetation alteration, habitats, wetlands, threatened and endangered species, invasive species, soil erosion)
- **Cultural resource disturbance** (historic properties)
- **Generation of noise and other emissions** (aircraft operations, vibration, visual impairment)

APPENDIX C

Sample Environmental Impacts

- Toxics contamination or addition to air, land, waterway
- Reduced visibility
- Air pollution (smog, acid rain, dust, visual impairment)
- Human health impact
- Landfill depletion
- Resource depletion
- Soil contamination
- Groundwater contamination
- Surface water contamination
- Hazardous material dispersal
- Biological material dispersal
- Solid material dispersal (litter)
- Ecological damage
- Ozone depletion
- Greenhouse gas contribution
- Habitat alteration
- Introduction of non-native species
- Pesticide damage
- Historic property damage
- Loss of public access to recreational resources
- Destruction of archeological resources
- Destruction of Native American resources
- Sedimentation of water courses
- Increased runoff / stream flow
- Watershed alterations
- Soil compaction
- Wind erosion
- Water erosion
- Loss or damage to threatened and endangered species
- Noise damage
- Vibration damage
- Light intensity disturbance
- Heat damage
- Radiation damage
- Odor nuisance
- Migration of indigenous species