



July 29, 2009

File No. 2000-766

RE: Subcontractor Environmental Requirements

To Whom It May Concern:

IAP-HILL has provided superior maintenance and facility support to the Navy on the Regional Base Operating Support Contract (RBOS) over the past nine years. We are taking a moment to remind our subcontractors of the important environmental elements that require focused attention to ensure contract compliance and environmental protection. Many environmental requirements are good business practices and maintaining compliance has allowed IAP-HILL to obtain and keep our ISO 14000 Certification in good standing and become the model for environmental stewardship.

To ensure the IAP-HILL environmental commitment is reflected in all subcontract work, we are informing subcontractors of your obligation to comply with all Navy, local, state and federal environmental regulations. All subcontractors must establish and follow environmentally friendly procedures while performing services for IAP-HILL. These procedures shall reflect the specific nuisances of working on a military contract, and these procedures are incorporated by reference in each subcontract awarded by IAP-HILL. An abbreviated list of applicable requirements is as follows.

**1) Spill Reporting.**

- A spill is defined as a release of greater than one gallon of **ANY hazardous material, hazardous waste, or petroleum product** to the land or water (grass, dirt, concrete, etc.). All spills to a storm drain, river, basin, etc. shall be reported regardless of the spill volume.
- At NAS Jacksonville and NS Mayport, all spills must be immediately reported to 911.
- At BIC, all spills must be immediately reported to 696-5396.
- You must follow up the notification report with your IAP-HILL Environmental representative (904/707-4416- NAS; 904/312-8110- NS Mayport; 904/339-3584-BIC).

**2) Material Safety Data Sheet (MSDS)/Hazardous Material Compliance.**

- Subcontractors shall have a MSDS available for EVERY hazardous material on your vehicle, even if the hazardous material is not intended for use on the IAP-HILL subcontract. MSDSs are to be available upon request by IAP-HILL, the local Fire Department or military representative.
- Subcontractors using large quantities of a hazardous material specifically purchased for use on the IAP-HILL subcontract are to report the amount purchased to the IAP-HILL Environmental representative for inclusion in our annual hazardous material purchasing

report (EPCRA). Notification of chemical purchases should be made **PRIOR** to performing work.

### **3) Hazardous Waste Management.**

- Please be advised, removing a hazardous waste from military property or improperly disposing of a hazardous waste is a violation subject to penalties and fines. All hazardous waste generated while performing work for IAP-HILL shall remain at the location of work performance. Provisions for hazardous waste storage and disposal shall be made **PRIOR** to beginning work. Wastes meeting the definition of a hazardous waste can be found in 40 CFR Part 261; however, subcontractors shall provide a list of all wastes expected to be generated during work performance to the IAP-HILL Environmental representative. The representative will assist each subcontractor on the specific disposal requirements for their wastes.
- Examples of commonly generated hazardous waste can be found in the IAP-HILL ISO 14000 Subcontractors Handbook on our webpage at:  
<https://serbos.iaphill.com/prog%5Fmgmt/environmental/ISO%2014000%20Sub%20Handbook.pdf>

### **4) Building Renovations (Lead Based Paint and/or Asbestos Containing Materials).**

- Areas subject to painting, carpet and tile removal or replacement, and any structural change to a building must be verified lead and asbestos free prior to beginning work.
- Subcontractors performing lead based paint or asbestos abatements for IAP-HILL are required to submit a work plan for government approval.

IAP-HILL is committed to maintaining full environmental compliance. There are many environmental requirements not listed due to the sheer number and variety of requirements. Each subcontractor is encouraged to contact their environmental representative with questions prior to beginning work. If an environmental complication arises during work performance, subcontractors shall **STOP WORK** and notify IAP-HILL to receive direction on how to proceed.

Thank you for your commitment to the environment and helping IAP-HILL maintain 100% environmental compliance. If you have any questions, please contact Wade Musgrave at NAS Jacksonville (904/707-4416), Patty Kostic at NS Mayport (904/312-8110), or Colette Snelling at MCSF-BI (904/339-3584).

Sincerely,

Wade Musgrave  
Environmental Manager

Susan Thibodeaux  
Assistant General Manager

Cc: Mr. Len Scullion, General Manager  
Mr. Joe Penell, IAP-HILL NAS Jax Site Manager  
Mr. Dennis Ferro, IAP-HILL NS Mayport Site Manager  
Mr. Steve Jones, IAP-HILL MCSF-BI Site Manager