

EPCRA Updates & Lessons Learned

2010 Lessons Learned & New Toxic Chemicals

Form R Data Hard at Work

Defense Environmental Programs Annual Report to Congress

The information provided on your Form R(s) is the basis of all data, calculations, and analysis for the Defense Environmental Programs Annual Report to Congress (DEP ARC). The fiscal year (FY) 2010 DEP ARC provides a comprehensive review of the Department of Defense's (DoD) budget trends and

the Navy Toxics Release Inventory (TRI) total releases on- and off-site, top 10 toxic chemicals released, top 10 installations (highest release amounts), and the top 10 percent change for toxic chemical releases and installation total releases. The summary analysis provided in the DEP ARC identifies toxic chemical release trends across the services allowing for comparisons, trend analysis, and identification of release reduction successes.

toxic chemical releases and tracks progress made during the previous year as well as plans for the current year and beyond. Form R release data collected in support of EPCRA Section 313 compliance is used to assess Navy's success in meeting the toxic chemical release reduction goal identified in the SSPP and new opportunities for reduction.

However, the Form R data and information currently collected only tells

The FY 2010 DEP ARC is available for review and download on the DENIX web site.

environmental performance. This publically available report summarizes the Emergency Planning and Community Right-to-Know Act (EPCRA) Section 313 reported toxic chemical data for DoD as a whole, each service, and the Defense Logistics Agency (DLA). It also examines progress made in meeting toxic chemical release reduction goals.

The DEP ARC presents Form R data for the current reporting year (RY) and the previous four years. It details

The FY 2010 DEP ARC is available for review and download at the DoD Environmental, Safety, and Occupational Health Network and Information Exchange (DENIX) web site at www.denix.osd.mil/arc/Index.cfm.

DoD Strategic Sustainability Performance Plan

Form R data is used to track progress towards the DoD Strategic Sustainability Performance Plan (SSPP) reduction goals. The SSPP identifies goals established by DoD to reduce

part of the story. The "EPCRA: Knowing is Half the Battle" article in the summer 2011 issue of *Currents* discusses updates to the Navy's environmental policy manual, due for release this year, and the subsequent policy and requirement changes for implementing EPCRA. In preparation for the new policy requirements, installations were asked to provide, along with their reports submitted in 2011, detailed information on the processes and activities that contribute to their toxic chem-

ical thresholds and emissions, events driving emission changes, progress and accomplishment supporting SSPP reduction goals, and reason(s) for non-reporting.

The FY 2010 SSPP is available for review and download at the DENIX web site at <http://www.denix.osd.mil/sustainability/PlansGuidance.cfm>.

If you have EPCRA related questions or need further clarification on what information to provide, please email the Navy EPCRA Helpline at NavyEPCRA@urs.com.

RY 2010 Lessons Learned

New data collected during the past reporting period provided additional insights to EPCRA-related processes and activities occurring Navy-wide. For RY 2010 efforts, many installations provided thorough responses regarding the processes and activities contributing to their toxic chemical thresholds and release, events driving release changes, progress and accomplishments supporting SSPP reduction goals, and reason(s) for non-reporting. The information you provide helps to identify pollution prevention opportunities, direct research and development efforts, and characterize progress made towards the SSPP reduction goal, so a complete response is crucial. To meet EPCRA reporting deadlines, now is the time to start collecting the information and data pertaining to the EPCRA TRI and SSPP. To assist with data collection and submission, ensure you follow the four guidelines below.

1. Processes triggering Form R reporting

Have I provided detailed information on processes triggering Form R reporting at my facility? A detailed response is especially important as no two facilities operate the same processes in the same way. The overall TRI process-driven data and information you provide serve as a starting point for headquarters personnel to analyze each installation's input processes and provides an opportunity to evaluate how the Navy will implement major projects to increase efficiency, comply with regulations, and minimize TRI releases.

2. Non-reporting explanation

Is the explanation for non-reporting clear and concise? For example, was the threshold not reached? If so, why? Was an exemption (or exemptions) applied to major activities resulting in no reporting required?

3. Explanation for a release increase/decrease

Did my TRI data analysis identify significant increases/decreases from the previous RY? If so, have I provide an explanation for the significant increases/decreases from the previous RY? For example, was the increase/decrease related to demilitarization, remediation, construction or demolition, weather, joint basing, or other events? Was the increase/decrease related to a facility change, such as workload, new process line, new weapon system, etc.? Was a process, material, or specific toxic chemical eliminated through process modifications or material substitution?

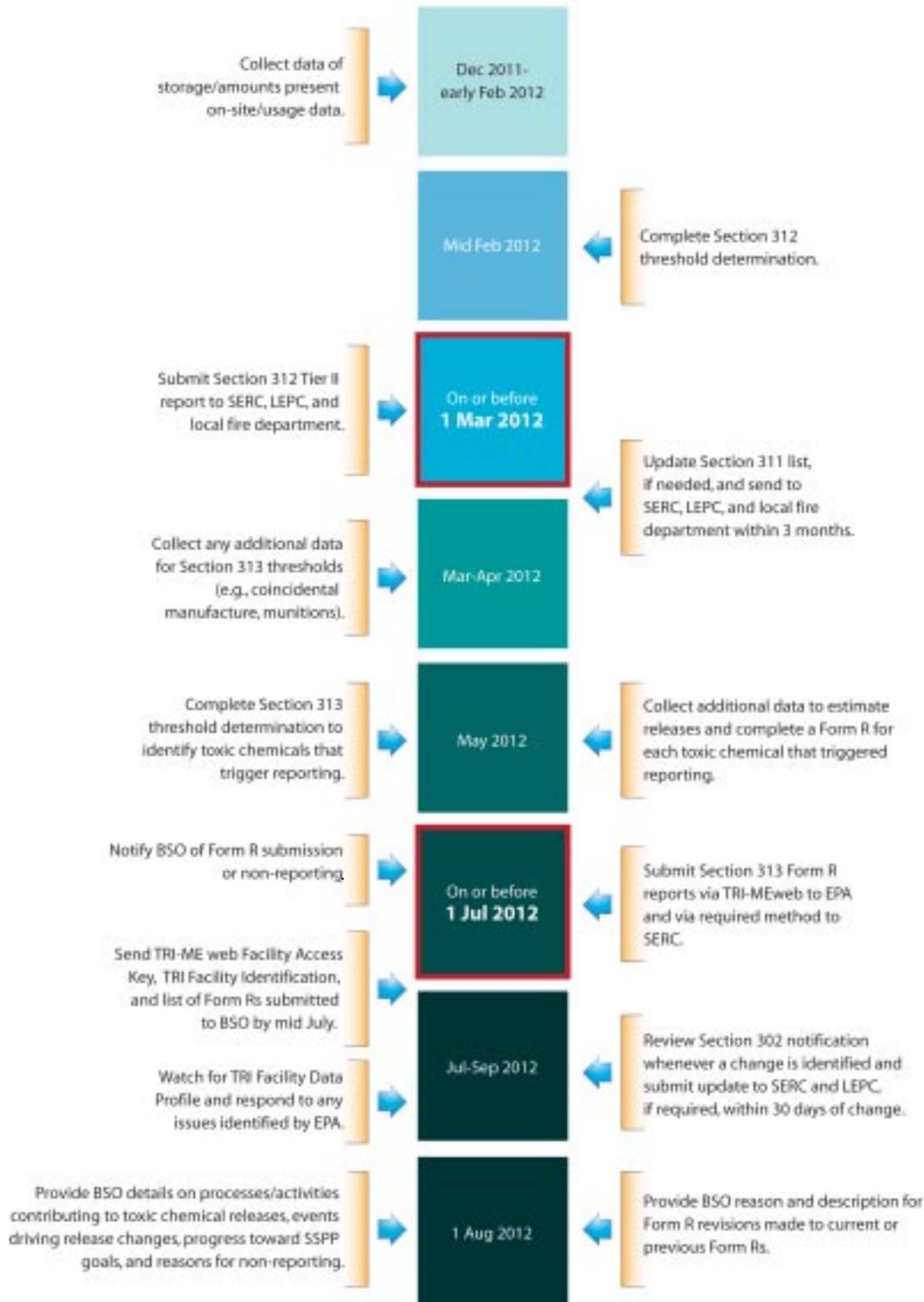
4. SSPP reduction goal progress report

Provide inputs on meeting the SSPP reduction goal of reducing non-range reportable quantities of on-site releases and off-site transfers of toxic chemicals by

EPCRA Related Data Request

THE INFORMATION YOU provide helps Navy to accurately assess toxic chemical releases, provides valuable insight into Navy Form R reporting, and helps to identify reduction opportunities through comparisons of toxic chemicals, processes, and activities between installations. For example, where two Navy installations are conducting the same processes but reporting different toxic chemicals or not reporting at all, a comparison could identify product substitutions, process modifications, or other opportunities to reduce toxic chemical releases and potentially eliminate the need to report.

RY 2011 EPCRA REPORTING TIMELINE



**Compile and complete all EPCRA documentation for the reporting year as soon as practicable following submittals. Timeline reflects OPNAVINST 3500.7, Environmental Readiness Program Manual, to be released 2012.*

15 percent by FY 2020 relative to RY 2006. A good example was provided by Fleet Readiness Center Southeast, where they decreased toluene use by 95 percent by switching to an environmentally-friendly aviation solvent, eliminating more than 700 gallons of toluene.

If you have EPCRA related questions or need further clarification on what information to provide, please email the Navy EPCRA Helpline at NavyEPCRA@urs.com or request assistance via the chain of command.

EPCRA News & Events

EPCRA Training Available Now

The Naval Civil Engineer Corps Officers School (CECOS) offers EPCRA and TRI Reporting refresher courses to prepare for RY 2011 deadlines of 1 March 2012 for Section 312 reporting and 1 July 2012 for Section 313 reporting. The Section 311/312 and Section 313 refresher courses briefly review the regulations with a focus on DoD and Navy-specific scenarios. Course participants may submit facility-specific questions in advance of the training for discussion. The refresher course for the Sections 311/312 requirements is offered on 12 January 2012 and the Section 313 refresher course is offered on 15 February 2012. All EPCRA course offerings are listed on the CECOS web site at <https://www.netc.navy.mil/centers/csfe/cecos/> under the courses tab.

New Toxic Chemicals for Section 313 Reporting

The U.S. Environmental Protection Agency (EPA) added 16 chemicals to the list of toxic chemicals subject to reporting under Section 313 of

Sixteen New Toxic Chemicals for RY 2011 Reporting

THE CHEMICALS ADDED to the EPCRA Section 313 toxic chemical list include the following:

- | | |
|-----------------------------------------|-------------------------|
| 1. 1-amino-2,4-dibromoanthraquinone | 7. o-nitroanisole |
| 2. 2,2-bis(bromomethyl)-1,3-propanediol | 8. nitromethane |
| 3. furan | 9. phenolphthalein |
| 4. glycidol | 10. tetrafluoroethylene |
| 5. isoprene | 11. tetranitromethane |
| 6. methyleugenol | 12. vinyl fluoride |

In addition, the chemicals added to the PACs toxic chemical category include:

- | | |
|----------------------|--------------------|
| 1. 1,6-dinitropyrene | 3. 6-nitrochrysene |
| 2. 1,8-dinitropyrene | 4. 4-nitropyrene |

EPCRA. The new chemicals are applicable for the RY beginning 1 January 2011 (reports due 1 July 2012). There are 12 individual toxic chemical listings and four chemicals added to the toxic chemical category for polycyclic aromatic compounds (PAC). The PACs category is a category of persistent, bioaccumulative, toxic chemicals and, as such, has a reporting threshold of 100 pounds.

EPA's Consolidated List of Chemicals Subject to EPCRA reporting (a.k.a. the List of Lists) reflects the additional 16 chemicals and is available on EPA's web site at <http://www.epa.gov/emergencies/tools.htm#lol>.

Navy Enterprise Resource Planning

The Navy Enterprise Resource Planning (ERP) system is an integrated business management system that updates and standardizes Navy business operations, provides financial transparency and total asset visibility across the enterprise, and increases effectiveness and efficiency. The first

release of the Navy ERP system, which includes financial management, acquisition program management, and workforce management, is currently in use at the Naval Air Systems Command, Naval Supply Systems Command (NAVSUP), Space and Naval Warfare Systems Command, and Naval Sea Systems Command General Fund. In addition, Navy ERP's Single Supply Solution rolled out to NAVSUP in March 2010. Over time, Navy ERP will replace the Regional Hazardous Inventory Control System and other systems used for hazardous materials management at Navy installations (industrial sites with hazardous materials managed by the DLA are not affected). 

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