# THE AFLC ECAMP EXPERIENCE: HOW IT WAS DONE AND LESSONS LEARNED

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## INTRODUCTION

The U.S. Air Force established the Environmental Compliance Assessment and Management Program (ECAMP) to enhance and ensure Air Force compliance with federal, state, and local environmental statutes, as well as with DOD and USAF policies and regulations. The cornerstone of ECAMP is a thorough, on-site facility inspection and records review for each of ten environmental programmatic areas. This paper describes Headquarters Air Force Logistics Command's (HQ AFLC) approach to implementing its first round of external ECAMP evaluations. Emphasis is placed on the "lessons learned" and action plan for future ECAMP evaluations.

## BACKGROUND AND SCOPE

AFLC is the Air Force's most industrialized major command. With over 100,000 civilian and military employees, AFLC's mission includes the entire range of depot-level maintenance activities for the Air Force's entire inventory of aircraft and missiles. This mission is accomplished through five air logistics centers and 12 specialized centers at seven bases, located in six states and five different EPA regions.

AFLC's ECAMP evaluations were accomplished with a unique team of contractor, HQ AFLC, and installation-level personnel. This team, with the HQ AFLC ECAMP program manager as team chief, conducted intensive, up to two-week long external evaluations at each of AFLC's seven installations during fiscal years 88-89. The results of the evaluations for each installation were documented in a series of four reports for each base. These reports summarized each installation's environmental programs and identified both positive and negative findings. During the review period for each report, progress toward correcting negative findings was documented. The review process culminated in a fully developed Management Action Plan for each installation.

A secondary objective of the first round of external ECAMP evaluations was to provide AFLC Environmental Managers with the necessary experience and expertise to take over the major components of the program in future years. To accomplish this objective, reliance on contractor support after the first three evaluations was replaced with personnel assigned from HQ AFLC, each of the AFLC installations, and the central and western Air Force Regional Civil Engineers (AFRCEs). Team size



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ranged from 9 to 18 evaluators, with an average of 15. Approximately one-third of the team members were in ECAMP training status. The involvement of all levels throughout the Command created the desired level of ECAMP awareness and recognition within AFLC. The installation-level personnel were able to translate the experience from external evaluations into practical application for conducting their own follow-on, internal evaluations. An intangible, but important benefit was the cross-feed they picked up by visiting another installation to see "how someone else does it."

## COMPLIANCE SUMMARY

With the completion of the first round of external ECAMP evaluations at all seven AFLC installations, a number of "common threads" emerged. First, and most importantly, no Significant negative findings remain at any of the AFLC's installations. And, in general, problems associated with PCBs no longer exist.

On the other hand, Major negative findings were identified at every installation. Consistently, the greatest number of problems were identified in the Hazardous Waste and Hazardous Materials Management programs. Other areas requiring considerable effort included Air and compliance with underground storage tank requirements. Pesticide compliance problems occurred primarily with pesticide application at the golf courses. Isolated findings were identified in the Drinking Water, Wastewater, Solid Waste, and Natural Resources protocols.

## LESSONS LEARNED

With the completion of the first round of headquarters-sponsored external ECAMP evaluation, HQ AFLC hosted an AFLC-wide "ECAMP Lessons Learned" conference held October 24-26, 1989. The objectives of this conference were to establish the basis for improving future compliance evaluations and determine ways to blend external evaluations with each installation's on-going, self-evaluation program.

It was most important to provide consistent evaluations and documents from base to base. For this reason, the ECAMP process has been highly structured. This structure includes the requirement for timely preparation of the Preliminary Environmental Findings report; within 14 days of the concluded evaluation. The most cost-effective method of providing consistent and rapid report preparation was to assign an experienced Word Processor to the evaluation team. The Word Processor, with a portable computer equipped with a hard drive and a pre-formatted, word-processing software package, provided the team with nearly instantaneous hardcopy of their findings in the standardized reporting format prescribed in AFR 19-XX.

Since FY89 completed the first formal round of ECAMP evaluations, it was HQ AFLC's intent that each document provide a comprehensive, baseline summary for each installation. To satisfy this intent, in-depth descriptions of existing base programs were developed to establish an informational baseline for each protocol, or programmatic area. This requirement obligated the evaluators to learn the programs they were evaluating. The evaluators established a good rapport with the host base and

achieved a greater knowledge of what they were reviewing, resulting in a more credible evaluation less subject to challenge. Expected long-term benefits from this approach include a programmatic summary of each base for HQ AFLC, a strong briefing document for future external evaluation teams, and an understanding of new ideas and methods for implementation that the evaluators could take back to their own installations. This additional requirement, although requiring added effort, paid immediate dividends that will extend into the future.

At the conclusion of each evaluation, a comprehensive outbriefing was provided to the installation Commander and Environmental Protection Committee (EPC). In addition to the verbal presentation, a formal "Outbriefing" document was prepared. On the heels of an exhaustive evaluation, the "Outbriefing" was viewed as an important deliverable as well as a mark of a professional courtesy. The key elements of this document included;

- the evaluation purpose,
- a list of the evaluators and their affiliations,
- definitions for the finding categories,
- a protocol-by-protocol summary of only the significant and major negative findings plus any affirmative findings, and
- two finding summary tables by protocol.

The "Outbriefing" was well-received by installation management. It provided base management with a formal, stand-alone document to use as a guide to initiate immediate action towards correcting the most pressing issues while spanning the period in which the Preliminary Findings report was being prepared.

During the Command-wide ECAMP program review, the large proportion of trainees on the evaluation teams was discussed in depth. The discussion concerned the few instances when the evaluators did not know the pertinent or recognize acceptable implementation of regulations. The stated preference was for a consistent team, from evaluation-to-evaluation, drawn from a designated pool of experienced evaluators. Given that the pool from which to draw experienced evaluators is subject to frequent turnover do to attrition and personnel transfer, other options would be investigated. The FY91 round of ECAMP external evaluations will, as much as feasibly possible, attempt to use the same evaluators for all bases.

Another issue involved the ranking system employed to depict the severity level of negative findings as described in the Air Force policy statement and proposed AFR 19-XX. Generally, this system is well-understood and accepted when applied to individual negative findings. However, when the highest severity level of negative finding identified in a protocol is applied to reflect the compliance status of the entire protocol, it is less well-accepted. When presented in TABLE 1 of the report, it is not possible for installation management to determine if an entire protocol is poorly managed or only one finding resulted in the unsatisfactory rating. A poor ranking reflects badly on programmatic managers who may have an otherwise outstanding program. In addition to the negative pressures the manager receives, the overall ECAMP program suffers because the results accentuate a negative bias. For example, the Hazardous Waste Management Program is evaluated at two bases. One base receives 15 major negative findings in a variety of compliance areas. The second base

receives a single major negative finding. Both bases receive "Yellow" rankings for their respective programs.

To overcome this bias and ambiguity, HQ AFLC has proposed to have TABLE 1 reflect overall programmatic compliance. TABLE 2 will continue to portray the detailed overview of the major compliance categories with the number of findings in each area. This proposal is contingent upon the development of objective criteria by which entire protocols can be ranked. In the interim, HQ AFLC has employed a finding tracking system for the reports. A separate TABLE 3 currently depicts the progress installations have made in closing out negative findings between the end of the evaluation and the submission of the Draft Final report. The fewer negative findings per protocol, the easier it is to demonstrate full compliance. The goal has been to have all protocols ranked as "Blue" by the end of this review period. We feel by providing this incentive, it is very possible to demonstrate programmatic strength through progressive color change.

**ACTION PLAN**

* **COLOR SCHEME: Reduce negative bias in summary presentation.**

  [1] The desired compliance summary should be hierarchial with TABLE 1 reflecting overall protocols, TABLE 2 summarizing compliance categories, and TABLE 3 itemizing each individual negative finding.

  [2] An objective set of criteria for assigning a rank for each protocol is required.

* **TEAM COMPOSITION: Establish experienced AFLC evaluator pool.**

  [1] HQ AFLC will attempt to use the same team of evaluators for each round of external evaluations.

  [2] ECAMP augmentation has been requested from other organizations such as Maintenance, Supply, etc.

* **INTERNAL REPORT FORMAT: Maintain consistency with the external reporting format, but reduce paper production.**

  [1] Adopt the "Outbriefing" format for the body of the report.

  [2] Adopt the "Finding Sheets" as the tracking vehicle.

* **SUPPORT SITES: HQ AFLC will make determination.**

  [1] Each installation EM will compile a list of its support sites and associated missions and submit to HQ AFLC.

  [2] HQ AFLC to clarify what sites fall within ECAMP's requirements.

* **STATE/LOCAL STATUTES: Compile applicable statutes for evaluations.**

  [1] HQ AFLC legal office will coordinate compilation with each base.

* **TENANTS: Involve tenant organizations in the ECAMP process.**

  [1] Request representatives from DRMS join the evaluation team pool.

  [2] Installation EMs to notify tenant organizations of ECAMP schedule; establish policy for tenant responsibility, planning, and compliance.

  [3] Installation EMs to review host/tenant agreements to ensure environmental compliance requirements are spelled out.

  [4] Need to ensure contracts have the necessary clauses to enforce compliance requirements with base contractors.

## INTERNAL EVALUATIONS

Each of AFLC's installations have either completed or instituted their internal ECAMP evaluations for FY91. From the results HQ AFLC has seen to date, the internal evaluations have been even more stringent and comprehensive than the external evaluations. This is an encouraging sign; it indicates not only that our compliance evaluators have benefited from conducting external evaluations at other AFLC installations, but they have recognized the need for their own tough, self-evaluation. These internal evaluations should also prepare the installations for the next round of external evaluations, which will normally be held every third year.

## SUMMARY

AFLC has expended a significant amount of time, money, and energy in establishing and conducting its ECAMP with a team of AFLC and contractor personnel. The resulting comprehensive compliance evaluations have identified problems which must be corrected to prevent non-compliance with environmental regulations and subsequent environmental degradation. While we are constantly working to improve the ECAMP process, AFLC now has active, comprehensive evaluation programs at each of its installations. The net result is an overall increase in environmental awareness across our installations at the highest levels.