

Pollution Prevention in Contracting

Frequently Asked Questions

1. Why should I implement P2 oriented Environment, Safety and Occupation Health (ESOH) into my programs?

The DoD Instruction 5000.2 dated 12 May 2003 states, “As part of risk reduction, the Program Manager (PM) shall prevent ESOH hazards where possible, and shall manage ESOH hazards where they cannot be avoided. The acquisition strategy shall incorporate a summary of the Programmatic ESOH Evaluation (PESHE), including ESOH risks, a strategy for integrating ESOH considerations into the system engineering process, identification of ESOH responsibilities, a method for tracking progress, and a compliance schedule for National Environmental Policy Act (NEPA) (42 U.S.C. 4321-4370d and Executive Order 12114, references (x) and (az)).”

2. What is Pollution?

Generally, matter or energy in the surrounding environment whose nature, location, or quantity produces undesired environmental effects. This can include, but is not limited to, matter such as hazardous waste, hazardous material, sound, radiation, and contaminated water.

3. What is Pollution Prevention?

Pollution Prevention – commonly referred to as P2 involves practices that reduce or eliminate the introduction of pollution into the environment. This can be accomplished by a variety of methods. Common examples include, in order of preference, source reduction, material substitution, material reuse and in-process recycling.

4. Why should P2 be of interest to my acquisition program?

P2 is an integral part of the life-cycle cost/total ownership cost (TOC) and systems engineering. When properly evaluated, P2 opportunities that have a positive return on investment should be considered for adoption to reduce TOC, along with other cost, schedule and performance considerations. Additionally, P2 often is a prudent method to approach environmental compliance challenges and can reduce ESOH risk throughout the system. Investments in pollution prevention in terms of capital costs for new equipment at maintenance activities often have an economic payback in less than two years. For the largest return on investment, incorporate pollution prevention early in the acquisition process.

5. Doesn't P2 only apply to hazardous material?

No. This is a common misconception. P2 encompasses all types of pollution to the environment- the air, water, and the ground. It includes pollution from non-hazardous solid and liquid wastes as well as excess hazardous materials that may become hazardous waste. Additionally, pollution can come from noise or acoustic emissions. Furthermore, pollution may be from emissions of chemicals into the air and water. All of these emissions should be targeted for Pollution Prevention.

6. What type of materials and waste streams (by-products) should be eliminated or reduced?

The determination of which materials and waste streams to eliminate or reduce is unique to each program. All materials and waste streams in a program should be evaluated for environmental impact, and environmental, safety and occupational health (ESOH) risks. Implementing the largest reduction in quantity and toxicity at the lowest program cost is a key to success. As they apply to your specific program, consider materials and waste streams such as those on the attached Tables of Suggested List of Targeted Chemicals/Materials and Additional-By-Products to Minimize. These lists do not include everything that should be avoided, but serve as a starting point. This evaluation can be used as part of the determination in what materials and waste streams may be reduced or eliminated from your program.

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7. What if I cannot reduce or eliminate a particular polluting material or waste stream?

P2 is as much about good business practice as it is material elimination. If the material cannot be eliminated, reused, recycled or reduced due to performance requirements, or it is economically infeasible (over the total life of the system) to replace the material, use the original material. As alternate technology becomes available, the PM should replace hazardous materials in the system through changes in the system design, manufacturing, and maintenance processes where technically and economically practical.

8. What can I do in my Request for Proposal (RFP) to let the offerors know I am concerned about ESOH issues, and I am interested in their process for addressing them?

- You can require the offerors to explain their approaches to integrating ESOH into their systems engineering processes throughout the life cycle of the weapons systems including: design, test, manufacturing, operation and maintenance, and disposal.
- You can assign it a weight commensurate to its importance to your program in Section M (Evaluation Criteria).
- You can include requirements for Hazardous Material Management Program (HMMP) and ESOH risk reduction deliverables.

9. How can I incorporate Pollution Prevention into my Statement of Work (SOW) and Statement of Objective (SOO)?

- Require a HMMP Plan for the entire life cycle of the system.
- Comply with the prohibition on using Class I Ozone Depleting Substances.
- Minimize use of Class II Ozone Depleting Substances and, if possible, prohibit their use.
- Minimize use of the EPA 17 Industrial Toxic Chemicals, Toxic Release Inventory Chemicals, and global warming substances.
- Include risk analysis requirements, such as MIL-STD-882 or a similar industry or DoD standard in the SOO or SOW.

Where possible, avoid use of material identified in the attached Tables of Suggested List of Targeted Chemicals/Materials and Additional By-Products to Minimize.

10. How do contracting and contract review activities support P2?

The contracting team should ensure that P2 requirements identified by the program office are in the contract in a consistent and enforceable manner throughout the life cycle of the weapon system.

Review activities are an excellent opportunity to learn what worked and what did not work. The lessons learned from repair, maintenance and operations of all programs, including legacy programs, are replete with examples of P2 opportunities to save limited resources. The key is to have a procedure in place including the appropriate contract requirements during the acquisition process to be able to identify P2 opportunities and implement them.

11. As a Ship Acquisition Program Manager (SHAPM), how do I encourage my Participating Managers (PARMSs) to practice P2?

The Ship Project Directive (SPD) can be used to instruct the PARM to implement P2 actions.

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12. Whom do I go to for help?

NAVSEA 04RE: (401) 832-5853

NAVSEA 04RE Internet (<http://www.navsea.navy.mil/sea00tWWW/>)

NAVSEA ESH Integration Program Manager's Guide (<http://www.navsea.navy.mil/sea00tWWW/>)

NAVSEA P2 Desktop Guide (<http://www.navsea.navy.mil/sea00tWWW/>)

AT&L Knowledge Sharing Systems <http://deskbook.dau.mil/jsp/default.jsp>

Suggested List of Targeted Chemicals/Materials

Benzene	Methyl Chloroform (1,1,1 – Trichloroethane)
Beryllium and Compounds	N – Butyl Alcohol
Cadmium and Compounds	Methyl Ethyl Ketone
Carbon Tetrachloride	Methylene Chloride (Dichloromethane)
Chromium and Compounds	Toluene
Ethylene Glycol	Trichlorotrifluoroethane (CFC-113)
Lead and Compounds	Xylene
Mercury and Compounds	Zinc Chromate

Additional By-Products to Minimize

Air emissions of toxic pollutants	Hazardous waste
Air emission of other (criteria) pollutants	Solvents
Water/ground water discharges	Plastics
Solid Waste	Rags
Noise Pollution/acoustic emissions	Thermal pollution
Ultra violet radiation	Uniform National Discharge Standards (UNDS) related discharges

Notes: _____

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