

**BY ORDER OF THE COMMANDER
TINKER AIR FORCE BASE**

**TINKER AIR FORCE BASE INSTRUCTION
32-7003**



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Civil Engineering

**ENVIRONMENTAL RISK
MANAGEMENT PROGRAM**

COMPLIANCE WITH THIS PUBLICATION IS MANDATORY

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This instruction implements AFPD 32-70 and establishes procedures for identifying and correcting environmental deficiencies to lower the level of risk that base operations have on the environment, both on and around the base. It is applicable to all OC-ALC and associate organizations on Tinker AFB. It doesn't apply to Air Force Reserve and Air National Guard (ANG) units. Refer recommended changes and questions regarding this instruction to 72 ABW/CEAN using the AF Form 847, *Recommendation for Change of Publication*; route AF IMT 847s through publications/forms managers. Ensure all records created as a result of processes prescribed in this publication are maintained in accordance with AFMAN 33-363, *Management of Records*, and disposed of in accordance with the Air Force Records Disposition Schedule (RDS) located at <https://www.my.af.mil/gcss-af61a/afrims/afrims/>.

SUMMARY OF CHANGES

This interim change revises TINKERAFBI 32-7003 by changing the frequency of briefing the ESOH council from quarterly to semi-annually, and revises routing symbols and organizational name to reflect a recent reorganization. It also updates regulations referenced within Attachment 1.

1. General Information:

1.1. This instruction outlines the base's environmental risk management program. Environmental deficiencies as defined herein are the basis for identifying problems which need correction to reduce environmental impacts, health hazards, and deviations from environmental laws, regulations and instructions.

1.2. The capability to allocate limited resources to maximize benefits to the environment and minimize adverse environmental impact is provided through an information system, which establishes priorities for environmental deficiencies. This system of assigning relative priorities to environmental problems is intended to be compatible with other base management information systems throughout the base. Other management information systems such as those used in Accounting and Finance, Civil Engineering, and Supply can then direct limited resources to correct environmental deficiencies relative to other requirements for those resources.

2. Responsibilities

2.1. The Environmental Management Branch of Civil Engineering (72 ABW/CEIE) will:

2.1.1. Establish the relative priorities for "E" coded work requirements and will then relay these priorities to the appropriate Civil Engineering Committee (Facility Board, AF 332 (Civil Engineering Work Request) Working Group, etc.)

2.1.2. Be responsible for administering the Environmental Risk Management Program.

2.1.3. Develop procedures to oversee environmental programs across base through inspections, surveys, program audits, and records reviews.

2.1.4. Complete the Environmental Deficiency Record (EDR), maintain a file copy, and send the original EDR to the responsible organization.

2.1.5. Develop charts/slides for the Environmental, Safety and Occupational Health (ESOH) working group and council meetings.

2.2. 72 ABW/CE will:

2.2.1. Direct resources to correct environmental deficiencies according to the priorities outlined in paragraph 8 when real property installed equipment is involved.

2.2.2. Code environmental deficiency work requirements with an "E" in the Special Indicator Code column in the Interim Work Information Management System (IWIMS), for work orders.

2.2.3. Be notified of these environmental deficiencies by the responsible organization when a copy of the EDR is submitted with AF Forms 332, Base Civil Engineer Work Requests, to the Production Control Center (72 ABW/CEOW).

2.3. Responsible Organization will:

2.3.1. When notified of an environmental deficiency by 72 ABW/CEIE, take necessary action to correct the deficiency.

2.3.2. Complete section B of the EDR, explaining the action taken or to be taken, retain a copy and return the original to 72 ABW/CEIE within 30 days after receipt of the EDR. Original should be returned to 72 ABW/CEIE both hard copy and electronic copy. If appropriate, 72 ABW/CEIE may require the response earlier than 30 days.

2.3.3. Send an additional copy of the EDR, with sections A and B completed, to the Production Control Center (72 ABW/CEOW) together with the appropriate work request if required by 72 ABW/CE. If work is not applicable to Civil Engineering, this copy may be submitted with any other project documents as appropriate to show justification in correcting the environmental deficiency.

2.3.4. Keep CEIE informed on the status of the correction of the deficiency weekly until it is finally corrected to the satisfaction of 72 ABW/CEIE.

2.3.5. Brief the ESOH Council semi-annually on the status of all environmental deficiencies with an Environmental Risk Code (ERC) of E1 or E2.

2.3.6. Review, along with 72 ABW/CEOW, all work requirements for environmental deficiencies. The status of "E" coded work requirements and information on all identified environmental deficiencies will be made available for ESOH Council and ESOH Working Group (ESOH WG).

2.4. Organizational commanders will ensure protection of both the immediate work place environment and protection of the total base and community environment.

3. Survey Audit Procedures

3.1. The environmental deficiency survey, inspection, and audit program is the method by which 72 ABW/CEIE identifies, ensures correction, and tracks environmental deficiencies. Through periodic visits to base organizations, 72 ABW/CEIE personnel will pay particular attention to the following areas and record these deficiencies.

3.1.1. Responsible persons' knowledge of environmental compliance requirements, protective measures, emergency response, and their organization's policies and procedures for environmental protection (includes all environmental permits, if applicable).

3.1.2. Adequacy and condition of facilities, equipment alarms, protective systems, and other devices designed for environmental risk management.

3.1.3. Condition of hazardous material (includes material containing asbestos), containers (tanks, drums, etc.), associated equipment and spill containment.

3.1.4. Adequacy of procedures and practices to control exposure of personnel to environmental hazards or release of pollutants to the environment.

3.1.5. Housekeeping practices.

3.1.6. Proper separation, storage, labeling, segregation, placarding, and manifesting of hazardous materials and wastes.

3.1.7. Adequacy of record keeping for environmental risk management requirements such as hazardous waste tracking, training records, and environmental assessments.

3.1.8. Current, recurring, or imminent cases of pollution or hazard exposure which require prompt remedial action (including spills and asbestos incidents). Such cases will be brought to the attention of the supervisor in charge who must take immediate action to reduce the environmental risk.

3.2. 72 ABW/CEIE will:

3.2.1. Develop procedures and programs to survey work areas, utility systems, and treatment and storage facilities which have potential for environmental impact.

3.2.2. Establish programs to survey, audit and inspect base waste disposal sites (on/off base), and base property as a whole, to monitor environmental hazards. Such programs will include the Environmental Compliance and Management Program (ECAMP), Installation Restoration Program (IRP), Storm Water Compliance Inspection, asbestos surveys, and the hazardous waste initial accumulation point (IAP) inspection program.

4. Funding, Programming, and Methods for Correcting Deficiencies

4.1. Identifying, tracking, and correcting environmental deficiencies provide management with information on the relative priority of environmental problems. This information is used to guide decisions in the use of limited resources in correcting deficiencies. Programming and determining appropriate funding source and method of accomplishing projects to correct deficiencies is the responsibility of the responsible organization, often in conjunction with civil engineering programming personnel and environmental compliance personnel. The program is designed to set relative priorities for environmental deficiencies based on the knowledge and experience of industrial hygienists and environmental/bioenvironmental engineers and technicians. In many cases involving environmental deficiencies, correction is required by law. In some cases, military and federal services employees may be held personally liable for their decisions with regard to these deficiencies. A sound environmental risk management program will provide decision makers with the proper information to program for correcting deficiencies in accordance with the law and good judgment.

5. Assignment of Environmental Risk Codes (ERC)

5.1. Environmental deficiencies will be evaluated and assigned an ERC, when applicable. If the environmental deficiency is also a fire, safety or health related deficiency, an appropriate RISK Assessment Code (RAC) will be assigned by a Fire, Safety, or Occupational Health representative according to AF 91-301. If neither a RAC nor an ERC is applicable to the given environmental deficiency, the EDR will be annotated by 72 ABW/CEIE. Evaluation and assignment of ERCs are made by environmental compliance personnel but other units may recommend a potential ERC for an environmental deficiency. An ERC may be determined by plotting the characteristics and consequences (I, II, III, or IV) for an environmental deficiency versus its potential for adverse impact (A, B, C, D, or E) onto the Environmental Risk Code Matrix (Table 1). The corresponding numerical value obtained from the table is the ERFC. Interim control measures to reduce the environmental risk will result in the ERC being reevaluated.

Table 1. ENVIRONMENTAL RISK CODE MATRIX

	CHARACTERISTICS AND CONSEQUENCES		ENVIRONMENTAL IMPACT POTENTIAL		
	A	B	C	D	
I	1	1	2	3	
II	1	2	3	4	
III	2	3	4	5	
IV	3	4	5	5	

5.2. Deficiency Characteristic and Consequences:

5.2.1. Type I – Critical or Illegal. The environmental deficiency is one which:

5.2.1.1. Causes serious or nonreversible environmental damage or a serious health or safety hazard.

5.2.1.2. Results in the release of contaminants to the environment in direct violation of specifically mandated standards in state or federal laws, regulations, or instructions.

5.2.1.3. Would require clean up costs in excess of \$500,000.

5.2.2. Type II – Dangerous or in Violation. The environmental deficiency is one which:

5.2.2.1. Could cause significant but reversible environmental damage. No health or safety hazard.

5.2.2.2. Results in the release of contaminants to the environment in violation of recommended state and/or federal standards.

5.2.2.3. Would require clean up costs of between \$100,000 and \$500,000.

5.2.2.4. Is a violation of administrative regulations (for example deficiencies in manifesting, record keeping, certification and training requirements, or environmental assessments) when there is no apparent, immediate risk for the actual release of contaminants to the environment.

5.2.3. Type III – Careless or Improper. The environmental deficiency is one which:

5.2.3.1. Results in the release of actual contaminants to the environment but not in the type or amount which violates standards or recommended standards.

5.2.3.2. Is contrary to DoD, MAJCOM, or base goals, policies, guidelines, or initiatives designed to reduce adverse environmental impact or risk (for example, contrary to waste minimization goals).

5.2.3.3. Would require clean up costs between \$1,000 and \$100,000.

5.2.4. Type IV – Deficient or Unwise. The environmental deficiency is one which:

5.2.4.1. Causes unsightly or undesirable results but is not a health hazard and does not cause environmental degradation.

5.2.4.2. Is contrary to good judgement or engineering practice but does not violate environmental laws, regulations, instructions or recommended standards.

5.2.4.3. Would require clean up costs of less than \$1,000.

5.3. Environmental Impact Potential:

5.3.1. A – Occurring or Imminent. Adverse environmental impact, deficiency, regulatory or instructional violation, or need for cleanup is currently occurring – either continuously or intermittently, or will occur in a relatively short time if no action is taken to correct the deficiency.

5.3.2. B – Probable. Adverse environmental impact, deficiency, regulatory or instructional violation, or need for cleanup is likely to occur in time if the deficiency is not corrected.

5.3.3. C – Possible. Adverse environmental impact, deficiency, regulatory or instructional violation, or need for cleanup may possibly occur in time.

5.3.4. D – Unlikely. There is a low possibility that adverse environmental impact, deficiency, regulatory or instructional violation, or need for cleanup will occur in the foreseeable future.

5.4. ERC Descriptions:

5.4.1. 1 – Extreme.

5.4.2. 2 – Severe.

5.4.3. 3 – Moderate.

5.4.4. 4 – Minor.

5.4.5. 5 – Negligible.

6. ERC Versus 72 ABW/CE Programming Priorities

6.1. The approving authority from 72 ABW/CE assigns the proper priority to each work request according to AFI 32-1031. The following guidance is used by the Civil Engineering Directorate when assigning specific work priorities to work requirements which have assigned an ERC according to this instruction.

6.2. For Work Orders and Contract Projects:

6.2.1. ERC 1 – Priority I.

6.2.2. ERC 2 – Priority II.

6.2.3. ERC 3 – Priority III.

6.2.4. ERC 4 and 5 – Priority IV.

6.3. For Job Orders:

6.3.1. ERC 1 – Emergency.

6.3.2. ERC 2 – Urgent.

6.3.3. ERC 3, 4, and 5 – Routine

7. Media Versus ERC

7.1. The natures of environmental deficiencies are such that public opinion and its perception of a deficiency may overshadow the actual or potential environmental impact of the deficiency. If such is the case, the Environmental Management Branch (72 ABW/CEIE), with advice from the Office of Public Affairs (72 ABS/PA) and Staff Judge Advocate (72 ABW/JA), may change the Environmental Risk Code of a deficiency to ensure proper attention is focused to correct that deficiency. If a deficiency's ERC is modified because of public opinion the EDR will be so annotated.

8. Prescribed/Adopted Forms and Attachments

8.1. Prescribed Form:

8.1.1. TINKER AFB Form 233, *Environmental Deficiency Record*

8.2. Adopted Form:

8.2.1. AF IMT 847, Recommendation for Change of Publication

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Attachment 1**GLOSSARY OF REFERENCES AND SUPPORTING INFORMATION*****References***

AFI 91-202, The US Mishap Prevention Program, 20 Aug 2013

AFI 91-203, Air Force Consolidated Occupational Safety Instruction, 25 Jul 2013

AFI 91-301, *Air Force Occupational and Environmental Safety, Fire Prevention, and Health (AFOSH) Program*, 01 June 1996

OC-ALC TAFBI, Hazardous Waste Management Instruction, 4 Mar 2011

OC-ALC-TAFBI 32-7004, *Hazardous Waste Management Instruction*, 22 May 2006

Abbreviations and Acronyms

EDR— Environmental Deficiency Record

EPA— Environmental Protection Agency

ERC— Environmental Risk Code

ERMP— Environmental Risk Management Program

ESOH— Environmental, Safety and Occupational Health

IWIMS— Interim Work Information Management System

ODEQ— Oklahoma Department of Environmental Quality

RAC— Risk Assessment Code

Terms

Environmental Risk Management Program—A systematic program to identify, assess, prioritize, correct, manage and track environmental deficiencies.

Environmental Deficiency—Any situation which when corrected would result in a reduction of risk to the environment. Examples include sewer cross connections causing unpermitted discharges to streams, using hazardous materials when nonhazardous materials could be successfully substituted, improper disposal of chemical wastes on base which constitutes a hazard and exposure to hazardous chemicals in the work place beyond acceptable limits.

Environmental Risk Code—A number (1 through 5) preceded by an “E” assigned to an environmental deficiency according to this instruction. It establishes relative priorities for environmental deficiencies as determined by an environmental (72 ABW/CEIE) representative in coordination with the Bioenvironmental Engineering and Ground Safety representatives.

TINKER AFB Form 233, Environmental Deficiency Record—A written record describing the deficiency, action required to correct it, follow-on action taken, and cross reference information with 72 Civil Engineering Directorate (72 ABW/CEOW) Production Control Center.

Responsible Organization—The organization with primary responsibility for the property/material involved in the deficiency. This organization is responsible for ensuring the problem is corrected with direction and oversight from 72 ABW/CEIE.

Risk Assessment Codes—A number (1 through 5) assigned to an occupational/health deficiency or hazard according to AFI 91-301. It establishes the relative priority of occupational safety hazards as determined by the Safety Office (72 ABW/SE) or Bioenvironmental Engineering Services Flight (72 AMDS/SGPB). This instruction does not replace but rather compliments the risk assessment code procedures contained in AFI 91-301.

Work Requirements Coded “E”—Any work requirement (work request, work order, job order, or contract requirement) for Civil Engineering for which the main purpose is to correct an environmental deficiency. These work requirements are coded with a special indicator code “E” in the command use column of IWIMS (Interim Work Information Management System).

Interim Measures—Corrective action taken which reduces the environmental risk but does not totally resolve the deficiency.

Non-reversible Environmental Damage—Damage which cannot be repaired, replaced, etc., (for example, a fish kill).

Mandated Standards—Standards which are prescribed by law, regulation, or instruction and must be adhered to or a notice of violation or other enforcement action could be issued by a regulatory agency, such as the Environmental Protection Agency (EPA), Oklahoma Department of Environmental Quality (ODEQ), etc.

Recommended Standards—Recommended Standards are standards which have been proposed by regulatory agencies, but are not enforceable. Such standards are set as a guideline due to the lack of any regulated standards for a particular media.

Environmental, Safety, and Occupational Health (ESOH) Council—A forum for discussing ESOH problems, advising the installation commander on ESOH related matters, and recommending solutions to ESOH problems to the installation commander.