Naval Networks & Space Operations Command (NNSOC)

FY2002 Annual EQA Summary Report
For
NSSS Brown Field, CA
Gila River, AZ
Elephant Butte, NM

February 2003

Submitted to:
Naval Networks & Space Operations Command (NNSOC)
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2	NEPA	○		
3	Pollution Prevention	○		
4	EPCRA	N/A		
5	Air	○		
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8	Drinking Water	○		
9/10	SPCC	○		
11	PCB	○		
OPNAVINST 5100.23E	Hazardous Material	⊙	Transporting 55 gallons of Diesel fuel, at least 2-5 times a day once a month, over the highway in a government vehicle. This creates many potential situations for spills to occur.	Corrective Action; Ensure implementation on the following actions: 1) Retain a copy of the correct Southern Cal Diesel fuel MSDS in vehicle transporting the diesel fuel. 2) Retain copy of the Emergency Response Guide book information (Guide No. 128) for emergency response guidance for diesel fuel inside the vehicle transporting the diesel fuel. 3) Before traveling on the public highway ensure the 55-gallon plastic drum for diesel fuel is secured properly to the truck. 4) Ensure that the 55-gallon plastic drum is labeled with the words DIESEL FUEL.
12	Infectious Waste	N/A		
13	Pesticide	○		
14	Solid Waste	○		
15	Installation Restoration	○		
16	Underground Storage Tanks	N/A		
17	Noise	N/A		
20	EQA Program	○		
22	Natural Resources	○		
23	Cultural Resources	○		
24	Training	⊙	The Hazardous Communication (HAZCOM) element specifically states the requirement for an annual review of the HAZCOM program and providing HAZCOM training to all personnel who may be exposed to HM. HAZCOM training is not being conducted on an annual basis.	HAZCOM refresher training will be conducted during site visits, utilizing the Virtual Safety Environmental training software training aid from NNSOC. Recommend expanding the software to include a "save" function so the Site Managers have the capability of saving test scores and training dates.
25	Sampling and Lab Testing	○		
26	Radon	○		

○ = Excellent
⊙ = Needs Improvement
● = Inadequate
N/A = Not Applicable

Summary of Problem Solving Efforts and Corrective Actions

The following problems were recognized during the period of 1 September 2000 through 30 September 2002 that were judged to require structured problem solving:

Problem Description	Status
The Hazardous Materials Control and Management Plan (HMC&M) for NSSS Brown Field is included in the Integrated Environmental Compliance Plan (IECP), dated January 2002. The HMC&M program elements give direction and instructions for implementing a HMC&M program. The Hazardous Communication (HAZCOM) element specifically states the requirement for an annual review of the HAZCOM program and providing HAZCOM training to all personnel who may be exposed to HM. The management of hazardous material at NSSS Brown Field is lacking proper training. HAZCOM is not conducted on a regular basis at NSSS Brown Field; new employees are not receiving the required hazardous communication training within a 6-month time frame after reporting to NSSS Brown Field and employees are not receiving hazardous communication annual refresher training.	Recommend utilizing the software provided by the major claimant to aid in the implementation of NNSOC HMC&M program elements. The required update to the IECP should mirror the direction contained in the Virtual Safety Environmental training demo software for HAZCOM training. Recommend updating the Virtual Safety Environmental Training software to include a "save" feature to the software so the NSSS sites can electronically document test scores and training dates.
Historic resource specialists have several concerns regarding the assessment and the related consultation with the State Historic Preservation Officers over the "Historic Resources Survey and Assessment."	SWDIV cultural resources staff has reviewed the document and are discussing the current status and options with regard to the report's findings. Recommend that the Historic Resources Survey and Assessment be redone. As the existing document is extremely flawed.
Transportation diesel fuel in a 55-gallon drum over the public highway and transferring the diesel fuel from the 55-gallon drum to a 550-gallon AST 2-5 times a day on a monthly basis.	The vehicle used to transport diesel fuel will have a copy of the MSDS, Emergency Response Guide (ERG) book information and spill kit retained inside the vehicle. The 55-gallon plastic drum will be labeled DIESEL FUEL.

During this period, a total of five deficiencies and eight management recommendations were recorded that required fixes or solutions by this installation. The sources of these findings and events break down as:

Four deficiencies and eight recommendations were revealed by scheduled Internal/External EQA compliance evaluations.

California Integrated Waste Management Board discovered one deficiency.

The assigned causes of the thirteen deficiencies, management recommendations and other events indicated that the installation's EMS required improvement in the area of Training and Awareness. These results confirm the findings of the External Assessment. With the exceptions of the problems noted above, 86 percent of the deficiencies have been corrected and management recommendations have been acted upon as of 1 September 2002. Documentation for all problem-solving exercises is available for review.

Status of Top 5 Environmental Issues/Concerns	
1	Concerns regarding the assessment and the related consultation with the State Historic Preservation Officers over the "Historic Resources Survey and Assessment." Reevaluate the documents findings.
2	Transferring 55-gallons of diesel fuel in a Government vehicle. Concerned areas are; potential issues with the Department of Transportation (DOT) regulations, potential spill on the highway, potential spill while transferring fuel from a 55-gallon plastic drum to a 550-gallon AST, several times in a day on a monthly basis.
3	HAZCOM training not being conducted.
4	None
5	None

Approach to Scheduling Internal/External Assessments and Site Visits	
	NNSOC has instituted a three-tiered approach to performing its internal assessments:
1	NNSOC will review each environmental program's status annually utilizing the EQA Summary Report as indicated in the Internal Assessment Plan. Program reviews are staggered throughout the year.
2	SWDIV program/media or their designated staff will review inspection results submitted by practice owners as submitted and will verify compliance status of each practice by means of on-site compliance assessments/site visits on a variable frequency determined by risk and past compliance status. Minimum frequencies for on-site assessments are indicated in the Internal Assessment Plan. During FY 03 SWDIV staff will schedule their onsite internal assessment with practice owners' in order to provide training on inspection techniques and documentation to practice owners' designated staff.
3	NSSS practice owners will perform inspections at least as frequently as required by regulation and more frequently as indicated in the Internal Assessment Plan Inventory.

Roles and Responsibilities

Inspections
Weekly inspections will be conducted by the NSSS Staff designated as a "practice owner". These designated staff will be tasked with reporting any discrepancies to SWDIV designated as the NSSS Environmental Program Managers and will provide inspection results to the NSSS Environmental Program Managers in a format and frequency as indicated in the Internal Assessment Plan (IAP) Inventory, determined by the NSSS Environmental Program Managers. NNSOC will schedule the frequency and scope for external assessments conducted by SWDIV.

Compliance Evaluations
The NSSS Environmental Program Managers as indicated in the IAP Inventory will conduct compliance evaluations annually. NSSS Environmental Program Managers will work with the NSSS staff designated practice owners, where applicable, to establish inspection procedures.

EMS Review
Under the EQA Program, EMS Reviews, conducted both internally and externally, will focus either on environmental media-specific program management of the comprehensive EMS. NSSS Environmental Program Managers will conduct the NSSS internal EMS review annually. NNSOC will determine frequency and scope for all NSSS external EMS reviews conducted by SWDIV.

Internal Assessment Plan (IAP) and/or Inventory Update

Changes in the IAP and/or Inventory effective 31 January 2003 will be as follows:

1. Command structure change: From Naval Space Command (NSC) to Naval Networks and Space Operations Command (NNSOC).

2. Change title of Appendix A Table: From Practice Inventory to Internal Assessment Plan Inventory.

3. Change title of Staff: From NSSS Environmental Staff to NSSS Environmental Program Manager(s).

4. Added six Natural Resources IAP Inventory practices.

NSSS Brown Field
INTERNAL ASSESSMENT PLAN INVENTORY

Program/Media Area	Type of Practice	Location	Inspection Frequency	Inspection Responsibility	Local Priority	Compliance Evaluation Frequency	Compliance Evaluation Responsibility	Notes
AIR	Air Emission Source Emergency Generator	Main building	Monthly	Dave Saunders	High	Quarterly	NSSS Environmental Program Managers	Operation logs are maintained and annotations are made whenever the generator is operated. Annual Registration required.
Environmental Management System	Records	Main building	Weekly	Dave Saunders	High	Annually	NSSS Environmental Program Managers	Records will be initially inventoried and organized by NSC staff and stored in an independent filing cabinet.
HAZMAT	HAZMAT Storage	Vehicle building	Monthly	Dave Saunders	Medium	Annually	NSSS Environmental Program Managers	Special protections are mandated for flammable and incompatible materials.
HAZMAT	Hazardous Material Business Plan	Main building	Semi-annual	Dave Saunders	Medium	Annually	NSSS Environmental Program Managers f	Every two years the plan must be revised and/or amended and submitted to HMD.
HAZMAT	Hazardous Material and Hazardous Waste Program Management	Main building	Quarterly	Dave Saunders	Medium	Annually	NSSS Environmental Program Managers	Incl. AUL updates, training, record keeping, reports, permits, maintaining MSDSs
Installation Restoration	Shooting Range clean-up	N.E. of main building	Quarterly	Dave Saunders	High	Quarterly	NSSS Environmental Program Managers	IR site cleaned up and regulator approval pending for final closure.

Program/Media Area	Type of Practice	Location	Inspection Frequency	Inspection Responsibility	Local Priority	Compliance Evaluation Frequency	Compliance Evaluation Responsibility	Notes
Natural Resources	Review “Environmental Constraints Map"	All areas	Annually	Dave Saunders	Medium	Annually	NSSS Environmental Program Managers	
Natural Resources	Diegan Coastal Sage Scrub	All areas	Weekly	Dave Saunders	High	Quarterly	NSSS Environmental Program Managers	Patrol the perimeter fences frequently in order to repair any holes that are created by trespassers. Repair damaged fencing areas with a stronger material.
Natural Resources	Vernal Pool Management	Vernal pool areas	Monthly	Dave Saunders	High	Quarterly	NSSS Environmental Program Managers	Protect and manage key habitats for several endangered, threatened, and candidate species.
Natural Resources	Exotic Weed Control	All areas	Monthly	Dave Saunders	High	Quarterly	NSSS Environmental Program Managers	Monitor status of Ice Plant dig out as necessary. Monitor property for invasion by noxious weeds that threaten habitats.
Natural Resources	Wildlife Protection and Management	All areas	Weekly	Dave Saunders	High	Quarterly	NSSS Environmental Program Managers	Once the nesting and breeding areas have been identified, restrict access to areas during the critical periods of Feb 1-31. Protect wildlife populations from the lethal effects of human facilities and activities, where this does not conflict with safety concerns
Natural Resources	Land and Vegetation Management	All areas and Antenna Arrays	When needed	Dave Saunders	Medium	Quarterly	NSSS Environmental Program Managers	The first round of mowing operations should be finished by 1 April, but would be modified by limiting the first mowing “pass” to a twenty-five foot break around the antenna arrays, preamplifier bldgs, fences, operations building, and other utility connections.

Program/Media Area	Type of Practice	Location	Inspection Frequency	Inspection Responsibility	Local Priority	Compliance Evaluation Frequency	Compliance Evaluation Responsibility	Notes
Natural Resources	Strip Mowing	All areas	Semi-Annually	Dave Saunders	Medium	Quarterly	NSSS Environmental Program Managers	Continue the existing practice of mowing only after the ground is dry to prevent soil compaction
NEPA	CATEX, EA, EIR Documentation	All areas	As needed	Dale Rubel	Medium	Annually	NSSS Environmental Program Managers	
Oil Hazardous Substances	Aboveground Storage Tank for Diesel Fuel	Directly S.E. of main building	Monthly	Dave Saunders	Medium	Quarterly	NSSS Environmental Program Managers	AST has a 500-gallon capacity and stores diesel fuel for the emergency generator.
Pest Management	Pesticide application	Main Buildings	Monthly	Dave Saunders	Medium	Quarterly	NSSS Environmental Program Managers	Contractor applies pesticide around the main buildings monthly
Pest Management	Pesticide Records	Main Building	Monthly	Dave Saunders	Medium	Quarterly	NSSS Environmental Program Managers	Keep pesticide records on hand indefinitely
Potable Water	Backflow Preventer	Lateral connection with the City of Otay water system	Annually	Dave Saunders	Medium	Annual	NSSS Environmental Program Managers	Backflow devices are required to be inspected and certified Annually. Being performed by contract. Last tested 5/25/01
Solid Waste	Dumpster	Outside of main building	Quarterly	Dave Saunders	Medium	Annually	NSSS Environmental Program Managers	Ensure solid waste disposal capabilities

Program/Media Area	Type of Practice	Location	Inspection Frequency	Inspection Responsibility	Local Priority	Compliance Evaluation Frequency	Compliance Evaluation Responsibility	Notes
Solid Waste	Program Management and Recycling	Main building	Quarterly	Dave Saunders	Medium	Quarterly	NSSS Environmental Program Managers	Ensure solid waste management plan is current, identify recyclable waste
Wastewater	Septic Tank	N.E. corner of compound	Annually	Dave Saunders	Low	Annually	NSSS Environmental Program Managers	The system was installed in 1991 and has a capacity of 1,000 gallons. Specs require cleanout every 15 years.

Environmental Strengths

Hazardous Waste/Hazardous Waste Minimization:

During FY99 SWDIV was given the responsibility of oversight for the Environmental Program Management role at Brown Field to assist NSC. Efforts to reduce the amount of hazardous waste generated at Brown Field was one of many program areas addressed and recognized as a potential cost and labor effort reduction. During this time period Brown Field was classified as a Conditionally exempt Small Quantity Generator (CESQG) due to the amount of hazardous waste generated.

Since then great strides have been made within the hazardous waste program. This focus to reduce the amount of hazardous waste generated at Brown Field was so successful; Brown Field no longer generates hazardous waste. Facility costs for hazardous waste fees and labor hours associated with the handling of hazardous waste saved NSC thousands of dollars (approx. $5,700.00).

This was accomplished by utilizing the various vendors off site for the maintenance of the vehicles. The batteries are exchanged one for one, this means that when the lead acid batteries need replacing the staff at Brown Field hands over the old battery to the vendor and purchases a new battery. Oil changes are also competed off site at a vendor. All hazardous materials are used until empty.

Installation Restoration:

The Naval Space Command Surveillance Station Brown Field has one Installation Restoration Program (IRP) Site, which was located on the former small arms range most recently used by the INS. IRP Site 1 consisted of a sandblast grit-like material imported from an off base location. This material was used by the INS to construct safety side berms and enhance the back berm bullet stop of the range. This sandblast grit-like material was later tested and found to be a hazardous material, thereby making the berms an inappropriate disposal of a hazardous waste.

Southwest Division Environmental staff made the decision to include the area of deposition of the sandblast grit-like material on the former INS shooting range into the Navy Installation Restoration Program (IRP) in January of 2001, thereby giving it CERCLA Site status. This was done after considerable legal and environmental policy evaluation, which determined the site was eligible for ERN funding. Installation and Site addition requests for inclusion in NORM/DESERT database were approved on 23 January 2001.

The California Department of Toxic Substance Control (DTSC) was notified of the new Site 1 on 12 February 2001. California Integrated Waste Management Board (CIWMB) delegated their authority over to the City of San Diego Solid Waste Local Enforcement Agency (LEA), who issued the NSSS Brown Field notice of violation (NOV) on 9 April 2001 for Drainage Erosion Control and Site Maintenance. The LEA's main concern was lead contaminated soils may be transported westward off-site to a ravine. Environmental samples for metals had been collected prior to Site 1's inclusion in the IRP. These prior sample results were evaluated and determined to be adequate to make the decision to take a CERCLA Time Critical Removal Action (TCRA) at Site 1.

A Work Plan, Field Sampling Plan (FSP), Quality Assurance Project Plan (QAPP) and a Health and Safety Plan were completed and submitted to the LEA for their review and concurrence on 9 May 2001. Comments were received on 4 June 2001. The Action Memorandum was sign at the end of July and the

Navy Public Works Center (PWC) started fieldwork preparations 31 July 2001 for the TCRA. The TCRA was completed on 29 November 2001
Site visits with Bill Prinz (LEA), Robert Guerra (CIWMB), and Public Works Center (PWC) occurred prior to, during, and after the TCRA. During these site visits the RPM, Walter Kitchin, established an excellent working relationship with the agencies and PWC, who conducted the actual work in the field. This provided for a smooth workflow for the removal action and document/report reviews.

The development and implementation of the TCRA and Site Closure Report for IRP Site 1 was a joint in-house effort between PWC and the SWDIV RPM. The TCRA was submitted in July 2002 to the LEA, who then processed it and submitted it to the CIWMB. The LEA issued a letter of rescission of the NOV on 29 July 2002. The final certification of clean closure for IRP Site 1 from the CIWMB was issued on 18 September 2002.

EQA Report: NSSS Gila River, AZ Program Area Status Summary				
OPNAVINST 5090 Chapter	**Program/ Media Area**	**Rating**	**Explanation for "Inadequate" Rating**	**Initiatives to Correct**
1	Program Management	○		
2	NEPA	○		
3	Pollution Prevention	○		
4	EPCRA	N/A		
5	Air	○		
6	ODS	○		
7	Wastewater	○		
8	Drinking Water	⊙	Chlorine Residual testing needs to be conducted and logged on a daily basis until consistent then weekly thereafter.	SWDIV is looking into the purchasing and cost of Chlorine Residual Kits for NSSS Gila River.
9/10	SPCC/ Spill Response	⊙	The bermed area which resides below the gas tank is not sufficient enough to hold 520-gallons.	In case of a spill the berm should hold at a minimum the 520 gallons. AST regulations state that any/all ASTs need to have adequate containment for spills,
11	PCB	○		
12	Hazardous Waste	○		
12	Infectious Waste	N/A		
13	Pesticide	○		
14	Solid Waste	○		
15	Installation Restoration	○		
16	Underground Storage Tanks	N/A		
17	Noise	N/A		
20	EQA Program	○		
22	Natural Resources	○		
23	Cultural Resources	⊙	Historic resource specialists have several concerns regarding the assessment and the related consultation with the State Historic Preservation Officers over the "Historic Resources Survey and Assessment."	Two major options: (1) accept the findings of the report and treat certain structures as eligible for the National Register, or (2) conduct a re-evaluation of NRHP eligibility in the hope that the command's buildings and structures would be found "not eligible. We have heard that a MILCON project for the demolition and reconstruction of all of the space surveillance stations may be on the horizon. If so, this major undertaking (and its timing) will certainly shape your evaluation of the most appropriate option.
24	Training	⊙	The Hazardous Communication (HAZCOM) element specifically states the requirement for an annual review of the HAZCOM program and providing HAZCOM training to all personnel who may be exposed to HM. HAZCOM training is not being conducted on an annual basis.	HAZCOM refresher training will be conducted during site visits, utilizing the Virtual Safety Environmental training software training aid from NNSOC. Recommend expanding the software to include a "save" function so the Site Managers have the capability of saving test scores and training dates..
25	Sampling and Lab Testing	○		
26	Radon	○		

○ = Excellent
⊙ = Needs Improvement
● = Inadequate
na = Not Applicable

Summary of Problem Solving Efforts and Corrective Actions

The following problems were recognized during the period of 1 September 2000 through 30 September 2002 that were judged to require structured problem solving:

Problem Description	Status
The Hazardous Materials Control and Management Plan (HMC&M) for NSSS Gila River is included in the Integrated Environmental Compliance Plan (IECP), dated January 2002. The HMC&M program elements give direction and instructions for implementing a HMC&M program. The Hazardous Communication (HAZCOM) element specifically states the requirement for an annual review of the HAZCOM program and providing HAZCOM training to all personnel who may be exposed to HM. The management of hazardous material at NSSS Gila River is lacking proper training. HAZCOM is not conducted on a regular basis at NSSS Gila River; new employees are not receiving the required hazardous communication training within a 6-month time frame after reporting to NSSS Gila River and employees are not receiving hazardous communication annual refresher training.	Recommend utilizing the software provided by the major claimant to aid in the implementation of NNSOC HMC&M program elements. The required update to the IECP should mirror the direction contained in the Virtual Safety Environmental training demo software for HAZCOM training. Recommend updating the Virtual Safety Environmental Training software to include save feature so the NSSS sites can electronically document test scores and training dates.
Historic resource specialists have several concerns regarding the assessment and the related consultation with the State Historic Preservation Officers over the "Historic Resources Survey and Assessment."	SWDIV cultural resources staff has reviewed the document and are discussing the current status and options with regard to the report's findings. Recommend that the Historic Resources Survey and Assessment be redone. As the existing document is extremely flawed.
NSSS Gila River will need to conduct daily chlorine residual test until the system is consistent. Monitoring the chlorine residual within the system is very important.	Recommend that NSSS Gila River purchase Chlorine Residual kits as soon as possible. SWDIV will help support this effort.
NSSS Gila River has a 520 gal AST outside of the main building. Currently the existing berm area is not adequate enough to hold 520 gallons of fuel.	Recommend NNSOC look into the existing fund request for this project. SWDIV can provide help if a new funding request needs to be developed.

During this period, a total of four deficiencies and six management recommendations were recorded that required fixes or solutions by this installation. The sources of these findings and events break down as:

> Four Deficiencies and six recommendations were revealed by scheduled Internal/External EQA compliance evaluations.

The assigned causes of the ten deficiencies, management recommendations and other events indicated that the installation's EMS required improvement in the areas of Training and Awareness. These results confirm the findings of the External Assessment. With the exceptions of the problems noted above, 90 percent of the deficiencies have been corrected and management recommendations have been acted upon as of 1 September. Documentation for all problem-solving exercises is available for review.

Status of Top 5 Environmental Issues/Concerns	
1	Chlorine Residual test kits need to be ordered and testing needs to be conducted daily until consistent then weekly.
2	Concerns regarding the assessment and the related consultation with the State Historic Preservation Officers over the "Historic Resources Survey and Assessment."
3	Additional bermed area is needed for the gas tank outside, which holds diesel fuel for the emergency generator. Currently the bermed area which resides below the gas tank is not sufficient enough to hold 520-gallons.
4	HAZCOM training not being conducted.
5	None

Approach to Scheduling Internal/External Assessments and Site Visits	
	NNSOC has instituted a three-tiered approach to performing its internal assessments:
1	NNSOC will review each environmental program's status annually utilizing the EQA Summary Report as indicated in the Internal Assessment Plan. Program reviews are staggered throughout the year.
2	SWDIV program/media or their designated staff will review inspection results submitted by practice owners as submitted and will verify compliance status of each practice by means of on-site compliance assessments/site visits on a variable frequency determined by risk and past compliance status. Minimum frequencies for on-site assessments are indicated in the Internal Assessment Plan. During FY 03 SWDIV staff will schedule their onsite internal assessment with practice owners' in order to provide training on inspection techniques and documentation to practice owners' designated staff.
3	NSSS practice owners will perform inspections at least as frequently as required by regulation and more frequently as indicated in the Internal Assessment Plan Inventory.

Roles and Responsibilities

Inspections
Weekly inspections will be conducted by the NSSS Staff designated as a "practice owner". These designated staff will be tasked with reporting any discrepancies to SWDIV designated as the NSSS Environmental Program Managers and will provide inspection results to the NSSS Environmental Program Managers in a format and frequency as indicated in the Internal Assessment Plan (IAP) Inventory, determined by the NSSS Environmental Program Managers. NNSOC will schedule the frequency and scope for external assessments conducted by SWDIV.

Compliance Evaluations
The NSSS Environmental Program Managers as indicated in the IAP Inventory will conduct compliance evaluations annually. NSSS Environmental Program Managers will work with the NSSS staff designated practice owners, where applicable, to establish inspection procedures.

EMS Review
Under the EQA Program, EMS Reviews, conducted both internally and externally, will focus either on environmental media-specific program management of the comprehensive EMS. NSSS Environmental Program Managers will conduct the NSSS internal EMS review annually. NNSOC will determine frequency and scope for all NSSS external EMS reviews conducted by SWDIV.

Internal Assessment Plan (IAP) and/or Inventory Update

Changes in the IAP and/or Inventory effective 31 January 2003 will be as follows:

1. Command structure change: From Naval Space Command (NSC) to Naval Networks and Space Operations Command (NNSOC).

2. Change title of Appendix A Table: From Practice Inventory to Internal Assessment Plan Inventory.

3. Change title of Staff: From NSSS Environmental Staff to NSSS Environmental Program Manager(s).

4. Added six Natural Resources IAP Inventory practices.

NSSS Gila River
INTERNAL ASSESSMENT PLAN INVENTORY

Program/Media Area	Type of Practice	Location	Inspection Frequency	Inspection Responsibility	Local Priority	Compliance Evaluation Frequency	Compliance Evaluation Responsibility	Notes
Air	Air Emission Source Emergency Generator	South Building 6	Monthly	Dale Rubel	High	Quarterly	NSSS Environmental Program Managers	Operation logs are maintained and annotations are made whenever the generator is operated. Annual Registration required.
Environmental Management System	Records and Documentation Filling	Building 6	Monthly	Dale Rubel	High	Annually	NSSS Environmental Program Managers	Records will be initially inventoried and organized by NSC staff and stored in an independent filing cabinet.
HAZMAT	Flammable Materials Accumulation	Maintenance Area	Monthly	Dale Rubel	Medium	Annually	NSSS Environmental Program Managers	(2) Flammable lockers. Special protections are mandated for flammable and incompatible materials.
Natural Resources	Review “Environmental Constraints Map"	All areas	Annually	Dale Rubel	Medium	Annually	NSSS Environmental Program Managers	
Natural Resources	Floodplain Management	Food areas	As needed	Dale Rubel	High	Quarterly	NSSS Environmental Program Managers	Due to past flood events, NSSS Gila River requires a contingency planning for possible flooding. Keep sandbags on hand; consider other means of diverting water away from high-value facilities.
Natural Resources	Sensitive Wildlife Species	All areas	Monthly	Dale Rubel	High	Quarterly	NSSS Environmental Program Managers	Procedures would ensure that staff does not handle am wildlife (especially the Gila monster) Contact ADGF if handling wildlife is considered necessary.

Program/Media Area	Type of Practice	Location	Inspection Frequency planned/ (required)	Inspection Responsibility	Local Priority	Compliance Evaluation Frequency	Compliance Evaluation Responsibility	Notes
Natural Resources	Exotic Weed Control	All areas	Monthly	Dale Rubel	High	Quarterly	NSSS Environmental Program Managers	Monitor status of Ice Plant dig out as necessary. Monitor property for invasion by noxious weeds that threaten habitats
Natural Resources	Migratory Birds	All areas	Monthly	Dale Rubel	High	Quarterly	NSSS Environmental Program Managers	The stewardship measures for conserving neo-tropical migratory bird resources at NSSS Gila River include habitat protection and habitat enhancement measures
Natural Resources	Land and Vegetation Management (Strip Mowing)	All areas and Antenna Arrays	When needed	Practice Owner	Medium	Quarterly	NSSS Environmental Program Managers	The first round of mowing operations should be finished by 1 April, but would be modified by limiting the first mowing “pass” to a twenty-five foot break around the antenna arrays, preamplifier bldgs, fences, operations building, and other utility connections
Natural Resources	Habitat Protection	All areas	Monthly	Dale Rubel	High	Quarterly	NSSS Environmental Program Managers	Continue to limit the use of pesticides at the station, support research and consider the needs of neo-tropical migrants whenever possible
Natural Resources	Soil erosion	All areas	Semi-annually	Dale Rubel	Medium	Quarterly	NSSS Environmental Program Managers	Continue the existing practice of mowing only after the ground is dry to prevent soil compaction
NEPA	CATEX, EA, EIR Documentation	All areas	As needed	Dale Rubel	Medium	Annually	NSSS Environmental Program Managers	
Oil Hazardous Substances	AST	South of Building 6	Monthly	Dale Rubel	Medium	Quarterly	NSSS Environmental Program Managers	AST has a 520-gallon capacity and stores diesel fuel for the emergency generator.

Program/Media Area	Type of Practice	Location	Inspection Frequency planned/ (required)	Inspection Responsibility	Local Priority	Compliance Evaluation Frequency	Compliance Evaluation Responsibility	Notes
Pest Management	Pesticide application	Main Buildings	Monthly	Dale Rubel	Medium	Quarterly	NSSS Environmental Program Managers	Contractor applies pesticide around the main buildings monthly
Pest Management	Pesticide Records	Main Building	Monthly	Dale Rubel	Medium	Quarterly	NSSS Environmental Program Managers	Keep pesticide records on hand indefinitely
Potable Water	Potable Water sampling and monitoring	Distribution System	Quarterly	Dale Rubel	High	Quarterly	NSSS Environmental Program Managers	Several monitoring requirements are outlined by OPNAVINST 5090.1B for non-public water supply systems.
Potable Water	3 Spigots (Backflow Preventive Program)	Main Building 6	Annually	Dale Rubel	Medium	Annually	NSSS Environmental Program Managers	Backflow device is required to by inspected and certified annually. Being performed by contract. Last tested 5/25/01
Solid Waste	Solid Waste Trash Accumulation (Dumpster)	NW corner of Building 6	Quarterly	Dale Rubel	Medium	Annually	NSSS Environmental Program Managers	Ensure servicing contractor, Maricopa Disposal Services, (520) 568-4020 is servicing Gila River correctly.
Solid Waste	Recycling	Building 6 and NW corner of Building 6	Quarterly	Dale Rubel	Medium	Annually	NSSS Environmental Program Managers	Ensure solid waste management plan is current, identify recyclable waste
Waste Water	Leach Field	North of Butler Building 7	Annually	Dale Rubel	Low	Annually	NSSS Environmental Program Managers	The system was installed in 1997 and has a capacity of 2,000 gallons. Specs require cleanout every 2 years.
Waste Water	Septic Tank	NW corner of Building 6	Annually	Dale Rubel	Low	Annually	NSSS Environmental Program Managers	The system was installed in 1997 and has a capacity of 2,000 gallons. Specs require cleanout every 2 years.

Environmental Strengths

Hazardous Material Management:

The surplus of hazardous material at NSSS Gila River has been significantly reduced in order to achieve storing small quantities of hazardous material on site for an as needed basis. The AUL/Hazardous Material Inventory has been developed and updated on an annual basis. Hazardous material containers are kept closed when not in use. The Material Safety Data Sheets (MSDSs) are well maintained, numbered, and kept current.

EQA Report: NSSS Elephant Butte, NM Program Area Status Summary				
OPNAVINST 5090 Chapter	**Program/ Media Area**	**Rating**	**Explanation for "Inadequate" Rating**	**Initiatives to Correct**
1	Program Management	○		
2	NEPA	○		
3	Pollution Prevention	○		
4	EPCRA	N/A		
5	Air	○		
6	ODS	○		
7	Wastewater	○		
8	Drinking Water	⊙	During winter, the Reverse Osmosis unit (ROU) will need a sort of heating element inside the building which it is stored in	Purchase an adequate heating element for the ROU storage area. The water, which runs through the ROU, has the potential to partially freeze throughout the system (especially the smaller pipes and glass tubes). This could also cause the ROU to shut down.
9/10	SPCC/ Spill Response	○		
11	PCB	○		
12	Hazardous Waste	○		
12	Infectious Waste	N/A		
13	Pesticide	○		
14	Solid Waste	○		
15	Installation Restoration	○		
16	Underground Storage Tanks	N/A		
17	Noise	N/A		
20	EQA Program	○		
22	Natural Resources	○		
23	Cultural Resources	⊙	Historic resource specialists have several concerns regarding the assessment and the related consultation with the State Historic Preservation Officers over the "Historic Resources Survey and Assessment."	Two major options: (1) accept the findings of the report and treat certain structures as eligible for the National Register, or (2) conduct a re-evaluation of NRHP eligibility in the hope that the command's buildings and structures would be found "not eligible. We have heard that a MILCON project for the demolition and reconstruction of all of the space surveillance stations may be on the horizon. If so, this major undertaking (and its timing) will certainly shape your evaluation of the most appropriate option.
24	Training	⊙	The Hazardous Communication (HAZCOM) element specifically states the requirement for an annual review of the HAZCOM program and providing HAZCOM training to all personnel who may be exposed to HM. HAZCOM training is not being conducted on an annual basis.	HAZCOM refresher training will be conducted during site visits, utilizing the Virtual Safety Environmental training software training aid from NNSOC. Recommend expanding the software to include a "save" function so the Site Managers have the capability of saving test scores and training dates.
25	Sampling and Lab Testing	○		
26	Radon	○		

○ = Excellent
⊙ = Needs Improvement
● = Inadequate
N/A = Not Applicable

Summary of Problem Solving Efforts and Corrective Actions

The following problems were recognized during the period of 1 September 2000 through 30 September 2002 that were judged to require structured problem solving:

Problem Description	Status
The Hazardous Materials Control and Management Plan (HMC&M) for NSSS Elephant Butte is included in the Integrated Environmental Compliance Plan (IECP), dated January 2002. The HMC&M program elements give direction and instructions for implementing a HMC&M program. The Hazardous Communication (HAZCOM) element specifically states the requirement for an annual review of the HAZCOM program and providing HAZCOM training to all personnel who may be exposed to HM. The management of hazardous material at NSSS Elephant Butte is lacking proper training. HAZCOM is not conducted on a regular basis at NSSS Elephant Butte; new employees are not receiving the required hazardous communication training within a 6-month time frame after reporting to NSSS Elephant Butte and employees are not receiving hazardous communication annual refresher training.	Recommend utilizing the software provided by the major claimant to aid in the implementation of NNSOC HMC&M program elements. The required update to the IECP should mirror the direction contained in the Virtual Safety Environmental training demo software for HAZCOM training. Recommend updating the Virtual Safety Environmental Training software to include save feature so the NSSS sites can electronically document test scores and training dates.
Historic resource specialists have several concerns regarding the assessment and the related consultation with the State Historic Preservation Officers over the "Historic Resources Survey and Assessment."	SWDIV cultural resources staff has reviewed the document and are discussing the current status and options with regard to the report's findings. Recommend that the Historic Resources Survey and Assessment be redone. As the existing document is extremely flawed.
The Reverse Osmosis Unit (ROU) at NSSS Elephant Butte will need to have a heating device installed inside the storage area where the ROU equipment resides.	Recommend NSSS Elephant Butte Purchase an adequate heating device for the Reverse Osmosis Storage Area. Potentially the water, which flows through the system, could freeze in areas within the system.

During this period, a total of four deficiencies and seven management recommendations were recorded that required fixes or solutions by this installation. The sources of these findings and events break down as:

> Three deficiencies and seven management recommendations were revealed by scheduled Internal/External EQA compliance evaluations.
>
> The State of New Mexico Environment Department Ground Water Quality Bureau discovered one deficiency.

The assigned causes of the eleven deficiencies, management recommendations and other events indicated that the installation's EMS required improvement in the areas of Training and Awareness. This result confirms the findings of the External Assessment. With the exceptions of the problems noted above, 80 percent of all deficiencies have been corrected and management recommendations have been acted upon as of 1 September. Documentation for all problem-solving exercises is available for review.

Status of Top 5 Environmental Issues/Concerns	
1	Concerns regarding the assessment and the related consultation with the State Historic Preservation Officers over the "Historic Resources Survey and Assessment."
2	An adequate heating device will need to be installed inside the storage area where the Reverse Osmosis unit is kept. The heating device will be needed for the duration of winter.
3	HAZCOM training not being conducted.
4	None
5	None

Approach to Scheduling Internal/External Assessments and Site Visits	
	NNSOC has instituted a three-tiered approach to performing its internal assessments:
1	NNSOC will review each environmental program's status annually utilizing the EQA Summary Report as indicated in the Internal Assessment Plan. Program reviews are staggered throughout the year.
2	SWDIV program/media or their designated staff will review inspection results submitted by practice owners as submitted and will verify compliance status of each practice by means of on-site compliance assessments/site visits on a variable frequency determined by risk and past compliance status. Minimum frequencies for on-site assessments are indicated in the Internal Assessment Plan. During FY 03 SWDIV staff will schedule their onsite internal assessment with practice owners' in order to provide training on inspection techniques and documentation to practice owners' designated staff.
3	NSSS practice owners will perform inspections at least as frequently as required by regulation and more frequently as indicated in the Internal Assessment Plan Inventory.

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Roles and Responsibilities

Inspections
Weekly inspections will be conducted by the NSSS Staff designated as a "practice owner". These designated staff will be tasked with reporting any discrepancies to SWDIV designated as the NSSS Environmental Program Managers and will provide inspection results to the NSSS Environmental Program Managers in a format and frequency as indicated in the Internal Assessment Plan (IAP) Inventory, determined by the NSSS Environmental Program Managers. NNSOC will schedule the frequency and scope for external assessments conducted by SWDIV.

Compliance Evaluations
The NSSS Environmental Program Managers as indicated in the IAP Inventory will conduct compliance evaluations annually. NSSS Environmental Program Managers will work with the NSSS staff designated practice owners, where applicable, to establish inspection procedures.

EMS Review
Under the EQA Program, EMS Reviews, conducted both internally and externally, will focus either on environmental media-specific program management of the comprehensive EMS. NSSS Environmental Program Managers will conduct the NSSS internal EMS review annually. NNSOC will determine frequency and scope for all NSSS external EMS reviews conducted by SWDIV.

Internal Assessment Plan (IAP) and/or Inventory Update

Changes in the IAP and/or Inventory effective 31 January 2003 will be as follows:

1. Command structure change: From Naval Space Command (NSC) to Naval Networks and Space Operations Command (NNSOC).

2. Change title of Appendix A Table: From Practice Inventory to Internal Assessment Plan Inventory.

3. Change title of Staff: From NSSS Environmental Staff to NSSS Environmental Program Manager(s).

4. Added six Natural Resources IAP Inventory practices.

NSSS Elephant Butte
INTERNAL ASSESSMENT PLAN INVENTORY

Program/Media Area	Type of Practice	Location	Inspection Frequency planned/ (required)	Inspection Responsibility	Local Priority	Compliance Evaluation Frequency	Compliance Evaluation Responsibility	Notes
Air	Air Emission Source Emergency Generator	Southeast of Building 1	Monthly	Eddie Vasquez	High	Annually	NSSS Environmental Program Managers	Operation logs are maintained and annotations are made whenever the generator is operated. Annual Registration required.
Drinking Water	RO Water Purification	Building 6	Quarterly	Eddie Vasquez	High	Annually	NSSS Environmental Program Managers	Placeholder until unit is installed.
Environmental Management System	Records and Documentation Filling	Building 1	Monthly	Eddie Vasquez	High	Annually	NSSS Environmental Program Managers	Records will be initially inventoried and organized by NSSS staff and stored in an independent filing cabinet.
HAZMAT	Flammable Materials Accumulation	HAZMAT Storage Area	Monthly	Environmental Coordinator	Medium	Annually	NSSS Environmental Program Managers	Special protections are mandated for flammable and incompatible materials.
Natural Resources	Review “Environmental Constraints Map"	All areas	Annually	Eddie Vasquez	Medium	Annually	NSSS Environmental Program Managers	
Natural Resources	Erosion Control	All areas	As needed	Eddie Vasquez	Medium	Annually	NSSS Environmental Program Managers	

Program/Media Area	Type of Practice	Location	Inspection Frequency planned/ (required)	Inspection Responsibility	Local Priority	Compliance Evaluation Frequency	Compliance Evaluation Responsibility	Notes
Natural Resources	Land and Vegetation Management (Strip Mowing)	All areas and Antenna Arrays	When needed	Eddie Vasquez	Medium	Quarterly	NSSS Environmental Program Managers	The first round of mowing operations should be finished by 1 April, but would be modified by limiting the first mowing "pass" to a twenty-five foot break around the antenna arrays, preamplifier bldgs, fences, operations building, and other utility connections
NEPA	CATEX, EA, EIR Documentation	All areas	As needed	Dale Rubel	Medium	Annually	NSSS Environmental Program Managers	
Oil Hazardous Substances	AST	Southeast of Building 1	Monthly	Eddie Vasquez	Medium	Annually	NSSS Environmental Program Managers	(2) AST's have 2,000-gallon capacity and stores diesel and gasoline fuel for the emergency generator and vehicles.
Pest Management	Pesticide Application	Main Buildings	Monthly	Eddie Vasquez	Medium	Quarterly	NSSS Environmental Program Managers	
Pest Management	Pesticide Records	Main Building	Monthly	Eddie Vasquez	Medium	Quarterly	NSSS Environmental Program Managers	Keep pesticide records on hand indefinitely
Potable Water	1 Spigots (Backflow Preventive Program)	SW of Butler Building 2	Quarterly	Eddie Vasquez	Medium	Annually	NSSS Environmental Program Managers	
Potable Water	Potable Water sampling and monitoring	Well B-1	Quarterly	Eddie Vasquez	High	Quarterly	NSSS Environmental Program Managers	Several monitoring requirements are outlined by OPNAVINST 5090.1B for non-public water supply systems.

Potable Water	Potable Water sampling and monitoring	Well B-2	Quarterly	Eddie Vasquez	High	Quarterly	NSSS Environmental Program Managers	Several monitoring requirements are outlined by OPNAVINST 5090.1B for non-public water supply systems.
Program/Media Area	**Type of Practice**	**Location**	**Inspection Frequency planned/ (required)**	**Inspection Responsibility**	**Local Priority**	**Compliance Evaluation Frequency**	**Compliance Evaluation Responsibility**	**Notes**
Potable Water	Potable Water sampling and monitoring	Well B-3	Quarterly	Eddie Vasquez	High	Quarterly	NSSS Environmental Program Managers	Several monitoring requirements are outlined by OPNAVINST 5090.1B for non-public water supply systems.
Solid Waste	Solid Waste Trash Accumulation (Dumpster)	Engle Parking Lot 5 CY Dumpster	Quarterly	Eddie Vasquez	Medium	Annually	NSSS Environmental Program Managers	Ensure servicing contractor, New Mexico Waste (xxx) xxx-xxxx.
Solid Waste	Recycling	Building 1	Quarterly	Eddie Vasquez	Medium	Annually	NSSS Environmental Program Managers	Ensure solid waste management plan is current, identify recyclable waste
Waste Water	Septic Tank	North corner of Building 1	Annually	Eddie Vasquez	Low	Annually	NSSS Environmental Program Managers	
Waste Water	Leach Field	North of Building 1	Annually	Eddie Vasquez	Low	Annually	NSSS Environmental Program Managers	The system was installed in 1997 and has a capacity of 2,000 gallons. Specs require cleanout every 2 years.
Waste Water	Vehicle Wash Rack	Southwest of Building 2	Quarterly	Eddie Vasquez	Medium	Annually	NSSS Environmental Program Managers	

Environmental Strengths

Water Program:

The New Mexico Environment Department (NMED) Ground Water Quality Bureau previously issued a final Corrective Action Report (CAR) approval letter on December 17, 1998, for NSSS Elephant Butte, NM. The CAR that was submitted for the site addressed various unauthorized discharges of petroleum hydrocarbons including motor oil and/or hydraulic fluid. In a meeting on January 7, 2003, it was brought to NMED's attention that the letter dated December 17, 1998 did not satisfy the needs of the Navy since it did not specifically stat that no further action was required at this site.

The CAR dated November 1998 was approved pursuant to Section 20.6.2.1203.A.7 NMAC of the Water Quality Control Commission Regulations, and no further action is required at this time.

Hazardous Material Management:

The surplus of hazardous material at NSSS Elephant Butte has been significantly reduced in order to achieve storing small quantities of hazardous material on site for an as needed basis. The AUL/Hazardous Material Inventory has been developed and updated on an annual basis. Hazardous material containers are kept closed when not in use. The Material Safety Data Sheets (MSDSs) are well maintained, numbered, and kept current.