



Office of Surety, Safety and Environment (SSE)
The SSE Elucidator

“Elucidator”: to give clarity through explanation and analysis.

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PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT FOR CHEMICAL AND BIOLOGICAL DEFENSE PROGRAM

In May 2001, Raymond Fatz, the Deputy Assistant Secretary of the Army for Environment, Safety and Occupational Health, provided a Notice of Intent for the preparation of a Programmatic Environmental Impact Statement (PEIS) for the assessment of potential environmental impacts associated with the execution of DoD’s Chemical and Biological Defense Program (CBDP). The CBDP consists of research, development, and acquisition activities in support of its mission, which is to allow U.S. military forces to survive and successfully complete their operational missions in battle space environments that are or may be contaminated with CB warfare (CBW) agents.

The US Army Medical Research and Materiel Command (USAMRMC) was tasked with overseeing the PEIS investigation and with the overall coordination between the principal

What is PIES and what purpose does it serve?

PEIS is acronym for Programmatic Environmental Impact Statement.

The primary purpose of PEIS is to examine long-term Management Strategies and alternatives as related to a Program (not specifically to individual projects within that program). Additionally, PEIS needs to evaluate the potential degree or level of implementation of the alternative measures and their expected environmental impacts at the Program level.

According the Council on Environmental Quality's NEPA regulations, a No Action alternative, i.e., maintaining the status quo, will be evaluated in the PEIS, along with other reasonable alternatives.

investigators and the Federal and State Agencies involved in the process. USAMRMC was also given the responsibility for the scoping process which entailed solicitation, collection, analysis and responding to public comments and concerns about CBDP.

The CBDP activities were broken down into six Commodity Areas, each constituting a focused investment area directly responsive to operational requirements and managed by a particular military service. The following Table provides the lead branch for each Commodity Area.

Commodity Area	Managing Service
Contamination Avoidance	Army
Individual Protection	Marine Corps
Collective Protection	Navy
Decontamination	Air Force
Medical Protection	Army
Modeling and Simulation	Navy

The sites for execution of CBDP activities are located at numerous military installations and contractor facilities throughout the United States. The PEIS investigators contacted more than 100 officials in five States and the District of Columbia for environmental, engineering and regulatory information as related to the CBDP. After a comprehensive, three-year investigation that studied all the commodity areas, and the CBDP program activities, the Final PDIS for the CBDP was completed and reported in May 2004.

The Final PDIS concluded “current and proposed CBDP research, development, and acquisition (RDA) activities have been and will likely continue to be performed without significant environmental impacts. The most severe potential effects associated with CBDP RDA activities are predicted to be minor; to date, all observed effects have been insignificant. Potential risks to

CBDP laboratory workers, public health, and the environment are and will be mitigated by adherence to benchmark guidelines, regulations, and standard operating procedures.”

A Record of Decision (ROD) for the Final PEIS is expected later this year.

You can review the CBDP PDIS and its associated documents at:

<http://chembioeis.detrick.army.mil/documents.html>

PROGRAMMATIC VS. SITE-SPECIFIC COMPLIANCE: PEIS provides for the coverage of general matters in a broader environmental document, usually as related to major policies and initiatives. Subsequent narrower and more site-specific environmental analyses may be required for NEPA compliance.

Depending on the scope of activities, site-specific research projects and activities could qualify for a Categorical Exclusion, or require additional analysis in forms of Environmental Assessment or even Environmental Impact Statements.

In July of 2004, the Office of Surety, Safety, and Environment at the U.S. Army Medical Research and Materiel Command (USAMRMC) published an Implementation Guidebook that provides guidance to the USAMRMC Subordinate Commands regarding NEPA regulations and processes as applicable to site-specific environmental analyses for research proposals and protocols. The Implementation Guidebook provides general overview of the types of documents needed in order to comply with NEPA regulations.

If you are interested in obtaining a copy of the Implementation Guidebook, please contact SSE at:

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SPOTLIGHT:
SCOB, APG, MD

Safety and Chemical Operations Branch at USAMRICD

The Safety and Chemical Operations Branch (SCOB), provides numerous services to the US Army Medical Research Institute of Chemical Defense (USAMRICD) at Aberdeen Proving Ground (APG), Maryland. Traditionally, safety, occupational health, chemical surety, environmental, and radiation safety services have been the main mandate for the SCOB. Since 2003, with the integration of the Security program into the SCOB, the scope of services has expanded into a comprehensive risk management approach for the Command.

The Security Program provides services for laboratories and other USAMRICD campus buildings. This program also provides assistance for clearance investigation application process for employees who are part of the chemical and biosurety programs. The Security Program is also heavily integrated into the APG program for anti-terrorism/force protection and the security involving information management systems.

Biosurety is also a relatively new program at SCOB. Since 2002, in response to the Department of Army’s mandate for initiation of biosurety programs, SCOB has been working closely with the Centers for Disease Control (CDC) to coordinate on-site inspections and provide other biosurety services for USAMRICD.

While the biosurety and security have been relatively new additions to the program, SCOB has always had a distinctive chemical surety mission. In fact, due to the USAMRICDs’ mission, the SCOB staff, along with the surety researchers participates in a chemical surety inspection conducted by a team of inspectors from the Department of the Army Inspector General’s Office every 18 to 24 months. The USAMRICD has been very successful in preparing for and standing these inspections.

The combination of an existing, established safety program, and new program areas has translated into an extended portfolio for the nine-person team at SCOB. In 2003, for example, the SCOB staff performed technical tasks that included:

- 474 laboratory inspections
- 12 extramural inspections

Training @ SCOB

In 2003, SCOB offered training programs to USAMRICD personnel through out the campus. SCOB was also called upon to provide training for personnel from USAMRMC and its subordinated commands. Altogether, providing trainings on such subjects as; spill clean up, Biosafety, radiation protection, HAZCOM and Blood-borne Pathogens counted for more than thirty SCOB programs in 2003.

- Hundreds of personnel protective equipment inspections
- Coordination of more than 100 physical exams for new and existing employees
- 17 Hazardous Work Area Permits
- 31 permits for laboratories that use biological defense and chemical agents
- 77 safety orientations

On the policy side, SCOB staff is responsible for:

- Writing / reviewing operating procedures for safety, surety, environment, security, and radiation safety.
- Reviewing research proposals as related to safety, occupational health, surety, radiation, security and environmental issues
- Permit Application Process review and recommendations
- License Audits for Radiation Safety
- Actively participates in APG, USAMRMC, and MEDCOM Committees for all regulatory issues.

Additionally, SCOB's responsibilities include historical record keeping, as well as NEPA related requests and safety reviews of facility upgrades and new construction projects.

What is next for SCOB? According to Jeanne Boisseau, the SCOB Safety Manager, two-areas are likely to play bigger roles in the SCOB portfolio in the coming years. These areas include providing ergonomics technical assistance and providing support for outside scientists and their staff who wish to conduct approved research at USAMRICD facilities.

The task of ensuring that outside personnel comply with USAMRICD and APG regulations in relationship to safety, security, and environmental requirements will be especially challenging and is likely to take additional resources-but if the last two years are any indication, the SCOB management and personnel will be able to effectively integrate these activities into the program areas.

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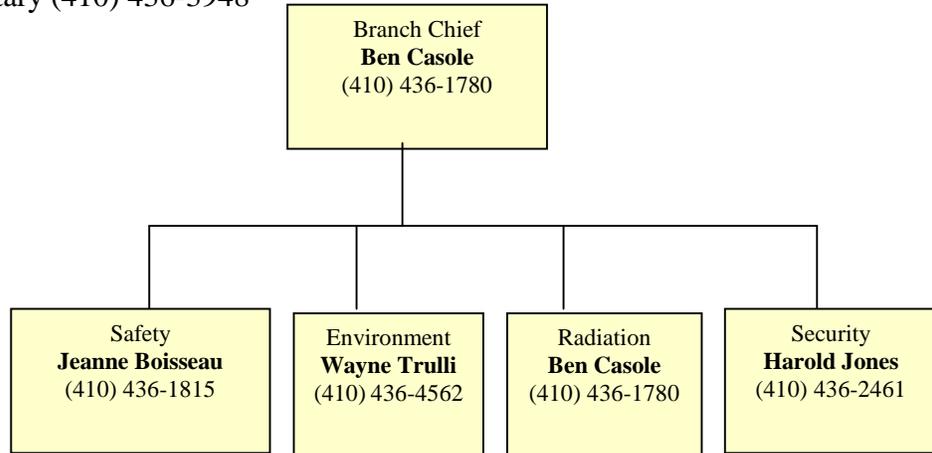
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The SCOB team is made up multi-disciplinary specialists, administrators, and scientists that provide both in-house and extramural services in their areas of expertise. They are directly responsible to the Institute Commander for the staff supervision of these varied programs.



Announcements:

Title: The First International Conference on Environmental Science and Technology
Date: Jan. 23-26, 2005
Location: New Orleans, Louisiana, USA
Venue: Fairmont Hotel
Description: The First International Conference on Environmental Science and Technology sponsored by the American Academy of Sciences will be held on January 23-26, 2005 at the Fairmont Hotel in New Orleans, Louisiana, USA. The conference will provide a multidisciplinary platform for environmental scientists, engineers and management professionals to discuss the latest developments in environmental research and applications. The deadline for submitting abstracts is closed.
Contact: William G. Lyon
Phone: Tel: (580) 332-8666
E-mail: conference@AASci.org
Web: <http://www.AASci.org/conference>

Title: American Occupational Health Conference; AOHC 2005
Date: Apr. 29, 2005 - May. 6, 2005
Location: Washington, DC, USA
Venue: Renaissance Hotel
Description: ACOEM's 90th AOHC (American Occupational Health Conference). This is the spring scientific meeting designed for physicians and other health and safety health professionals interested in the field of OEM. CME: 38 Attendees: Physicians, Health Executives (including Fortune 500 companies), Nurses, Safety Engineers, Public Health Officials and many more. Topics: Disability, Cardiovascular, Infectious Disease, Productivity, Management, Toxicology, Practice Guidelines, Leadership, MRO's and much much more.
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Do you have an announcement, comment or topic you would like to see in the next newsletter? Please feel free to contact Alex Izadpanah, Universe Technologies, Inc. (UNITEC) at 301-695-0982 or aizadpanah@unitec-md.com.