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Environmental Quality

Environmental Guidance for Military Exercises

*This regulation supersedes AE Regulation 200-2, 4 July 2007.

For the Commander:

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Summary. This regulation provides environmental standards and prescribes policy and responsibilities for Army in Europe units conducting military exercises outside of U.S. overseas installations (referred to as off-installation exercises in this regulation) within the USAREUR area of responsibility (AOR).

NOTE: Military exercises conducted on U.S. Army installations within the USAREUR AOR are governed by the policy and regulations prescribed by DOD Instruction 4715.5 and AE Regulation 200-1.

Summary of Change. This revision—

- Expands the applicability to encompass all Army in Europe units as well as units deployed to the USAREUR AOR for training.
- Incorporates recent changes to environmental requirements that apply to off-installation exercises.
- Adds and defines an exception approval authority (para 4).
- Updates responsibilities of program proponent (Office of the Deputy Chief of Staff, Engineer (ODCSENGR), HQ USAREUR) and the unit commander (paras 6a and c).
- Breaks out and expands the responsibilities of environmental staff positions (environmental chief and environmental officer) from the program proponent and unit commander paragraphs (paras 6b and d).
- Adds USAREUR G3 to responsibilities paragraph and identifies specific responsibilities for coordinating with environmental staff during exercise planning (para 6e).

- Defines and clarifies responsibilities, specifically for key players with respect to funding, coordinating and information sharing (paras 6a through g).
- Updates the prescribed environmental site documentation requirements and processing responsibilities. This includes conducting environmental health and safety assessments (para 7b), reporting spills (paras 7e and 10), reporting maneuver damage (para 7f), and completing post-exercise documentation (para 7g).
- Expands and clarifies requirements for protecting natural resources and endangered species (para 15) as well as historic and cultural resources (para 16).
- Updates and clarifies service support contract checklists (app C).
- Updates and clarifies the spill report format (app D).
- Updates and clarifies the excavation backfill waiver format (app E).
- Updates terminology and defines additional terms and abbreviations (glossary).

Applicability. This regulation applies to HQ USAREUR, USAREUR major subordinate and specialized commands (AE Reg 10-5, app A), IMCOM-Europe, and other U.S. Army units that are planning, conducting, or participating in off-installation exercises within the USAREUR AOR.

NOTE: Environmental requirements on U.S. Army installations within the USAREUR AOR are governed by AE Regulation 200-1.

Supplementation. Organizations will not supplement this regulation without ODCSENGR (AEEN-FC) approval.

Suggested Improvements. The proponent of this regulation is the ODCSENGR (AEEN-FC, DSN 370-3249). Users may suggest improvements to this regulation by sending DA Form 2028 to the ODCSENGR (AEEN-FC), Unit 29351, APO AE 09014-9351.

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SECTION I

GENERAL

1. PURPOSE

This regulation establishes the minimum environmental requirements applicable to U.S. Army units conducting or participating in all types of off-installation exercises (glossary) within the USAREUR area of responsibility (AOR).

a. U.S. Army units conducting exercises in the USAREUR AOR must comply with all applicable U.S. and host nation (HN) laws and regulations designed to protect the environment.

b. This regulation will assist unit commanders and Soldiers conducting or participating in off-installation exercises to understand and comply with environmental standards and procedures.

c. Commanders should use the information in this regulation to monitor compliance with and measure performance to environmental standards.

2. REFERENCES

Appendix A lists references.

3. EXPLANATION OF ABBREVIATIONS AND TERMS

The glossary defines abbreviations and terms.

4. EXCEPTION AUTHORITY

Commanders at all levels will ensure that applicable environmental standards are met, and all applicable activities are in compliance with the requirements of this regulation. Send requests for exception to this regulation through the Office of the Deputy Chief of Staff, Engineer (ODCSENGR), HQ USAREUR, to the DCG, USAREUR, for approval.

SECTION II ENVIRONMENTAL STANDARDS

5. USAREUR OFF-INSTALLATION ENVIRONMENTAL POLICY AND OBJECTIVES

a. Policy. Article II of the NATO Status of Forces Agreement (SOFA) and the Partnership for Peace SOFA require Army in Europe units to respect the HN law (including, by implication, the environmental law) while conducting off-installation exercises. Therefore, HQ USAREUR, USAREUR major subordinate and specialized commands, and IMCOM-Europe agencies will protect HN environments during off-installation exercises.

b. Objectives. The USAREUR off-installation exercise environmental program objectives are:

(1) To provide command guidance and to ensure staff supervision of Army in Europe training events in order to protect personnel health during off-installation exercises and ultimately minimize the potential costs of third-party damage claims against the U.S. Government.

(2) To promote continued good working political-military relationships with HNs by respecting their environments during off-installation exercises.

(3) To preserve the value of HN natural resources by protecting the environment during off-installation exercises conducted on HN controlled training areas and HN provided maneuver rights areas.

6. RESPONSIBILITIES

a. The Deputy Chief of Staff, Engineer (DCSENGR), USAREUR, is responsible for managing the USAREUR off-installation exercise environmental program. The DCSENGR will—

(1) Appoint an Environmental Chief to implement and enforce this regulation.

(2) Participate in exercise planning as required to ensure exercise planners incorporate environmental requirements into exercise support agreements (ESAs).

(3) Provide the USAREUR G3 (AEOP-OMT) with environmental planning expertise during regular twice-yearly exercise-planning conferences (combined training conferences).

(4) Support the USAREUR G3 (AEOP-OMT) by developing environmental budget estimates for the environmental requirements of off-installation exercises.

(5) Program reimbursable and nonreimbursable environmental funds for off-installation exercises.

(6) Manage the execution of projects to produce environmental baseline surveys (EBSs) and environmental closure reports (ECRs) for off-installation exercises.

(7) Manage the execution of environmental contracts as required in support of and on behalf of off-installation exercise units.

(8) When requested, conduct onsite assistance visits to off-installation exercise locations to ensure the event incorporates compliance with regulation requirements.

(9) Electronically archive all environmental documentation generated during the off-installation exercise. The ODCSENGR will coordinate with the off-installation exercise commander's environmental officer (EO) to ensure the unit collects, scans, and posts all applicable documents to the ODCSENGR electronic repository. The ODCSENGR must send a copy of all environmental reports (EBSs, ECRs, spill reports, and other damage reports) to the United States Army Claims Service, Europe (USACSEUR) (AEJA-C-ET), Unit 30010, APO AE 09008-0010 or e-mail: usarmy.badenwur.usareur.mbx.oja-claims-service@mail.mil.

b. The Environmental Chief, ODCSENGR, will—

(1) Serve as the DCSSENGR's representative for environmental issues.

(2) Determine the necessity and extent of environmental studies for each off-installation exercise location.

(3) Manage the execution of off-installation exercise EBSs and ECRs.

(4) In coordination with site commanders, provide or coordinate training on identification and proper safe handling of hazardous material (HM) to personnel who will work with HM for the off-installation exercise. The Environmental Chief will also maintain records of trained personnel in coordination with site EOs.

(5) Provide technical advice and support to off-installation exercise planners and directors on the technical and regulatory aspects of environmental engineering related to the preparation of ESAs. The Environmental Chief will also prepare environmental annexes to ESAs in coordination with HN officials and USACSEUR. Attend planning conferences and conduct onsite visits, as required to support exercise planning.

(6) In coordination with site EO, ensure all off-installation exercise locations have adequate HM and hazardous waste accumulation points (HWAPs).

(7) Develop specific guidance as required for site commanders and EOs to ensure effective environmental protection.

(8) Conduct onsite visits as required to verify compliance with requirements in this regulation, other applicable regulations, and other applicable guidance.

(9) Select off-installation exercise EOs if required and complete additional (collateral) duty statements for each EO.

c. The commander of the unit conducting the exercise will—

(1) Assume overall responsibility for environmental regulation compliance and environmental protection at off-installation exercise locations.

(2) Appoint in writing (by individual or blanket order) additional duty EOs and alternates for each off-installation exercise. These individuals must be in the grade of GS-5, WS-5, sergeant, or above.

(3) Review environmental inspection/report results and take necessary actions to correct deficiencies.

(4) Develop and implement an environmental guidance statement for the off-installation exercise site.

(5) Ensure the participants receive an environmental briefing as part of the preparation for the training event. Further ensure documentation of the training and attendance.

(6) Maintain environmental file records for the site in accordance with this regulation and AR 25-400-2. Ensure availability of files for inspection at all times.

(7) Ensure, in coordination with the Environmental Chief, ODCSENGR that the EO and all personnel handling HM receive adequate training.

(8) Send a copy of all spill reports to the ODCSENGR and USACSEUR for use in adjudicating potential third-party claims. Maintain damage logs and be prepared to send a copy to the ODCSENGR and USACSEUR as required.

(9) Ensure proper removal and disposal of unit generated HM and hazardous waste (HW).

(10) Ensure correction of environmental deficiencies as identified by the EO during the off-installation exercise.

d. The exercise EO will—

(1) Serve as the exercise commander's representative for environmental issues.

(2) Ensure incorporation of all environmental requirements of this regulation into the off-installation exercise service contracts.

(3) Coordinate with HN environmental representatives to resolve issues and to arrange day-to-day environmental matters (for example, developing hazardous-substance inventories; HW, solid waste, and wastewater disposal practices and operations; handling hazardous-substance spills; conducting visits with HN EOs).

(4) Be responsible for ensuring all comments and documents expressing environmental concern are adequately addressed before, during, and after the off-installation exercise (para 7).

(5) Ensure units prepare spill reports for all off-installation exercise spills. The EO must send completed reports through the chain of command to ODCSENGR and USACSEUR.

(6) Complete AE Form 350-22A for each incident of maneuver-related damage. The EO must send completed reports to USACSEUR.

(7) Coordinate with the Defense Reutilization and Marketing Office (DRMO) and provide the DRMO—

(a) Inventories of HW generated by the unit conducting the off-installation exercise.

(b) A timeline of anticipated HW generation during the event in order to coordinate a specific and timely waste-pickup schedule.

(8) Initiate, complete, and maintain files regarding HM and HW management in accordance with this regulation.

(9) Conduct internal environmental assessments and report deficiencies to site commander.

(10) As required, in coordination with the Environmental Chief, ODCSENGR provide or conduct training for personnel on the identification of HM and HW, proper safe handling of HM and HW, and spill response. The exercise EO must provide copies of trained personnel's certificates to the Environmental Chief.

(11) Ensure all environmental documentation required by this regulation is sent to the ODCSENGR and the Office of the Judge Advocate (OJA), HQ USAREUR (through USACSEUR).

(12) Maintain unit environmental files in accordance with this regulation and AR 25-400-2. The exercise EO will ensure these files are available for inspection at all times during the off-installation exercise.

(13) Report any environmental deficiencies to the exercise commander.

(14) Ensure that spill response kits, if required, are complete, readily accessible, and in compliance with the requirements in this regulation.

e. The OJA (through USACSEUR) will—

(1) Provide technical advice and support to off-installation exercise planners and directors on the legal aspects of environmental engineering as related to the preparation of ESAs. This specifically includes support in preparing the environmental section and annex, as well as the scope of work portions of the EBS and ECR.

(2) Maintain copies of EBSs, ECRs, and other documents for use in evaluating third-party claims, including environmental damage claims.

f. Training and Exercises Division, Office of the Deputy Chief of Staff, G3, HQ USAREUR (AEOP-OMT) will—

(1) Coordinate all off-installation exercise-related milestones, logistical requirements, conferences, and site visits promptly with the ODCSENGR and USACSEUR to ensure incorporation of environmental requirements.

(2) Provide the ODCSENGR and USACSEUR the location of all planned HM and HW storage and collection points (for example, petroleum, oils, and lubricants (POL) storage and usage areas, HWSAs, electrical generation sites, wastewater storage and disposal sites, ammunition holding areas, living areas) no later than 7 workdays after the main planning conference to support environmental planning.

(3) Receive program funding requirements and recommendations from ODCSENGR for EBSs and ECRs and provide program funding as required.

g. The Office of the Deputy Chief of Staff, G8, HQ USAREUR (AERM-IA), and OJA (AEJA-ILO in coordination with USACSEUR) will provide agreement-specific assistance to the exercise commander, the ODCSENGR, and the exercise EO in preparing the environmental section and annex to the ESA. This assistance will include, but is not limited to help in preparing either of the following:

(1) An environmental paragraph to the ESA (in coordination with USACSEUR when required).

(2) An environmental annex to the ESA for the off-installation exercise (in coordination with USACSEUR when required). The annex (if required) must address the following major environmental areas of concern:

(a) EBS and ECR.

(b) Solid-waste management and disposal.

(c) HW management and disposal.

(d) Wastewater accumulation and disposal.

(e) HM management.

(f) Fuel storage and distribution.

(g) Emergency spill-response reporting and clean-up.

(h) Borrow pits and backfill procedures.

(i) Natural, historic, and cultural resources.

7. ENVIRONMENTAL DOCUMENTATION OF OFF-INSTALLATION EXERCISE SITES

a. Documentation. Environmental documentation of off-installation exercise sites will include the following:

(1) EBSs.

(2) ECRs.

(3) Environmental health and safety assessments (EHSAs).

(4) Maneuver damage reports.

(5) Post-exercise environmental documentation.

(6) Spill reports and documentation of emergency response actions.

b. EBS. An EBS is essential to determine and document preoccupation environmental conditions for safety determination, for the protection of personnel health and safety, and to protect the U.S. Government from illegitimate third-party claims at closure.

(1) The EBS will be performed before, but as close as possible to, the start of the exercise.

(2) The ODCSENGR will coordinate the scope of work for the EBS with OJA and USACSEUR to ensure the U.S. Government has adequate protection from third-party claims and related matters. The ODCSENGR will also consult the EHSA to avoid duplication of effort.

(3) EBSs are scalable and may include any or all of the following:

(a) Drums and containers of HM.

(b) HW accumulation and disposal.

(c) Observed spills or soil staining.

(d) Sampling and analysis of site media (for example, air, groundwater, sediment, soil, surface water).

(e) Sanitary waste disposal.

(f) Underground and above-ground storage tanks.

(g) Water supply and discharge.

(h) Other items of significance to existing baseline conditions.

(4) The ODCSENGR will manage execution of the EBS by directing the efforts of personnel performing field work. The ODCSENGR will coordinate with OJA (through USACSEUR) and the U.S. Army Public Health Command Europe Region (PHCR-Europe), and any other United States Government agencies involved in the off-installation exercise to avoid duplication of effort.

(5) Appendix B provides EBS requirements.

c. ECR. An ECR is required as soon as possible after the end of the exercise. Ideally, an ECR is performed immediately after vacating the site. An ECR is essential to document post-occupation environmental conditions in order to protect the U.S. Government from liability for pollution discovered after the departure of U.S. Forces from the off-installation exercise location. The ECR must include the time period of U.S. occupancy. Other related site documentation should be included in the ECR. The contents of the ECR must be coordinated with the ODCSENGR, the OJA and USACSEUR.

(1) The ECR should parallel the most recently prepared EBS. The ECR must address and report on all topics mentioned in the EBS, including site documentation (for example, interviews, photographs, samples).

(2) If the EBS includes laboratory analysis of media samples, the ECR should include samples taken from the same locations and analyzed using the same procedures. Additional areas of concern may require sampling and analysis if the site significantly changed from the time of the original EBS.

(3) The ODCSENGR will manage execution of the ECR.

(4) The ODCSENGR and USACSEUR will retain file copies of ECR and the EBS reports.

(5) Appendix B provides ECR requirements.

d. EHSA. An EHSA is required as soon as practicable after identification of a site for occupation for an extended period. An EHSA determines whether conditions are safe for site occupation.

(1) The task force surgeon will conduct an EHSA to determine any known imminent and substantial endangerments (KISE) to human health and safety located on or emanating from a site (for example, unexploded ordnance, stockpiled munitions, containers of HW, unsafe drinking water).

(2) Any KISE must be reported to the appropriate site commander for action.

e. Maneuver Damage Reports. Documentation is required each time an off-installation exercise-related maneuver causes damage to the environment (for example, environmental assets, life, resources, structures). The EO is responsible for sending the completed AE Form 350-22A according to AE Regulation 350-22.

f. Post-Exercise Documentation. The EO will—

(1) Be responsible for coordinating and closing environmental questions or issues with HN environmental representatives.

(2) Document the results of all HN coordination.

(3) Send a copy of all environmental documentation to the ODCSENGR and OJA (through USACSEUR).

g. Spill Reports. The EO is responsible for completing and forwarding spill-response reports according to this regulation. Along with the EBS and ECR, spill-response reports can protect the U.S. from illegitimate claims during site closure. Spill-response requirements are discussed in detail in paragraph 10.

8. HM MANAGEMENT

The off-installation exercise logisticians will provide the ODCSENGR an inventory of HM (for example, cleaners, fuels, POL products) intended for transport to the off-installation exercise location. The ODCSENGR will use this information to scope and prepare the EBS before the off-installation exercise starts. If the HN requires a copy of the inventory, the off-installation exercise logisticians will provide the HM inventory to the HN EO. Appendix C provides service-contract guidance to support this requirement. HM brought to the off-installation exercise by U.S. Forces must be managed during the off-installation exercise in a manner that prevents release of HM into the environment.

a. If requested by the exercise EO, material safety datasheets (MSDSs) for all items on the inventory must be provided to the exercise EO by the exercise logisticians before the exercise starts. The EO should include the chemical inventory and MSDSs as part of the environmental documentation for the off-installation exercise.

b. The design of the HM storage points for the off-installation exercise will be coordinated with the HN environmental representatives with their written concurrence before any HM is brought to the HN. Any necessary coordination must be completed to ensure HM is managed in a manner approved by HN environmental representatives.

c. Storage locations must include secondary containment for containers holding free liquids, sufficient storage space to prevent any need to double-stack containers, and sufficient storage space to segregate incompatible hazard classes. The storage location must also be in a secured and controlled area. The units must use the storage hazard compatibility chart in appendix D to prevent storing HM incorrectly. The storage activity may be no closer than 50 feet from the nearest ignition source. Units must post “No Smoking Within 50 Feet” signs.

d. The EO will inspect and document that HM is managed in accordance with the HN-approved procedures.

e. HM that remains usable for its intended purpose should not be stored in an HWAP. Usable HM should be stored in another area with appropriate fire, safety, and security precautions. For example, a partially used can of oil-based paint should be stored in a flammable storage locker, not in an HWAP. If the intention is to dispose of the HM, then the HM must be stored in an HWAP.

9. HW MANAGEMENT

a. Units conducting an off-installation exercise must manage HW generated during the exercise in a manner that prevents waste release into the HN environment. Appendix C provides service-contract guidance to support this requirement.

b. The unit must coordinate the design of the HWAP for the exercise with the HN EO and obtain concurrence in writing before the start of HW collection activities.

c. HW generally includes all HM to be discarded. The glossary provides a technical definition of HW. The environmental annex to the ESA may provide additional specific directives concerning the collection, transportation, and disposal of HW at the specific exercise locations.

d. The EO should, in coordination with the ODCSENGR, use cost-effective process changes and pollution-prevention technology to minimize HW generation.

10. SPILL RESPONSE

a. Immediate Actions: Each off-installation exercise unit is responsible for reporting spills and performing emergency response actions on spills. Off-installation exercise units must maintain adequate numbers of spill kits and provide proper containers and equipment for HW storage. EOs will ensure all spill kits are complete with at least the following materials readily available in case of a leak or spill:

(1) Absorbent material (for example, dry-sweep).

(2) Fire extinguishers (type ABC).

(3) Non-sparking shovels.

(4) Push brooms.

b. The unit must complete a spill report in accordance with appendix E and send the report through the chain of command, with a copy sent to the EO. At this point the critical actions are complete. The unit should refer to the “You Spill, You Dig” handbook for additional procedural guidance. The exercise EO will ensure copies of all spill reports are sent to the ODCSENGR (AEEN-FC) as soon as possible after the spill.

11. SOLID WASTE

a. Units conducting an off-installation exercise must manage solid waste generated during the exercise in a manner that prevents release of refuse into the HN environment. Appendix C provides service-contract guidance to support this requirement.

b. Solid-waste collection and removal must occur as often as necessary to prevent overflowing containers or vector issues.

c. The HN solid-waste disposal site must be coordinated with the HN environmental representatives and approved by the OJA or the ODCSENGR in writing before the start of solid-waste disposal activities. This coordination must be completed to ensure off-installation exercise refuse will be disposed of at HN approved disposal locations.

d. The exercise EO will inspect and document the condition of the collection and disposal practices during the off-installation exercise. The EO will also inspect and document that solid-waste disposal is occurring only at HN approved locations.

12. BORROW PITS AND BACKFILL PROCEDURES

a. Exercise units and agencies must ensure to backfill all excavations after the exercise unless authorized HN officials waive this requirement in writing. Appendix C provides service-contract guidance to support this requirement.

b. Units and agencies must enclose any signed waiver, releasing the U.S. Government from backfilling excavations, to the exercise documentation and send the documentation to the ODCSENGR and USACSEUR. Units should use the excavation backfill waiver format in appendix F.

13. WASTEWATER COLLECTION AND DISPOSAL

Units and agencies conducting an off-installation exercise must manage wastewater generated during the exercise in a manner that prevents wastewater release into the environment. Appendix C provides service-contract guidance to support this requirement.

a. Units and agencies must coordinate with and gain the concurrence in writing of HN EOs for the design of the wastewater accumulation point for the exercise before the start of wastewater-collection activities. This ensures off-installation exercise generated wastewater is accumulated in a manner acceptable to the HN.

b. All wastewater generated from the off-installation exercise must be properly disposed of by a competent service provider at the end of the exercise or as often as storage capacity dictates. The optimal choice for wastewater disposal is a locally permitted HN municipal wastewater treatment plant. Only the ODCSENGR may grant individual exceptions.

c. The designated exercise EO is responsible for contacting HN environmental representatives to identify available local wastewater-disposal options.

d. The EO will inspect and document that wastewater is accumulated and disposed of in accordance with HN-approved procedures agreed to by the ODCSENGR.

14. FUEL STORAGE AND DISTRIBUTION

Units conducting off-installation exercises must manage fuel transport during the exercise in a manner that prevents fuel release into the HN environment. Appendix C provides service-contract guidance to support this requirement.

- a. Units and agencies must coordinate with and gain the concurrence in writing of the HN environmental representatives to the design of the bulk and retail fuel points for the off-installation exercise before fuel is brought onto the HN site. This coordination ensures fuel is managed in a manner approved by the HN.
- b. Refueling operations must be equipped with and use secondary containment while dispensing fuel.
- c. Exercise participants and observers must use drip pans under all parked tracked and wheeled vehicles at the off-installation exercise site.
- d. The EO will inspect and document that fuel is managed in accordance with the HN-approved procedures agreed to by the ODCSENGR.

15. NATURAL RESOURCES AND ENDANGERED SPECIES

- a. USAREUR units must respect and protect HN natural resources while they conduct off-installation exercises on HN training areas.
- b. The EO will investigate which HN environmentally sensitive natural resources as well as endangered or threatened plant or animal species and their habitats may be encountered during the off-installation exercise. The EO will include any identified sensitive areas and habitats in site environmental documentation, as necessary.
- c. If the protection of recognized natural resources and endangered species requires off-installation exercise participants to avoid certain areas, the EO must provide that information to the exercise operations officer and exercise commander, who will ensure these areas are avoided. Exercise commanders should order exercise participants to avoid protected or sensitive cultural and natural resource areas, delineate the areas on exercise maps, and mark the physical areas with signs.
- d. Appendix C provides service-contract guidance to support this requirement. Natural resources and endangered species should be identified before the start of the off-installation exercise and documented in site environmental documentation.

16. HISTORIC AND CULTURAL RESOURCES

- a. USAREUR units must respect and protect HN historic and cultural resources while they conduct off-installation exercises on HN training areas or other HN areas outside U.S. installations. The environmental annex to the appropriate ESA may provide additional guidance concerning historic and cultural resources.
- b. Off-installation exercise planners will coordinate with appropriate HN environmental authorities to identify historic and cultural resources that may be encountered during the off-installation exercise. Identified areas must be listed in the site environmental documentation.

c. Specific activities conducted as part of the off-installation exercise that may negatively affect or damage historic and cultural resources include all forms of land development, pollutant discharges, firing ranges, and demolition ranges. To the extent practicable under operational conditions, efforts must be made to protect historic and cultural resources, even if neither HN authorities nor a field survey identified specific resources.

d. If the protection of recognized historic and cultural resources requires off-installation exercise participants to avoid certain areas, the EO must provide that information to the operations officer and exercise commander, who will ensure these areas are avoided. Exercise commanders should order exercise participants to avoid protected or sensitive historic and cultural resource areas, delineate the areas on exercise maps, and mark the physical areas with signs.

e. Appendix C provides service-contract guidance to support this requirement. Exercise planners and EOs must identify historic and cultural resources before the start of the off-installation exercise and, depending on the scale of the study, document them in the EBS.

APPENDIX A REFERENCES

SECTION I PUBLICATIONS

Agreement Between the Parties to the North Atlantic Treaty Regarding the Status of Their Forces (NATO Status of Forces Agreement) and Supplementary Agreement

Agreement Among the States Parties to the North Atlantic Treaty and the Other States Participating in the Partnership for Peace Regarding the Status of Their Forces

DOD Directive 4715.1E, Environment, Safety and Occupational Health (ESOH)

DOD Instruction 4715.5, Management of Environmental Compliance at Overseas Installations

DOD Guidance 4715.05-G, Overseas Environmental Baseline Guidance Document

DOD 4160-21-M, Defense Materiel Disposition Manual

AR 25-400-2, The Army Records Information Management System (ARIMS)

AR 350-28, Army Exercises

FM 3-34.5/MCRP 4-11B, Environmental Considerations

USEUCOM Directive 80-1, Environmental Policies, Procedures and Responsibilities

AE Regulation 10-5, Headquarters, United States Army Europe

AE Regulation 200-1, Army in Europe Environmental Quality Program

SECTION II FORMS

DA Form 2028, Recommended Changes to Publications and Blank Forms

AE Form 350-22A, Maneuver Environmental Damage Incident Report

APPENDIX B

ENVIRONMENTAL BASELINE SURVEY AND ENVIRONMENTAL CLOSURE REPORT

B-1. REQUIRED DOCUMENTATION

Units conducting off-installation exercises must complete an environmental baseline survey (EBS) and an environmental closure report (ECR). These two reports document the environmental condition of the site, respectively, before and after U.S. Forces occupy a site. The U.S. Government uses these reports as protection from illegitimate environmental claims of damage and to alert U.S. commanders before site occupation of the presence of any environmental conditions that may impede the mission.

B-2. LEVEL OF EFFORT

The level of effort required to complete environmental documents will depend on the relative risk at the specific location, international agreements between the United States and the host nation, and known environmental circumstances that could affect or be affected by U.S. military activities. Tables B-1 and B-2 describe the required elements of an EBS and an ECR when conducted within the USAREUR area of responsibility.

a. A review of documents, site photographs, aerial imagery, and maps is the most basic element of the EBS. Any knowledgeable and qualified environmental professional with understanding of environmental issues with respect to the EBS and ECR processes may conduct this review.

b. Based on the review results, the reviewer should provide an EBS background summary that includes the history of the location, including current and previous activities at the site.

c. Media sampling and analyses (for example, of groundwater, soil, surface water) are used to provide analytical documentation on contaminants found in soils and water bodies.

Table B-1 EBS Required Elements		
	Non-NATO or Non-PfP SOFA	NATO or PfP SOFA
EBS background summary	X	X
Review of aerial imagery, documents, maps, media sample analysis (surface soil and water bodies), and site photographs,	X	X
Well drilling (temporary piezometers) and analysis of media samples (surface soil and water bodies)		X

Table B-2 ECR Required Elements		
	Non-NATO or Non-PfP SOFA	NATO or PfP SOFA
Spill reports	X	X
Excavation backfill waivers	X	X
Cultural or natural resource documentation	X	X
Review of aerial imagery, documents, maps, media sample analysis (surface soil and water bodies), and site photographs.	X	X
Well drilling (temporary piezometers) and analysis of media samples (surface soil and water bodies)		X

**APPENDIX C
ENVIRONMENTAL CHECKLIST FOR OFF-INSTALLATION EXERCISE SUPPORT
CONTRACTS**

C-1 PURPOSE

The exercise environmental officer (EO) must use the checklist in figure C-1 to ensure that USAREUR environmental standards and practices are included in service-support contracts.

C-2 CHECKLIST USAGE

The exercise EO will verify text from the service contract to answer each question on the checklist and will identify the referenced page and paragraph numbers. A properly completed checklist provides an easy reference to ensure the contract delineates actions required before, during, and after the off-installation exercise.

1. Solid Waste Management and Disposal. Yes ___ See page ___ or No ___

The service contract requires the contractor to prevent refuse from polluting the host nation (HN) environment and to dispose of solid waste at a location approved in writing by the HN. (Where HN requirements do not exist, the contractor must use the highest U.S. standard as a minimum and other higher European Union (EU) or NATO standards if applicable to prevent disposal of solid waste into the environment.)

2. Hazardous Waste (HW) Management. Yes ___ See page ___ or No ___

The service contract requires the contractor to prevent HW from polluting the HN environment and to provide an HW collection area that includes all of the following design features:

- a. Ability to locate HW collection and accumulation in a secured and controlled area.
- b. Secondary containment for storage of containers holding free liquids.
- c. Sufficient space to prevent the need to double stack containers.
- d. Sufficient space to segregate incompatible hazard classes.

3. Wastewater Collection and Disposal. Yes ___ See page ___ or No ___

The service contract requires the contractor to prevent wastewater polluting the HN environment and to provide wastewater collection and disposal services that meet HN requirements. (Where HN requirements do not exist, the contractor must use the highest U.S. standard as a minimum and other higher EU or NATO standards if applicable to prevent disposal of solid waste into the environment.)

4. Hazardous Material (HM) Management. Yes ___ See page ___ or No ___

The service contract requires the contractor to prevent HM from polluting the HN environment and to provide HM management by—

- a. Sending an inventory list of all HM intended to be brought onto the site to the Office of the Deputy Chief of Staff, Engineer, HQ USAREUR, and the exercise EO before the start of the off-installation exercise or transport onto the site by the contractor.

Figure C-1. Environmental Checklist

b. Maintaining material safety datasheets on hand for each HM brought onto the site by the contractor.

c. Providing the following:

(1) Secondary containment for containers holding free liquids.

(2) Segregation of incompatible hazard classes.

(3) Sufficient space to prevent the need to double stack.

d. Locating HW collection and accumulation in an area that is secured and controlled.

5. Fuel Storage and Distribution.

Yes ___ See page ___ or No ___

The service contract requires the contractor to prevent fuel storage and refueling activities from polluting the HN environment and to provide fuel-management services that include all of the following features:

a. Secondary containment around and under fuel-storage vessels, tanks, pods, barrels, or cans.

b. Secondary containment placed around and under refueling operations such as bulk delivery service and retail or fleet refueling services of vehicles, aircraft, power generators, light sets, and refrigeration units.

c. Secondary containment for seepage collection and disposal of seepage as HW.

6. Emergency Spill-Response Reporting and Clean-Up.

Yes ___ See page ___ or No ___

The service contract requires the contractor to respond to U.S.-generated spills of fuel and HM. The contractor must complete and forward a spill report to complete the response. The contract must also include clean-up of spills as they occur or as directed by the contracting officer. The contractor will use the spill-report template in appendix E to report spills.

7. Borrow Pits and Backfill Procedures.

Yes ___ See page ___ or No ___

The service contract requires the contractor to backfill excavations created as part of the off-installation exercise (unless authorized HN officials waived this requirement in writing). The contractor must use the excavation backfill waiver template in appendix F to meet this requirement.

8. Natural and Cultural Resources.

Yes ___ See page ___ or No ___

The service contract requires the contractor to respect HN historic, cultural, and natural resources. The contractor will observe the directed “setback distance” requirements of any recognized historic, cultural, or natural resource during the performance period of the contract.

Figure C-1. Environmental Checklist—Continued

APPENDIX D INCOMPATIBLE HAZARD CLASSES

D-1. GENERAL

Figure D-1 provides a cross-reference for users, environmental officers, and commanders to determine the compatibility of items for consolidated storage or shipment.

INCOMPATIBLE MATERIALS CHART						
HMUG	MATERIALS	EXAMPLES	INCOMPATIBLE MATERIALS	EXAMPLES	REACTION IF MIXED	
1	ACIDS 	Battery Acids Paint Removers De-Rust Sprays	FLAMMABLE/COMBUSTIBLES ALKALIES/BASES/CAUSTICS, OXIDIZERS (Groups 2-4, 6, 7, 9-15, 17-20, 22)	Degreasers, Carbon Removers Antifogging Compounds	HEAT GAS Generation	VIOLENT REACTION
2	ADHESIVES	Epoxies, Isocyanates, Diethylenetriamine	ACIDS, OXIDIZERS, ALKALIES/BASES/CAUSTICS (HMUG Groups 1, 3, 18)		HEAT FIRE HAZARD	
3	ALKALIES, BASES/ CAUSTICS 	Ammonia, Cleaners, Sodium Hydroxide, Sodium Bicarbonate	ACIDS / OXIDIZERS FLAMMABLES / COMBUSTIBLES (HMUG Groups 1, 2, 6, 8-11, 14, 17-20, 22)	Battery Acid, Paint Removers, De-Rust Sprays, Paint Solvents	HEAT GAS Generation	VIOLENT REACTION
4	CLEANING COMPOUNDS 	Degreasers Carbon Removers Antifogging Compounds	DETERGENTS/SOAPS OXIDIZERS (HMUG Groups 1, 7, 18)	Calcium Hypochlorite, Sodium Nitrate, Hydrogen Peroxide)	HEAT FIRE HAZARD	
5	COMPRESSED GASES	Acetylene, Argon, Propane, Nitrogen, Oxygen, Helium,	HEAT SOURCES (HMUG Groups 8, 9, 10, 11, 12, 15, 18, 19)		FIRE HAZARD EXPLOSION HAZARD	
6	CORROSION PREVENTIVE COMPOUNDS	Corrosion Inhibitors, Chemical Conversion Compounds	ACIDS BASES OXIDIZERS IGNITION SOURCES (HMUG Groups 1, 3, 18, 20)		FIRE HAZARD	
7	DETERGENTS/ SOAPS	Detergents, Disinfectants, Scouring Powders, Trisodium Phosphate	ACID-CONTAINING COMPOUNDS (HMUG Groups 1, 4, 18)	Battery Acid, Paint Removers, De-Rust Sprays	VIOLENT REACTION HEAT	
8	GREASES 	Lithium Grease, Graphite, Silicone, Molybdenum	OXIDIZERS, ALKALIES/BASES/CAUSTICS (HMUG Groups 3, 5, 18)		FIRE HAZARD	
9	HYDRAULIC FLUIDS	Petroleum-Based Synthetic Fire-Resistant	CORROSIVES, OXIDIZERS (HMUG Groups 1, 3, 5, 18)		HEAT	
10	INSPECTION PENETRANTS	Petroleum-Based Dyes	CORROSIVES	Battery Acid/Caustic Soda Chlorine Laundry Bleach Calcium Hypochlorite Hydrogen Peroxide OBA Canisters Paint Removers	VIOLENT REACTION	
11	LUBRICANTS/ OILS	Gen. Purpose, Gear Turbine, Weapons	OXIDIZERS (HMUG Groups 1, 3, 5, 18)		EXPLOSION HAZARD	
12	PAINT MATERIALS	Primers, Enamels, Lacquers, Varnish, Strippers, Thinners	OXIDIZERS, CORROSIVES (HMUG Groups 1, 5, 18)		HEAT FIRE HAZARD	
13	PHOTO CHEMICALS	Toners, Bleaches, Stopbath, Developers, Replenishers	ACIDS, HEAVY METALS (HMUG Groups 1, 18, 20)		HEAT FIRE HAZARD	
14	POLISH/WAX COMPOUNDS	Buffing Compounds, Gen. Purpose Wax, Metal Polish	CORROSIVES, OXIDIZERS (HMUG Groups 1, 3, 18)		HEAT, FIRE HAZARD VIOLENT REACTION	
15	SOLVENTS	Acetone, Toluene, Xylene, Methyl Ethyl Ketone (MEK), Alcohols	CORROSIVES, OXIDIZERS BATTERIES (HMUG Groups 1, 5, 18, 21, 22)	Battery Acid Calcium Hypochlorite Sodium Nitrate Sodium Hydroxide	HEAT FIRE HAZARD	
16	THERMAL INSULATION	Asbestos, Fibrous Glass Man-Made Vitreous Fibers	MATERIAL IS NOT REACTIVE. KEEP DRY.		NO REACTION	
17	WATER TEST/ TREATMENT CHEMICALS	Nitric Acid, Mercuric Nitrate, Tri-Sodium Phosphate, Caustic Soda	CORROSIVES OXIDIZERS HEAVY METALS (HMUG Groups 1, 3, 18, 20, 21)		HEAT VIOLENT REACTION	
18	OXIDIZERS 	Calcium Hypochlorite, Laundry Bleach, Hydrogen Peroxide, OBA Canisters	PETROLIUM BASED MATERIALS FUELS SOLVENTS, CORROSIVES, HEAT (HMUG Groups 1-15, 17, 19-22)		FIRE HAZARD VIOLENT REACTION EXPLOSION HAZARD TOXIC GAS GENERATION	
19	FUELS	JP8, JP4, JP5, Gasoline, Diesel Fuel	CORROSIVES OXIDIZERS (HMUG Groups 1, 3, 5, 18)	Battery Acid Calcium Hypochlorite Sodium Nitrate Sodium Hydroxide	FIRE HAZARD TOXIC GAS GENERATION	
20	HEAVY METALS	Beryllium, Chromium, Lead, Magnesium, Mercury, Strontium Chromate	CORROSIVES OXIDIZERS WATER TREATMENT/PHOTO CHEMICALS (HMUG Groups 1, 3, 6, 13, 17, 18, 21)		VIOLENT REACTION GENERATION OF TOXIC AND FLAMMABLE GAS	
21	BATTERIES	Lead-Acid, Dry Cell, Alkaline, Lithium	SOLVENTS, HEAVY METALS OXIDIZERS (HMUG Groups 15, 17, 18, 20)	Xylene, Toluene Alcohol, Tin, Zinc,	HEAT VIOLENT REACTION TOXIC GAS GENERATION	
22	PESTICIDES	Insecticides, Fungicides, Rodenticides, Fumigants	CORROSIVES, OXIDIZERS (HMUG Groups 1, 3, 15, 18)		TOXIC GAS GENERATION	

1. This chart is to be used as a **GUIDE ONLY!**
2. For *specific information* on storage of hazardous material, consult the material safety datasheet.

Figure D-1. Incompatible Hazard Classes

**APPENDIX E
SPILL REPORT FORMAT**

E-1 GENERAL

Figure E-1 provides an example of the required questions and information that must be included on any spill report.

WHO

(For questions 1 through 8, provide the name of the individual and his or her organization, telephone number, and e-mail address.)

1. Who completed the report? _____
2. Who reported the spill? _____
3. Who spilled the substance? _____
4. Who responded to the spill? _____
5. Was anyone injured as a result of the spill? If so who? _____ (Yes or No)

6. Who did the unit notify of the event? _____
7. Who was the first responder? _____
8. Who was or is the incident commander? _____

WHAT

9. Which substance was spilled? (If not known, is the substance a solid, a liquid, or a gas?)

 10. What is the current status of the substance? (Was the substance released all at once or is the substance still leaking?)

 11. What apparent hazard is being presented at the time of this report (for example, could ignite, currently burning, reacting, generating heat)?

 12. What actions did the unit take to mitigate the spill?

 13. What actions are recommended (or were recommended and completed) to clean up the spill?

-

Figure E-1. Spill Report Format

14. What actions caused the spill to occur?

15. What follow-up actions are required by the host nation (HN)?

HOW MUCH

16. What is the estimated volume of the spilled substance?

17. What is the maximum volume (capacity) of the container, vessel, or storage tank that released the substance?

18. What is the approximate volume of the contents (before the spill) of the container, vessel, or storage tank that released the substance?

19. What is the estimated volume of the excavated spill residue, contaminated soil, or water?

WHEN

20. When did the incident occur? _____

21. When was the incident reported? _____

22. When did the first responder arrive? _____

23. When was the spill cleaned up, if applicable? _____

WHERE

24. Was the location of the spill inside or outside the site perimeter?

25. Describe the exact location of the spill site. (Provide global positioning system coordinates if possible.)

26. Name of the site and off-installation exercise associated with the spill.

Enclosures
(Attach photographs of the spill scene.)

Signature Block

Figure E-1. Spill Report Format (Continued)

**APPENDIX F
EXCAVATION BACKFILL WAIVER FORMAT**

F-1. GENERAL

Figure F-1 provides an example of the required information that must be included in any excavation backfill waiver request.

1. Waiver Request Date: _____ (Provide the U.S. waiver request date.)

2. Location and description of the excavation. (Using global positioning system (GPS) coordinates, identify the north, south, east, and west excavation edges of the waiver request.)

North _____

South _____

East _____

West _____

3. Depth (identify the approximate maximum depth of the excavation). _____

4. Name of the site and off-installation exercise associated with the excavation.

5. Printed name and signature of the U.S. military official requesting the waiver to release the U.S. from any obligation to backfill an excavation.

Sign: _____

Print: _____

Date: _____

6. Printed name of the host-nation official releasing the U.S. military from obligation to backfill an excavation.

Sign: _____

Print: _____

Date: _____

Figure F-1. Excavation Backfill Waiver Format

GLOSSARY

SECTION I ABBREVIATIONS

AE	Army in Europe
AEPUBS	Army in Europe Library & Publishing System
AOR	area of responsibility
CofS	chief of staff
DCG, USAREUR	Deputy Commanding General, United States Army Europe
DCSENGR	Deputy Chief of Staff, Engineer, United States Army Europe
DOD	Department of Defense
DRMO	Defense Reutilization and Marketing Office
EBS	environmental baseline survey
ECR	environmental closure report
EHSA	environmental health and safety assessment
EO	environmental officer
ESA	exercise support agreement
EU	European Union
GPS	global positioning system
HM	hazardous material
HN	host nation
HQ	headquarters
HQ USAREUR	Headquarters, United States Army Europe
HW	hazardous waste
HWAP	hazardous waste accumulation point
HWSA	hazardous waste storage area
IMCOM-Europe	United States Army Installation Management Command, Europe Region
KISE	known imminent and substantial endangerments
MSDS	material safety datasheet
NATO	North Atlantic Treaty Organization
ODCSENGR	Office of the Deputy Chief of Staff, Engineer, Headquarters, United States Army Europe
OJA	Office of the Judge Advocate, Headquarters, United States Army Europe
PfP	Partnership for Peace
PHCR-Europe	United States Army Public Health Command Region-Europe
POL	petroleum, oils, and lubricants
SOFA	Status of Forces Agreement
U.S.	United States
USACSEUR	United States Army Claims Service, Europe
USAREUR	United States Army Europe
USAREUR G3	Office of the Deputy Chief of Staff, G3, Headquarters, United States Army Europe

SECTION II TERMS

accumulation point

The location where organizations temporarily store excess hazardous material or hazardous waste (for example, a container inside the maintenance bay where motor oil is stored after oil is drained from vehicles). Also known as a hazardous waste accumulation point.

collection point

See hazardous waste storage area.

environmental officer (EO)

An individual appointed to serve as an off-installation exercise commander's designated environmental representative. Paragraphs 6c and d prescribe exercise EO appointing requirements and responsibilities.

hazardous material

A substance or material in a quantity or form that may pose an unreasonable risk to safety, health, the environment, or property when commercially transported. HM includes substances known to be corrosive, explosive, flammable, reactive, or toxic, (for example, battery acid, cleaning fluids, degreasers, explosives, fuels of all types, herbicides, insecticides, paint, paint thinners, pesticides, any product labeled "poison," solvents).

hazardous substance

The generic name for hazardous material (HM), hazardous waste (HW), or an unknown item (possibly HM, HW, or a mixture).

hazardous waste

A hazardous material with no further beneficial use or with no ability for use for its original purpose. Any soil or absorbent material that absorbed hazardous material is considered hazardous waste.

hazardous waste accumulation point

See accumulation point.

hazardous waste collection point

See hazardous waste storage area.

hazardous waste storage area

A location used to receive and temporarily store containers of hazardous material or hazardous waste before they are shipped off-site for disposal. Also known as a hazardous waste collection point or a collection point.

off-installation exercise

A military training event conducted on property that is not part of a U.S. Government-controlled installation. For the purpose of this regulation, off-installation exercise also means an exercise conducted overseas (outside of the continental United States) and implies within the USAREUR area of responsibility.

secondary containment

A basin or bermed area made of or lined with impervious material to create a barrier around and under a vessel or refueling activity. The containment should prevent accidental fuel spills from making contact with the ground.

setback distance

The minimum separation from an object required for the construction of other structures or facilities or required for operations to be allowed.

U.S. occupancy

The period from the arrival of U.S. Government equipment and personnel conducting an off-installation exercise through the final departure of U.S. Government equipment and personnel from the area.