

DEPARTMENT OF THE AIR FORCE
WASHINGTON DC

23 AUG 1994

ACQUISITION POLICY 94A-003

MEMORANDUM FOR DISTRIBUTION

FROM: SAF/AQ
1060 Air Force Pentagon
Washington DC 20330-1060

SUBJECT: Pollution Prevention on Air Force Acquisition Programs

References: (a) DoDI 5000.2, Defense Acquisition Management Policies and Procedures,
23 Feb 91

(b) CSAF/SECAF Action Memorandum, Air Force Pollution Prevention Program,
7 Jan 93

(c) CSAF/SECAF Action Memorandum, Air Force Ban on Purchase of Ozone
Depleting Chemicals (ODCs), 7 Jan 93

(d) AF Supplement 1, DoDI 5000.2, Feb 93 (Draft)

(e) USAF/CVA Letter, Air Force Ozone Depleting Chemical (ODC) Interim Waiver
Application, Approval Procedures, and Reporting Requirements, 14 Jul 93

(f) Executive Order 12856, Federal Compliance With Right-to-Know Laws and
Pollution Prevention Requirements, 3 Aug 93

This policy memo supersedes AQ Policy Memo 93M-011.

The Chief of Staff and the Secretary of the Air Force cosigned two landmark environmental policies concerning pollution prevention and Ozone Depleting Chemicals (ODCs) on 7 Jan 93. On 3 Aug 93 President Clinton signed Executive Order 12856 that requires all Federal Agencies to have pollution prevention programs working to significantly reduce the use of hazardous materials. For Acquisition Programs, these documents reinforce the existing requirements described in DoDI (and AF Sup 1) 5000.2, Part 6, Section I, "System Safety, Health Hazards, and Environmental Impact." These policies and instructions apply to all acquisition programs and can significantly improve health, safety, and survivability. Program Executive Officers (PEOs), Designated Acquisition Commanders (DACs), Single Managers (SMs), and the entire acquisition community shall implement these policies in accordance with the following guidance and with the full support and assistance of Headquarters Air Force Materiel Command (HQ AFMC). Program Management Directives shall be amended at the next opportunity. The funds for

implementation must come from the normal budgeting process, and will require program restructuring to accomplish this task within existing program budgets. Essentially, Acquisition Pollution Prevention (APP) consists of no more, and no less, than fully integrating the policies and procedures from DoDI 5000.2 into the systems engineering decision process and focusing management attention on this area to ensure innovative, cost-effective approaches are taken in implementing the results.

HQ AFMC will coordinate support to the SMs in implementing this policy. With the assistance and support of HQ AFMC, SMs will work with their customers and the Logistics communities to identify and minimize the use of ODCs and hazardous materials (HAZMAT), implement required changes to Technical Orders (TOs) and MILSPECs, and make the necessary investments to physically implement the changes in the support and operation of their systems. When multiple SMs identify projects (e.g. R&D, test and evaluation) that could be combined to resolve a common pollution source, HQ AFMC will coordinate the use of AFMC resources in support of those projects.

Pollution prevention's primary goal is to reduce ODC and HAZMAT use and release into the environment to as near zero as feasible.

a. All SMs will track the elimination of Class I ODCs using the metric at Attachment 1. SMs shall also identify and track HAZMAT reduction using the metric at Attachment 2 that focuses on the Environmental Protection Agency's list of 17 industrial toxins (EPA 17).

b. SMs must assess all alternative materials and processes to ensure they are not more hazardous than the Class I ODCs or the EPA 17 substances being replaced. SMs shall select alternatives that incur the lowest cost required to protect human health and the environment over the life cycle of their system (DoDD 4210.15).

c. In addition, for systems still in development, SMs shall assess all chemicals and materials in terms of program trade-off decisions and life cycle cost impact. This allows hazardous materials trade-offs to take a logical place in the overall weapon system design and development, thereby balancing pollution prevention and support characteristics. For new systems each milestone review shall contain an evaluation of hazardous materials and documentation of the program manager's decision in accordance with Air Force Supplement 1 to DoDI 5000.2, Part 6, Section I.

Class I ODCs are a critical subset of pollution prevention. Environmental laws and the worldwide end of chlorofluorocarbon (CFC) production by 1995 have the potential to adversely impact our mission if SMs do not develop and implement effective environmental programs.

a. The FY93 National Defense Authorization Act, PL 102-484, Section 326, prohibits the award of any new contracts, as well as the issuance of certain modifications, extensions, and amendments to existing contracts, after 1 Jun 93 if the contract contains a specification or standard that requires, or can only be satisfied by, the use of Class I ODCs unless use of the chemical is approved by a senior acquisition official. In these cases, SMs must review their contracts to determine Class I ODC requirements. An adequate review consists of investigation through the appropriate tier of documentation stipulated in DoDI 5000.2, Part 10, Section C, paragraph 3b, unless engineering expertise or judgment dictates further review.

b. Although the Air Force goal is to eliminate use of Class I ODCs, this may not be possible in the short term if we are to meet mission requirements. In those critical cases where substitutions are not feasible (technically, economically, or legally), SMs can apply for waiver approval to contract for continued use or purchase of Class I ODCs in accordance with the procedures contained in the 14 Jul 93 USAF/CVA letter. The waiver approval only serves as a transitional measure until the use of Class I ODCs can be eliminated. The waiver applications must include the specifics (milestones, schedules, and funding) of the SM's plan to find and implement a suitable substitute.

c. SMs must work aggressively toward meeting the 1 Apr 94 CSAF goal to revise all TOs to allow the use of non-Class I ODC alternatives. If this date is not achievable, notify SAF/AQX by 1 Apr 94 with the reason why it cannot be met and a plan of action to meet the requirement. This plan should include all waivers necessary for the system until the TOs are revised. SMs shall use the metric at Attachment 3 to document their progress.

d. In accordance with the 14 Jul 93 USAF/CVA letter, HQ AFMC/EN is the Air Force ODC Waiver Focal Point (WFP) to assist SMs with elimination efforts. This focal point is empowered to cross-feed waiver information and technical alternatives and identify R&D technology needs to the HQ AFMC/ST Technology Master Plan Process to ensure that top priorities are addressed. Assistance is available through the ODC help line operated/recorded 24 hours per day at DSN 787-2229, ext 117.

Each SM must have a strategy and funding plan for minimizing hazardous materials and Class I ODCs in the program. SMs should have these funding plans in place no later than May 94 for inclusion in the next POM cycle.

a. The emphasis is to implement a pollution prevention program that would reduce life cycle costs of systems through reduced operation and maintenance costs and avoidance of corrective measures downstream. To help document this and to assist in the decision making process, SMs must compare the life cycle costs of continued use of HAZMAT and ODCs to the life cycle costs of finding and implementing replacements.

b. SAF/AQ, working with HQ AFMC and SM representatives, has developed an overall strategy to coordinate the SMs' efforts to reduce implementation costs. HQ AFMC has the lead in organizing and implementing this strategy. The strategy will involve SMs working with other SMs, contractors, and military services to solve shared or similar problems and avoid parallel efforts. This will require identifying shared problems and developing innovative solutions by utilizing horizontal engineering and teaming with contractors and industry associations. SMs also need to look at AF industrial operations on a plant basis so common needs can be aggregated.

c. SMs will need to work with their operational customers using risk management to trade off cost, schedule, and performance requirements to reduce the use of hazardous materials to as near zero as feasible, technically and economically. As part of this, SMs must include in their systems engineering functions the Environmental Impact Analysis Process (EIAP) and System Safety Programs (SSP), that already address pollution prevention issues. SMs are already responsible for complying with the EIAP and SSP requirements. However, SMs must ensure they fully integrate the EIAP and SSP into the ongoing systems engineering management decision making processes. To facilitate this, SMs must prepare their own Environmental Impact Assessments/Statements, with assistance from the Center Environmental, Safety, and Health staffs.

The Air Force is committed to environmental leadership. By fully implementing the policies and procedures within DoDI 5000.2, Part 6, Section I, and the Air Force Supplement 1, SMs can contribute to this goal. To clearly show progress in pollution prevention, the attached metrics shall be briefed at each Weapon System Program Assessment Review. In addition, each program shall provide HQ AFMC semiannual progress reports in March and September, starting March 94, consisting of the attached metrics. HQ AFMC will consolidate the inputs into roll-up metrics and provide those to SAF/AQ. SAF/AQ will use the roll-up metrics to track Air Force wide progress for all weapon systems. If all data are not available for the March 94 report, the report shall consist of available data with a plan for obtaining the metric information. Subsequent reports shall also include a brief narrative describing the changes from the previous report.

The OPR for this memorandum is SAF/AQXM, DSN 227-5023.

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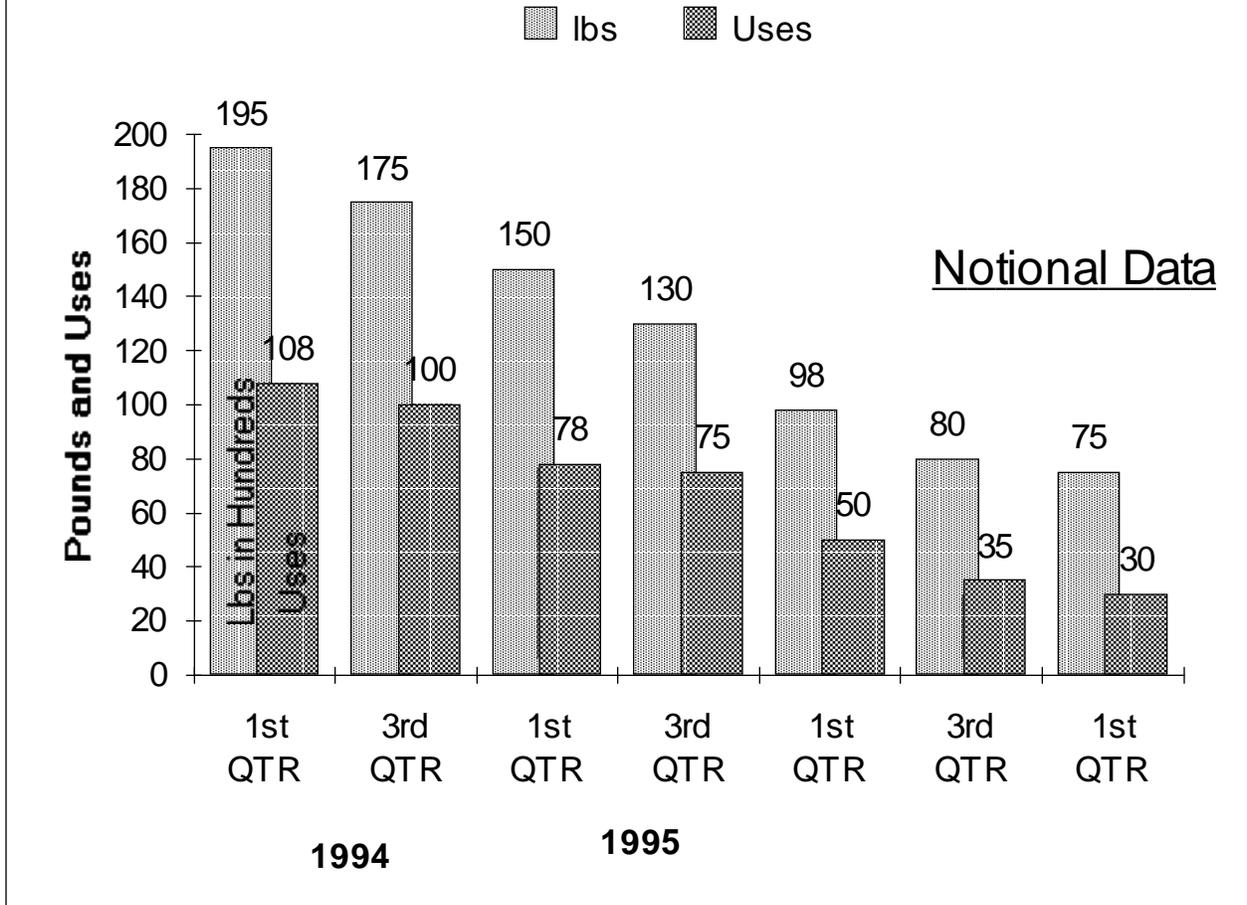
CLARK G. FIESTER

Assistant Secretary of the Air Force
(Acquisition)

Attachments:

1. Distribution
2. Metric: Class I ODC Use
3. Metric: EPA 17 Industrial Toxins Use
4. Metric: TOs with Class I ODC Requirements

Program XYZ Ozone Depleting Chemical Use



Definitions: USES - The number of processes or product applications required by applicable technical data (i.e., engineering data, specifications, and technical orders).

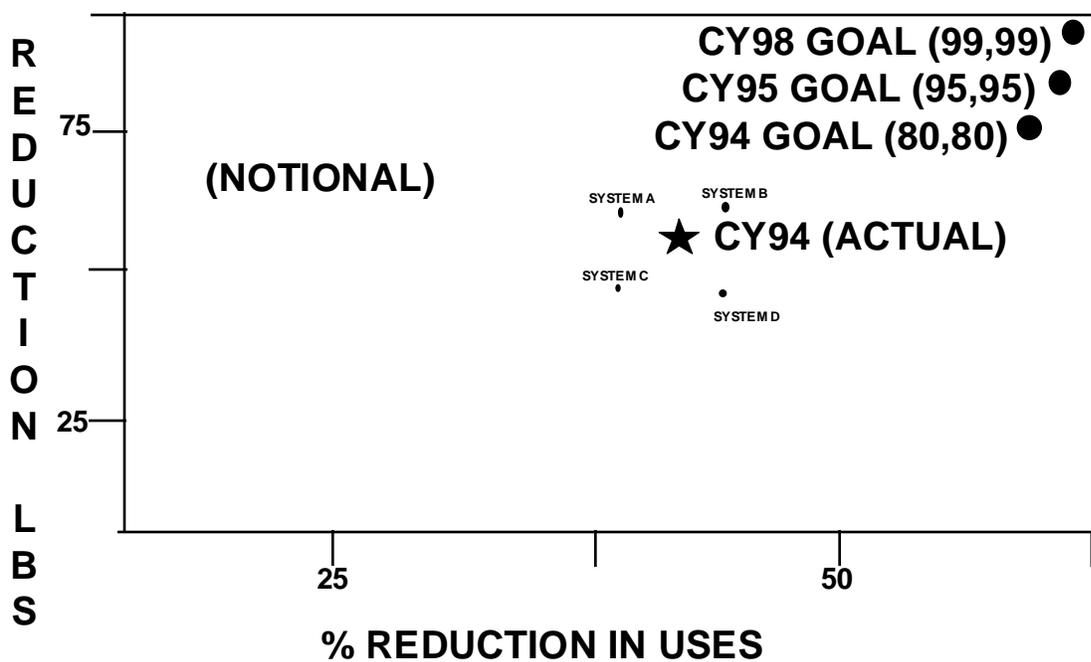
POUNDS - Amounts installed on the system and purchased for manufacturing, operations, and support.

ROLL-UP METRIC CLASS I ODC REDUCTION

WEAPON SYSTEMS, PRODUCT GROUPS, MATERIEL GROUPS

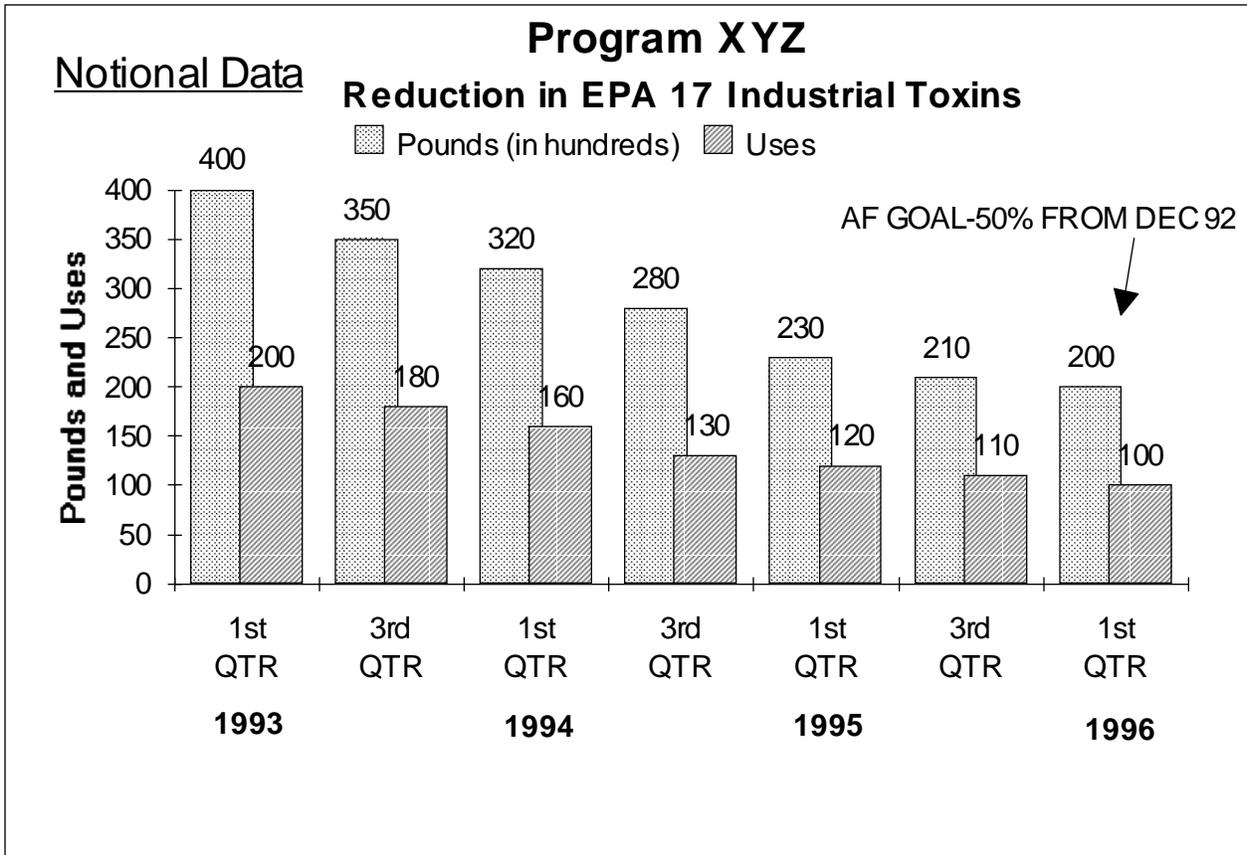
AF GOAL: BY 31 DEC 95, REDUCE BY 95% THE POUNDS REQUIRED AND USES FROM THE BASELINE 31 DEC 92. BY 31 DEC 98, ELIMINATE 99% OF ODC USE

%



- BASELINED ON 31 DEC 92 REGARDLESS OF PHASE
- INCLUDES ODCs REQUIRED IN ACQUISITION, TEST, PRODUCTION, DEPLOYMENT, AND DISPOSAL
- DEFINITIONS: USES - THE NUMBER OF PROCESSES OR PRODUCT APPLICATIONS REQUIRED BY APPLICABLE TECHNICAL DATA. (I.E., ENGINEERING DATA, SPECIFICATIONS, TECHNICAL DATA)

POUNDS - AMOUNTS INSTALLED ON THE SYSTEM PURCHASED FOR MANUFACTURING, OPERATIONS, AND SUPPORT.



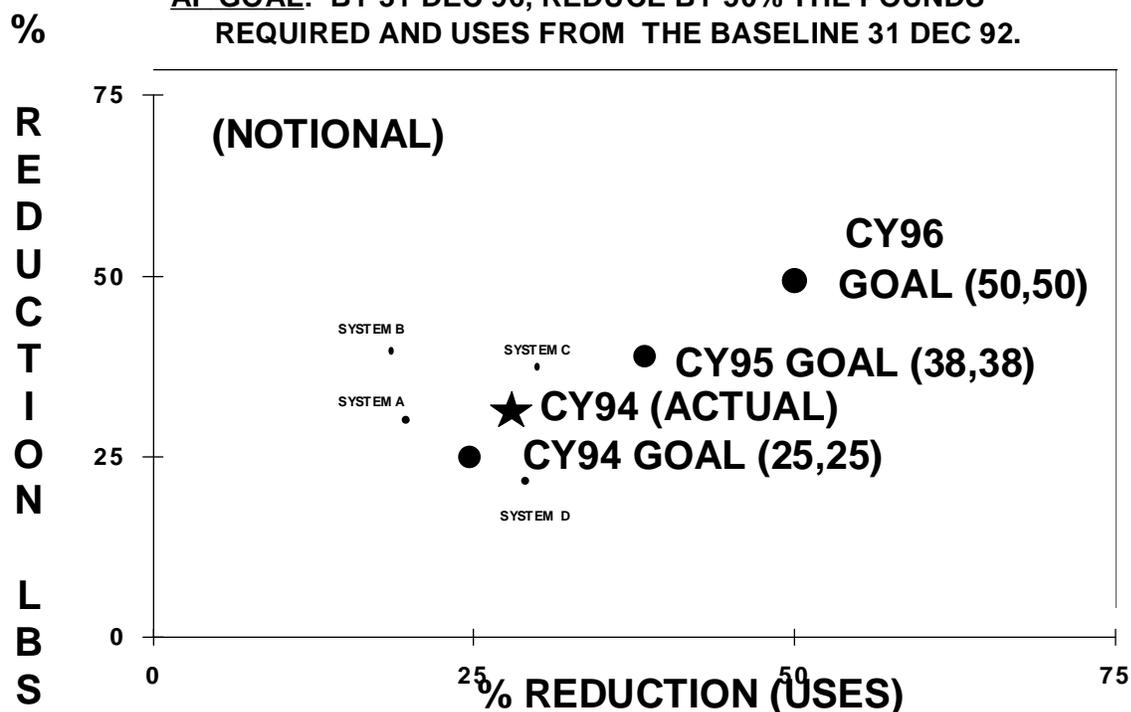
Definitions: USES - The number of processes or product applications required by applicable technical data (i.e., engineering data, specifications, and technical orders).

POUNDS - Amounts installed on the system and purchased for manufacturing, operations, and support.

ROLL-UP METRIC EPA 17 REDUCTION

WEAPON SYSTEMS, PRODUCT GROUPS, MATERIEL GROUPS

AF GOAL: BY 31 DEC 96, REDUCE BY 50% THE POUNDS
REQUIRED AND USES FROM THE BASELINE 31 DEC 92.

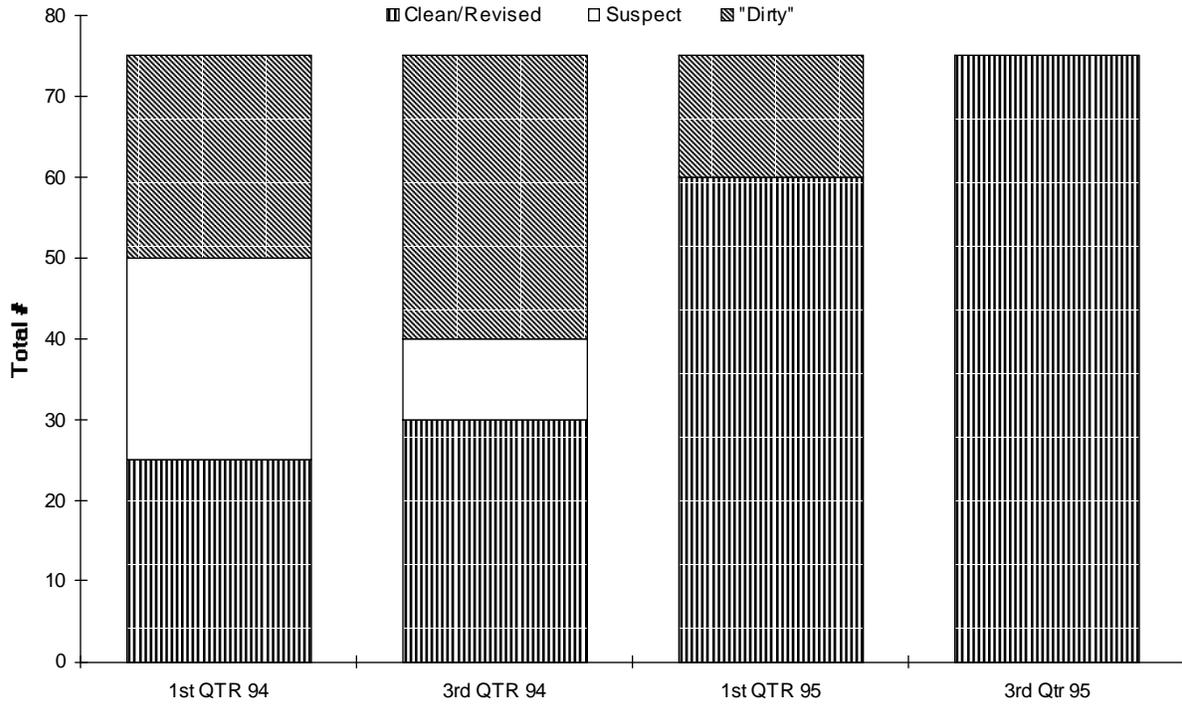


- BASELINED ON 31 DEC 92 REGARDLESS OF PHASE
- INCLUDES HAZMATS REQUIRED IN ACQUISITION, TEST, PRODUCTION, DEPLOYMENT, AND DISPOSAL
- DEFINITIONS: USES - THE NUMBER OF PROCESSES OR PRODUCT APPLICATIONS REQUIRED BY APPLICABLE TECHNICAL DATA. (I.E., ENGINEERING DATA, SPECIFICATIONS, TECHNICAL DATA)

POUNDS - AMOUNTS INSTALLED ON THE SYSTEM PURCHASED FOR MANUFACTURING, OPERATIONS, AND SUPPORT.

Program XYZ

Technical Orders Containing Ozone Depleting Chemicals



ROLL-UP METRIC

TECHNICAL ORDER REVISION

WEAPON SYSTEMS, PRODUCT GROUPS, MATERIEL GROUPS

AF GOAL: BY 1 APR 94, REVISE ALL TOs TO ALLOW USE OF NON-ODC ALTERNATIVES

