

Quantum Change in Environmental Compliance in Naval Region Europe

New EMS Simplifies Procedures

IMAGINE TRYING TO keep your installation in compliance with environmental regulations with a staff that has very little corporate knowledge, multiple sets of rules and the expectation that environmental regulators are unlikely to conduct inspections.

That's the challenge that has faced environmental programs in Commander, Navy Region Europe, Africa, Southwest Asia (CNREURAFSWA) for years. Add to those factors a high staff turnover rate,

stewardship occurred across the entire installation population.

The OCONUS Culture

Due to limitations on lengths of overseas tours, Outside the Continental United States (OCONUS) installations have a much higher employee turnover rate than facilities within the U.S. Typical civilian tours range between two and five years, and military tours typically rotate more

environmental regulatory requirements, it is, for the most part, non-specific. For example, a backflow prevention program protects drinking water systems from materials that may contaminate the system. Some U.S. states have dedicated several pages of regulations instructing utilities on how to manage their backflow prevention program; however, the FGS provides only a single sentence directing installations to establish an effective backflow prevention program.

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and it's no wonder that these installations failed environmental compliance audits for many years. In fact, external auditors routinely found the same problems at each installation, even on a three-year external audit cycle. Compliance audits and self-reporting mechanisms were employed in an effort to fix the problem, but they all fell short in maintaining a healthy environmental program. It was only when an Environmental Management System (EMS) was implemented that a fundamental shift in attitudes toward environmental

frequently. This impedes critical corporate knowledge retention for operations and facilities. Some corporate knowledge, however, is retained by host nation personnel, who generally do not rotate in and out of positions like civilians or military.

Environmental compliance for OCONUS installations is governed by a document called the Final Governing Standards (FGS). Although this document incorporates the most protective of U.S. or host nation envi-

For years, CNREURAFSWA tried to establish a healthy environmental program by using external and internal audits and self-reporting mechanisms to help installations maintain environmental compliance. These avenues relied upon inspections and self-enforcement, which resulted in limited success. What seemed to be missing was a commitment to go beyond the minimum, to make environmental issues a priority for the installation, and to engage process owners.

EMS to the Rescue

It was evident that a real change was needed to make environmental issues a priority to OCONUS installations. The answer came from Executive Order (EO) 13423 entitled Strengthening Federal Environmental Energy, and Transportation Management which, among other items, required EMS implementation at all appropriate organizational levels. Under this guidance, the Navy then required all appropriate installations to incorporate EMS by 30 September 2009. Appropriate facilities in CNREURAFSWA include:

- Naval Support Activity (NSA) Naples, Italy,
- Naval Station (NAVSTA) Rota, Spain,
- NSA Souda Bay, Greece,
- NSA Bahrain, and
- Naval Air Station (NAS) Sigonella, Sicily.

EMS is basically a management system that integrates environmental concerns and issues into the organization's management processes. It helps organizations avoid environmental problems by increasing awareness, and by developing and implementing sustainable activities and processes. Quite simply, it's a framework that evaluates and prioritizes those activities that can have a significant impact on the environment. EMS provided the impetus to shift outdated perceptions of base environmental programs from one as an enforcer to one as an enabler of environmental compliance.

In order to implement EMS, several elements have been incorporated into the organization's day-to-day business.



Installation Commanding Officer for NAS Sigonella signs his EMS self declaration memo. LEFT TO RIGHT: Barbara Tissier, Captain Thomas J. Quinn, Scott Horwitz and Cora Mata.

Norman Stiegler

One important element included identifying operations that can significantly impact the environment (i.e. generation of hazardous waste, petroleum spills, etc). Standard Operating Procedures (SOP) for those operations were established for process owners to educate them on how they can minimize their impact. For example, if a facility determined that preventing oil spills was a priority, then the facility would identify all areas that use oil, produce appropriate SOPs and work directly with the process owner to identify how they can minimize the risk of spilling into the environment.

To produce meaningful SOPs, environmental personnel needed to understand how each department interacts with these operations. Environmental staff worked with operators to understand how they do their jobs in order to determine how best to incorporate environmental controls into their work processes. A fairly simple idea, yet it would require a culture shift and an effort on everyone's behalf. The relationship between environmental

personnel and process owners had historically been strained, even adversarial, due to environmental personnel enforcing various requirements that may not have always made sense to other employees.

At CNREURAFSWA, EMS was embraced by Installation Commanding Officers (ICO), and their leadership. Enthusiasm quickly spread throughout the entire installation, from shop workers to white collar workers, from Port Operations to Public Works, from new enlisted sailors to veteran Naval Officers, civilians, local nationals and contractors. This new environmental awareness is driving a quantum change in environmental compliance.

An About-face in Attitude

The changes in attitude became quite clear with EMS conformity audits for Europe and Southwest Asia installations. Operators greeted the auditors with enthusiasm and were proud to show how they had incorporated environmental controls in

their workplaces. Environmental personnel were greeted like they were old Navy buddies as employees discussed what they were working on, and talked about exchanging new ideas. Workplaces contained SOPs that were readily available and easily accessed. Some shops used colorful posters and were actually excited to see auditors arrive. Shops that auditors were unable to visit expressed open disappointment.

It's still too early to measure exactly how well EMS is working, but CNREURAFSWA is beginning to see evidence that EMS is making a difference in environmental compliance. Fewer compliance problems are being found during internal audits and data calls. Outstanding compliance issues are being corrected, and



The Auto/Wood Skills Center staff at NSA Naples Support Site, with assistance from the Public Works Department Environmental Office, has integrated environmental management into their daily work lives. Gino Spirito, an employee at the shop, reports that spills have been reduced by 100 percent. Scott Horwitz

new ways of conducting business are being considered to create a better way to run operations.

Driving the Change

So how did CNREURAFSWA drive these critical changes and become the first multi-installation region within the Commander Navy Installations Command (CNIC) to achieve 100 percent EMS conformance? Leadership commitment and visibility were critical.

In 2008, CNREURAFSWA made EMS conformance the number one environmental priority, and installation environmental staffs worked steadily on implementation. One important concept of EMS, though, is that roles and responsibilities regarding EMS extend beyond the Environmental Office and require coordination across the entire installation. As ICOs became engaged and began communicating EMS importance to tenant commands, the momentum accelerated.

In Their Own Words

Once tenant commands understood their role, and that the EMS was a systematic process to ensure that they had the tools and information they needed to maintain compliance with environmental requirements, their relationships with the Environmental Office began to strengthen. Barbara Tissier, Installation Environmental Program Manager at NAS Sigonella, states, "EMS has helped us build a better working relationship with both our top management as well as our process owners. We have not only been out in every building and shop, but we are now known by first name in the ICO's office, talking with everyone about how to make environmental management improve-

ments at Sigonella. When everyone communicates, things happen."

NAVSTA Rota's Commanding Officer Captain William F. Mosk is an EMS proponent. "The implementation of EMS at NAVSTA Rota has been a huge success. You don't have to look hard to see the tangible improvements," said Mosk.

In addition to awareness and compliance, another benefit is fiscal savings. "NAVSTA Rota's utilities conservation efforts have resulted in over \$350,000 in savings this fiscal year, and we have an opportunity to save even more. Our environmental focus has resulted in less spills and increased recycling. Everyone is involved and doing the right thing."

Rudy Criscuolo, from the Public Works Transportation Department at NSA Naples, thinks EMS is a good system because it helps define environmental goals for the base and his department. Rudy reports that "since implementing EMS, SOPs for various processes have been updated and employees are reminded of the importance of preventing spills, reducing the amount of energy and water usage and recycling. Also, employees are more aware of the importance of maintaining training records and documentation." ⚓

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