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DEPARTMENT OF THE NAVY
NAVAL INSPECTOR GENERAL
WASHINGTON, D.C. 20374-2001

N60028_001225
TREASURE ISLAND
SSIC NO. 5090.3.A

5090/1
Ser 05/239
1 October 1993

IN REPLY REFER TO

From: Naval Inspector General

To: Commander, Naval Base, Treasure Island, 410 Palm Avenue,
San Francisco, CA 94130-0411
Commanding Officer, Fleet and Industrial Supply Center,
Oakland, CA 94625-5000
Commanding Officer, Navy Public Works Center, San
Francisco Bay, P.O. Box 24003, Oakland, CA 94623-5000

Subj: SURVEY OF THE LIFE CYCLE MANAGEMENT OF HAZARDOUS MATERIAL

Ref: (a) SECNAVINST 5430.57F
(b) OPNAVINST 5090.1A
(c) NAVINSGEN Washington 220803Z Sep 93

Encl: (1) Background Information
(2) Logistics and Security Information

1. References (a) and (b) establish the authority and responsibility for the Naval Inspector General's (NAVINSGEN) Navy Environmental Inspection Team (NEIT) to conduct inspections and surveys of various elements of the Navy's environmental protection program. Reference (c) announced that during the period 25 October through 30 November 1993, the NEIT will visit several Fleet and Industrial Supply Centers (FISCs) and their associated Defense Distribution Depots, public works organizations, and area Defense Reutilization and Marketing Offices (DRMOs).

2. Enclosure (1) provides background information and the NAVINSGEN's goals and objectives for this Navywide inspection. The inspection will be conducted in three phases:

- | | |
|-----------|---|
| Phase I | Information visit to the Naval Supply Systems Command (NAVSUPSYSCOM); |
| Phase II | Surveys of several FISCs and their associated Defense Distribution Depots, if applicable;

Surveys of Public Works Centers (PWCs) and/or Public Works Departments (PWDs) Defense Reutilization and Marketing Offices (DRMOs) within the FISCs' regions; |
| Phase III | De-brief at NAVSUPSYSCOM (FISC representatives are encouraged to attend). |

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3. Your activity has been chosen as a site for a Phase II survey. During this Phase II survey, NEIT will gather facts and information regarding the entire life cycle management of hazardous material in your area from requisition to disposal.

4. Each commanding officer should designate a Point of Contact (POC), i. e., one from Naval Base (COMNAVBASE) San Francisco, one from the FISC Oakland, and one from the PWC Oakland to help coordinate the visit matters with NEIT.

5. The Naval Base San Francisco POC will be the primary POC. The primary POC should act as the overall visit coordinator to ensure that: FISC and PWC POCs are designated and NEIT logistics requirements outlined in enclosure (2) are met. The COMNAVBASE, FISC, AND PWC POCs should also assist NEIT with arrangements for visits to base and tenant activities as needed.

6. The FISC Oakland POC should coordinate with the Defense Logistic Agency (DLA) Defense Distribution Depot, and the Regional Shelf Life Coordinator as well as FISC departments to ensure their involvement in the survey. During the visit, the FISC Oakland POC should help NEIT schedule meetings and gain access to FISC and/or DLA hazardous material warehouses/storage areas, documents, flow diagrams, and other pertinent documents.

7. The PWC Oakland POC should coordinate with DRMO and appropriate PWC departments to ensure their involvement in the survey. During the visit, PWC Oakland should help NEIT schedule meetings and gain access to hazardous waste storage areas, DRMO storage facilities, manifests, HW annual reports, and other pertinent documents.

8. Mr. Tom White of NEIT will conduct an informal entry brief on the morning of **29 October 1993** and an exit brief on the morning of **3 November 1993**. The primary POC should coordinate times and locations for these briefings prior to the visit.

9. Please provide names and phone numbers of your POCs NLT 8 October 1993 to Ms. Vickie Durbin at (804) 444-1086 or DSN 564-1086 as soon as possible. Enclosure (2) provides NEIT logistics requirements for this survey, NEIT security information, and other pertinent information.

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10. If you would like any additional information regarding this inspection, please contact Mr. Tom White or Mr. Mike Doyle at (804) 444-1086 or DSN 564-1086. If any information needs to be sent by a facsimile, the number is (804) 444-1088.



K. R. STILL
By direction

Copy to:

ASN (I&E)

NAVINGEN (NIG-OOE)

CNO (N4, N45)

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CINCPACFLT

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WESTNAVFACENCOM



DLA MMDO

DLA MMSLP

DRMSD

DRMSDW

DLA DDRW

DRMO Oakland

DDOC

BACKGROUND INFORMATION

LIFE CYCLE MANAGEMENT OF HAZARDOUS MATERIAL INSPECTION

GENERAL INFORMATION

GOAL: To identify root causes of problems with the Navy's life cycle management of hazardous material, which lead to the underutilization and premature disposal of the material as hazardous waste. To recommend process improvements in life cycle control and management which mitigate these problems.

ISSUE: Navy activities and supply organizations are transferring a significant amount of unused/unopened hazardous material (HAZMAT) to Defense Reutilization and Marketing Offices (DRMOs) for donation to non-Navy organizations, resale to the public, or disposal as hazardous waste (HW). Ramifications of this ineffective HAZMAT control and management include, but are not necessarily limited to the following:

- a. Loss of initial procurement, handling and storage funds; additional cost for procurement of replacement material; incurred cost for disposal of the excessed material as HW.
- b. Exacerbates environmental problems and increases cost and liabilities associated with handling, storage and disposal of HW; is inconsistent with both EPA's and the Navy's pollution prevention policies and programs.
- c. Unused/unopened HAZMAT as well as waste byproducts from the manufacture of replacement materials must often be disposed of as hazardous wastes. Waste byproducts from manufacturing processes contribute to air and water pollution. Energy and natural resources used to process and manufacture HAZMAT are wasted when unused products are disposed of as waste.

BACKGROUND:

1. Shelf-life expired HAZMAT is found in shops, storage areas and supply warehouses at Navy activities during nearly every NEIT inspection. In many cases, shelf-life can be easily extended, however, few activities have programs in place to do so. Although the material is frequently used, without benefit of shelf-life extension or testing, a significant volume ends up at DRMOs for disposal.
2. NEIT has visited DRMOs where large volumes of expired shelf-life and excess HAZMAT from Navy activities are processed for resale, donation or disposal. In many cases

material coming from Navy activities is sent directly from base supply departments and FISCs. As substantial as the problem is in the continental United States, it is even greater at overseas bases, such as in Japan, Guam, Iceland, and in the Mediterranean.

3. FISCs and base supply department personnel have reported to NEIT inspectors that hazardous material often arrives at the activity with either expired shelf-life or with less than three months to expiration. This is particularly a problem at overseas activities. Although hard data to support this assertion has not generally been available, it was noted during the NEIT inspection of FISC/DDD Norfolk, that the Navy has actually been receiving expired or nearly expired HAZMAT from GSA and DLA warehouses.

4. Supplies, including HAZMAT, shipped from the U.S. to naval activities overseas may take 90 days or more between the request for the material and receipt at the ultimate destination. Because of long logistical lead times, supply departments seldom refuse shelf-life expired material, whose absence would adversely impact mission. Activities accepting expired shelf-life material out of necessity, assume the responsibility of extending the shelf-life and the financial and environmental liability of disposing of unfit material.

5. Many area, regional, base and tenant commands are setting up various types of HAZMAT control centers and reutilization programs. These programs present some complex organizational problems. In some cases the FISCs, supply depots, and base supply departments are involved in these programs. In other cases the supply organizations have been unwilling to participate in actions to improve the control and management of HAZMAT.

INSPECTION SPECIFICS

PLAN: The Navy Environmental Inspection Team (NEIT) will systematically review the steps in the life cycle of Navy hazardous material. This evaluation will include field investigation of:

- (1) supply processes including procurement, receipt, storage, and distribution;
- (2) customer use practices including stocking, rotation of material, and turn-in of hazardous material to either supply or public works organizations;
- (3) the disposition of materials through DRMO as either a hazardous waste or a usable material for donation or resale.
- (4) Navy supply system and other initiatives to promote full utilization of HAZMAT through the development of material control and reutilization programs will also be addressed.

SCOPE: *This inspection will provide an opportunity to gather and evaluate information about "cradle to grave" management of hazardous materials. The scope will include an administrative component to identify what is supposed to be done and what are the expected levels of performance; a field component to verify program implementation and actual levels of performance; and an evaluation of the roles of the major organizational units involved in carrying out this complex process.*

1. Strategic plans, policies, administrative procedures, and operations will be reviewed. Overall Navy policies and directives involved in the procurement, receipt and storage of HAZMAT will be evaluated. Navy organizations involved with item management, development of hazardous material specifications, distribution, use, and tracking of hazardous materials; hazardous materials/waste minimization; and the collection, management and disposal of excessed hazardous materials and wastes will also be asked to participate. Department of Defense organizations that play a part in the Navy's management of HAZMAT, including the Government Services Administration (GSA), Defense Logistics Agency (DLA), Defense Reutilization and Marketing Service (DRMS) and various regional Defense Reutilization and Marketing Offices (DRMOs) will also be requested to provide information.

2. NEIT will review HAZMAT management and control programs, processes, and initiatives at the Naval Supply Systems Command (NAVSUPSYSCOM) and the Fleet Industrial Supply Centers (FISCs), FISC detachments, and supply depots. How Navy policies and directives have been implemented and applied in different regions will be evaluated. The requisition, issue, and distribution of HAZMAT to the fleet; duration of remaining shelf life and condition of material at issue; labeling, packaging, and units of issue; and types and quantities of HAZMAT being issued will also be covered.

3. NEIT will evaluate avenues for customers/users to turn in unused HAZMAT for recycling, and whether these avenues are actually being used, or as is often the case, is it easier for the customer label it HW and turn it over to Public Works (PW) for disposal. NEIT will look at PW procedures to determine if HAZMAT, collected from shore and ship customers, is automatically downgraded to HW for easy disposal or channeled into a base reutilization program. NEIT will examine FISC and supply department procedures and criteria for determining if a HAZMAT can be accepted into stock. DRMO processes for HAZMAT resale or donation will also be reviewed.

4. The roles of the FISCs, Regional Shelf-life Coordinators, and the Public Works organizations in hazardous waste (HW) minimization will be evaluated. The role of FISCs in resolving HAZMAT customer supply problems and as agents to facilitate better control of HAZMAT will be evaluated.

ANTICIPATED BENEFITS: *To gain a better insight into the problems and issues related to the acquisition storage, management, distribution, issuance of HAZMAT to Navy customers which result in large amounts of unused, unopened HAZMAT being disposed of as HW. The objective is to enhance the understanding of the inner-workings of the supply system, gain experience working with supply personnel, apply lessons learned, and actual information accumulated during the inspection to assist the Navy in its efforts to reduce the generation of HW especially from the underutilization of its material assets.*

CUSTOMERS:

ASN I&E
CNO N4
CNO N45
NAVSUPSYSCOM
All Navy Major Claimants and Activities
DOD IG
DLA

MAJOR TOPICS:

1. **NAVSUPSYSCOM ROLE IN THE NAVY HMC&M PROGRAM** as envisioned in OPNAVINST 4110.2; progress toward completing action directed by the Master Navywide Hazardous Material Control and Management Plan of Action and Milestones dated 21 Aug 1992; initiatives to better control and manage Navy materials; initiatives to revise material specifications and shelf-life.
2. **DLA AND GSA HMC&M INITIATIVES** to provide better service and avoid passing shelf-life expired and nearly expired HAZMAT to the Navy.
3. **NAVY AND DLA INTERFACE IN HMC&M** regarding the Defense Distribution Depots and the physical management and distribution of Navy HAZMAT; DLA initiatives to improve HAZMAT management and shelf-life management; regional ISSAs and actual working relationships between the individual FISCs and their respective DDDs; consistency with the Navy/DLA MMOA, clear delineation of responsibilities, all "bases covered", maturity of relationship, effective communication, good coordination, cooperative atmosphere, supplier/customer roles, FISC oversight of DDD operations, FISC assumption of role as Navy customer advocate and liaison with DDD.
4. **NAVSUPSYSCOM, FISC AND DDD COMPLIANCE WITH DOD AND NAVY HMC&M AND MATERIAL MANAGEMENT INSTRUCTIONS**, especially NAVSUPINST 4410.52 Shelf-life Item Identification Management and Control; HAZMAT inventory management, shelf-life management and extension programs, stocking levels, and units of issue; administrative procedures including issue of Records of Discrepancy (RODs), proper completion

of 1348's, periodic review of shelf-life HAZMAT, biannual shelf-life review reports.

5. **HAZMAT INVENTORY CONDITION:** container condition, age, labeling, frequency of unknowns, types and condition of storage facilities for ready for issue (RFI) HAZMAT, hazardous material turned into store (HMTIS) storage and handling, where HAZMAT is stored, proper storage/segregation of incompatible HAZMAT, types HAZMAT on hand. Gather photographic evidence.

6. **FISC FLEET/CUSTOMER INTERFACE AND SUPPORT** including policies and procedures for CONUS and OCONUS issue, distribution, and transportation of HAZMAT.

7. **FISC AND PW HAZMIN EFFORTS:** role of the Regional Shelf-Life Coordinators, regional HAZMAT control and reutilization programs; the FISCs' role as Navy agents on behalf of their Navy customers for identification and resolution of all supply system related issues; PW's role involvement in regional reutilization programs; PW procedures for HAZMAT and HW collection and disposition.

8. **REGIONAL IMPORT PROCEDURES** for acceptance and processing CONUS and OCONUS hazardous material turned in to store starting with the customer/users and PW and ending with DRMO and/or the FISC/DDD. Estimate amount of HAZMAT going to disposal as HW, especially shelf-life expired, good condition excessed HAZMAT. Gather photographic evidence.

9. **PW AND DRMO INTERFACE AND DRMO INVOLVEMENT IN HAZMIN:** handling of collected HAZMAT, the DRMO Reuse, Transfer, Donation and Sale (RTD&S) process, when HAZMAT is downgraded to HW.

LOGISTICS AND SECURITY INFORMATION

LOGISTICS INFORMATION

PLEASE PROVIDE THE FOLLOWING SUPPORT:

1. Private WORKSPACE for five (5) people using portable computers with tables to contain reports, various books, manuals, and reference materials. A conference room type environment with desks for each team member's computer and reference materials is preferred. A key for locking the workspace at night will also be required. Additionally the workspace should have the following:

a. Electrical outlets, and/or extension cords, sufficient to handle a minimum of five (5) portable computers and one (1) printer;

b. LaserJet printer or equivalent with printer cable for hookup to portable computers provided by the host command. NEIT computers have a 25-pin port for printer hookup;

c. A large markerboard or flip chart with markers;

d. Telephone with capability of making long-distance credit card calls and DSN calls with telephone listing of key personnel; and

e. Copying capability at or near the workspace.

2. Two (2) official photographers available for the duration of the inspection with the following capabilities:

VHS Video

35 mm color print (8½" by 10") and slide photography

The photographers may be asked to prepare two (2) sets of video, color prints and color slides.

3. Escorts to accompany inspectors to all worksites.

4. Government vehicle transportation for NEIT inspectors and escorts to use during inspection of local workplaces.

Encl (2)

5. Provide any required specialized safety equipment for inspection team, other than safety glasses, safety shoes and hearing protection.
6. Please ensure that each inspector is provided with security badges & vehicle passes **PRIOR TO THE ENTRY BRIEF** and three (3) parking spaces at or within short walking distance of NEIT's private workspace, available for the duration of the inspection.

SECURITY INFORMATION

1. The below listed personnel have been issued NAVINSGEN credentials signed by the Secretary of the Navy designating each of them as an "Assistant Inspector General". In accordance with reference (a), these personnel are certified for access up to and including Secret; presumed to have a need to know and when requested, **granted immediate unescorted access to all Navy installations, ships, or commands**, other than those designated as Top Secret, Special Intelligence, or similarly controlled areas.

a. T. F. White, GM-14, Environmental Engineer, 227-56-4313, DOB 10/31/43, Norfolk, VA, SECRET clearance based on NACI completed 20 March 1989 by OPM, U.S. Citizen.

b. D. P. Cormier, GS-12, Environmental Engineer, 111-56-1017, DOB 9/7/60, Denver, CO, SECRET clearance based on NACI completed 1 October 1987 by OPM, U.S. Citizen.

2. Additional team member(s) have been selected to augment the inspection team. Their security information will be forwarded by separate correspondence.