



U.S. AIR FORCE

AF Regional Environmental Office & AF REC Region 5

**Dr. Thom Rennie
Deputy Director & AF REC Region 5
AF REO
Central Region**



U.S. AIR FORCE

AF Regional Environmental Office – Central Region (Dallas)



AF Regional Environmental Office
Central Region
Dallas, Texas

A. Maceo Smith Federal Building

- AF Regional Environmental Officers (Regions 5-8)
- AF Regional Environmental Managers (Media Experts)
- Regional Counsel Office (Co-located)



U.S. AIR FORCE

REO Mission

- Protect the AF mission
- Support Installations and MAJCOMs
- Support AFCEE
- Support HAF
- Support SAF
- Support DoD



REO Core Mission Activities

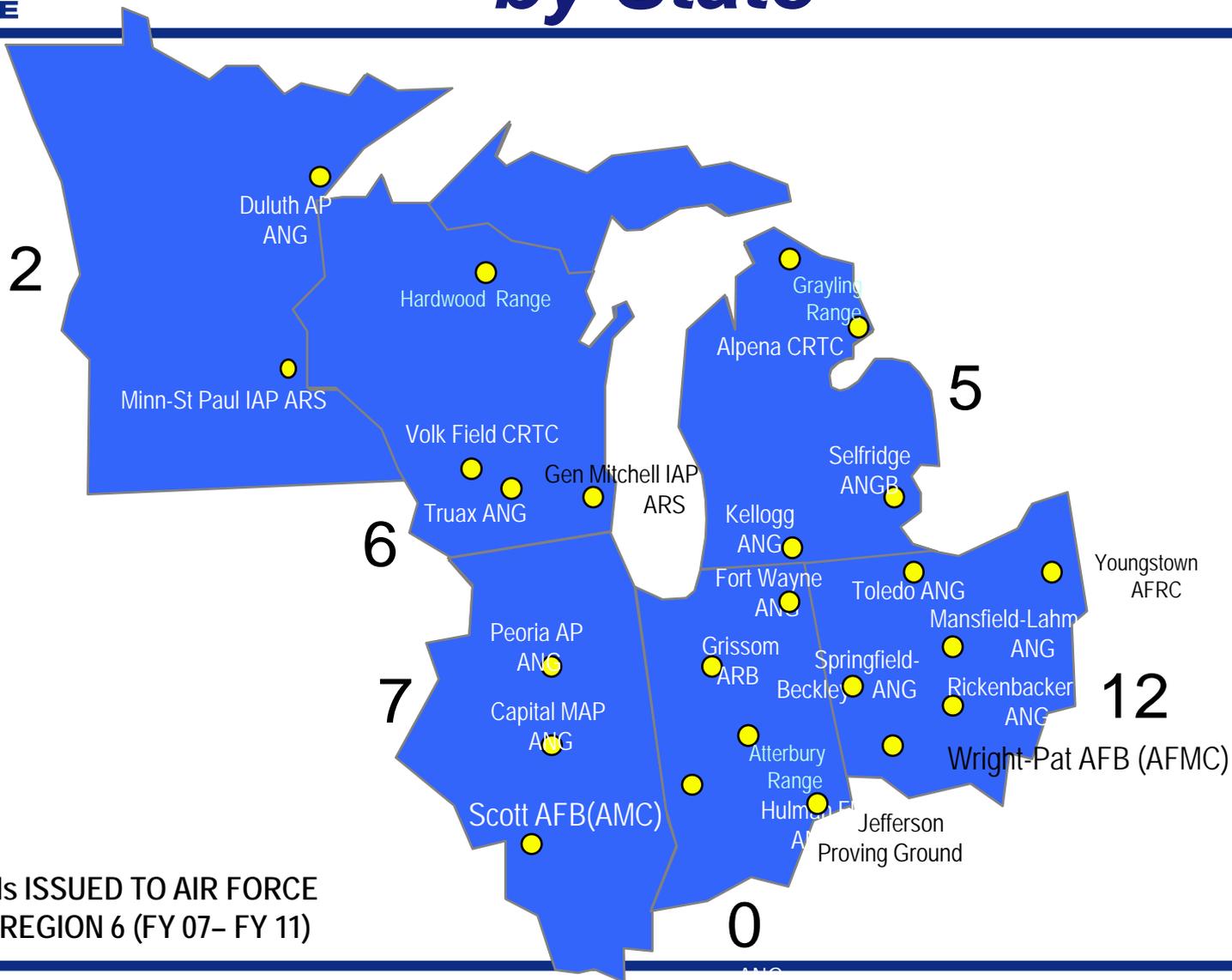
- Regional Advocacy
- Legislative/Regulatory Monitoring and Engagement
- Installation/Range Sustainability
- Partnering with Regulatory Agencies and Stakeholders
- DoD Regional Environmental Coordinator (REC) Role
- Compliance Assistance





Region 5 Enforcement Actions by State

U.S. AIR FORCE



32 EAs/ONONs ISSUED TO AIR FORCE AND ANG IN REGION 6 (FY 07- FY 11)



U.S. AIR FORCE

Michigan ANG Facilities & Environmental Manager



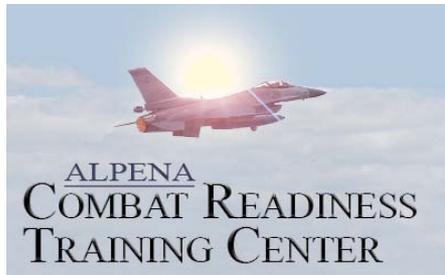
Battle Creek ANG – 110th

Lt Col James Shay



Selfridge ANG - 127th WG

Mr. Moe Arif



Alpena Combat Readiness Training Center (CRTC)
& Grayling Range

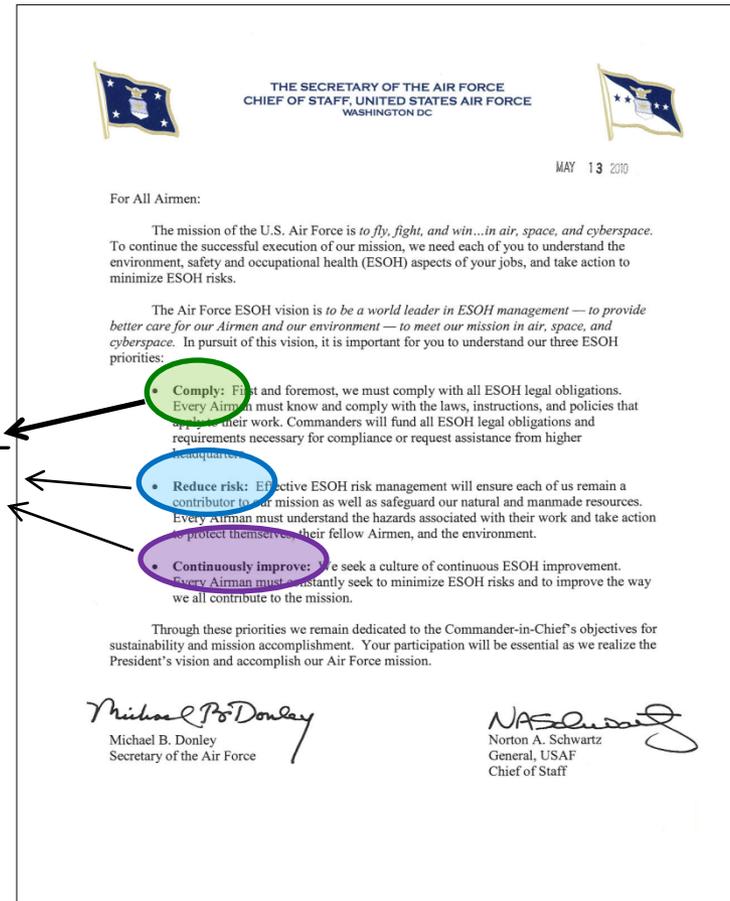
Maj Ryan Kristof



Regulatory / Compliance Efforts

U.S. AIR FORCE

- Stakeholder /Regulatory outreach
- State Legislative/Regulatory Review, Analysis & Engagement
 - Regulatory Alerts
- Enforcement Vulnerability Analyses (EVAs)
- Enforcement trends and analyses
 - Compliance assistance/strategies
 - Partnering





ENFORCEMENT ACTIONS, SPILLS, AND INSPECTIONS (EASI) ENVIRONMENTAL REPORTING

<https://www.my.af.mil/accgeoprod4/easi/ea/ea-default.aspx>

U.S. AIR FORCE

- Web based and collects all required EA, spill, and inspection data in one central location
- Any AF CAC holder can access, view real time data, and produce up-to-date reports
- Complete and accurate information a MUST for HAF, SAF, and Congress

A POWERFUL TOOL FOR EA PREVENTION

Report Options

Fiscal Year: ALL

Date of Interest: Select a Date of Interest...

Start Date: [Text Box]

End Date: [Text Box]

MAJCOM: ALL

Base/Installation: ALL

EPA Region: ALL

REO Region: ALL

Issuing Agency: ALL

Law: ALL

State: ALL

Overall Root Cause: ALL

Specific Root Cause: ALL

EA/HNEA Status: Pending Unresolved Disputed Closed

Classification: Administrative Operational Project N/A

Impact Level: High Visibility All Others N/A

Entries with Fines and Penalties: Yes No

Entries Resulting from Regulatory Inspection: Yes No

Compliance Agreement Entries: Yes No

EA HNEA

Reset Search



EVA Table of Contents

U.S. AIR FORCE

Section	Slide #
Air Program	6-7
RCRA and Solid Waste Programs	8-9
Toxics Program	10-11
Water Program	12-15
Tanks Program	16-17
Restoration Program	18-19
Regulatory Trends	20-21
Delegation of Programs to State	22-25
Fines, Penalties, and Liabilities	25
Points of Contact	26-27
Appendix A – Regulatory Agency Priorities	28-30
Appendix B – National Enforcement Trends	31-37



U.S. AIR FORCE

Regulatory Agency Contact Information

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION 5

77 W. Jackson Blvd.

Chicago, IL 60604

312-353-2000 or

toll-free at 800-621-8431

<http://www.epa.gov/region5/contact.htm>

- Dan Wyant, Director
Michigan Department of Environmental Quality
525 W. Allegan Street, Constitution Hall., 6th Floor S
Lansing, MI 48909
(517) 373-7917 voice
<http://www.michigan.gov/deq>



U.S. AIR FORCE

EPA National Federal Facilities Compliance & Enforcement FY 2012 Program Agenda

The federal facilities program strives to achieve EPA's Strategic Goal of Improving Compliance by ensuring federal agencies comply with environmental laws. The federal sector is one of the largest and most diverse in the nation. EPA is focused on ensuring long-term environmental compliance, and uses both enforcement and compliance assistance to accomplish this. Timely and appropriate enforcement actions are emphasized in Integrated Strategy areas that compliance assistance was delivered or inspections were conducted in prior years. The national federal facilities program seeks to maximize environmental benefits by focusing on:

INTEGRATED STRATEGIES: *Aligns EPA's Compliance Assistance, Compliance Incentives, and Monitoring & Enforcement tools to assure compliance by the federal community.*

- NPDES Stormwater requirements (FY06-FY12)
- Federal Underground Storage Tanks (FY07-FY12)
- RCRA Integrated Strategy with emphasis on 1) corrective action progress; 2) facilities that generate medical hazardous waste and 3) LQGs with violations found in past 5 years not addressed by formal enforcement.
- Exploratory integrated strategy areas for FY 2012: GOCO/GOPO facilities, HCFCs/CFCs and Energy Extraction, which complements a new national OECA-wide initiative.
- Inspection targeting in Vulnerable Communities to monitor compliance with all media programs including current Integrated Strategies as well as other statutes outside of FFEO's FY 2012 Integrated Strategies.
- Inspection activities associated with the disposal and selling of excess federal real estate property that is no longer needed.

ENFORCEMENT: *Through Monitoring and Enforcement, the National Federal Facilities Program will increase compliance, pollutant reduction or treatment, and improve environmental management practices by:*

- Timely and appropriate enforcement actions for each Federal facility, including those inspected pursuant to an Integrated Strategy area.
- Reducing Green House Gas emissions from federal facilities in enforcement action settlements and SEPs.

MONITORING: *By monitoring compliance, EPA seeks to ensure that Federal facilities operate in accordance with environmental laws, especially in Integrated Strategy areas.*

- National Program Managers Guidance ACS Process:



U.S. AIR FORCE

EPA National Federal Facilities Compliance & Enforcement FY 2012 Program Agenda (Ctnd)

- Each Region must conduct 10 federal facilities inspections to support integrated strategy areas. This requirement can be satisfied through any combination of single media or multimedia inspections, with the following limitation: a maximum of three UST and three vulnerable community inspections can count toward the total of ten. A multimedia inspection may count as two inspections if the site inspection supports two *Integrated Strategies*.
- Inspections may simultaneously satisfy inspection commitments required in any National Enforcement Initiative or other core Regional program area. Inspections in IS Exploratory Areas (GOCO/GOPO, HCFCs/CFCs and Energy Extraction) qualify for annual commitment credit. These activities, along with the activities identified in the OECA National Program Manager Guidance under specific Federal Facility Enforcement Program performance expectations, serve as minimum federal facility priority areas. Regions may also pursue their own priorities.

COMPLIANCE ASSISTANCE: *Through Compliance Assistance, EPA hopes to improve federal facility understanding of environmental requirements; federal facility implementation of environmental management practices and increase the number of regulated federal entities that reduce, treat, or eliminate pollution. EPA will accomplish this by:*

- Maximizing use of *FedCenter*, the Federal facility environmental stewardship and compliance assistance center, to deliver compliance assistance tools and training opportunities.
- Considering climate change mitigation and adaptation work in Regional compliance assistance activities, particularly in vulnerable communities.

CLEANUP/LAND RESTORATION: *The National Federal Facilities Program also strives to achieve EPA's Strategic Goal of Restoring Land by overseeing federal facility cleanup of contaminated property. We will measure the volume of contaminated media addressed by our actions and focus this year on:*

- Taking timely and appropriate enforcement actions to address noncompliance with cleanup responsibilities.
- Timely completion of CERCLA Federal Facility Agreements (FFAs).
- Integrating Corrective Action at federal sites into the proposed National Enforcement Strategy for Corrective Action (NESCA); Participating in NESCA and focus on federal facilities aspects of the initiative.
- Develop proper written documents to support oversight and future enforcement actions where needed.
- Partnering with program offices to ensure munitions and other priority contaminants are addressed in cleanups, initially focusing on sites where cleanup construction should be completed by FY 2013.
- Assuring proper and enforceable safeguards are in place for long-term stewardship at cleanup sites.

DATA QUALITY AND REPORTING: Capturing the environmental results of our activities in the federal facilities sector is critical to demonstrate the impact of our work. We will measure our progress on EPA's Strategic Goals by ensuring that environmental results are recorded on the proper data sheets and entered into the appropriate data systems for all federal facility activities.



U.S. AIR FORCE

Recent Enforcement Actions

Michigan, FY 11 - Present

State	Law	Violation Date	Status	Issuer	Summary of Findings
MI	CWA	15 Feb 11	Closed	State	Permit Holding time (7 days) exceeded (9 days) on TSS parameter for sanitary sewer self-monitoring event.



SAF/IEE FY12 Priorities

U.S. AIR FORCE

- Refocus Environmental Cleanup Program
- Refocus Environmental Impact Analysis Process (EIAP)
- Refocus Pollution Prevention (P2) Efforts
- Establish Net Zero Policy
- Ensure Proper ESOH Program Oversight
- Implement Safety & Occupational Health Management System
- Ensure Active Range Cleanup
- Conduct Strategic Communications in Planned, Proactive Manner
- Streamline Risk Analysis in CERCLA Process
- Integrate Climate Change Adaptation into Planning Process



U.S. AIR FORCE

Summary: Emerging Trends and Potential Vulnerabilities

- EPA shift from compliance assistance to enforcement; See EPA National Federal Facilities Compliance & Enforcement FY 2012 Program Agenda
- Growing threats from water rights challenges, use restrictions, emerging State legislation on conservation/drought preparedness
- States seeking increased storm water discharge "fees"
- General 'cool down' in GHG reduction emphasis (except California) - most likely due to the economic downturn
- EPA's proposed Air Toxics Standards for Boilers and Process Heaters (Boiler MACT & Area Source Rules) will create a significant expense

Headquarters U.S. Air Force

Integrity - Service - Excellence

Questions?



U.S. AIR FORCE
