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**Civil Engineering**

**ENVIRONMENTAL INCIDENT  
INVESTIGATION PROCESS**



**COMPLIANCE WITH THIS PUBLICATION IS MANDATORY**

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This instruction implements Air Force Policy Directive (AFPD) 32-70, *Environmental Quality*, and establishes an Environmental Incident Investigation Process (EIIP) for the United States Air Force Academy (USAFA). The purpose of the EIIP at USAFA is to investigate environmental incidents to determine their primary causes and contributing factors and to identify corrective actions that will prevent future recurrence of similar incidents. The level of investigation required is to be determined by the relative seriousness of an incident.

Refer recommended changes and conflicts between this and other publications to HQ USAFA/CECV, 8120 Edgerton Dr, USAF Academy, CO 80840, on Air Force (AF) Form 847, **Recommendation for Change of Publication**.

Maintain and dispose of records created as a result of prescribed processes in accordance with AFMAN 37-139, *Records Disposition Schedule* (will convert to AFMAN 33-322, Volume 4).

**SUMMARY OF REVISIONS**

**This document is substantially revised and must be completely reviewed.**

These revisions restructure the investigative process and update office titles and symbols throughout.

**1. Criteria to Trigger the EIIP.** The EIIP may be triggered when an incident occurs that falls into one of the categories identified below. The 10th Civil Engineer Squadron Environmental Division (10 CES/CEV) will provide the initial briefing to the EIIP Chair and assist in determining whether an EIIP is warranted.

1.1. **Categories.** The following incidents may trigger the Environmental Incident Investigation Process:

1.1.1. Category 1. Reportable Quantity Spills or Releases

- 1.1.2. Category 2. Enforcement Action (Notice of Violation (NOV), Fine or Warning Memorandum)
- 1.1.3. Category 3. Significant Wildlife Violations
- 1.1.4. Category 4. Illegal Dumping Incidents
- 1.1.5. Category 5. Incidents not covered in other categories but that have the potential to endanger human health and safety or have a significant impact to the environment or as directed by the Environmental Protection Committee (EPC) Chair or the EIIP Chair.

## 2. EIIP Organization and Responsibilities:

2.1. **10th Air Base Wing Vice Commander (10 ABW/CV) (EIIP Chair).** The 10 ABW/CV will manage the EIIP and serve as EIIP Chair. 10 ABW/CV will:

- 2.1.1. Initiate command-directed inquiry or investigation.
- 2.1.2. Appoint an Investigator for each incident at the proper level to ensure the Investigator is capable of conducting a complete, impartial, and unbiased investigation.
- 2.1.3. Ensure each incident is properly investigated.
- 2.1.4. Review and validate EIIP Reports.
- 2.1.5. Inform senior management of significant developments relating to EIIP incidents.
- 2.1.6. Ensure corrective actions and preventive measures are implemented.

2.2. **10 CES/CEV.** 10 CES/CEV will gather the initial facts, brief the EIIP Chair and if warranted request the initiation of an EIIP. To avoid problems associated with bias in the investigation of environmental incidents, 10 CES/CEV's responsibilities in the process will be limited to initial coordination and closure action after the investigation is complete. 10 CES/CEV will:

- 2.2.1. Provide the initial briefing to EIIP Chair.
- 2.2.2. Notify Air Force Office of Special Investigations (AFOSI) and Headquarters USAFA Judge Advocate (HQ USAFA/JA).
- 2.2.3. Assist the designated EIIP Investigator during the investigation.
- 2.2.4. Maintain documentation of each environmental incident.
- 2.2.5. Analyze investigation results for use in incident prevention. Develop preventive actions.
- 2.2.6. Ensure investigation results are shared with other organizations to prevent similar occurrences.
- 2.2.7. Follow up to ensure corrective actions and preventative measures are implemented.

2.3. **EIIP Investigator.** The EIIP Chair will appoint an Investigator to conduct the inquiry or investigation. The Investigator should be appointed from an organization or flight not directly associated with the incident and capable of conducting a complete, impartial and unbiased investigation. The Investigator will:

- 2.3.1. Assemble Investigating Team (Primary and Supporting as required).
- 2.3.2. Direct all investigation actions.

- 2.3.3. Determine the incident category in accordance with this instruction.
- 2.3.4. Conduct initial investigation and collect all pertinent data.
- 2.3.5. Report all milestones to EIIP Chair and ensure all suspenses are met.
- 2.3.6. Coordinate with HQ USAFA/JA and AFOSI Detachment 808 (AFOSI).
- 2.3.7. Generate incident investigation report, review corrective actions and assist in implementation of preventative measures.

2.4. **EIIP Primary Team.** The primary EIIP Team may consist of members from the Environmental Division 10 CES/CEV, 10th Aero Space Medical Squadron Bioenvironmental Engineering (10 AMDS/SGPB), 10th Civil Engineer Squadron Fire Operations (10 CES/CEF), and Headquarters USAFA Safety (HQ USAFA/SE). The EIIP primary team will:

- 2.4.1. Provide technical support and expertise to the EIIP Investigator as required.

2.5. **EIIP Supporting Team.** The supporting team includes HQ USAFA/JA, AFOSI, Headquarters USAFA Public Affairs (HQ USAFA/PA), as well as any outside agencies that are participating in the investigation. The supporting team responsibilities include the following:

2.5.1. Legal and Office of Special Investigations. The intent of the EIIP is to determine the primary causes of environmental incidents and to identify corrective actions that will prevent future recurrence of similar incidents. Because incidents may also result in a criminal investigation, the Investigator will coordinate with HQ USAFA/JA and AFOSI to determine if a criminal investigation is required. Should HQ USAFA/JA or AFOSI decide to pursue and prosecute alleged violations, the EIIP will be suspended until HQ USAFA/JA or AFOSI determines the EIIP will not interfere with the criminal investigation and evidence.

2.5.2. Public Affairs. HQ USAFA/PA involvement will be proactive, emphasizing the maximum disclosure/minimum delay philosophy. HQ USAFA/PA will ensure all newsworthy information is made publicly available to the maximum extent possible. No information should be held for query only; however, the state and local environmental offices are to be notified prior to releasing information concerning Category 1 or 2 environmental incidents. All environmental incidents which endanger public health or safety, as determined by the EIIP primary team, or result in substantial environmental damage will be publicly released by HQ USAFA/PA.

2.5.3. Other Supporting Team Members. Other supporting team members may include agencies or other organizations within or outside of the Academy. The supporting team may be called upon to provide technical experience to directly support the investigation.

**3. Incident Reporting.** When notified of an environmental incident which may trigger the EIIP (as outlined in paragraph 1.1.), the following actions must take place:

3.1. **Reporting Actions:** The following actions must take place in the event of an EIIP.

3.1.1. In the case of a substance release, the Environmental Division will notify all appropriate regulatory agencies as prescribed by law, and as directed by Headquarters USAFA Environmental Office (HQ USAFA/CEV).

- 3.1.2. Bioenvironmental Engineering will assess the potential health risk to responders or the community and determine a sampling, analysis, and monitoring plan to ensure the incident area is restored to background levels when remediation is completed.
- 3.1.3. The Environmental Division will contact and brief the EIIP Chair on the details of the incident.
- 3.1.4. Based on the nature of the incident and recommendations from the Environmental Division, the EIIP Chair will determine whether an investigation is warranted.
- 3.1.5. The EIIP Chair will appoint an Investigator and provide guidance for the investigation.
- 3.1.6. The Investigator will generate a report that identifies pertinent facts and findings and contains recommendations to prevent future occurrences.
- 3.1.7. The EIIP Investigator will report findings to the EIIP Chair and brief conclusions and recommendations to the Environmental Protection Committee (EPC).
- 3.1.8. Corrective actions and preventative measures will be implemented.

**4. The Incident Investigation.** The incident should be investigated thoroughly to ascertain the cause of the incident and provide feedback to the EIIP Chair. Investigations must consider all facts before drawing a conclusion on the causes or contributing factors in an environmental incident. The Investigator must conduct interviews of all affected personnel. (Affected personnel include those involved in the incident and those who have the necessary training and experience to qualify them as experts). Because the EIIP investigation will not take place until after HQ USAFA/JA and AFOSI determine no interference with a criminal investigation exists, the investigator will not normally be required to advise interviewees of their rights against self-incrimination. In the event an investigator believes he has cause to suspect an individual of criminal conduct, the investigator must immediately consult with HQ USAFA/JA personnel.

- 4.1. **Investigation Guidelines.** The following guidelines should be followed during an investigation:
  - 4.1.1. Examine the incident site, if applicable. Use of photographs is encouraged to accurately record actual conditions.
  - 4.1.2. Examine all physical evidence and documentation.
  - 4.1.3. The EIIP Chair may request assistance from HQ USAFA/JA and (or) AFOSI. If the Investigator feels that evidence has been discovered that points to possible criminal wrongdoing or legal liability, the AFOSI and HQ USAFA/JA representatives shall be consulted immediately. Care should be taken to safeguard all documentation to allow the AFOSI and HQ USAFA/JA representatives access to all pertinent evidence. If representatives from AFOSI and or HQ USAFA/JA determine sufficient evidence exists to proceed with a criminal investigation, the EIIP shall cease operations until legal clearance is obtained.
  - 4.1.4. Examine personnel training and other records to help determine if lack of adequate training contributed to the incident.
  - 4.1.5. Compare interview data, physical evidence, documentation, and records against applicable laws and regulations. Using evidence and professional judgment, determine direct root causes, indirect or contributing factors, and circumstances leading to the incident.
  - 4.1.6. Identify corrective actions and recommended additional measures to prevent recurrence.

**5. Report/Briefing Preparation.** For each investigation, the EIIP Investigator will prepare a Findings Report. All incident reports must be factual and complete. The investigation results shall be briefed to the EIIP Chair after the investigation is concluded.

5.1. **The Findings Report:** The Findings Report will contain the following:

5.1.1. A narrative description of the incident. Photographs and site sketches should be included where appropriate. The setting and circumstances of the incident should be clear from the background information contained within the narrative description.

5.1.2. The direct root cause of the incident.

5.1.3. Contributing factors leading to the direct cause of the incident.

5.1.4. Recommendations to prevent recurrence at the incident location and Air Force wide.

**6. Report Disclosure.** An EIIP report is intended to be an internal Academy document to prevent future similar incidents. It should not otherwise be disclosed to those individuals or organizations outside the Academy unless directed by the EIIP chair and approved by HQ USAFA/JA.

**7. Information Collections, Records, and Forms.**

7.1. Information Collections. No information collections are created by this publication.

7.2. Records. Maintain and dispose of records created as a result of prescribed processes in accordance with AFMAN 37-139, *Records Disposition Schedule* (will convert to AFMAN 33-322, Volume 4).

7.3. Forms.

7.3.1. Forms or IMTs Adopted. No forms were adopted by this publication.

7.3.2. Forms or IMTs Prescribed. No forms were prescribed by this publication.

Thomas F. Hayden III, Colonel, USAF  
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