

FORT NOVOSEL

Environmental Document

ENV-AE003: Ozone Depleting Chemical Compliance Manager Policy (28 MARCH 2025)

Approved by: *Julie Majors/Troy Dunn*

1.0 PURPOSE

This procedure defines the steps that are necessary for Fort Novosel to comply with the Environmental Protection Agency's (EPA) requirements outlined in the Clean Air Act, Title VI. Protection of Stratospheric Ozone, 40 CFR Part 82.

Control of environmental procedures is addressed in procedure ENV-P002: Document Control.

2.0 SCOPE

This procedure applies to personnel involved in the management of Ozone Depleting Chemicals (ODC) on Fort Novosel. It is the intent of Fort Novosel to comply with all Federal, State, and local regulations. This procedure intends to establish an Ozone Depleting Chemical Compliance Manager for every entity responsible for the maintenance of equipment containing ODCs on the Main Cantonment, Stagefields, and any leased facility of the above entities. This includes DOD employees, trade workers, vendors, or outside contractors hired to perform work on any of Fort Novosel's ODC containing systems. This procedure is also applicable to facilities management when hiring, contracting, or scheduling refrigerant and fire suppression work. Any misuse, falsification, or inappropriate disposal of Class I or II ODCs or the failure of managers and technicians on Fort Novosel to comply with all ODC regulatory requirements could result in fines of up to \$37,500 per violation per day and criminal charges.

Protection of Stratospheric Ozone, 40 CFR Part 82, strives to implement the Montreal Protocol on Substances that Deplete the Ozone Layer and sections 602, 603, 604, 605, 606, 607, 614 and 616 of the Clean Air Act Amendments of 1990, Public Law 101-549. Prohibiting the intentional release of Class I or II ozone depleting substances to include halon emission reduction as specified in 40 CFR, Chapter 1, Subchapter C, Part 82, Subpart H. Only de minimis releases associated with good faith efforts to recapture and recycle or safely dispose of any such substance shall be allowed. All other refrigerants shall be recovered, recycled, or reclaimed using proper refrigerant servicing techniques.

3.0 DEFINITIONS

| Term | Definition |
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| ADEM | Alabama Department of Environmental Management |
| DPW-ENRD | Directorate of Public Works, Environmental and Natural Resources Division, located in Bldg. 1121, telephone number 334-255-0484 |

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| Term | Definition |
|-------|---|
| EPA | Environmental Protection Agency |
| ODC | Ozone Depleting Chemical |
| ODCCM | Ozone Depleting Chemical Compliance Manager |

4.0 RESPONSIBILITIES

4.1 DPW-ENRD - Air Quality Manager

4.1.1 Development of the written refrigerant compliance policy document.

Assist in conducting periodic program audits to monitor compliance while advising the Ozone Depleting Chemical Compliance Manager (ODCCM) in matters related to regulatory compliance.

4.1.2 Ensure all maintenance providers have an ODCCM.

Maintain and update facilities ODCCM contact database, assist ODCCM in updating forms and/or logs to accomplish recordkeeping requirements.

4.1.3 Responsible for issuing, revising, and maintaining this SOP.

Assume the responsibility as Fort Novosel's regulatory representative to ADEM and EPA for this program while conducting periodic program assistance visits to monitor compliance.

4.1.4 Make recommendations for the Installation, Replacement or Removal of ODC containing equipment through the NEPA process.

Recommendations shall be made in accordance with the Army's Ozone Depleting Chemical Elimination Program and Public Law 101-549.

4.2 Ozone Depleting Chemical Compliance Manager

4.2.1 Ensure environmental recommendations are followed in preparation to install, replace, or remove equipment containing ODCs at facilities on Fort Novosel.

Be familiar with and understand the current regulations pertaining to the handling, control, and proper disposal of ozone depleting substances.

4.2.2 Assimilate the refrigerant inventory training into the regulatory/recordkeeping requirements for all ozone depleting chemicals.

Coordinate on-going training for employees involved in repair, recovery, or recycling of refrigerant including identification of regulatory or Army policy changes.

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5.0 PROCEDURE

An Ozone Depleting Chemical Compliance Manager shall be established for all entities described in the scope above and shall be called the ODCCM. The ODCCM shall be the Environmental Health and Safety manager of the maintenance contract provider or be the facility manager at facilities responsible for their own maintenance where an environmental health and safety official is not designated. The ODCCM shall be charged with the administrative control of the program and shall have the authority to enact changes necessary for regulatory compliance. Furthermore, an ODC inventory should be established per facility to assist the OCM in maintaining the central database for each facility.

6.0 FORMS AND RECORDS

None.

7.0 REFERENCES

ENV-P002: Document Control