Coatesville Veterans Affairs Medical Center
GEMS Program Training for Contractors
Pre-Construction Meeting

HISTORY: All federal agencies are required to implement an Environmental Management System (EMS) by December 31, 2005 under Executive Order 13148, "Greening the Government through Leadership in Environmental Management". As a result, the Department of Veterans Affairs has chosen to call its EMS ~ Green Environmental Management Systems or "GEMS." Such systems have been shown to be a valuable management tool to lessen negative impacts on the environment, and create more efficient, cost effective means of conducting activities.

GEMS PROGRAM INFORMATION:

The GEMS Program is based on ISO 14001, which applies specifically to EMS. An EMS program provides a framework or process to review activities performed by, or on behalf of the organization, including work performed by contractors. The GEMS Program emphasizes the importance of compliance with federal, state, and local regulations; encourages pollution prevention strategies whenever possible; and focuses on achieving continued improvements.

The GEMS Program documents activities at the medical center, prioritizes activities according to their likelihood of resulting in an adverse impact (called *Significant Environmental Aspects*), and puts operational controls in place to reduce or mitigate adverse environmental impacts. As a result, any party that performs an activity identified by the local GEMS Committee to be a *Significant Environmental Aspect* must be familiar with our GEMS training to reduce the environmental impacts.

GEMS PROGRAM TRAINING:

GEMS Program awareness training will be conducted during the pre-construction meeting for all construction projects. This training will include a summary of the GEMS Program, its primary elements and overall goals (i.e. pollution prevention, efficient use of resources and reuse/recycling). Further, any construction project that involves an activity or activities deemed to be a *Significant Environmental Aspect* must ensure that appropriate operational control measures are in-place, their staff members are properly trained, and all work performed is completed in compliance with local, state and federal regulations.

The following are construction activities that have been deemed to be *Significant Environmental Aspects*:

- Use and storage of hazardous chemicals (potential for spills), if no safer alternative is available, must be used and stored in accordance with OSHA, EPA (49 CFR 265 Subpart I), and NFPA requirements. Any hazardous chemicals and wastes must be properly used, handled, transported and stored in a manner which would prevent release into the environment and must be disposed of in accordance with local, state and federal regulations.
- Abatement activities ~ Asbestos (29 CFR 1926.1101), Lead (29 CFR 1926.62), etc.
- Excavation sites that could impact storm water inlets.

- Recyclable material. All contractors are required to recycle construction debris in accordance with spec section 01 74 19 titled, Construction Waste Management. At a minimum, the following will be diverted from the landfill:
    - Soil.
    - Inerts (eg, concrete, masonry and asphalt).
    - Clean dimensional wood and pallet wood.
    - Green waste (biodegradable landscaping materials).
    - Engineered wood products (plywood, particle board and I-joists, etc).
    - Metal products (eg, steel, wire, beverage containers, copper, etc).
    - Cardboard, paper and packaging.
    - Bitumen roofing materials.
    - Plastics (eg, ABS, PVC).
    - Carpet and/or pad.
    - Gypsum board.
    - Insulation.
    - Paint.
    - Fluorescent lamps.

  The records of materials recycled and weights must be submitted to the COTR for recordkeeping and subsequent reporting in the Greenhealth Tracker System.

Attached is a pre-construction meeting report and a Project Reuse/Recycling Log

The Coatesville VA Medical Center in accordance with VA Directive 2004-069 (**Waste Minimization and Compliance Report**) and the **Federal Pollution Prevention Act** formally establishes Pollution Prevention (P2) as a national objective, and defines P2 as source reduction and other practices that reduce or eliminate pollutants. This act establishes a hierarchy of environmental protection consisting of prevention or source reduction, recycling, treatment, and proper disposal. The most desirable method of pollution abatement is prevention or source reduction. Disposal and other releases to the environment should be done only as last resort, and then in an environmentally safe manner.

The **Resource Conservation and Recovery Act (RCRA)**, as amended by the **Hazardous and Solid Waste Amendments of 1984**, has authority over generation, treatment, storage, disposal, and transportation of hazardous and non-hazardous waste and emphasizes source reduction as its highest priority. RCRA requires "cradle-to-grave" management of hazardous waste (HW), encourages recycling and reuse, and further requires HW generators to certify that the generator has a program in place to "reduce the volume or quantity and toxicity" of wastes created. Further, RCRA mandates Federal facilities to procure recycled products. In addition, the **Federal Facilities Compliance Act of 1992** makes Federal facilities subject to Federal, State and local waste management and disposal laws and regulations.

In accordance with these rules and regulations, the VA requires contractors and project managers to monitor waste(s) taken from their construction projects, and certify that proper disposal has

occurred. Further, if a waste product (door, light fixture, etc.) can be recycled or reused, reasonable effort should be made to do so.

Items that may be reused include, but are not limited to: doors (if in good shape), door locks, light fixtures, electronics items (nurse call wiring, other wiring, etc.), electrical panels, breakers, sinks, toilets, plumbing fixtures, power pools, accessories (mirrors and towel dispensers), handrails, and possibly corner guards. However, if these items no longer meet codes, safety, or other requirements and are not specifically stated in the AE drawings or specs to be reused, they should not be reused.

If items are to be reused, these items should be logged by the Project Manager on a Project Reuse/Recycling Log (see attachment). At the conclusion of the project, this form shall be reviewed and signed by the Supervisor, Facility Design, and copies provided to the GEMS Program Manager for their records.

Coatesville Veterans Affairs Medical Center
Project Reuse/Recycling Log

Project Number:_____	**Project Location:**_____		**Page** ____ **of** ____	
Date:_____			**Project Manager:**_____	
Material Being Reused/Recycled	**Reused/Recycled**	**Quantity**	**Location Taken**	**Comments**
(e.g. Plumbing Fixtures)	Reused	3	Plumbing Shop	Delivered on _____

cc: Supervisor, Facility Design
GEMS Program Manager