MANAGEMENT COORDINATION PLAN

Marine Corps Base Quantico

Prepared by:
Environmental Management System Coordinator
Natural Resources and Environmental Affairs Branch

January 2014 Version 1.0

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Approval

This Management Coordination Plan meets requirements established within Marine Corps Order P5090.2A, w/Ch3, Environmental Compliance and Protection Manual, and Marine Corps Base Order 5090.2D, Environmental Program Management.

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Record of Changes

Log completed change actions as indicated.

Change Number	Date of Change	Summary of Revision	Signature of Editor

Table of Contents

Acronyms and Abbreviations

AST	Aboveground Storage Tank
AT/FP	Anti-Terrorism/Force Protection
CETEP	Comprehensive Environmental Training and Education Program
CMC	Commandant of the Marine Corps
CMC (LFL)	Commandant of the Marine Corps, Assistant Commandant Installations and Logistics (Land Use and Military Construction)
CMEP	Centrally Managed Environmental Program
DoD	Department of Defense
DoN	Department of the Navy
E^2MS	Environmental Management System and Energy
E3	Exemplary Environmental Enterprise
EAP	Environmental Action Plan
EC	Environmental Coordinator
ECE	Environmental Compliance Evaluation
ECHO	Enforcement and Compliance History Online
ECPSOP	Environmental Compliance and Protection Standard Operating Procedure
EM Portal	Environmental Management Portal
EMP	Environmental Management Procedure
EMS	Environmental Management System
EPA	Environmental Protection Agency (United States)
EPCRA	Emergency Planning and Community Right-to-Know Act
EPI	Environmental Performance Indicator
EQUIP	Environmental Quality in Progress
ESOP	Environmental Standard Operating Procedure
FOIA	Freedom of Information Act
GSE	Ground Support Equipment
HCP	Hazardous Material Consolidation Program
HM	Hazardous Material
HQMC	Headquarters Marine Corps
HQMC (LFL)	Headquarters Marine Corps (Land Use and Military Construction)
HW	Hazardous Waste
IAP	Internal Audit Program
ISMP	Integrated Spill Management Plan
ISO	International Organization for Standardization
LAN	Local Area Network
MAP	Mission Assurance Plan
MCBO	Marine Corps Base Order
MCBQ	Marine Corps Base, Quantico
MCCS	Marine Corps Community Services
MCO	Marine Corps Order
MCP	Management Coordination Plan
NOV	Notice of Violation
NREA	Natural Resources and Environmental Affairs
O&M,MC	Operations and Maintenance, Marine Corps

ODS	Ozone-Depleting Substance
OTIS	Online Targeting Information System
PAI	Practices, Aspects, and Impacts
PAO	Public Affairs Office
PCB	Polychlorinated Biphenyl
POA&M	Plan of Action and Milestones
POC	Point of Contact
POM	Program Objective Memorandum
POV	Privately Owned Vehicle
PPBS	Planning, Programming, and Budgeting System
STEPS	Status Tool for Environmental Programs
T/O	Table of Organization
TEAM	The Environmental Assessment and Management
TNA	Training Needs Assessment
USMC	United States Marine Corps
UST	Underground Storage Tank
VDEQ	Virginia Department of Environmental Quality
VEEP	Virginia Environmental Excellence Program
WEBCASS	Web Compliance Assessment and Sustainment System

Introduction

1. Purpose and Objective

a. Purpose. This Management Coordination Plan (MCP) is designed to supplement Marine Corps Base Quantico's (MCBQ's), Environmental Management System (EMS) Manual, Marine Corps Base Order (MCBO) 5090.2D, and MCBQ's Environmental Compliance and Protection Standard Operating Procedure (ECPSOP). The purpose of this MCP is to provide a detailed description of procedures used to administratively implement MCBQ's EMS.

b. Objective. The objective of MCBQ's MCP is to provide MCBQ with Environmental Management Procedures (EMPs) necessary to perform duties associated with EMS under the scope of the International Organization for Standardization (ISO) 14001:2004 standard and United States Marine Corps (USMC) EMS guidance.

2. References and Definitions. All applicable references and definitions have been divided into their corresponding chapters within this plan.

3. Requirements and Scope

a. Requirements

(1) USMC units and personnel regularly conduct practices during day-to-day operations and training that may impact human health and the environment. To govern these actions, the Commandant of the Marine Corps (CMC) has formalized the USMC EMS through Marine Corps Order (MCO) P5090.2A, w/Ch3, Chapter 2. Marine Corps EMS guidance is divided into 17 elements that mirror the ISO 14001:2004 standard.

(2) The USMC EMS supports Executive Order 13148, "Greening the Government Through Leadership in Environmental Management," and the Department of Defense (DoD) EMS Policy of 5 April 2002.

(3) Specific MCBQ EMS requirements are provided through:

(a) MCBO 5090.2D and the MCBQ EMS Manual, which provide the overall structure of MCBQ's EMS;

(b) MCBQ's ECPSOP, which provides program specific documentation or references to environmental program plans, as applicable; and

(c) MCBQ's Sustainability Plan, which provides the procedures and strategies for meeting Federally-mandated sustainability requirements such as green procurement, energy conservation, and waste reduction.

b. Scope

(1) MCBQ, also referred to as “the Base,” maintains an EMS, which includes areas used and affected by all activities aboard MCBQ. The Federal Bureau of Investigation Academy, Drug Enforcement Agency, and two Public Private Ventures (Lincoln Housing and Marine Corps Heritage Center) do not fully implement MCBQ’s EMS because those organizations have their own EMS and United States Environmental Protection Agency (EPA) Facility Identification Number.

(2) The MCP is implemented under the direction of the Base Commander, MCBQ, in accordance with MCBO 5090.2D and carries the Base Commander’s authority for implementing the procedures described herein.

4. Overview. The MCP is organized into the following chapters, which correspond to the 17 specific elements identified in MCO P5090.2A, w/Ch3 and associated ISO 14001:2004 standard:

a. Element 1, Environmental Policy. Chapter 1 provides the requirements and procedures used to edit and maintain MCBQ’s Environmental Policy (associated with ISO 14001:2004, Paragraph 4.2).

b. Element 2, Practices, Aspects, Impacts, and Risk Prioritization. Chapter 2 describes the requirements and procedures used to maintain MCBQ’s Practices, Aspects, and Impacts (PAI) Inventory and to conduct risk prioritization of those practices (associated with ISO 14001:2004, Paragraph 4.3.1).

c. Element 3, Legal and Other Environmental Requirements. Chapter 3 describes the procedures used by MCBQ to identify applicable Federal, state, local, DoD, Department of the Navy (DoN), Marine Corps, and installation-level environmental requirements. These requirements are subsequently used to maintain compliance and are disseminated as appropriate to all levels and functions operating aboard MCBQ (associated with ISO 14001:2004, Paragraph 4.3.2).

d. Element 4, Objectives, Targets, and Actions to Improve Performance. Chapter 4 identifies the procedures used to identify objectives, targets, and actions used to improve the performance of MCBQ’s EMS (associated with ISO 14001:2004, Paragraph 4.3.3).

e. Element 5, Roles, Responsibilities, and Resources. Chapter 5 summarizes the roles, responsibilities, and resources (including funding) associated with implementation and operation of MCBQ’s EMS. These items may be periodically evaluated to ensure MCBQ’s objectives, targets, and EMS improvements are continually being met (associated with ISO 14001:2004, Paragraph 4.4.1).

f. Element 6, Competence, Training, and Awareness. Chapter 6 describes training requirements for MCBQ’s EMS and the procedures used

to meet those requirements (associated with ISO 14001:2004, Paragraph 4.4.2).

g. Element 7, Communication. Chapter 7 describes the internal and external procedures used to communicate environmental requirements to multiple levels and functions at MCBQ, coupled with public notifications of environmental matters to the Base and outside parties that are interested in MCBQ's environmental activities (associated with ISO 14001:2004, Paragraph 4.4.3).

h. Element 8, EMS Documentation. Chapter 8 provides the procedures used to document MCBQ's EMS and describes how elements relate to each other (associated with ISO 14001:2004, Paragraph 4.4.4).

i. Element 9, Control of Documents. Chapter 9 describes the procedures used to inventory all environmental documents associated with the EMS. This procedure also describes management of current and obsolete EMS documents (associated with ISO 14001:2004, Paragraph 4.4.5).

j. Element 10, Operational Control of Practices. Chapter 10 describes the procedures used to generate, review, and update Environmental Standard Operating Procedures (ESOPs), which are used to prevent or mitigate negative environmental impacts associated with significant practices (associated with ISO 14001:2004, Paragraph 4.4.6).

k. Element 11, Emergency Preparedness and Response. Chapter 11 describes the procedures for identifying, documenting, responding to, and recording accidents and emergencies; and for mitigating the potential environmental impacts that may result. Procedures to be followed in the event of an accident or emergency are communicated in scope and detail appropriate to personnel responsibilities (associated with ISO 14001:2004, Paragraph 4.4.7).

l. Element 12, Monitoring and Measurement. Chapter 12 describes the procedures used to monitor and measure performance within the EMS (i.e., progress towards meeting objectives and targets). This chapter also discusses procedures to verify that calibrated or verified equipment is used as applicable and that associated records of calibration and validation are maintained (associated with ISO 14001:2004, Paragraph 4.5.1).

m. Element 13, Evaluation of Compliance. Chapter 13 describes the procedures used to evaluate MCBQ's EMS through Benchmark Environmental Compliance Evaluations (ECEs) and Internal ECEs (associated with ISO 14001:2004, Paragraph 4.5.2).

n. Element 14, Problem Solving. Chapter 14 describes the procedures used to address noncompliance and nonconformance issues and

for implementing appropriate corrective and preventive actions through root cause analysis (associated with ISO 14001:2004, Paragraph 4.5.3).

o. Element 15, Control of Records. Chapter 15 provides the procedures for maintaining EMS records so they can be located, are protected from alterations or damage, and are removed or archived, as appropriate, when obsolete (associated with ISO 14001:2004, Paragraph 4.5.4).

p. Element 16, EMS Audit. Chapter 16 describes the procedures for performing EMS Audits (associated with ISO 14001:2004, Paragraph 4.5.5).

q. Element 17, Management Review. Chapter 17 describes the procedures used to perform Management Review of MCBQ's EMS through the MCBQ Environmental Management System and Energy (E^2MS) Core Team (associated with ISO 14001:2004, Paragraph 4.6).

CHAPTER 1

Environmental Policy

1. Purpose and Applicability

a. This chapter discusses the requirements and management of MCBQ's Commander's Environmental Policy (Figure 1-1) statement, which is posted on the Natural Resources and Environmental Affairs (NREA) Branch Website at the following world wide web address: http://www.quantico.usmc.mil/download.aspx?Path=./Uploads/Files/NREA_Environmental Policy.pdf. It is also posted to the NREA Branch SharePoint site on the MCBQ, NREA Intranet Site at: https://eis.usmc.mil/sites/mcbquan/g5/nrea/SitePages/Home.aspx

b. The Environmental Policy statement applies to all activities that are included within the scope of MCBQ's EMS. Refer to Paragraph 3.b(1) in the Introduction.

c. This chapter is designed to meet the requirements of MCO P5090.2A, w/Ch3, Element 1.

2. Responsibilities

a. E^2MS Core Team. The E^2MS Core Team reviews, discusses potential edits and approves MCBQ's Environmental Policy.

b. E^2MS Implementation Team and/or Program Managers. The E^2MS Implementation Team provides recommended edits to the Environmental Policy for the review and approval of the E^2MS Core Team.

c. EMS Coordinator. The EMS Coordinator recommends edits to the E^2MS Implementation Team for evaluation. The EMS Coordinator facilitates recommended edits from the E^2MS Implementation Team to the E^2MS Core Team for review. Subsequent to E^2MS Core Team approval of recommended edits, the EMS Coordinator revises the Environmental Policy accordingly for basewide redistribution.

d. Environmental Coordinators (ECs). ECs ensure that the current Environmental Policy is available (i.e., posted at organization work centers) to staff belonging to their activity. They also ensure that activity staff are familiar with the Environmental Policy and how it relates to their job function.

e. Practice Owners and Workers. All Practice Owners and Workers at MCBQ must be familiar with the Environmental Policy and how it relates to the practices they perform during day-to-day activities.

3. Procedure

a. The EMS Coordinator maintains a Commanding Officer's Environmental Policy statement for MCBQ, ensuring it meets the following requirements outlined in the MCO P5090.2A, w/Ch3:

(1) Is dated, documented, and signed by the Base Commander;

(2) Reflects the vision of the Marine Corps EMS to sustain and enhance mission readiness and access to training environments through effective and efficient environmental management;

(3) Commits to:

(a) Compliance with relevant environmental legislation, regulations, and policy,

(b) Pollution prevention,

(c) Conservation of natural and cultural resources,

(d) Cleanup of contaminated sites,

(e) Minimizing risks to mission, and

(f) Continual improvement in performance of the EMS;

(4) Is communicated throughout MCBQ and made available to the public; and

(5) Reflects overarching MCBQ Environmental Objectives, discussed in greater detail in Chapter 4, Objectives, Targets, and Actions to Improve Performance.

b. The EMS Coordinator provides the Environmental Policy statement to the E^2MS Implementation and E^2MS Core Teams for review, potential revisions, and concurrence at the end of each calendar year, or as necessary.

(1) The E^2MS Implementation Team provides a high-level review of the Environmental Policy at the end of each calendar year, or as needed, prior to the Management Review meeting, and recommends updates and/or revisions for E^2MS Core Team review and concurrence.

(2) The E^2MS Core Team reviews revisions made to the Environmental Policy by the E^2MS Implementation Team, recommends its own revisions as necessary, and provides concurrence on the Environmental Policy.

(3) After the Environmental Policy has been approved by the E^2MS Core Team, the EMS Coordinator updates the Environmental Policy as necessary and routes it to the Base Commander for signature and

subsequent basewide distribution, using the procedures described in Chapter 7, Communication.

c. As part of the Management Review process, the Environmental Policy is reviewed by senior leadership at the end of each calendar year to ensure that it aligns with current Base goals and Objectives. For more information about the Management Review process, refer to Chapter 17, Management Review.

d. All new Base Commanders are required to review the Environmental Policy statement, revise as appropriate, and release their own Environmental Policy statement within 90 days of assuming command.

4. References and Related EMS Documents

a. ISO 14001:2004, Element 4.2

b. MCO P5090.2A, w/Ch3, Element 1

c. MCBO 5090.2D

d. MCBQ ECPSOP

e. MCBQ Environmental Policy

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Figure 1-1. Commander's Environmental Policy

UNITED STATES MARINE CORPS
MARINE CORPS BASE
QUANTICO, VIRGINIA 22134-5001

Environmental Policy

As "The Crossroads of the Marine Corps," Marine Corps Base, Quantico offers a broad spectrum of operational, training, education, and administrative facilities for active and reserve Marine and Naval units, as well as national, state, and local agencies. We utilize almost 60,000 acres of land and natural resources to enhance readiness by providing operational and training support, infrastructure, and community services that are responsive to tenant command and activity requirements and the needs of our military members, families, and civilians. Sustaining current and future operations and ensuring the Base maintains its live fire capabilities requires that we continuously improve how we manage and conserve resources Base-wide at all activities, functions, and residences.

To that end, I need all individuals that train, live, and/or work aboard the Base to conduct their mission planning, decision-making, training, and daily operations in a manner that demonstrates a firm commitment to:

- Improving Quantico's environment in a manner that enhances Quantico's value as a premier support and training facility;

- Complying with all applicable environmental laws, regulations, and policies in order to sustain our capacity to train and to support our Marines, Sailors, Civilian Marines, and their families;

- Reducing energy and water consumption through conservation and efficiency to meet Federal energy and water reduction mandates and reduce utility costs;

- Preventing pollution and spills, while minimizing the use of hazardous materials, reducing waste sources, and ensuring a safer and cleaner environment. If spills do occur, immediately report and clean them properly;

- Minimizing soil erosion, fire hazards, and other threats to our cultural and natural resources.

I ask all Commanders and leaders to enhance awareness of this policy and actively participate through designated representatives in the Marine Corps Base, Quantico Environmental Management System to make Marine Corps Base, Quantico a cleaner, safer, and more sustainable place to live and work for our Marines, Sailors, Civilian Marines, and their families.

Semper Fidelis,

DAVID W. MAXWELL
Colonel, U.S. Marine Corps
Commander
Marine Corps Base, Quantico
Date: 13 August 2012

Note: Pictured in the background is a small whorled pogonia (*Isotria medeoloides*), a threatened species that exists here at Marine Corps Base Quantico. In partnership with the U.S. Fish and Wildlife Service, we strive to protect ecosystems while sustaining military preparedness. The result at Marine Corps Base Quantico is the largest number of small whorled pogonia colonies in Virginia.

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CHAPTER 2

Practices, Aspects, Impacts, and Risk Prioritization

1. Purpose and Applicability

a. This chapter describes the process used to complete initial PAI Inventories and PAI Inventory updates.

b. This chapter also defines MCBQ's method for risk prioritization based on defined risk categories and provides a schedule for periodic review and updates of the risk ranking results.

c. This chapter is designed to meet the requirements of MCO P5090.2A, w/Ch3, Element 2.

2. Definitions. Terms and definitions under this chapter are defined in MCO P5090.2A, w/Ch3, Chapter 2. Terms and definitions that differ or are specific to MCBQ are provided below.

a. Activity. Activities are all MCBQ staff sections, subordinate commands, other USMC organizations aboard MCBQ, as well as tenants of the Base.

b. Environmental Resource. Environmental resources are MCBQ's natural and cultural resources that could be impacted by unrestricted operation of practices. Environmental resources at MCBQ include the Chesapeake Bay Watershed, plant and animal species, wetlands, and historic/cultural items.

c. PAI Inventory. PAI Inventory is a collection of applicable/active Headquarters Marine Corps (HQMC)-defined practices, aspects, and impacts for an associated location or installation:

(1) Basewide PAI Inventory. The basewide PAI Inventory is a compilation of MCBQ's activity-level PAI Inventories. It is maintained in Web-based Compliance Assessment and Sustainment Software (WEBCASS).

(2) Activity-level PAI Inventories. Activity-level PAI Inventories capture practices and aspects for all units and buildings at MCBQ.

d. Prioritize. Prioritizing is to assign priority to a practice based on the potential or actual risk to mission.

e. Risk Ranking. Risk ranking is the collective risk data associated with MCBQ's practices and aspects.

f. Risk Scoring. Risk scoring is the act of assigning risk ratings to aspects associated with a given practice and location.

g. Significant Practice. A significant practice is a high-risk practice defined either by a practice's risk score or identified by the E^{2}MS Implementation Team and approved by the E^{2}MS Core Team.

h. Validation. Validation is the act of systematically ensuring that data in the PAI Inventory is accurately assigned and associated.

i. WEBCASS. WEBCASS is HQMC's prescribed risk software which can be accessed at: https://www.usmcenviron.com/webcass/WelcomePage.aspx

3. Responsibilities

a. E^{2}MS Core Team. Review and approve significant practices determined by E^{2}MS Implementation Team's review of PAI Inventories.

b. E^{2}MS Implementation Team and/or Program Managers

(1) PAI Inventories. Review basewide and activity-level PAI Inventory data collected by the EMS Coordinator.

(2) Risk Prioritization

(a) Review basewide and activity-level risk prioritization when provided by the EMS Coordinator.

(b) Offer feedback to the EMS Coordinator in order to increase accuracy for individual risk factors associated with aspects.

(c) Provide significant practice recommendations for approval by the E^{2}MS Core Team.

c. EMS Coordinator

(1) PAI Inventories

(a) Establish strategy to maintain PAI Inventory.

(b) Conduct and oversee PAI Inventory data collection efforts.

(c) Organize, review, and store data associated with the PAI Inventories.

(d) Maintain current and archived basewide and activity-level PAI Inventories. Refer to Chapter 9, Control of Documents and Chapter 15, Control of Records.

(2) Risk Prioritization

(a) Perform risk prioritization, as necessary, for new and updated activity-level PAI Inventories and the basewide PAI Inventory. Review risk prioritization and ensure new or modified practices are subjected to risk prioritization.

(b) Provide results of risk prioritization to the E^2MS Implementation Team for review and the E^2MS Core Team for approval.

(c) Update risk prioritization, as required, based on feedback from the E^2MS Implementation Team and E^2MS Core Team.

d. Activity ECs

(1) PAI Inventory

(a) Assist with developing activity-level PAI Inventories.

(b) Identify specific locations and practices for each activity.

(c) Update and validate activity-level PAI Inventories when practices are altered, discontinued, or added; and communicate changes to the EMS Coordinator.

(d) Review activity-level PAI Inventories for accuracy.

(e) Ensure practice owners are aware of practices they are associated with.

(2) Risk Prioritization

(a) Review activity-specific risk prioritization, be aware of significant practices, and communicate general awareness to practice owners.

(b) Identify and forward information that may affect risk prioritization to the EMS Coordinator.

e. Practice Owners and/or Workers. Notify ECs when a new process is implemented that may impact the environment or there is a change or alteration to the practices currently performed.

4. Procedures for Conducting the PAI Inventories

a. MCBQ follows current HQMC EMS guidance, documented in MCO P5090.2A w/Ch3, Chapter 2 to complete both activity-level and basewide PAI Inventories and updates. HQMC EMS guidance requires the use of WEBCASS to maintain a basewide PAI Inventory. MCBQ accomplishes this requirement and also maintains activity-level PAI Inventories that document practice occurrences at each activity aboard MCBQ. This

approach supports the implementation of MCBQ's Internal Audit Program (IAP). Standardized HQMC-defined practices, aspects, and impacts are used by MCBQ for both activity-level and basewide PAI Inventories. These standardized practices, aspects, and impacts are available in WEBCASS and are also included in Tables 2-1, 2-2, and 2-3, respectively. MCO P5090.2A, w/Ch3 and/or WEBCASS contain the most current listing of practices, aspects, and impacts.

b. The basewide PAI Inventory is limited to activities that currently occur throughout MCBQ, including contractor and activity operations. It is composed of all activity-level PAI Inventories and is available in WEBCASS. Practices are defined using the HQMC standardized practice list contained in Table 2-1.

c. Activity-level PAI Inventories are initiated by the EMS Coordinator. These inventories rely on a combination of site visits, pre-existing data reviews, collective experience and the knowledge of assigned personnel, established work procedures, practice controls, program effectiveness, and training, as needed.

(1) Before conducting site visits, a PAI Inventory team reviews each activity's most recent PAI Inventory. If no preexisting PAI Inventory exists, the PAI Inventory team conducts an assessment of the activity's mission to determine potential active practices before arriving onsite. The PAI Inventory team communicates with ECs prior to site visits to the extent practicable to determine or verify mission and operations performed.

(2) During site visits, the PAI Inventory team confirms existing practices are still active and identifies new practices. If practices are no longer active, they are removed from the inventory. In general, site visits consist of a physical walk-through of each activity accompanied by the site's EC and/or other relevant personnel who answer questions pertaining to onsite practices. The PAI Inventory teams ask questions based upon the activity's current PAI Inventory as well as collective knowledge and experience. If the activity does not have a PAI Inventory, the PAI Inventory team surveys all active practices. The EC and practice owners assist the PAI Inventory team to collect active practice information.

d. Activity-level PAI Inventories include the following data:

(1) Command or Tenant Organization. The name of the owning activity responsible for the PAI Inventory. Each activity that requires an EC shall have a PAI Inventory. Each EC is also identified in the activity-level PAI Inventory.

(2) Practice Type. Operation performed (selected from Table 2-1).

(3) Location. The physical location (i.e., building number, facility name) where the practice is performed.

(4) Practice Owner. The personnel responsible for day-to-day implementation of a practice. Due to military turnover, the billet name is typically used versus the name of the practice owner. Practice owner may be the “worker” or first supervisor of staff performing the practice.

(5) Subcommand. The unit, division, or subordinate group within the responsible activity.

(6) Aspect. Any characteristic associated with implementation of a given practice (selected from Table 2-2).

(7) Practice Risk. The Practice Risk is equivalent to the highest ranked aspect risk for that practice and determined through the risk scoring process. Section 5, Procedures for Conducting Risk Prioritization, provides the steps for calculating Practice Risk based on perceived Environmental Risk, Regulatory Risk, Public Perception Risk, and Health and Safety Risk. Environmental Risk, Regulatory Risk, Public Perception Risk, and Health and Safety Risk are defined in MCO P5090.2A, w/Ch3, Element 2.

e. Results of the activity-level PAI Inventory are summarized in a Summary of Findings memorandum. Site visit results are reviewed by the EMS Coordinator prior to submittal to ECs. Updates to activity-level PAI Inventories are also made to the basewide PAI Inventory.

f. Newly created and updated activity-level PAI Inventories are approved by the EMS Coordinator and E^2MS Implementation Team prior to inclusion in MCBQ’s basewide PAI Inventory.

g. The EMS Coordinator provides an activity-level PAI Inventory to the respective EC. The EC, with the help of practice owners, indicates which practices have been altered, discontinued, or added, and provides updates to the EMS Coordinator as needed. Updates are integrated into MCBQ’s basewide PAI Inventory.

5. Procedures for Conducting Risk Prioritization

a. Each activity-level PAI Inventory is maintained in electronic databases on the EMS Coordinator’s network folder. These databases are collectively known as the MCBQ PAI Database and are used to document and analyze environmental, regulatory, perception, and health and safety risks for each activity at MCBQ. Activity-level PAI Inventories are also maintained in EC turnover folders.

b. Activity-level PAI Inventories are combined to produce a basewide PAI Inventory that is maintained in WEBCASS. The basewide PAI Inventory provides a high-level overview of practices performed at MCBQ and is used by the E^2MS Implementation Team to determine MCBQ’s

significant practices. The EMS Coordinator maintains MCBQ's basewide PAI Inventory.

c. Risk is assessed based on the vulnerability of key resources to the aspects of existing and planned practices. Risk scoring is conducted for each aspect using the Marine Corps-wide risk calculation standards implemented by MCO P5090.2A, w/Ch3, Chapter 2, and executed through WEBCASS and the MCBQ PAI Database. Risk scoring procedures are provided in MCO P5090.2A, w/Ch3, Chapter 2.

d. Risk at the activity-level is scored for each aspect of each practice at a specified location identified in the PAI Inventory. Practice risk score is equivalent to the highest ranked aspect risk for that practice. Once all practices have been risk scored, they are entered into a summary table that organizes practices from highest risk to lowest risk.

e. Risk rankings from the activity-level and basewide PAI Inventories are reviewed and validated by the EMS Coordinator. The EMS Coordinator then forwards the basewide PAI Inventory with recommended significant practices (including risk rankings) to the E^2MS Implementation Team for review. The E^2MS Implementation Team examines the basewide PAI Inventory and risk rankings for operational accuracy and edits and/or approves significant practices.

f. The EMS Coordinator incorporates any comments and updates the risk score(s) as necessary.

g. The EMS Coordinator provides a final basewide PAI Inventory and risk ranking to the E^2MS Core Team in order to edit or approve the recommended significant practices. Significant practices are used to identify Objectives and Targets (refer to Chapter 4, Objectives, Targets, and Actions to Improve Performance) and to develop/maintain ESOPs to mitigate risks from these practices (refer to Chapter 10, Control of Practices).

h. Risk ranking data for MCBQ's basewide PAI Inventory is reviewed, amended, and reported to HQMC at a minimum annually, or more often as needed, using WEBCASS and the Environmental Management Portal (EM Portal). The basewide PAI Inventory is updated annually, based on any changes to the activity-level PAI Inventories. Risk ranking data for activity-level PAI Inventories is reviewed and amended every three years.

6. References and Related EMS Documents

a. ISO 14001:2004, Element 4.3.1

b. MCO P5090.2A, w/Ch3, Element 2

c. MCBO 5090.2D

d. MCBQ ECPSOP

e. MCBQ’s basewide and activity-specific PAI Inventories

Table 2-1. HQMC List of Practices and Definitions

Practice		Definition
1	Acid cleaning	Any activity involving cleaning of equipment or parts using an acidic solution.
2	Aircraft combat training	Any activity involving aircraft combat training.
3	Aircraft deicing	Any activity involving the use of product for aircraft deicing.
4	Aircraft ground support equipment (GSE) operation and maintenance	Any activity involving GSE operations and maintenance including operating, fluid change and parts replacement.
5	Aircraft maintenance	Any aircraft maintenance including fluid change and parts replacement.
6	Amphibious training	Any training using amphibious vehicle capable of operating on both land and water.
7	Battery management	Any activity involving recharging, replacing, collection and disposal of batteries.
8	Boat operation/maintenance	Any activity involving operating, fueling, fluid change, and parts replacement on boats/water vessels.
9	Boat, ramp, dock cleaning	Any activity involving washing using detergent and water on boats/water vessels/ramps/docks.
10	Boiler operation	Any activity involving operation of boilers including industrial size water heaters and generation of steam.
11	Building operation/maintenance/ repair	Any activity involving building maintenance and repairs.
12	Burnout oven operation	Any activity involving the removal of coating and insulation from motor components using high temperature.
13	Channel dredging	Any activity involving the removal of accumulated sediment from channel beds to maintain the design depths for amphibious vehicles entering and exiting water.
14	Chemical treatment	Any activity involving the use of chemicals for treating metals, including bluing and Parkerizing.
15	Chlorination	Any activity involving application of chlorine to water or wastewater.
16	Combat construction training	Any activity involving combat training involving breaching, fording, laying obstacles, or otherwise disturbing natural resources.
17	Commuting	Any activity involving sharing a ride to reduce air pollution.
18	Composting	Any activity involving organic material that can be used to grow plants or for landscaping.
19	Construction/renovation /demolition	Any activity involving construction/renovation/demolition.

Table 2-1. HQMC List of Practices and Definitions

Practice		Definition
20	Cooling tower operation and maintenance	Any activity involving removing heat from hot water which returns from an HVAC heat source such as a chiller, condenser or heat exchange, and transfers this heat to the atmosphere.
21	Degreasing	Any activity involving aerosol, water, or solvent products to clean parts and equipment.
22	Dining hall/restaurant operations*	Dining Hall and restaurant operations (e.g., Mess Hall, The Clubs at Quantico). Does not to include commercial facilities (e.g., McDonald's, Subway).
23	Drinking water management	Any activity involving potable water including treatment, delivery and use.
24	Dry cleaning	Any activity involving the use of solvents to remove soils and stains from clothing performed by the Base's dry cleaners.
25	Emergency generator operation & maintenance	Any activity involving the operation and maintenance of a stationary internal combustion engine solely used for emergency power.
26	Encampment	Any activity involving the temporary construction of work and living areas while in the training area.
27	Energy use*	Any activity involving consumption of any type of fuel source (e.g., diesel fuel, propane, natural gas) to heat and power a facility.
28	Engine operation and maintenance	Any activity involving the operation and maintenance of an engine.
29	Explosive ordnance disposal training	Any activity involving training to diagnosis, rendering safe, recovery, and final disposal of explosive ordnance or any hazardous material associated with an explosive ordnance disposal incident.
30	Equipment operation/maintenance/ disposal	Any activity involving operating, collection, consolidation, and disposal of AC equipment, boilers, refrigerators, generators, washers, and water heaters.
31	Erosion/runoff control	Any activity involving the construction of physical barriers, such as vegetation or rocks to control runoff.
32	Field mess	Any activity involving the feeding of troops in the field or training area.
33	Fire department training	Any activity involving training on responding to large spills aboard the installation.
34	Fish stocking	Any activity involving the stocking of fish.
35	Flare and smoke usage	Any activity involving the use of flares or smoke for training exercises or emergency operations.

Table 2-1. HQMC List of Practices and Definitions

Practice		Definition
36	Forest fire management	Any activity involving the management of fires in the natural environment. This can include removal of debris and controlled burns.
37	Fueling and fuel management/storage	Any activity involving fueling and fuel storage.
38	Grease traps	Any activity involving the operation and maintenance of a device that minimizes grease, oils, fat, wax, and other debris from entering the sanitary sewer system, storm drains, and associated with food establishments.
39	Habitat management	Any activity involving the protecting of the wildlife surrounding in order for the installations endangered species to survive.
40	Hazardous Material Consolidation Program (HCP) operation	Any activity involving the HCP.
41	Hazardous material (HM) storage	Any activity involving an area specifically designated to store HM.
42	HM transportation	Any activity involving the transport of HM on base or to an designated training area.
43	Hazardous waste (HW) disposal offsite transport	Any activity involving the transport of HW offsite or Installation for disposal.
44	HW recycling	Any activity involving the collection, transporting, sorting, and cleaning solid waste that can be reused.
45	HW satellite accumulation area	Any activity involving HW satellite accumulation areas at/or near the point of generation.
46	HW storage (< 90 day site)	Any activity involving HW being stored/accumulated at an authorized designated area.
47	HW transportation	Any activity involving the transport of HW on base or to an authorized designated accumulation site.
48	Infantry training	Any activity involving training Marines to fight on foot or vehicle transport.
49	Laboratory	Any activity involving the testing of unidentified hazards substances.
50	Landfill gas energy recovery system	Any activity involving techniques to remove landfill gases to be converted into energy.
51	Landscaping	Any activity involving general lawn maintenance.
52	Laundry	Any activity involving the use of washing machines and dryer at the Installations laundry facility or barracks.
53	Live fire range operations	Any activity involving live fire operations conducted at indoor/outdoor ranges and in designated training areas.
54	Livestock operations	Any activity involving the housing of livestock.

Table 2-1. HQMC List of Practices and Definitions

Practice		Definition
55	Materiel storage/handling (Compressed gas)*	Any activity involving storage or use of compressed gas including carbon dioxide, argon, nitrogen, oxygen, and propane.
56	Medical/dental operations	Any activity providing medical/dental care.
57	Metal working	Any activity involving working with metals to create or repair parts and large structures.
58	Non-destructive inspection	Any activity involving the testing that does not destroy the test object. Often used on a complex systems such as aircraft.
59	Non-potable water use*	Any activity involving the use of make-up water for STP and fire hydrants. This includes non-potable distribution and aboveground water tanks/reservoirs. Water which is not suitable for human consumption.
60	Ozone-depleting substances (ODS)/halon management	Any activity involving the use or disposal of ODS/halon.
61	Oil-water separator*	Any activity involving operation and maintenance of an oil-water separator, which separates oil from water.
62	Open burning/open detonation	Any activity involving controlled burns and detonations by trained personnel.
63	Packaging/unpackaging	Any activity involving the packaging/unpackaging of equipment.
64	Paint booth	Any activity involving a structure specifically designed to optimize painting procedures.
65	Paint gun cleaning	Any activity involving the cleaning of paint guns.
66	Paint removal	Any activity involving infrastructure paint removal using chemicals, dry and wet abrasive blasting.
67	Painting	Any activity involving painting using aerosol cans, brush/roller, and paint guns.
68	Painting preparation	Any activity involving in readying a surface for the process for painting.
69	Parts replacement	Any activity involving parts replacement for equipment or vehicles.
70	Patch testing	Any activity involving the use of patches in hydraulic fluid testing.
71	Polychlorinated biphenyl (PCB) management	Any activity involving PCB or PCB items identified for disposal, items that has come into contact with PCBs as part of a spill cleanup, or items that has been contaminated by a PCB spill where cleanup standards were not met and where the items can be removed for disposal.
72	Pesticide/herbicide management and application	Any activity involving the application, mixing, storage of pesticide/herbicide.
73	Photographic developing	Any activity involving developing photographs and x-rays.

Table 2-1. HQMC List of Practices and Definitions

Practice		Definition
74	Polishing	Any activity involving a mechanical, chemical, or electrolytic process or combination thereof used to prepare a smooth, reflective surface prior grinding.
75	Pumping station/force main	Any activity involving sewer pump (lift) station/force main operations including screener/comminutor.
76	Radioactive material storage	Any activity involving the use of radioactive material (new and used) storage such as storage of smoke detectors, exit signs, and compasses.
77	Range residue clearance	Any activity involving range clean-up operations.
78	Recreational facilities operations	Any activity involving the theater, bowling, pool, golf course, main exchange/PX, etc.
79	Road construction and maintenance	Any activity involving road construction and maintenance.
80	Rock crushing operations	Any activity involving rock crushing in order to manage the removal and disposal of large rocks, concrete, and asphalt.
81	Roofing kettle	Any activity involving preheating tar, asphalt, or similar substances for waterproofing.
82	Row crop agriculture	Any activity involving planting of rows of crops to increase nutritional values of wildlife.
83	Sewers	Any activity involving stormwater sewer systems.
84	Sidewalk and road deicing	Any activity involving the process of removing snow and ice from sidewalks and roads.
85	Silver recovery unit operation	Any activity involving the recovery of silver waste that is generated from photo finishing, metal plating, as well as x-ray users.
86	Soil excavation/grading	Any activity the means of disturbing, digging, removing, or moving soil.
87	Solid waste disposal offsite transport	Any activity involving the transport of SW offsite or base for disposal.
88	Solid waste landfill	Any activity involving accepting solid waste at a designated landfill.
89	Solid waste recycling facility	Any activity involving the collection of solid waste for recycling at an authorized facility.
90	Storage tank management	Any activity involving the storage of HM/HW and proper management requirements for storage tanks.

Table 2-1. HQMC List of Practices and Definitions

Practice		Definition
91	Stormwater collection/conveyance system	Any activity involving those natural and manmade channels, swales, ditches, rivers, streams, creeks, branches, reservoirs, ponds, drainage ways, inlets, catch basins, pipes, headwalls, storm sewers, lakes and other physical works, properties and improvements which transfer, control, convey, detain, retain, treat, or otherwise influence the movement of stormwater runoff.
92	Surface washing	Any activity involving the clean-up HW/HM when spilled so it will not impact the environment.
93	Swimming pool operation and maintenance	Any activity involving the operations and maintenance of swimming pools by trained personnel.
94	Timber management	Any activity involving management of forest resources, including forest health and sale of forest products.
95	Turbine generation	Any activity involving the generation of power by using electric generators driven by a steam, hydraulic, or gas turbine.
96	Universal waste storage/collection	Any activity involving the collection and disposal of universal waste.
97	Urban wildlife management	Any activity involving the management of wildlife and their interaction with humans.
98	Used oil/antifreeze storage*	Any accumulation of used oil/antifreeze from equipment and motor vehicles.
99	Underground storage tank (UST)/aboveground storage tank (AST) facility level*	Any activity involving management and/or maintenance of a tank.
100	UST/AST operator level*	Any activity involving regulatory inspections by the user of a tank.
101	Unexploded ordnance/EOD operations	Any activity involving steam-out operations, open burning, and open detonation of ordnance and explosives.
102	Vehicle operations	Any activity involving operation of a vehicle including privately owned vehicles (POVs), government vehicles, and aircraft.
103	Vehicle maintenance	Any activity involving vehicle maintenance such as fluid change and parts replacement.
104	Vehicle parking	Any activity involving parking of vehicles on hard surfaces and off-road.
105	Vehicle smog inspection	Any activity involving emissions testing operations on POVs and government vehicles.
106	Wash rack	Any activity that involves using and operating of wash racks.
107	Wastewater flare operations	Any activity involving the burning of methane gases from being release into the air at waste water treatment plant operated by trained personnel.

Table 2-1. HQMC List of Practices and Definitions

Practice		Definition
108	Wastewater sludge treatment and disposal*	Any activity involving the treatment of sludge using chemicals and equipment and/or the management of sludge for disposal.
109	Wastewater treatment	Any activity involving physical/chemical treatment of wastewater including biological treatment and treatment of wastewater by separating organic solids from wastewater.
110	Water heater operation and maintenance	Any activity involving the operation and maintenance of water heaters by trained personnel.
111	Weapons cleaning	Any activity using patches, q-tips, brushes, and cleaner, lubricant, and preservative (CLP).
112	Woodworking	Any activity involving building, making, or carving something using wood by trained personnel.

*These practices are specific to MCBQ's operations. MCBQ is working with HQMC to have them added to the HQMC standardized list.

Table 2-2. HQMC List of Aspects

1	Air Emissions
2	Asbestos Presence
3	Electricity Use*
4	Fire/Explosion
5	Fuel Use
6	HM Use
7	HW Generation
8	Lead-Based Paint Presence
9	Material (Non-Hazardous) Use
10	Noise
11	Nuisance Odor
12	Physical Presence
13	Potable Water Backflow or Cross-Connection
14	Radon Presence
15	Soil Disturbance
16	Solid Waste Generation
17	Spill
18	Stormwater Discharge
19	Vegetative Disturbance
20	Wastewater Discharge
21	Water Use

*Denotes an aspect that is under consideration for removal from all practices other than Energy Use.

Table 2-3. HQMC List of Impacts

1	Air Quality Degradation
2	Community Relations/Public Perception Impact
3	Depletion of Landfill Space
4	Depletion of Resources
5	Electricity Consumption
6	Flooding
7	Fuel Consumption
8	Groundwater Quality Degradation
9	Historic or Cultural Resource Disturbance
10	Other Natural Resource Disturbance
11	Personnel Exposure
12	Potable Water Quality Degradation
13	Real Property/Private Property Damage
14	Reduced Visibility
15	Soil Compaction
16	Soil Erosion
17	Soil Quality Degradation
18	Surface Water Quality Degradation
19	Water Consumption
20	Wetlands Disturbance
21	Wildlife Species/Habitat Disturbance

CHAPTER 3

Legal and Other Environmental Requirements

1. Purpose and Applicability

a. This chapter establishes a procedure to identify and provide access to Federal, state, local, DoD, and Marine Corps environmental requirements that are applicable to MCBQ's practices and environmental programs. In accordance with MCO P5090.2A, w/Ch3, Legal and Other Requirements are provided by media in MCBQ's ECPSOP. The ECPSOP is reviewed annually and updated as needed.

b. Since environmental requirements frequently develop and change over time, this chapter addresses both emerging requirements and changes to existing requirements.

c. This chapter is designed to meet the requirements of MCO P5090.2A, w/Ch3, Element 3.

2. Definitions

a. Environmental Requirements. Environmental requirements are any agreement or guidance that is environmental in nature that requires MCBQ to take specific actions. It includes legal and other requirements as defined by the EMS.

b. Legal Requirements. Legal requirements are regulatory agreements or guidance found in environmental legislation, regulation, or policy that MCBQ is subject to and that requires the Base to take action(s). Some legal requirements may also qualify as environmental documents or records as specified in Chapter 13, Evaluation of Compliance.

c. Other Requirements. Other requirements include non-regulatory agreements or guidance documents that MCBQ is subject to and/or has committed to take action(s) (e.g., Memorandum of Agreement, Memorandum of Understanding).

3. Responsibilities

a. E^2MS Implementation Team and/or Program Managers

(1) Identify applicable environmental requirements.

(2) Review and update environmental requirements to maintain as current.

(3) E^2MS Implementation Team members who are also Program Managers review EPA's Online Targeting Information System (OTIS) and Enforcement and Compliance History Online (ECHO) databases at least

every 3 months to ensure MCBQ compliance data is accurate and current. Variances in compliance status are provided to the EMS Coordinator for recordkeeping purposes. Resolution of compliance variances are addressed in accordance with Chapter 14, Problem Solving.

b. EMS Coordinator

(1) Ensure that the ECPSOP is reviewed annually and updated as needed.

(2) Ensure that the most current version of the MCBQ ECPSOP and ESOPs are accessible and distributed to appropriate personnel for use in management and maintenance of practices and environmental programs aboard MCBQ.

c. ECs

(1) Ensure that practice owners are aware of, and are following, the environmental requirements for their activity's practices.

(2) Ensure that contractors under the control of the activity perform significant practices in accordance with approved ESOPs.

4. Procedure

a. The EMS Coordinator utilizes input from the E^2MS Implementation Team to create an ECPSOP which contains a listing of Legal and Other Requirements, by individual media area. A copy of the ECPSOP is maintained by the EMS Coordinator and posted on the EM Portal, in accordance with MCO P5090.2A, w/Ch3.

b. On an annual basis, E^2MS Implementation Team members who are also Program Managers review their media-specific chapters of MCBQ's ECPSOP. The adequacy of Legal and Other Requirements is accessed through review of:

(1) EPA Federal Register Notices;

(2) State Register Environmental Notices;

(3) Virginia Regulatory Town Hall;

(4) Other publications, magazines, and newsletters;

(5) Internet websites; and

(6) Communications with regulators.

c. While not exhaustive, the following websites are used to ensure all Legal and Other Requirements are up to date:

(1) http://www.regscan.com/

(2) 69C77880F2%7d"
|http://doni.daps.dla.mil/allinstructions.aspx?SortField=Directive_x0020_Date&SortDir=Desc&View=%7b1FF912B1-1BC6-444A-8943-B769C77880F2%7d}

(3) http://community.marines.mil/news/publications/Pages/NewOrdersandDirectives.aspx

(4) http://www.quantico.usmc.mil/directives.aspx?Command=MCBQ

d. Additions, deletions, or other modifications to Legal and Other Requirements are communicated to the EMS Coordinator for approval. Once incorporated, the EMS Coordinator publishes revised ECPSOP chapters and notifies ECs that new environmental guidance is available for distribution.

e. MCBQ's IAP assesses the implementation of this procedure on an annual basis.

5. References and Related EMS Documents

a. ISO 14001:2004, Element 4.3.2

b. MCO P5090.2A, w/Ch3, Element 3

c. MCBO 5090.2D

d. MCBQ ECPSOP

e. MCBQ IAP

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CHAPTER 4

Objectives, Targets, and Actions to Improve Performance

1. Purpose and Applicability

a. This chapter defines the methods that MCBQ will follow to establish and meet overarching and program specific Objectives and Targets that support MCBQ's Environmental Policy. MCBQ's overarching objectives are contained within MCBQ's Environmental Policy.

b. Objectives and Targets describe achievable outcomes and metrics for the Base's environmental goals. As Objectives and Targets are set and achieved over time, the Base's overall environmental performance will improve. Objectives and Targets are established by E^2MS Implementation Team Members and/or Program Managers and executed through an Environmental Action Plan (EAP) or Plan of Action and Milestone (POA&M) which tracks Objective and Target metrics.

c. This chapter is designed to meet the requirements of MCO P5090.2A, w/Ch3, Element 4.

2. Definitions

a. Action Officers. Action Officers are assigned to create Objectives, Targets, and EAP content. These individuals will oftentimes be members of the E^2MS Implementation Team and/or Program Managers.

b. EAP. An EAP is a plan designed to achieve a specific set of Objectives and Targets which require participation and input from more than one functional area and/or Program Manager. EAPs are developed for Objectives and Targets that are complicated and need to involve multiple parties to ensure completion. Typically, EAPs are used for Base-level Objectives. Refer to Table 4-1 for the proper format and information required for an EAP.

c. Funded Project. Funded projects may be required to implement an Objective or Target. They require external funding requested through Planning, Programming, and Budgeting System (PPBS) methods, as further discussed in Chapter 5, Roles, Responsibilities, and Resources. Examples of projects include pollution prevention investments, infrastructure and sustainability investments, and externally-funded studies.

d. Objective. An Objective is a basewide or program-specific environmental goal that ensures continual environmental improvement and can be measured. An Objective must be based on compliance or

conformance requirements and may not conflict with MCBQ's Environmental Policy.

e. POA&M. A POA&M is a plan designed to achieve a program-specific objective and target. POA&Ms are limited to a specific Objective and Target set by a Program Manager to resolve deficiencies from Benchmark or Internal ECEs, regulatory inspections, or to ensure continual improvement. Refer to Chapter 14, Problem Solving and/or WEBCASS for the proper format and information required for a POA&M.

f. Target. A Target is a detailed performance metric, quantified where practicable and applicable to the organization, which arises from an environmental Objective, which needs to be set and met in order to achieve the Objective.

3. Responsibilities

a. E^2MS Core Team

(1) Review MCBQ's significant practices prior to approving Objectives and Targets.

(2) At least annually, and as necessary, review and approve current basewide Objectives as well as proposed Objectives and Targets for consistency with the Environmental Policy and to ensure economic/technological feasibility. Program-specific Objectives and Targets are created by Program Managers to ensure continued environmental compliance and conformance. Program-specific Objectives and Targets are implemented by establishing a POA&M, as discussed in greater detail in Chapter 13, Evaluation of Compliance.

(3) Approve EAPs for basewide Objectives and Targets and review at least once a year as part of Management Review, which is discussed further in Chapter 17, Management Review.

b. The Chair, E^2MS Implementation Team assigns Action Officers who create and review EAPs. Action Officers are staffed from the E^2MS Implementation Team and/or Program Managers.

c. E^2MS Implementation Team and/or Program Managers

(1) Recommend basewide Objectives and Targets for the E^2MS Core Team to review and approve.

(2) Create and execute EAPs, as assigned by the Chair, E^2MS Implementation Team.

(3) Create and execute POA&Ms devised to address program-specific Objectives, which are generally identified during Benchmark or Internal ECEs and regulatory inspections. For further information concerning ECEs, refer to Chapter 13, Evaluation of Compliance.

c. EMS Coordinator

(1) Coordinate actions of the E^2MS teams to create, approve, and implement EAPs and POA&Ms.

(2) Track the progress towards achieving Objectives and Targets.

d. ECs are aware of basewide Objectives and Targets and ensure their activity's practices are implemented in a manner that supports meeting MCBQ's Objectives and Targets.

4. Procedure for Creating Objectives and Targets

a. Basewide and Program-specific Objectives and Targets:

(1) Are consistent with the Environmental Policy (refer to Chapter 1, Environmental Policy) and applicable environmental requirements (refer to Chapter 3, Legal and Other Requirements).

(2) Reflect risks to the Base's mission because their selection may be based in part on MCBQ's significant practices (refer to Chapter 2, Practices, Aspects, Impacts, and Risk Prioritization).

(3) Are subject to both economical and technological restraints, as well as operational requirements and schedules.

(4) Are able to be conceptualized into finite projects with a distinct start and finish point.

(5) Can be broken down into short-term (completed within 1 year) and long-term targets.

b. Sources of information used for formulation of basewide and program-specific Objectives and Targets include:

(1) Risk ranking of PAI Inventories and selection of significant practices (refer to Chapter 2, Practices, Aspects, Impacts, and Risk Prioritization).

(2) The results of Benchmark or Internal ECEs (refer to Chapter 13, Evaluation of Compliance) and the results from EMS Audits (refer to Chapter 16, EMS Audit).

(3) Information associated with problem solving efforts (refer to Chapter 14, Problem Solving).

(4) The results of Management Reviews (refer to Chapter 17, Management Review). These may produce recommendations for improvements to the elements of the EMS.

c. The E^{2}MS Implementation Team and/or Program Managers review data described in Paragraph 4.b to determine adequate basewide and program-specific Objectives and Targets. POA&Ms are developed for program-specific Objectives and Targets and EAPs are established for basewide Objectives and Targets. EAPs also track complicated Objectives and Targets and documents specific actions/compromises taken by all those involved. A specific point of contact (POC) or Action Officer is established for each POA&M and EAP.

d. POA&Ms and EAPs are finalized by the E^{2}MS Implementation Team and then provided to the E^{2}MS Core Team for review and approval.

e. Once basewide Objectives and corresponding Action Officers have been approved by the E^{2}MS Core Team, the EMS Coordinator fills in the preliminary sections of an EAP for each Objective and forwards the information to the appropriate Action Officer (usually an E^{2}MS Implementation Team Member and/or Program Manager). Note that program-specific Objectives (versus basewide Objectives) are managed through POA&M(s), as discussed in Chapter 14, Problem Solving.

f. Once the Action Officer(s) are provided with the pertinent information, they formulate appropriate Targets needed to complete the POA&M or EAP. Targets for both POA&Ms and EAPs must be measurable and accomplishable within current economic and technological constraints.

g. When Action Officer(s) have completed an EAP, they provide it to the EMS Coordinator for review and tracking. When a Program Manager has completed a POA&M, they notify the EMS Coordinator for review. The EMS Coordinator may request, as needed, POA&M status updates on a recurring basis to ensure compliance and conformance deficiencies are being addressed.

h. The approved basewide Objectives and Targets are communicated to appropriate Base employees through activity ECs.

5. Procedure for Tracking Progress Towards Meeting Objectives and Targets

a. Progress on EAPs are reviewed annually, or as needed, by the E^{2}MS Core Team as part of the Management Review (refer to Chapter 17, Management Review). The EMS Coordinator informs the respective Action Officers of review dates. The Action Officers complete updates to the EAP in advance of the E^{2}MS Core Team meeting(s).

b. Once Action Officer(s) complete an EAP update, the file is placed in the EMS Coordinator’s shared folder.

c. The Base’s Objectives, Targets, and EAP list are subject to revision according to operational requirements and schedules. The status of Objectives, Targets, and EAPs are included in an annual Management Review, as described in Chapter 17, Management Review.

d. Once EAPs are completed, and the Objectives and Targets therein are accomplished, the EAP is "closed out" by the E^2MS Core Team, and archived by the EMS Coordinator electronically and/or in hard copy.

e. Progress on POA&Ms is tracked by the EMS Coordinator on an as-needed basis. Program Managers use WEBCASS to track their POA&Ms until completion. It is the Program Manager's responsibility to ensure targets are being met within specified timelines. Once a POA&M has been completed, it is no longer subject to tracking.

6. Procedures to Improve Environmental Performance

a. Environmental performance may be gauged by the use of environmental performance indicators (EPIs) as detailed in Chapter 12, Monitoring and Measurement, and also by the results of environmental audits as discussed in Chapter 16, EMS Audit.

b. Other actions to improve environmental and sustainability performance may stem from monitoring and measurement efforts (covered in Chapter 12, Monitoring and Measurement), the use of EAPs and POA&Ms as detailed in Chapter 14, Problem Solving, and/or by instituting funded projects, as appropriate.

7. References and Related EMS Documents

a. ISO 14001:2004, Element 4.3.3

b. MCO P5090.2A, w/Ch3, Element 4

c. MCBO 5090.2D

d. MCBQ ECPSOP

e. MCBQ IAP

Table 4-1. Sample Environmental Action Plan

YR-MO ENVIRONMENTAL ACTION PLAN

Activity(s)/ Section(s):	G-4; G-F; NAVFAC ROICC	Action Officer:	G-F, NREA Branch
Supervisor:		Date:	

Practice/ Resource:		Risk Ranking:	
Aspect(s):		Date:	
Impact(s):			

An EAP describes the actions required to achieve basewide Objectives and Targets. The Action Officer maintains this EAP and the E^2MS Teams ensure that actions are completed as scheduled.

1. Objective. Establish Central Hazardous Materials Pharmacy.

2. Target(s)

a. Fund, design, and build new Hazardous Materials Pharmacy within five years.

b. Fund, source, and purchase support materials (e.g., vehicles, computers, inventory system) one year prior to completion of construction

c. Fund, hire, and train staff to run Hazardous Materials Pharmacy within six months prior to completion of construction.

3. Description

a. History of problem and technical description of problem.

b. Rationale.

4. Funding

a. Class/funding currently budgeted to this project.

b. Additional/future funding requested for this project, and impact if not funded.

5. Achieving Objectives and Targets. The Action Owner describes the steps necessary to achieve the Objective and Targets above. This includes recording any meetings with other functional areas, discussions held, and any information pertinent to the Objective.

CHAPTER 5

Roles, Responsibilities, and Resources

1. Purpose and Applicability

a. This chapter outlines the organizational structure of MCBQ's EMS and provides roles and responsibilities as they relate to implementation and operation of MCBQ's EMS. Program Manager roles and responsibilities related to implementation of specific media programs are described in MCBQ's ECPSOP.

b. This chapter also guides environmental personnel in identifying funding for MCBQ's environmental requirements, planning operations and financial plans, preparing funding requests, and receiving/executing/tracking funds.

c. This chapter is designed to meet the requirements of MCO P5090.2A, w/Ch3, Element 5.

2. Definitions

a. E^2MS Team. The E^2MS Team consists of a group of MCBQ personnel assigned to a working committee with specific responsibilities related to the implementation and operation of the Base's EMS. The two E^2MS Teams at MCBQ are the E^2MS Core Team (refer to Table 5-1) and the E^2MS Implementation Team (refer to Table 5-2).

b. EMS Coordinator. The EMS Coordinator is a staff member of the NREA Branch who is the single POC for EMS matters. The EMS Coordinator is appointed by the Base Commander to implement MCBQ's EMS.

c. ECs. ECs are appointed individuals who act as a liaison between the NREA Branch and an activity located aboard MCBQ. Refer to Appendix B for a full description of all EC responsibilities.

d. Environmental Media Program. Environmental media programs are environmental media areas delineated in the NREA Branch organizational chart.

e. Environmental Media Program Managers (Program Managers). Program Managers are persons employed in the NREA Branch who are tasked with managing a specific environmental media program.

f. Environmental Requirement. An environmental requirement is an activity or project required to maintain environmental compliance, conduct environmental management, and promote EMS conformance.

g. Practice Owner(s). Practice Owners are personnel in work centers or shops who are responsible for control of practices which may have an impact on the environment.

h. Status Tool for Environmental Programs (STEP). STEP is a web-enabled database used to track environmental program requirements, requests, funding allocations, and associated costs.

i. Table of Organization (T/O). A T/O describes the organizational manpower requirements in terms of grade, Military Occupational Specialty, series, weapon, and billet title for civilian and military personnel. It is a basic document that describes, in billet line detail, the composition of every Marine Corps organization.

3. Roles and Responsibilities

a. Chair, E^2MS Core Team (Base Commander, MCBQ)

(1) Ensure Base-wide implementation and operation of the MCBQ EMS.

(2) May delegate their authority to the Alternate Chair, E^2MS Core Team.

b. E^2MS Core Team

(1) Meet at least annually, or as needed, to discuss environmental and energy policies, planning, implementation and operations, corrective actions, and Management Reviews (refer to Chapter 17, Management Review).

(2) Review environmental and energy priorities (Objectives and Targets) for MCBQ.

(3) Ensure policies, principles, and philosophies outlined in guidance and references from HQMC (Land Use and Military Construction) (LFL) are integrated into MCBQ's EMS.

(4) Review existing T/O, staffing, and environmental media program organization for congruence with the Environmental Policy and in conjunction with review of Objectives and Targets.

(5) Identify and systematically analyze deficiencies in current and future staffing or organizational structure required to meet environmental and natural resources management requirements.

c. Chair, E^2MS Implementation Team (Head, NREA Branch)

(1) Meet at least annually, or as needed, with the E^2MS Implementation Team to provide oversight during the development and execution of proposed environmental policies, procedures, and plans.

(2) Chair all E^{2}MS Implementation Team meetings.

(3) May delegate their authority to an alternate.

(4) Ensure policies, principles, and philosophies outlined in guidance from HQMC (LFL) are used in the implementation and operation of the Base's EMS.

(5) Initiate data calls to the E^{2}MS Implementation Team in order to create inventories of environmental data required for EMS implementation.

(6) Appoint Action Officers for EAPs as discussed further in Chapter 4, Objectives, Targets, and Actions to Improve Performance and Chapter 14, Problem Solving.

d. E^{2}MS Implementation Team and/or Program Managers

(1) Meet at least annually, or as needed, to discuss environmental and energy policies and provide sound technical advice and guidance to implement the E^{2}MS Core Team's environmental policies, procedures, and guidance. Other responsibilities are described in detail throughout the MCP and are highlighted as follows.

(2) Provide PAI Inventory support, including feedback on completed inventories, reviewing risk ranking(s), and monitoring environmental resources described in Paragraph 2.b of Chapter 2, Practices, Aspects, Impacts and Risk Prioritization. Provide recommended list of "Significant Practices" to the E^{2}MS Core Team for approval.

(3) Suggest, create, and execute EAPs to accomplish Objectives and Targets for MCBQ.

(4) Develop and implement POA&Ms to correct identified deficiencies and/or to improve overall mission accomplishment.

(5) Coordinate internal and external communication, including but not limited to ensuring technical soundness of responses to media inquiries, facilitate regulatory visits, and address inquiries from the public and other environmental stakeholders.

(6) Perform recordkeeping as directed by regulatory agencies, structural best management practices, and management direction.

(7) Provide technical input during review of ESOPs.

(8) Conduct EMS reviews, as required, and assist with implementing any identified EMS improvements.

(9) The E^{2}MS Implementation Team is a cross-functional team composed of members of the NREA Branch and other organizations at MCBQ

(e.g., Safety Division, Marine Corps Community Services (MCCS), Regional Contracting Office). Members of the E^{2}MS Implementation Team who are Program Managers have duties that are defined in MCBQ's ECPSOP. The ECPSOP can be found on the Base SharePoint site, along with other EMS Documents at: https://eis.usmc.mil/sites/mcbquan/g5/nrea/SitePages/Home.aspx

(10) E^{2}MS Implementation Team members who are NREA Branch Section Heads have the following additional duties:

(a) Identify projects for funding by reviewing information associated with the operation of EMS. This includes actions to achieve Objectives and Targets (as detailed in Chapter 4, Objectives, Targets, and Actions to Improve Performance) and the results from problem solving efforts, which may include corrective/preventative measures, as explained in Chapter 14, Problem Solving.

(b) Identify any additional environmental requirements not identified through Objectives and Targets or problem solving efforts that may need funding. Examples of these include Virginia Environmental Excellence Program (VEEP) reporting or annual Environment and Energy Summit requests.

(c) Identify sources of funding for items specified in Paragraphs 3.d (10) (a) and (b). Validate, prioritize, and prepare funding requests for submitted projects or requirements. Enter and track environmental projects and requirements in STEP, on a continual basis.

e. EMS Coordinator

(1) Provide administrative and technical support to the E^{2}MS Core Team and Implementation Team.

(2) Develop and disseminate relevant information on EMS matters.

(3) Monitor EMS implementation activities as well as the ongoing operation of the Base's EMS.

(4) Ensure key personnel involved in the Base's EMS receive EMS training including, but not limited to, E^{2}MS Core Team members, E^{2}MS Implementation Team members, ECs, and practice owners.

(5) Perform any responsibilities that are listed in other chapters of the MCBQ MCP.

g. ECs

(1) Act as the activity's official liaison with NREA Branch on environmental matters, including mandatory NREA Branch meeting attendance, required reports to NREA Branch, and relaying environmental compliance matters from NREA Branch to the activity.

(2) Assist in identifying activity practices that may have an impact on the environment. ECs coordinate with NREA Branch personnel for meetings and facilitate access to all applicable spaces as needed for PAI Inventory; environmental training; and environmental inspections.

(3) Report any perceived or known environmental concerns to appropriate NREA Branch personnel.

(4) Maintain a general awareness of environmental regulations as applicable, and communicate Base environmental initiatives, policies, and procedures to activity personnel.

(5) Ensure Practice Owners and activity staff receive training in accordance with the MCBQ's Comprehensive Environmental Training and Education Program (CETEP).

(6) Participate in EC Meetings, assist NREA Branch in environmental data collection, and facilitate and track corrective actions.

(7) Maintain a turnover folder and provide adequate notification to activity heads, ensuring alternate personnel are successfully transitioned when required.

(8) Perform other duties as described in Appendix B.

4. Procedures

a. The responsibilities of the E^2MS Teams are designed to evolve over time. During the initial implementation of EMS for MCBQ, the E^2MS Core Team and the E^2MS Implementation Team did the majority of the foundational work in creating an EMS and documenting the EMS in the former EMS Manual (now incorporated into MCBO 5090.2D). Initially, G-F, Installation and Environment Division, was the only practice owner included in MCBQ's EMS in order to meet the 2005 EMS implementation requirements set by the DoD and HQMC (LFL).

(1) In 2005, the Assistant Chief of Staff, G-F, Installation and Environment Division, initially appointed members of the E^2MS Implementation Team and E^2MS Core Team, as the majority of members are environmental staff personnel.

(2) In 2006 and 2007, additional practice owners were incorporated into the Base's EMS. As new practice owners were added to the EMS, ECs were established.

(3) In 2011, the E^2MS Core Team was expanded to include executive leadership from major activities throughout MCBQ, including the Base Commander and his executive staff. The E^2MS Implementation Team was also expanded to include subject matter experts who can provide technical guidance on Base policies, procedures, and orders. Also in 2011, the E^2MS teams were expanded to include energy conservation to reflect MCBQ's growing focus on sustainability and resources conservation. Since both EMS and energy, conservation has similar goals and structures, combining the executive steering committee and cross-functional teams proved appropriate. This combining of efforts led to the renaming of the existing EMS teams into the E^2MS Core Team and E^2MS Implementation Team.

b. The E^2MS Core Team meets at least annually or as needed, and as determined, by the Chair to be briefed on topics such as E^2MS Objectives and Targets (refer to Chapter 4, Objectives, Targets, and Actions to Improve Performance); any necessary EMS Manual, ECPSOP, or MCP updates; and audit results (refer to Chapter 13, Evaluation of Compliance and Chapter 16, EMS Audit). The E^2MS Core Team also evaluates the adequacy of MCBQ's environmental manpower and programs with the Environmental Policy (refer to Chapter 1, Environmental Policy). Members of the E^2MS Core Team are requested by the Chair and appointed via command approval of this MCP.

c. The E^2MS Implementation Team meets at least annually or as needed, and as determined, by the Chair to help in reviewing the PAI Inventory; creating and reviewing ESOPs; creating and reviewing procedures documented in the MCP; creating and reviewing Objectives, and Targets; and addressing other topics as required. An Appointment Letter for the E^2MS Implementation Team is included as Figure 5-1. E2MS Implementation Team Members and/or Program Managers maintain a copy of their Appointment Letter in their turnover folder.

d. The NREA Branch, G-F, Installation and Environment Division, collectively manages MCBQ's environmental media programs. Manpower to support environmental and natural resources management aboard MCBQ is supplied by several possible sources which include, but are not limited to:

(1) Full-time staff consisting of Federal civilian employees or active duty Marines as prescribed by the current T/O. Although most of MCBQ's environmental staff resides within the NREA Branch, there are many other positions that perform duties directly related to environmental and natural resources management.

(2) Additional manpower through support contracts.

(3) Part-time or temporary support, such as Marine manpower or contract personnel to augment specific media areas.

e. Section Heads within the NREA Branch verify that adequate position descriptions and turnover folders are available for each person/position in their charge.

(1) Position descriptions clearly specify program management responsibilities and operational duties of staff for personal accountability purposes.

(2) Turnover folders provide details about how responsibilities are to be met and how duties are accomplished in order to facilitate their transfer to other personnel when needed.

f. In the course of aligning environmental manpower and programs to support EMS, it is important to acknowledge that:

(1) An “ideal” staffing level is probably not always achievable due to organizational, budgetary, and other constraints.

(2) Authority and responsibility for effecting changes will not normally rest within the E^2MS Core Team.

(3) Creativity is often required to resolve staffing deficiencies; therefore, a variety of options should be considered.

g. Procedures to fund environmental compliance and EMS conformance are conducted in accordance with MCO P5090.2A, w/Ch3, Chapter 3.

h. The PPBS is a DoD mandated process through which a base’s resource requirements, including environmental programs, are identified, justified, and funded.

(1) This system incorporates the use of biennial Program Objective Memorandums (POMs) to forecast requirements for the next 6 fiscal years. For example, POM08 identified expected environmental requirements for funding from fiscal year 2008 to fiscal year 2013.

(2) The budget for the current year is executed while the budget for the following fiscal year is developed. Requirements and requested allocations are explained in more detail in budget submissions than in the POM.

i. Commandant of the Marine Corps, Assistant Commandant Installations and Logistics (Land Use and Military Construction)(CMC [LFL]) requires the use of STEP by base environmental offices to budget for and classify environmental requirements, and to allocate funding and track expenditures related to the requirements. Individual Program Managers enter funding requests into STEP, which

are validated by the Head and/or Deputy, NREA Branch and forwarded to HQMC.

j. There are two major types of environmental funding that MCBQ receives, Operations and Maintenance, Marine Corps (O&M,MC) funding and funds from reimbursable accounts. MCO P5090.2A, w/Ch3 describes in detail the types of funding available to MCBQ, as well as the processes for obtaining funding.

(1) O&M, MC Funds

(a) At the beginning of each fiscal year, a portion of the O&M,MC funds received by MCBQ are allocated to the NREA Branch for use.

(b) In February or March of each year, the Section Heads solicit data on the next fiscal year's environmental requirements and associated funding needs from Program Managers. Additionally, a mid-year review of current fiscal year requirements is conducted and adjustments are made as warranted.

(c) Throughout the fiscal year, Section Heads and other personnel responsible for environmental project management/funding track and manage expenditures.

(d) Towards the end of the fiscal year, a data call for the Operational Plan Submission is made by CMC (LFL). At this time, Program Managers identify environmental requirements that fall under the Centrally Managed Environmental Program (CMEP) for the coming fiscal year.

(e) Program Managers identify requirements and provide information to the Section Heads, who review and record CMEP requirements before entering them into STEP. Once CMC (LFL) authorizes CMEP funding, the MCBQ Comptrollers track funding and ensure that the Base properly allocates the funding for its intended purpose.

(2) Reimbursable Accounts

(a) The Forestry Section Head, with NREA Branch Head approval, makes timber management decisions that affect income and expenditures associated with the forestry funds aboard MCBQ.

(b) The Fish, Wildlife, and Agronomy Section Head, with NREA Branch Head approval, makes decisions involving the hunting, fishing, and trapping license fees.

(c) Budgetary actions associated with Reimbursable Accounts follow the requirements in MCO P5090.2A, w/Ch3.

5. References and Related EMS Documents

a. ISO 14001:2004, Element 4.4.1

b. MCO P5090.2A w/Ch3, Element 5

c. MCBO 5090.2D

d. MCBQ ECPSOP

Table 5-1. E²MS Core Team Organization

Chair, E²MS Core Team	Base Commander, MCBQ
	Chief of Staff, MCBQ (Alternate)
E²MS Core Team	Assistant Chief of Staff, G-1 Manpower Division
	Assistant Chief of Staff, G-3 Operations Division
	Assistant Chief of Staff, G-4 Logistics Division
	Assistant Chief of Staff, G-F Installation and Environment Division
	Assistant Chief of Staff, G-6 Communications Division
	Director, Public Affairs Office (PAO)
	Commanding Officer, Naval Health Clinic Quantico
	Director, Safety Division
	Office of Counsel
	Director, MCCS
	Director, Business Performance Office

Table 5-2. E²MS Implementation Team Organization

Chair, E²MS Implementation Team	Head, NREA Branch
	Deputy, NREA Branch (Alternate)
E²MS Implementation Team	Head, Compliance Section, NREA Branch
	Air Program Manager, NREA Branch
	HW Program Manager, NREA Branch
	Pollution Prevention Program Manager, NREA Branch
	Water Programs Manager, NREA Branch
	Storage Tank Program Manager, NREA Branch
	Solid Waste Program Manager, NREA Branch
	Head, Environmental Planning Section, NREA Branch
	EMS Coordinator, NREA Branch
	Remediation Program Manager, NREA Branch
	CETEP Coordinator, NREA Branch
	Head, National Environmental Policy Act Program, NREA Branch
	Cultural Resources Program Manager, NREA Branch
	Noise Program Manager, NREA Branch
	Head, Natural Resources Section, NREA Branch
	Forestry Program Head, NREA Branch
	Fish, Wildlife, and Agronomy Program, NREA Branch
	Conservation Law Enforcement Program, NREA Branch
	Head, Environmental Audit Section, NREA Branch
	Energy Program Manager, Public Works Branch
	Associate Counsel, Environmental and Land Use
	Representative, Naval Health Clinic Quantico
	Head, G-1 Manpower Division
	Deputy Director, G-3 Operations Division
	Operations Officer, G-4 Logistics Division
	Representative, Regional Contracting Office
	Facilities Director, MCCS
	Deputy Director, Safety Division

Figure 5-1. E²MS Implementation Team Appointment Letter

UNITED STATES MARINE CORPS
MARINE CORPS BASE
QUANTICO, VIRGINIA 22134-5001

IN REPLY REFER TO:
5090
B 046

From: Assistant Chief of Staff, G-5 Installation and Environment Division

To: Deputy, Natural Resources and Environmental Affairs Branch

Subj: APPOINTMENT TO THE ENVIRONMENTAL MANAGEMENT SYSTEM (EMS) IMPLEMENTATION TEAM

Ref: (a) MCBQ EMS Manual (01 Jan 09)
(b) Executive Order 13514 (5 Oct 09)
(c) DoDI 4715.17 (15 Apr 09)
(d) MCO P5090.2A (10 Jul 98)
(e) CMC EMS Policy (3 Mar 04)
(f) USMC Conformance Guide (29 Dec 04)

1. In accordance with the direction and requirements outlined in the references, the Deputy, Natural Resources and Environmental Affairs (NREA) Branch is appointed as a member of the EMS Implementation Team for Marine Corps Base, Quantico (MCBQ).

2. EMS Implementation Team duties include, but are not limited to:

a. Meet, quarterly and as needed, with the EMS Implementation Team to develop and execute proposed environmental policies, procedures, and plans in accordance with References (b) through (f).

b. Perform additional responsibilities set forth in Reference (a).

3. During staff turnover, the outgoing person has the duty to brief the incoming person on the current status and duties of EMS Implementation Team Membership.

4. Maintain a copy of this appointment letter in your turnover folder.

5. This appointment letter will be reviewed as needed, in conjunction with comprehensive EMS Manual revisions.

C. MELENDEZ

CHAPTER 6

Competence, Training, and Awareness

1. Purpose and Applicability

a. The purpose of this procedure is to guide Base personnel in ensuring that environmental training and awareness needs are identified, provided, and documented. The environmental training addressed is:

(1) Mandatory training required by laws and regulations;

(2) Training to ensure appropriate personnel possess EMS awareness; and

(3) Training to reduce negative environmental impacts resulting from a practice.

b. The primary goal of environmental training is to ensure personnel operating aboard MCBQ are aware of, understand, and comply with environmental requirements applicable to their jobs.

c. This chapter is designed to meet the requirements of MCO P5090.2A, w/Ch3, Element 6.

2. Definitions

a. CETEP. CETEP is the program that guides Marine Corps Environmental Training and Education in accordance with MCO P5090.2A, w/Ch3, Chapter 5.

b. Explicit Training. Explicit training is job-specific training that is driven by environmental regulations (e.g., Federal, state, or local plans and permits) in designated media areas. From this point forward, it is referred to as “compliance-based” training.

c. Implicit Training. Implicit training is job-specific training that is not driven by environmental regulation (e.g., Federal, state, or local plans and permits). From this point forward, it is referred to as “conformance-based” training.

d. Training Needs Assessment (TNA). A TNA is a comprehensive analysis of training needs that justifies the allocation of training resources and training services requests. The analysis also allows for an evaluation of the efficiency and effectiveness of environmental training efforts.

3. Responsibilities

a. CETEP Coordinator. Identify, coordinate, track, and schedule all environmental training that is not the responsibility of Program Managers (i.e., training required to ensure permit compliance). Specifically:

(1) Ensure all identified personnel aboard MCBQ receive required compliance-based training appropriate to their current responsibilities.

(2) Ensure that key personnel involved with EMS implementation and operation receive conformance-based training appropriate to their level of involvement.

(3) Conduct environmental TNA according to procedures described in the CETEP Manual.

(4) Manage training budget.

b. EMS Coordinator. Verify compliance- and conformance-based training is occurring at the activity level through various measures discussed further in Chapter 12, Monitoring and Measuring; Chapter 13, Evaluation of Compliance; and Chapter 16, EMS Audit.

c. ECs

(1) Complete TNA for responsible activity.

(2) Identify and coordinate EMS training.

d. Practice owners. Participate in applicable training and communicate training to organization personnel, as required.

4. Procedures for Compliance- and Conformance-Based Training

a. A TNA to identify and update the environmental training needs of MCBQ is conducted, reviewed annually, and updated (if required) every three years. For more information on the TNA, refer to the MCBQ CETEP Manual.

b. Compliance-based and conformance-based training is conducted in accordance with the procedures described in the MCBQ CETEP Manual.

(1) All Base personnel receive EMS Awareness training through New Hire Welcome Aboard/Indoctrination, distribution of EC Meeting minutes, or distribution of materials (i.e., posting of Environmental Policy) by ECs at work centers.

(2) ECs train Practice Owners on ESOPs and other Operational Controls necessary to mitigate significant practices.

c. Records are maintained in accordance with the policies and procedures described in the MCBQ's CETEP Manual, and Chapter 15, Control of Records. ECs maintain copies of EMS Awareness and ESOP training in their turnover folder.

5. References and Related EMS Documents

a. ISO 14001:2004, Element 4.4.2

b. MCO P5090.2A, w/Ch3, Element 6

c. MCBO 5090.2D

d. MCBQ ECPSOP

e. MCBQ CETEP Manual

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CHAPTER 7

Communication

1. Purpose and Applicability

a. This chapter documents the channels for effective communication at MCBQ to successfully manage environmental affairs. This chapter includes:

(1) Methods to ensure timely and effective internal communication with respect to environmental affairs throughout all levels and functions at MCBQ.

(2) Methods for receiving, recording, and responding to communications from external, interested parties on the Base's environmental affairs.

b. This chapter is designed to meet the requirements MCO P5090.2A, w/Ch3, Element 7.

2. Definitions

a. Environmental Affairs. Environmental affairs are environmental issues at MCBQ, including any of the environmental media programs discussed in MCBQ's ECPSOP.

b. External Communication. External communication occurs between MCBQ and regulatory agencies, the public, tenants not included as part of the EMS (e.g., FBI), and others outside the Marine Corps who are interested in MCBQ's environmental affairs.

c. Internal Communication. Internal communication occurs among the Base Commander, E^2MS Teams, NREA Branch, all organizations and offices that own practices, and others within the Marine Corps interested in MCBQ's environmental affairs.

d. Local Area Network (LAN) Manager Message. The LAN Manager message is MCBQ's e-mail announcement notification system.

e. Quantico Sentry. The Quantico Sentry is MCBQ's Base newspaper.

f. MCBQ SharePoint Site. The MCBQ Sharepoint site is a web-based, "cloud" server system used to review, store, and distribute internal MCBQ documents and records.

3. Responsibilities

a. Base Commander. Communicate appropriate environmental information for MCBQ.

b. EMS Coordinator. Communicate and coordinate EMS information for MCBQ.

c. E^2MS Implementation Team and/or Program Managers

(1) Draft information needed for responses to media inquiries through the PAO.

(2) Coordinate regulatory inspector visits.

(3) Address calls from on-Base stakeholders or public concerns, as required.

(4) Coordinate public meeting arrangements.

d. ECs. Coordinate and/or facilitate communication between the EMS Coordinator, Program Managers, and practice owners.

e. Practice Owners. Communicate and document environmental information related to their practices.

f. PAO. Develop, coordinate, and respond to media inquiries in coordination with applicable E^2MS Team Members.

g. Community Planning and Liaison Officer. Develop, coordinate, and respond to local government agency related correspondence in coordination with applicable E^2MS Team Members.

h. Legal Counsel. Assist in the development and/or review of information needed to respond to correspondence or inquiries with legal implications (e.g., Notices of Violation [NOVs], Warning Letters).

4. Procedures

a. Internal Communication

(1) Communication between the E^2MS Core Team, E^2MS Implementation Team, and the Base Commander is conducted via formal paperwork, briefings, decision papers, route sheets, and weekly staff meetings.

(2) Communication between the E^2MS Implementation Team, ECs (and potentially Practice Owners), and the EMS Coordinator is conducted through informal discussions, e-mail, and meetings on an as-needed basis.

(3) Communication within the NREA Branch is conducted via weekly staff meetings with Section Heads and through informal discussions.

(4) Communication between the E^{2}MS Implementation Team and ECs (and potentially Practice Owners) is conducted via one or more of the following methods: Base Orders, inspections, training, e-mail, faxes, hand-delivered communications, ESOPs, MCBQ website, MCBQ SharePoint site, assistance visits, EC Meetings held roughly every other month, and informal discussions. Communication with ECs also occurs as part of MCBQ's PAI Inventory updates. Typically, the Environmental Planning Section coordinates with ECs prior to PAI site visits, to the extent practicable.

(5) General communication with MCBQ personnel on environmental affairs is conducted via Quantico Sentry and/or LAN Manager Message, MCBQ website, MCBQ SharePoint site, as well as directly with the affected personnel.

(6) ECs disseminate EMS requirements and general information, both up and down their chain-of-command to their organization's senior leadership and to their organization's staff (i.e., Practice Owners, Workers, and contractors). The method used for communication may be selected at the discretion of the EC (e.g., internal meetings, newsletters, e-mail, briefings). Records of communication are maintained in the EC turnover folder as discussed in Chapter 15, Control of Records.

b. External Communication

(1) Formal communications include the following actions:

(a) Letters of Authorization from the Base Commander or "by direction" of the Commander to non-MCBQ staff conducting work on the Base.

(b) Communications from a regulatory agency related to formal receipt of an enforcement action and/or site inspection by regulatory agency representative. This type of communication is from the regulatory agency to the Base Commander.

(c) Freedom of Information Act (FOIA) requests are a formal method for external parties to request information from MCBQ. FOIA inquiries for MCBQ are addressed between the inquiring party and the appropriate Marine Corps FOIA Office.

(d) Congressional inquiries and Government Accounting Office auditor inquiries.

(f) Communication between MCBQ and contractors are conducted via contract language, the contracting officer, or directly to the contractor if an immediate environmental threat is identified. The host activity of the contracted service is responsible for contractor compliance and conformance with environmental requirements. The host activity also ensures contractors receive environmental/EMS awareness training.

(g) Formal communications between MCBQ and the public are conducted via the PAO, public meetings, public notices, and press releases.

(h) Media requests are managed through the PAO.

(2) Informal communications may include, but are not limited to:

(a) Answering general questions from the public.

(b) Any type of informal or oral indication of an enforcement action by a regulatory agency.

(c) Posting of information (e.g., noise advisories, Annual Water Quality Reports) on the MCBQ website.

(d) These questions are generally answered by the party they are addressed to (e.g., Program Managers) and may be run through Counsel for concurrence.

c. Execution

(1) Records of communications are maintained by the Base or activity that sent out the correspondence. MCBQ's external correspondence files are maintained by the Base Adjutant. Copies of formal, written communication must be maintained in turnover folders, as applicable (e.g., EC, Program Managers, EMS Coordinator).

(2) External correspondence sent on environmental matters is also filed within the NREA Branch. Records are maintained in either electronic or paper format, depending on the type of communication involved (i.e., electronic records for emails and other electronic communications and paper records for hard copy format). Refer to Chapter 15, Control of Records, for additional information concerning recordkeeping requirements.

5. References and Related EMS Documents

a. ISO 14001:2004, Element 4.4.3

b. MCO P5090.2A, w/Ch3, Element 7

c. MCBO 5090.2D

d. MCBQ ECPSOP

CHAPTER 8

EMS Documentation

1. Purpose and Applicability

a. This chapter discusses the requirements for, and management of, documentation associated with MCBQ's EMS. There are many documents associated with MCBQ's EMS, including the Commander's Environmental Policy, MCBO 5090.2D, this MCP, MCBQ's ECPSOP, and various operational controls (i.e., ESOPs and media management plans). Additional EMS documents are included in Paragraph 4.a. These documents are reviewed in accordance with procedures established either in Paragraph 4 of this MCP chapter or the subject media management plan. Refer to MCBO 5090.2D for a description of how EMS elements and related EMS documentation relate to each other.

b. This chapter is designed to meet the requirements of MCO P5090.2A, w/Ch3 - Element 8. MCO P5090.2A, w/Ch3, Element 9 is discussed in Chapter 9, Control of Documentation. MCO P5090.2A, w/Ch3, Element 15 is discussed in Chapter 15, Control of Records.

2. Definitions

a. EMP. An EMP is a procedure designed to apply an EMS Element (e.g., Training, Communication, and Control of Documents). EMPs define how management controls are effectively applied across the Base to enhance environmental performance.

b. MCP. The MCP provides MCBQ's EMPs for each of the 17 USMC EMS elements, how each of the 17 elements relates to each other, and the responsibilities of Base personnel intimately involved in the EMS.

b. MCBO 5090.2D (EMS Manual). MCBO 5090.2D promulgates Environmental Program Management and the policy under which MCBQ's EMS operates.

c. MCBQ ECPSOP. The MCBQ ECPSOP helps to reduce the impact of MCBQ's practices upon human health and the environment through effective and concise management procedures. The ECPSOP also provides a foundation for MCBQ's EMS and provides turnover guidance for MCBQ's environmental programs.

d. Media Management Plan. The Media Management Plan is a media-specific management plan that is required by Federal, state, or DoD regulation. Common examples include Stormwater Management Plans; Spill Prevention, Control, and Countermeasure Plans; and Hazardous Waste Management Plans.

e. Operational Controls. Operational controls are media management plans and ESOPs designed to mitigate adverse impacts from MCBQ's practices upon human health and the environment.

f. Permit. A permit is a written authorization granted by an environmental regulatory body that specifies actions, requirements, and/or allowances with regards to MCBQ activities that impact the environment.

3. Responsibilities

a. Chair, E^2MS Core Team. Endorse EMS documents for MCBQ.

b. E^2MS Core Team. Approve EMS documents for Chair, E^2MS Core Team signature. Perform top-level review to ensure that all EMS Documents are consistent with the Commander's Environmental Policy (Chapter 1, Environmental Policy) and MCBQ mission requirements.

c. E^2MS Implementation Team and/or Program Managers

(1) As subject matter experts, prepare EMS documentation and perform regular reviews of EMS documentation as specified in Paragraph 4.

(2) Provide technical advice and assistance to ECs and Practice Owners through comprehensive and clear EMS documentation.

(3) If applicable, maintain controlled copies of EMS documentation (i.e., media management plans) and ensure correct direction is distributed to ECs and Practice Owners.

d. EMS Coordinator

(1) Ensure EMS Elements are adequately addressed in MCBO 5090.2D, this MCP, ECPSOP, and ESOPs. Ensure EMS Elements are considered to the extent possible in media management plans. Maintain controlled copies of MCBO 5090.2D, this MCP, ECPSOP, and ESOPs.

(2) Coordinate and track revisions to EMS Documents.

(3) Maintain documents relevant to MCBQ's EMS, as detailed in Paragraph 4.b.

(4) Provide awareness of EMS documentation to ECs.

(5) Maintain uncontrolled copies of EMS documentation on the MCBQ Website and MCBQ SharePoint site.

e. ECs

(1) Maintain copies of EMS documentation in turnover folders.

(2) Provide copies of EMS documentation to Practice Owners.

(3) Provide EMS documentation awareness to Practice Owners.

4. Procedures

a. Maintaining EMS Documentation

(1) The following items are considered EMS documentation and will be maintained in accordance with this MCP Chapter and Chapter 9, Control of Documents:

(a) Commander’s Environmental Policy

(b) MCBO 5090.2D

(c) MCBQ MCP

(d) MCBQ ECPSOP (contains a full list of MCBQ’s EMS documents, including media permits)

(e) MCBQ ESOPs

(f) Basewide and Activity PAI Inventories

(g) Objectives and Targets (and associated EAPs/POA&Ms)

(h) Media management plans

(2) Uncontrolled EMS documentation is maintained on the MCBQ Website for unrestricted public access and the MCBQ SharePoint site for internal MCBQ access. The EMS Coordinator or the respective Program Manager posts uncontrolled EMS documentation to these sites.

(3) Signed, controlled electronic or paper copies of EMS documentation are maintained by the owner (e.g., EMS Coordinator, Program Manager). Electronic copies are maintained in the document owner’s share drive folder and paper copies are maintained in the owner’s record file.

(4) Outdated EMS documents are maintained in hard copy files and/or in electronic form in the owner’s shared drive folder.

b. Revisions to EMS Documentation

(1) EMS Documentation (i.e., Environmental Policy, MCBO 5090.2D, MCP, ECPSOP, ESOPs) are reviewed by the EMS Coordinator on an annual basis, with minor changes incorporated every year. On a

triennial basis, each EMS document undergoes a significant revision and a newly dated version is issued to the E^{2}MS Teams for input, concurrence, and signature. Comprehensive reviews are completed prior to the triennial benchmark ECEs.

(2) Media management plans and individual ECPSOP Chapters are reviewed by the document owner on an annual basis. Minor changes are incorporated every year. The media management plans undergo a significant revision in accordance with governing regulatory requirements. Following revision, the newly dated versions are issued to the E^{2}MS Teams for input, concurrence, and signature.

(3) Annual review and updates to EMS documentation is tracked using the Record of Changes Log. The EMS Coordinator or Program Manager records the change number, the effective date of the change, the sections changed, and a brief summary of the changes. The Record of Changes Log is then forwarded to the E^{2}MS Core Team for Management Review and approval.

5. References and Related EMS Documents

a. ISO 14001:2004, Element 4.4.4

b. MCO P5090.2A, w/Ch3, Element 8

c. Commander’s Environmental Policy

d. MCBO 5090.2D

e. MCBQ ECPSOP

f. MCBQ ESOPs

g. MCBQ media management plans

CHAPTER 9

Control of Documentation

1. Purpose and Applicability

a. In conjunction with MCBO 5090.2D, this chapter defines procedures that MCBQ shall follow with respect to inventory and control of EMS documents (refer to Chapter 8, EMS Documentation and MCBQ's ECPSOP for a listing of EMS documents). This includes creation, retention, storage, revision, version control, and disposal or permanent archiving, as applicable.

b. This chapter is designed to meet the requirements of MCO P5090.2A, w/Ch3, Element 9.

2. Definitions

a. Environmental Programs Document Status Form. An Environmental Programs Status Form is maintained by the EMS Coordinator and inventory individual media areas and their required EMS documentation. It is available in MCBO 5090.2D.

b. Refer to Chapter 9, EMS Documentation for additional discussion of related definitions.

3. Responsibilities

a. E^2MS Core Team. Approve EMS documents for Chair, E^2MS Core Team signature. Perform top-level review to ensure that all EMS documents are consistent with the Commander's Environmental Policy (Chapter 1, Environmental Policy) and MCBQ mission requirements.

a. E^2MS Implementation Team and/or Program Managers. The majority of MCBQ's E^2MS Implementation Team is composed of Section Heads and Program Managers from the NREA Branch.

(1) Perform annual reviews of their media management plan(s), ECPSOP Chapters, and related EMS documentation. Following the annual review, E^2MS Implementation Team members notify the EMS Coordinator of necessary changes.

(2) Conduct in-depth reviews in accordance with Federal, state, or DoD requirements. Following in-depth review, E^2MS Implementation Team members notify the EMS Coordinator of required changes.

(3) Identify EMS documentation that pertains to media programs and MCBQ's PAI Inventory.

(4) Protect all EMS documentation from alteration or damage.

(5) Ensure appropriate disposal or archiving of EMS documents that have been superseded or have exceeded their retention periods.

b. EMS Coordinator

(1) Consolidate information from E^{2}MS Implementation Team members to prepare the Environmental Programs Document Status form in accordance with MCBO 5090.2D.

(2) Coordinate annual review of EMS documents with E^{2}MS Implementation Team. Subsequently, update the Environmental Programs Document Status form with revised EMS document information received from the E^{2}MS Implementation Team.

(3) Ensure that EMS documents are accessible to appropriate personnel for use in management and maintenance of practices and environmental programs aboard MCBQ. Uncontrolled electronic copies of EMS documents are available to the public via MCBQ's Website. Uncontrolled EMS documents are available to MCBQ staff via MCBQ's SharePoint site or EM Portal.

(4) Disseminate revised EMS documents to ECs for distribution to Practice Owners.

4. Procedures

a. Controlled EMS documents are maintained according to the instructions below:

(1) The MCBQ Website is used for current uncontrolled electronic EMS documents that are approved for distribution to the general public.

(2) The MCBQ SharePoint site is used for current uncontrolled electronic EMS documents that are approved for distribution to MCBQ staff.

(3) The EM Portal is used for controlled, electronic EMS documents (i.e., records) that are approved for use within the E^{2}MS Implementation Team. The NREA Branch shared drive is also acceptable for storage of current and obsolete controlled EMS documents.

(4) Current and obsolete controlled paper EMS documents are located in files maintained by EMS document owners (e.g., Program Managers).

b. The EMS Coordinator conducts data calls to the E^{2}MS Implementation Team to identify EMS documents and to clarify EMS document ownership. Information that collected includes:

(1) Document Title/Description

(2) Document Owner

(3) Effective Date (Date of Current Version)

(4) Required/Planned Update or Review of Document

(5) Current Status of Document (if being revised)

(6) Retention Location

(7) Permit Identification Number

(8) Permit Title

(9) Permit Program

(10) Regulating Agency

(11) Expiration Date

c. Once data is provided by the E^{2}MS Implementation Team, the EMS Coordinator creates and maintains the Environmental Programs Document Status Form, as shown in MCBO 5090.2D. Information to create this document is also taken from the media-specific chapters in MCBQ's ECPSOP and data calls with Program Managers.

d. E^{2}MS Implementation Team members annually review their controlled EMS documents, and update them as required, but at least triennially. E^{2}MS Implementation Team members include in their EMS documents, a signed statement indicating, at a minimum:

(1) A review was conducted,

(2) Any changes that resulted from this review

(3) This is the current version; and

(4) Date of review.

e. Following the guidance of MCO 5215.1K, the Marine Corps Directives Management Program, all directives (e.g., Base Orders) are reviewed and re-released, updated, or cancelled every 9 years. Base directives are revised in accordance with the procedures established in this Chapter, which exceed the requirements of MCO 5215.1K. Updates to Marine Corps directives are governed by MCO 5216.20, the HQMC Supplement to the DoN Correspondence Manual.

g. The EMS Coordinator provides guidance to the E^{2}MS Implementation Team for archiving or disposal of documents and permits. Guidelines are based on MCO 5210.11E, Records Management

Program for the Marine Corps, and Secretary of the Navy Instruction 5215.5D, Navy and Marine Corps Records Disposition Manual, Subject Standard Identification Code 5090, or Federal and state environmental regulations, as applicable. This guidance is documented in turnover folders for E^2MS Implementation Team members.

5. References and Related EMS Documents

a. ISO 14001:2004, Element 4.4.5

b. MCO P5090.2A, w/Ch3, Element 9

c. Commander’s Environmental Policy

d. MCBO 5090.2D

e. MCBQ ECPSOP

CHAPTER 10

Operational Control of Practices

1. Purpose and Applicability

a. This chapter establishes the procedure to prepare and maintain ESOPs for significant practices and operations. ESOPs function as operational controls for significant practices, without which, deviation from standard performance may cause significant impacts to the environment and/or human health. .

b. This chapter is designed to meet the requirements of MCO P5090.2A, w/Ch3, Element 10.

2. Definitions

a. ESOP Document Owner. The ESOP Document Owner has the primary responsibility for managing an ESOP.

b. ESOP. An ESOP is a written document that describes required steps to be followed in order to mitigate negative environmental impacts from significant practices. ESOPs may be written at the practice-level, which means that they apply to any location on Base, or at the shop-level, which means that they are written to apply at a specific location on Base. Additionally, ESOPs may be prepared for unique activities by request from E^2MS Implementation Team members or Program Managers; if the activity is not considered a “Practice” per the list approved by HQMC (refer to Chapter 2, Practices, Aspects, Impacts and Risk Prioritization) but warrants operational controls (e.g., charitable car washes, secondary containment maintenance). Such conditions would require the approval of the E^2MS Implementation Team.

3. Responsibilities

a. E^2MS Implementation Team and/or Program Manager

(1) Identify significant practices that require ESOPs.

(2) Provide input on ESOP content and review ESOPs prior to dissemination.

(3) Review existing ESOPs when modifications to processes or operating procedures are identified.

(4) Approve or disapprove the use of an ESOP(s) to establish controlling documents for activities (e.g., charitable car washes, secondary containment maintenance) that are not considered “Practices” by HQMC (refer to Chapter 2, Practices, Aspects, Impacts, and Risk Prioritization).

b. ESOP Document Owners

(1) Provide technical assistance during ESOP preparation and revision processes.

(2) Perform annual reviews of ESOPs.

(3) Coordinate revisions to applicable ESOPs in coordination with the EMS Coordinator on an as-needed basis.

c. EMS Coordinator

(1) Coordinate ESOP preparation and facilitate revisions.

(2) Write ESOPs with E^2MS Implementation Team, Document Owner, and Practice Owner input.

(3) Retain current and archived ESOPs in accordance with Chapter 8, EMS Documentation and Chapter 9, Control of Documents.

(4) Retain information associated with ESOP dissemination.

(5) Disseminate ESOPs to ECs and provide or arrange for initial EC training on ESOPs. ECs in turn provide similar training for Practice Owners within their activity, as applicable.

d. ECs and Practice Owners

(1) Provide input during ESOP development, as required.

(2) Ensure that ESOPs are disseminated to all appropriate personnel, personnel (including contractors and suppliers, as necessary) receive training, and implemented and maintained in appropriate work centers.

(3) If requested, participate in reviews of ESOPs.

(4) Provide recommendations to the EMS Coordinator for suggested ESOP revisions should ESOPs provide incorrect information.

(5) ECs retain records showing the Practice Owners have been trained on the contents of each ESOP.

4. Procedure for Prioritized List for ESOP Creation

a. The E^2MS Implementation Team develops a prioritized list of practices for ESOP creation by examining:

(1) Significant practices as specified in Chapter 2, Practices, Aspects, Impacts, and Risk Prioritization.

(2) Personal observations by E^{2}MS Implementation Team members. These may stem from Benchmark or Internal ECEs, corrective actions, or problem solving efforts.

(3) Input from ECs and Practice Owners

b. When ECs, Practice Owners, or E^{2}MS team members identify the need for an ESOP, the EMS Coordinator, with assistance from the E^{2}MS Implementation Team, ESOP Document Owners, ECs, and Practice Owners prepares an ESOP.

5. Procedure for Preparing an ESOP

a. Once the list of significant practices has been created (as outlined in Chapter 2, Practices, Aspects, Impacts, and Risk Prioritization), the E^{2}MS Implementation Team may designate which practices shall have ESOPs created (if none currently exist). All significant practices have an ESOP that mitigates impacts to environmental media at MCBQ. The Document Owner for an ESOP is defined in MCBQ's ECPSOP. The Document Owners works with the EMS Coordinator to create an ESOP.

b. The Purpose section of each ESOP designates the practice on which the ESOP is based. The following areas are addressed when creating practice-level ESOPs:

(1) Version and Effective Date. The version of the ESOP and what date it was approved for dissemination.

(2) Purpose. The overall purpose of the ESOP (i.e., why the procedure is necessary).

(3) Applicability. Includes the following information:

(a) The intended audience for the ESOP. Specification of the intended audience is very important because it indicates the amount of complexity and technical details that will go into the ESOP. Practice-level ESOPs are written generically to apply to locations anywhere on MCBQ. Conversely, shop-level ESOPs usually apply to a specific location, and may be written for subject matter experts who deal with the practice at that location.

(b) The scope of the ESOP. This section addresses the general message of the ESOP, including affected processes and locations at MCBQ.

(4) Definitions. This section defines terms that support the ESOP.

(5) Responsible Parties. Person(s) or organization(s) responsible for implementing each ESOP, operating or maintaining

equipment, managing or supervising the practice associated with the ESOP, or performing or maintaining the ESOP.

(6) Procedure. The systematic tasks used for operation or practice addressed by the ESOP. Tasks include operations, monitoring and measuring, reporting and recordkeeping, and control and mitigation measures.

(7) Inspection and Corrective Action. The person(s) or activity(ies) responsible for inspecting, testing, or performing corrective actions related to the operation or practice. Also includes the frequency of the inspections, tests, or corrective actions, if applicable.

(8) Internal Communication. The person(s) or activity(ies) responsible for, and methods used for, proper communication among Base personnel regarding the operation, activity, or practice.

(9) Training/Awareness. Training required for personnel identified in the ESOP.

(10) Emergency Preparedness and Response. Action(s) and reporting required in the event of an emergency.

(11) Associated Documents and Records. Additional controlling documents and references pertinent to the ESOP including, but not limited to operator manuals, permits, preventive maintenance procedures, media management plans, and environmental logs.

(12) Document Revision History. Record of modifications and revisions to the ESOP.

(13) Document Owner. The ESOP Document Owner and person responsible for final review and approval of the procedure.

c. To facilitate use, a streamlined version of the practice-level ESOP may be used for shop-level ESOPs. The EMS Coordinator, ECs, and Practice Owners determine the need for development of shop level ESOPs; not all practice level ESOPs will have associated shop level Standard Operating Procedures.

d. MCBQ’s ECPSOP identifies Document Owners for ESOPs. The ESOP Document Owner may conduct a meeting with key personnel (e.g., subject matter experts on the practice/ESOP). This may be facilitated by the EMS Coordinator to obtain needed content for the ESOP. The ESOP Document Owner is responsible for providing essential information to the EMS Coordinator and assisting with any changes required to finalize the ESOP.

e. Once the EMS Coordinator has a first draft completed, it is submitted to the E^2MS Implementation Team for review.

f. Next, EMS Coordinator incorporates changes and distributes the final ESOP to the E^{2}MS Implementation Team, ECs, and Practice Owners. The EMS Coordinator is responsible for ensuring that the style, format, and overall "quality" of the document are acceptable and are in accordance with the Standard Naval Letter Format, as specified in SECNAVINST 5216.D, the Navy Correspondence Manual.

g. Upon approval, the final version of the ESOP will be under document control and may be saved onto the EMS Coordinator's shared drive folder.

6. Procedure for Dissemination of an ESOP

a. Once the ESOP is approved, the EMS Coordinator provides the ESOPs to applicable ECs.

b. ECs are responsible for training and dissemination to their Practice Owners and retaining records documenting that Practice Owners are familiar with and understand the contents of the ESOP. ECs choose the best method for dissemination of information. This is maintained as a record in the EC's turnover folder.

c. At this point, the Practice Owners are responsible for ensuring that the ESOP is followed by any person operating the practice in or for their unit or organization, including contractors and suppliers. Relevant provisions are incorporated into contracts.

d. Practice Owners ensure current copies of the ESOPs are maintained in the work center and that new personnel are trained on the ESOPs. ECs ensure the distribution of new or revised ESOPs to Practice Owners. New and revised ESOPs are available for download from the NREA SharePoint Webpage at: https://eis.usmc.mil/sites/mcbquan/g5/nrea/SitePages/Home.aspx

e. ECs and Practice Owners have the opportunity to provide feedback on changes to procedures or practices at the unit or organizational level that may affect the ESOP.

f. The EMS Coordinator and CETEP Coordinator provides training, as needed, to correct deficiencies and non-conformities that are observed during inspections and assistance visits.

7. Procedure for Maintaining (Monitoring and Measuring) ESOPs

a. Annually, the E^{2}MS Implementation Team reviews the list of significant practices as well as the list of existing ESOPs. Every significant practice is required to have an associated ESOP. If MCBQ's list of significant practices has changed, then the E^{2}MS Implementation Team requires new ESOPs to be created.

b. On an annual basis, the E^{2}MS Implementation Team requires the ESOP Document Owner to review current ESOPs to ensure they are still

adequate for the practices occurring at MCBQ. On a triennial basis, the E^{2}MS Implementation Team requires the ESOP Document Owner to conduct complete reissues of current. Reviews and revisions are coordinated with the EMS Coordinator.

c. After revisions, ESOPs are disseminated to ECs by the EMS Coordinator. ECs disseminate and train their Practice Owners and Workers on their ESOPs and document that training has occurred. ECs ensure their Practice Owners maintain current copies of ESOPs in their work center(s). The EC may choose to print paper copies of ESOPs (for those without computer or SharePoint access) or show their Practice Owners where ESOPs may be downloaded from the MCBQ SharePoint site.

d. Approved ESOPs are maintained separate from this Plan, retained by the EMS Coordinator, and managed in accordance with Chapter 9, Control of Documents. In addition, ECs, Practice Owners, and ESOP Document Owners retain copies of current ESOPs if they cannot access the MCBQ SharePoint site.

8. References and Related EMS Documents

a. ISO 14001:2004, Element 4.4.6

b. MCO P5090.2A, w/Ch3, Element 10

c. MCBO 5090.2D

d. MCBQ ECPSOP

e. MCBQ ESOPs available on the MCBQ website

CHAPTER 11

Emergency Preparedness and Response

1. Purpose and Applicability

a. This chapter ensures that MCBQ personnel:

(1) Document procedures used to identify, respond to, and mitigate environmental accidents and emergencies.

(2) Review and revise the emergency preparedness and response procedure when there has been an environmental accident or emergency. Procedures are also reviewed, as necessary, after the initiation of a new practice.

(3) Communicate emergency preparedness and response procedures to the appropriate personnel. Personnel must follow these procedures in the event of an environmental accident or emergency.

b. This chapter is designed to meet the requirements of MCO P5090.2A w/Ch3, Element 11.

2. Definitions

a. Environmental Accident. An environmental accident is an unplanned event that could cause negative impacts to environmental resources.

b. Environmental Compliance-Related Emergency Preparedness and Response Plans. Environmental Compliance-Related Emergency Preparedness and Response Plans are covered by MCO P5090.2A, w/Ch3, Chapter 7, and applicable to MCBQ environmental operations.

c. Environmental Emergency. An environmental emergency is a situation (usually resulting from an environmental accident) that requires immediate attention to mitigate serious negative impacts to Base or environmental resources.

d. Integrated Spill Management Plan (ISMP). The ISMP is an emergency preparedness and response plan, which addresses the requirements of several different types of environmental regulations in terms of environmental accidents and/or emergencies.

e. Mission Assurance Plan (MAP). The MAP is a comprehensive contingency document that addresses response to emergencies (e.g., destructive weather, active shooters, and spills of HM or HW) at MCBQ. Also incorporates MCBQ’s Anti-Terrorism/Force Protection (AT/FP) Plan. The Mission Assurance Plan is managed by G-3, Operations Division. NREA Branch provides technical input on environmental concerns addressed in the MAP.

3. Responsibilities

a. Head, NREA Branch. Ensure that all applicable NREA personnel are trained to act as “Technical Advisors” in the event of a mishap in all levels of the response requirements.

b. Head, Environmental Compliance Section

(1) Collaborate with the Spill Response Program Manager to establish environmental compliance-related emergency preparedness and response plans (i.e., MCBQ’s ISMP) and associated procedures.

(2) Ensure satellite accumulation area training is conducted.

c. Spill Response Program Manager

(1) Coordinate with EMS Coordinator to review and revise ISMP and associated procedures in accordance with Chapter 9, Control of Documents.

(2) Coordinate with EMS Coordinator and CETEP Coordinator to communicate emergency preparedness and response procedures to ECs.

d. In addition to the Head, Environmental Compliance Section and Spill Response Program Manager, members of the E^2MS Implementation Team (e.g., CETEP Coordinator) participate in Base AT/FP training upon request from G-F, Installation and Environment Division.

e. ECs and Practice Owners. Be aware of emergency preparedness and response instructions included in the ISMP and applicable ESOPs. ECs provide general awareness training to workers within their organization.

f. G-3, Operations Division. Manage the MAP.

4. Procedures

b. Environmental compliance-related emergency preparedness and response plans are organized in accordance with MCO P5090.2A w/Ch3, Chapter 7. HQMC (LFL) divides environmental compliance-related emergency preparedness and response plans into seven different areas based on the requirement that prompts the plan.

c. Compliance-related emergency preparedness and response requirements, as they apply to MCBQ, are listed as follows:

(1) Spill Prevention, Control, and Countermeasure.

(2) Virginia Oil Discharge Contingency Plan.

(3) Superfund Amendments and Reauthorization Act Title III (EPCRA).

(4) Resource Conservation and Recovery Act Contingency Plan.

(5) Air Compliance Risk Management/Excess Air Emissions.

d. MCBQ's existing environmental compliance-related emergency preparedness and response plans have been consolidated in the ISMP. The most recent version was published in March 2012. Annual and regulatory-based reviews and updates are conducted in accordance with Chapter 9, Control of Documents.

e. Elements of the MAP are incorporated into MCBQ's EMS, as appropriate, by the EMS Coordinator.

f. Every EMS Document will include a section to address emergency preparedness and response.

g. Emergency preparedness and response plans and associated procedures, including changes, are communicated to ECs and Practice Owners based on the level of detail they need to conduct their job duties.

h. Communication of emergency preparedness and response information are typically conducted by the Environmental Compliance Section Head, Spill Response Program Manager, CETEP Coordinator, and the EMS Coordinator, and accomplished through training, distribution of ESOPs, and other EMS documents, and/or posting information on the NREA Website and NREA's SharePoint site.

i. Training related to emergency preparedness and response are conducted in accordance with MCBQ's CETEP (refer to Chapter 6, Competence, Training, and Awareness) and includes:

(1) The Spill Response Program Manager and CETEP Coordinator work together to prepare and provide training to applicable E^2MS Implementation Team Members, ECs, and Practice Owners and Workers that includes Annual Oil Spill Handing and Discharge Prevention Briefings, table top exercises, equipment deployment training, and after action/lessons learned reviews. The Spill Response Program Manager incorporates lessons learned into the ISMP. The EMS Coordinator is notified of any applicable changes or modifications, and incorporates them into the EMS as necessary.

(2) Satellite accumulation area training is provided by the Environmental Compliance Section each time there is a change of personnel, change of waste stream, or introduction of a new waste stream. Annual refreshers are provided if there are no changes.

(3) Annual AT/FP training is conducted by G-3, Operations Division. At a minimum, the Environmental Compliance Section Head, Spill Response Program Manager, and CETEP Coordinator assist and/or participate in the annual training upon request when appropriate.

5. References and Related EMS Documents

a. ISO 14001:2004, Element 4.4.7

b. MCO P5090.2A, w/Ch3, Element 11

c. MCBO 5090.2D

d. MCBQ MAP

e. MCBQ ISMP

f. MCBQ ECPSOP

CHAPTER 12

Monitoring and Measurement

1. Purpose and Applicability

a. This chapter outlines the procedures for the following:

(1) Monitoring and measuring progress towards achieving Objectives and Targets. This is achieved through the use of EAPs and POA&Ms. Refer to Chapter 4, Objectives, Targets, and Actions to Improve Performance.

(2) Monitoring practices that may have significant impact on the environment. This is achieved through the implementation of MCBQ's IAP. The MCBQ IAP also monitors compliance with compliance and conformance requirements. Refer to Chapter 13, Evaluation of Compliance and Chapter 16, EMS Audit.

(3) Verifying that equipment used for monitoring and measuring environmental performance is calibrated.

b. This chapter is designed to meet the requirements of MCO P5090.2A, w/Ch3, Element 12.

2. Definitions

a. Actions to Improve Performance. Objectives and Targets are used to as actions to improve environmental performance at MCBQ. Refer to Chapter 4, Objectives, Targets, and Actions to Improve Performance for more information.

b. Benchmark Environmental Compliance Evaluation (ECE). Refer to Chapter 13, Evaluation of Compliance.

c. Environmental Performance. Environmental performance is a point-in-time measurement of environmental compliance or conformance measured against applicable laws, regulations, and standards.

d. EPI. An EPI is a metric that is used to determine environmental performance in a specific environmental media program or element of MCBQ's EMS.

e. IAP. An IAP is a program that guides MCBQ's Internal ECE and determines which activities, buildings, locations, and/or media areas are to be evaluated each week, along with the evaluation criteria that are to be used for the purposes of the self-audit program requirement established by MCO P5090.2A w/ Ch3.

f. Internal ECE. Refer to Chapter 13, Evaluation of Compliance.

g. WEBCASS. WEBCASS is the USMC's online compliance and conformance tracking software. POA&Ms are tracked using WEBCASS.

3. Responsibilities

a. E2MS Core Team

(1) Ensure appropriate resources (i.e., financial, personnel, and technical) are available to track environmental performance.

(2) Review progress of Actions to Improve Performance and the Base's overall environmental performance.

(3) Review and approve changes to the Objectives, Targets, and Actions to Improve Performance.

b. E^2MS Implementation Team and/or Program Managers

(1) Establish and measure EPIs to maintain compliance and to attain Objectives and Targets (i.e., EAPs and POA&Ms). Track progress and maintain trends of EPIs. Refer to Chapter 4, Objectives, Targets, and Actions to Improve Performance and Chapter 14, Problem Solving.

(2) Report progress towards achieving Objectives, Targets, and Actions to Improve Performance upon request by the Chair, E^2MS Implementation Team, E^2MS Core Team or the EMS Coordinator.

c. EMS Coordinator

(1) Coordinate progress tracking of Objectives, Targets, and Actions to Improve Performance between E^2MS Teams.

(2) Incorporate approved changes to the Objectives, Targets, and Actions to Improve Performance.

(3) Measure progress at completing EAPs and POA&Ms.

(4) Maintain records on Objectives, Targets, and Actions to Improve Performance (i.e., EAPs, POA&Ms, and EPIs).

(5) Conduct inspections with the Lead Environmental Auditor.

d. Environmental Audit Section/ Lead Environmental Auditor

(1) Lead the NREA Branch Inspection Team(s) in implementing MCBQ's IAP and perform inspections at all activities.

(2) Perform activity-specific inspections that serve as the basis of the basewide Internal ECE.

(3) Identify trends from internal inspections that may indicate a programmatic flaw versus an isolated incident. Determine if trends are specific to an activity or are basewide in nature.

(4) For a complete list of Lead Environmental Auditor responsibilities, refer to the MCBQ IAP.

e. ECs and Practice Owners. Assist the E^{2}MS Implementation Team and/or Program Managers in monitoring and measuring tasks that apply to their unit's practices.

4. Procedures

a. Monitoring and Measurement of Objectives, Targets, and Actions to Improve Performance

(1) The E^{2}MS Core Team, NREA Branch Head, and Environmental Planning Head requisition the appropriate resources (i.e., financial, personnel, and technical) to track progress.

(2) Monitoring and measurement efforts are designed to ensure that environmental performance is consistent with MCBQ's Environmental Policy and encourages continual improvement by highlighting successes and revealing areas that may need improvement.

(3) Environmental performance may concern either environmental compliance or conformance. The level of environmental performance may be judged by Internal or Benchmark ECEs or compliance audits and/or through other methods, as appropriate.

(4) EPIs include the following data fields: what is being measured, the frequency of measurement/data collection, the process for data collection/record keeping, and references to appropriate calibration equipment, as necessary. When EPIs are established, the E^{2}MS Core Team or appropriate Program Manager specifies what normal, acceptable, and/or threshold ranges or limits are for each EPI.

(5) EPIs may be determined by any E^{2}MS Implementation Team member. Program Managers and Action Officers are responsible for maintaining adequate records and reporting data on their EPIs. If an EPI falls outside of acceptable limits, the performance of the EPI may be referred to the Problem Solving process (refer to Chapter 14, Problem Solving) or as the subject of a potential Objective and Target (refer to Chapter 4, Objectives, Targets, and Actions to Improve Performance) at the discretion of the Program Manager or Action Officer.

b. Monitoring and Measurement of Compliance, Conformance, and Significant Practices

(1) IAP, Monitoring and Measuring Environmental Conformance and Compliance

(a) MCBQ's environmental conformance and compliance is monitored by annual internal audits at all activities. The Lead Environmental Auditor conducts these audits with the assistance of the EMS Coordinator and Program Managers. Internal audits are specific to individual activities aboard MCBQ as opposed to basewide audits that may be conducted (i.e., Benchmark or Internal ECE).

(b) Internal audits are based on the identified environmental processes, practices, environmental aspects, environmental assets, and the associated impacts determined by the environmental audit management team.

(c) Internal audits focus on specific environmental media areas and the practices that each area has listed on the activity-specific PAI Inventories.

(d) Findings and recommendations from internal audits are documented in WEBCASS. Refer to Chapter 13, Evaluation of Compliance and Chapter 14, Problem Solving for more information. For more information about MCBQ's internal audit program, refer to the MCBQ IAP.

(2) IAP, Monitoring and Measuring Environmental Conformance

(a) The Lead Environmental Auditor and EMS Coordinator assess each activity's conformance to the Environmental Policy, MCP, all Base ESOPs, and MCO 5090.2A, w/Ch3. These results are used to determine basewide environmental conformance. Refer to Chapter 16, EMS Audit for more information.

(b) Findings and recommendations from related to environmental conformance are documented in WEBCASS and may not be subject to external release. Refer to Chapter 14, Problem Solving and Chapter 16, EMS Audit for more information.

(3) Monitoring of conformance may also be determined using performance against external criteria such as sustainability targets, data calls, and Virginia Department of Environmental Quality (VDEQ) Exemplary Environmental Enterprise (E3) status reports.

5. References and Related EMS Documents

a. ISO 14001:2004, Element 4.5.1

b. MCO P5090.2A, w/Ch3, Element 12

c. MCBO 5090.2D

d. MCBQ IAP

e. MCBQ ECPSOP

f. MCBQ Sustainability Plan

g. VDEQ E3 requirements

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CHAPTER 13

Evaluation of Compliance

1. Purpose and Applicability

a. This chapter outlines the procedure for evaluating environmental compliance with applicable requirements including laws and regulations. Compliance evaluations are management tools used to achieve, maintain, monitor, and continually improve environmental compliance and EMS performance, reducing environmental risks aboard MCBQ.

b. Evaluation of compliance are conducted annually through Internal ECEs and triennially through an Benchmark ECEs to ensure environmental compliance and conformance aboard MCBQ.

c. This chapter is designed to meet the requirements of MCO P5090.2A, w/Ch3, Element 13.

d. All internal and external ECEs are for agency internal guidance purposes only and are not to be released to the public or regulatory authorities unless required by law or court order.

2. Definitions

a. Compliance Evaluation. Compliance evaluation is identification, characterization, and documentation of compliance deficiencies related to either practices or environmental programs managed by NREA Branch personnel or other environmental professionals designated by MCBQ.

b. Benchmark ECE. A Benchmark ECE is a triennial environmental evaluation performed by HQMC which assesses the compliance and conformance of an installation based on pertinent environmental regulatory requirements. The External ECE utilizes The Environmental Assessment and Management (TEAM) Guides (including USMC and Virginia Supplements) to evaluate installation compliance and conformance.

c. ECE Program. The ECE Program is required by MCO P5090.2A, w/Ch3 and includes a Triennial Benchmark ECE; annual Internal ECEs at each activity; and an annual basewide Internal ECE. The ECE Program provides the Base Commander with an assessment of environmental compliance and conformance, associated risks, and corrective actions (mandatory or recommended).

d. Internal ECE. An Internal ECE is a documented, objective, and comprehensive environmental compliance and conformance review of Base facilities, processes, and practices to be completed within a 12 month period. Implemented through the IAP, an Internal ECEs are performed at every activity aboard MCBQ. Activity-specific ECEs are used to

complete MCBQ's basewide Internal ECE. Similar to the Benchmark ECEs, Internal ECEs use the Federal TEAM Guide (including USMC and Virginia Supplements). NREA Branch personnel, or their designees, conduct the internal ECEs in accordance with MCO P5090.2A, W/Ch3, Chapter 4.

e. TEAM Guide. The TEAM Guide is an audit protocol issued for Federal, state, and USMC regulations and requirements which addresses 14 environmental protocols in a checklist format. TEAM Guide protocols are used to evaluate environmental compliance and conformance with a standardized numbering and classification system. They are used for both Internal and External ECEs.

3. Responsibilities – Activity-specific and Basewide Internal ECEs

a. E^2MS Core Team

(1) The Chair, E^2MS Core Team reviews activity-specific Internal ECEs and POA&Ms during biweekly briefings with the Lead Environmental Auditor and the EMS Coordinator.

(2) The E^2MS Core Team is briefed on basewide internal ECEs and related POA&Ms during Management Reviews, as described in Chapter 17, Management Review.

b. Chair, E^2MS Implementation Team

(1) Ensure IAP development, implementation, and maintenance of the IAP.

(2) Ensure IAP is reviewed annually and updated, as necessary.

(3) Provide the IAP, along with annual updates, to the Base Commander and all Base activities.

c. Lead Environmental Auditor

(1) Manage operation of MCBQ's IAP and leads activity-specific Internal ECEs with the EMS Coordinator and other NREA Branch staff.

(2) With the EMS Coordinator, participate in biweekly meetings with the Chair, E2MS Core Team and brief results of activity-specific Internal ECEs.

(3) Act as the alternate POC for the basewide Internal ECE.

(4) Refer to the MCBQ IAP for a complete list of Lead Environmental Auditor responsibilities.

d. Program Managers. Refer to the MCBQ IAP for a complete list of Program Manager responsibilities.

e. EMS Coordinator

(1) With the Lead Environmental Auditor, participate in biweekly meetings with the Chair, E^{2}MS Core Team and brief results of activity-specific Internal ECEs. Also brief the results of the basewide Internal ECE during Management Reviews (refer to Chapter 17, Management Review).

(2) Conduct weekly activity-specific Internal ECEs with the Lead Environmental Auditor and other NREA Branch staff.

(3) Act as the primary POC for the basewide Internal ECE, which is based upon results of the activity-specific Internal ECE.

(4) Retain records of basewide Internal ECE.

(5) Report results of basewide Internal ECE to HQMC through WEBCASS.

f. Activity ECs participate in activity-specific Internal ECEs as directed by E^{2}MS Teams and the Lead Environmental Auditor. They also program POA&Ms that result from findings at their activity. Refer to Chapter 14, Problem Solving.

4. Responsibilities – Benchmark ECEs

a. E^{2}MS Core Team

(1) Participate in Benchmark ECE, as appropriate.

(2) Review the results of Benchmark ECEs and POA&Ms at the conclusions of each inspection.

b. E^{2}MS Implementation Team and/or Program Managers

(1) Participate in Benchmark ECE.

(2) Review the results of Benchmark.

(3) Create and/or implement POA&Ms following Benchmark ECEs, as pertinent to each Program Manager’s role. Refer to Chapter 14, Problem Solving.

(4) Track and report status of POA&Ms, as requested.

c. Lead Environmental Inspector

(1) Serve as the POC for Benchmark ECEs.

(2) Distribute Benchmark ECE information to appropriate Base personnel.

(3) Attend in brief and out-brief with Base Commander.

(4) Coordinate the creation of POA&Ms following Benchmark ECEs.

(5) Review POA&Ms for adequacy.

(6) Track and report the status of POA&Ms, as requested.

(7) Retain records of Benchmark ECEs.

d. EMS Coordinator

(1) Serve as the alternate POC for Benchmark ECEs.

(2) Perform the duties outlined in Paragraph 4.c if authorized or if Lead Environmental Auditor is not available.

e. Activity ECs participate in activity-specific Internal ECEs as directed by E^2MS Teams and the Lead Environmental Auditor.

5. Procedure for Conducting Activity-Specific Internal ECEs. Refer to the MCBQ IAP for procedures to conduct activity-specific Internal ECEs.

6. Procedures for Conducting Benchmark and Basewide Internal ECEs. Refer to MCO P5090.2A w/Ch.3, Paragraph 4206 for procedures to follow during Benchmark and basewide Internal ECEs. Additional guidance for ECEs is contained in the MCBQ IAP, Federal TEAM Guide, and USMC and Virginia TEAM Guide Supplements.

7. References and Related EMS Documents

a. ISO 14001:2001, Element 4.5.2

b. MCO P5090.2A, w/Ch3, Element 13

c. MCBO 5090.2D

d. MCBQ ECPSOP

e. MCBQ IAP

f. U.S. Federal TEAM Guide

g. Virginia TEAM Guide Supplement

h. USMC TEAM Guide Supplement

CHAPTER 14

Problem Solving

1. Purpose and Applicability

a. This chapter guides problem solving efforts in MCBQ's EMS. This includes identifying and documenting environmental noncompliance and EMS nonconformance issues and implementing appropriate corrective and preventive actions to solve problems.

b. MCBQ also uses EAPs and POA&Ms to address findings from Benchmark and Internal ECEs. Refer to Chapter 4, Objectives, Targets, and Actions to Improve Performance for a discussion of EAPs and POA&Ms used to achieve Objectives and Targets.

c. This chapter is designed to meet the requirements of MCO P5090.2A, w/Ch3, Element 14.

2. Definitions

a. EAP. Refer to Chapter 4, Objectives, Targets, and Actions to Improve Performance.

b. NOV. An NOV is an administrative measure used by regulatory agencies in order to enforce requirements of the law.

c. POA&M. Refer to Chapter 4, Objectives, Targets, and Actions to Improve Performance.

d. Root Cause. The root cause is the fundamental reason for compliance or conformance issue exists (e.g., lack of an established procedure, training, or resources).

d. Root Cause Analysis. A root cause analysis is an analytical technique used to determine the basic underlying cause of a deviation from expected performance.

3. Responsibilities

a. E^2MS Core Team

(1) Review all POA&Ms (and potentially EAPs) stemming from Benchmark ECEs.

(2) Review EAPs and POA&Ms that cannot be resolved by the E^2MS Implementation Team.

(3) Review corrective actions from Internal ECEs that cannot be resolved by the E^2MS Implementation Team.

b. Chair, E^{2}MS Implementation Team

(1) Initiate problem solving efforts, including EAPs or POA&Ms.

(2) Assign an Action Officer(s) for each problem solving effort.

(3) Review corrective actions from Internal ECEs that cannot be resolved by the Lead Environmental Auditor and EMS Coordinator.

(4) Review progress of EAPs and POA&Ms, as necessary.

c. E^{2}MS Implementation Team and/or Program Managers

(1) Review compliance and conformance issues (i.e., ECE findings or NOVs) submitted for problem solving efforts.

(2) Before submittal to the E^{2}MS Core Team, review and approve or reject proposed EAPs or POA&Ms resulting from Benchmark ECEs. After review by the Lead Environmental Auditor and the EMS Coordinator, approve or reject proposed EAPs and POA&Ms resulting from Internal ECEs.

(3) Coordinate and implement recommended corrective and preventive actions with appropriate personnel.

(4) Track and report progress toward resolving issues addressed by EAPs or POA&Ms.

(5) Assist in the development and modification of environmental procedures, programs, and other documents, as necessary, to avoid repetition of problems.

(6) Recommend an Action Officer(s) for each EAP or POA&M, as directed by the Chair, E^{2}MS Implementation Team.

d. EMS Coordinator and Lead Environmental Auditor

(1) Review results from basewide Internal ECEs and EMS Audits (refer to Chapter 16, EMS Audit) and identify findings or management practices. Generate EAPs or POA&Ms for EMS nonconformance(s).

(2) Review EAPs and POA&Ms from Internal ECEs. Monitor progress towards resolving EAPs or POA&Ms. Oversee close-out and effectiveness of corrective and preventive actions contained in the EAP or POA&M.

e. Action Officer

(1) Complete information on EAP or POA&M, as directed.

(2) Notify affected personnel of the information contained in the EAP or POA&M that requires their coordination or action.

(3) Manage and track EAP & POA&M to completion. Notify Lead Environmental Auditor and/or EMS Coordinator on progress.

f. ECs and Practice Owners

(1) Provide input for problem solving efforts, as applicable.

(2) Implement practice control improvements.

4. Procedures

a. EAPs or POA&Ms are developed when a compliance or conformance related deviation(s) from expected performance is identified through structured mechanisms like internal inspections, compliance audits, or monitoring of EMS Objectives and Targets.

(1) Noncompliances are deviations from a law or regulatory requirement, whether it is a Federal, state, or USMC requirement. Noncompliances are identified from an external source, such as a regulatory agency during a site visit and/or inspection, internally by Base personnel or environmental staff, during an ECE, or as a result of emergencies.

(2) Nonconformances are deviations from EMS procedures, EMS element requirements, or non-regulatory requirements. Nonconformances can be discovered during activity-level Internal ECEs, basewide Internal ECEs, and/or Benchmark ECEs. A nonconformance may be programmatic (i.e., aggregation of several compliance findings with the same root cause) or documentation-based (i.e., EMS is missing required records, written procedure, or documentation).

b. Types of Problem Solving Efforts. Environmental problem solving efforts can occur in many ways. The Marine Corps have already specified certain processes for problem solving, such as:

(1) NOV tracking through Environmental Quality in Progress (EQUIP) or the most current online reporting method utilized by HQMC.

(2) POA&Ms associated with ECEs and EMS Audits, which shall be followed by MCBQ. These POA&Ms are tracked in WEBCASS. POA&Ms for compliance issues also include a traceable link to the affected practice and aspect (refer to Chapter 2, Practices, Aspects, Impacts, and Risk Prioritization) as well as a root cause used to identify a solution to prevent the issue from reoccurring. Each root cause is one of the 17 EMS elements.

(a) Findings and recommendations are entered into WEBCASS, which is also used to track and report Internal and External ECEs. To correct findings, a POA&M is created and appropriate personnel can create, review, and monitor progress towards correcting findings.

(b) POA&Ms are reviewed and validated in WEBCASS by HQMC, the E^2MS Implementation Team, Lead Environmental Auditor, and/or EMS Coordinator depending on the type of finding (e.g., Benchmark or Internal ECE). Once a finding has been corrected, the POA&M shall be "closed out" in WEBCASS.

(3) EAPs, shown in Table 4-1, are used to address environmental problems which are complex in nature or whose solution requires action from units outside of NREA Branch.

c. Using the EAP or POA&M in Problem Solving Efforts. The Chair, E^2MS Implementation Team assigns an Action Officer(s) to be the POC for each EAP or POA&M. The Action Officer is responsible for filling out the EAP or POA&M in order to:

(1) Identify the problem.

(2) Specify the nature of the problem (one time or recurring).

(3) Determine the cause(s) of the problem through a root cause analysis, if necessary.

(4) Consider possible solutions.

(5) Select a course of action:

(a) Corrective action for one-time issues or corrective action and preventive actions for recurring issues.

(b) Identify whether funding is needed for the corrective and preventive actions, and follow the Environmental Funding procedure contained in Chapter 5, Roles, Resources, and Responsibilities.

(6) Create measurable targets and dates for completing each target.

(7) Implement corrective/preventive actions.

(8) Monitor implementation of corrective/preventive actions until completed. The Action Officer may also complete a root cause analysis in the EAP or POA&M if the situation warrants it and/or their supervisor requests it. The root cause analysis is performed using the following steps:

(a) Gather data and identify the factors surrounding the nonconformance and/or noncompliance.

(b) Organize and analyze information to identify possible causes of the problem.

(c) Compare each potential cause with facts and information to verify whether it is a contributor to the nonconformance or potential nonconformance.

(d) Identify root causes (refer to WEBCASS for a listing of root causes).

d. Noncompliance

(1) Enforcement Actions identified by an external source. MCO P5090.2A, w/Ch3, Appendix C outlines the procedure for addressing enforcement actions (i.e., NOVs). NOVs are entered and tracked through EQUIP or the current HQMC-required online reporting tool. A Report of NOV/Notice of Noncompliance (RCS MC-5090-01) is submitted to CMC (LF).

(2) Possible noncompliance identified by an internal source

(a) Members of any of the E^2MS Teams may submit issues associated with noncompliance to the problem solving process. Action Officers complete the EAP or POA&M, and submit it to the Chair, E^2MS Implementation Team for review and consideration.

(b) The Chair, E^2MS Implementation Team leads the E^2MS Implementation Team members in evaluating information on the EAP or POA&M, deciding a course of action, and directing the execution of required corrective and/or preventive actions.

(c) The EMS Coordinator assists in monitoring the progress of the corrective/preventive actions until a resolution is reached, and maintains active EAPs or POA&Ms.

(d) The EMS Coordinator verifies the closeout and effectiveness of the corrective/preventive actions and reports results to the Chair, E2MS Implementation Team.

(e) The EMS Coordinator or designee retains closed EAPs or POA&Ms for a 3-year period, in accordance with the record control procedure in Chapter 15, Control of Records.

(3) Possible noncompliance identified in an ECE

(a) A possible noncompliance event may be identified during an activity-specific Internal ECE. This may represent an isolated point of noncompliance; however, the EMS Coordinator performs a trend analysis on all activity-specific Internal ECEs during the year. It may be that the isolated point of noncompliance is systemic at all activities aboard MCBQ, resulting in a programmatic finding for MCBQ’s basewide Internal ECE.

(b) The ECE program addresses regulatory compliance by using an inspection checklist called the TEAM Guide based off Federal and state environmental laws and USMC environmental regulations. Problem solving efforts associated with the ECE are managed through a separate POA&M process in accordance with MCO P5090.2A, w/Ch3, Paragraph 4208.

(4) Emergency Situations. All environmental accidents and emergencies are addressed through the Emergency Preparedness and Response procedure contained in Chapter 11, Emergency Preparedness and Response.

e. EMS Nonconformance

(1) Deficiencies noted in EMS Audits. Problem solving efforts associated with EMS Audits are managed through the EAP or POA&M process, as appropriate. All audit deficiencies are handled in accordance with the EMS Audit and review procedure in Chapter 16, EMS Audit.

(2) Nonconformance noted in EMS Reviews

(a) The EMS nonconformance identified in EMS reviews is highlighted in the report associated with the EMS review, and forwarded to the EMS Coordinator for consideration.

(b) The E^2MS Implementation Team Chairperson may assign an Action Officer to generate an EAP or POA&M, as appropriate, for any applicable finding of EMS nonconformance or potential nonconformance.

(c) The results of the EMS review and any associated EAPs or POA&Ms are forwarded together to the E^2MS Implementation Team for consideration and approval.

f. Periodically, the E^2MS Implementation Team and EMS Coordinator may modify and/or create environmental procedures, programs, and other documents as necessary, to avoid repeated noncompliance or nonconformance, based on root cause analyses, or trends seen through problem-solving efforts.

5. References and Related EMS Documents

a. ISO 14001:2004, Element 4.5.3

b. MCO P5090.2A, w/Ch3, Element 14

c. MCBO 5090.2D

d. MCBQ ECPSOP

CHAPTER 15

Control of Records

1. Purpose and Applicability

a. This chapter defines procedures that MCBQ follows with respect to inventory and control of environmental records. This includes creation, retention, storage, revision, version control, disposal, or permanent archiving, as applicable.

b. This chapter is designed to meet the requirements of MCO P5090.2A, w/Ch3, Element 15.

2. Definitions

a. Environmental Records. Environmental records is information, stored on paper, electronic, or other media that states results achieved or provides evidence of activities performed. Records are not subject to change and, once created, cannot be modified. Examples of records include:

(1) E^2MS Team meeting minutes.

(2) Management Review meeting minutes.

(3) Historical HQMC Conformance Reports.

(4) Environmental training data.

(5) Obsolete MCP and ECPSOP Chapters, Base Orders or base directives, or versions of media management plans.

(6) Benchmark and Internal ECE results.

(7) Historical POA&Ms and EAPs to resolve ECE findings.

(8) Media-specific monitoring records (e.g., calibration reports, spill reports, fuel usage reports, waste disposal records).

b. EM Portal. The EM Portal is a SharePoint site that is managed by HQMC where electronic records may be stored. Access is limited to Program Managers and the EMS Coordinator.

3. Responsibilities

a. E^2MS Implementation Team and/or Program Manager

(1) Identify records that pertain to environmental programs and practices.

(2) Maintain a list of records in ECPSOP Chapter and turnover folder. Include in the turnover folder, where the record is maintained.

(3) Protect all applicable records from alteration or damage.

(4) Ensure appropriate disposal or archiving of documents that have been superseded and of records that have exceeded their required retention periods.

b. EMS Coordinator

(1) Review ECPSOP Chapters, turnover folders, and Environmental Programs Document Status Form to ensure accurate inventory of records.

(2) Conduct an annual review of records on conjunction with activity-specific or basewide Internal ECE. Refer to Chapter 13, Evaluation of Compliance and Chapter 15, EMS Audit.

(3) Ensure that EMS records are accessible to appropriate personnel for use in management and maintenance of practices and environmental programs aboard MCBQ.

c. Activity ECs maintain records pertaining to activity-specific information (e.g,. PAI Inventories, training certificates, ECE results) in their turnover folders.

4. Procedures

a. Using the MCBQ ECPSOP, turnover folders, media-specific management plans, and Environmental Programs Document Status Form, the EMS Coordinator conducts data calls to the E^2MS Implementation Team and/or Program Managers to identify environmental records, record type (e.g., paper or electronic), and location. This information is verified during Internal ECEs.

b. If a new operation or practice is present that causes alteration of existing conditions, the E^2MS Implementation Team and/or Program Managers and EMS Coordinator conduct data calls to identify new records and verify ownership of records.

c. Information to be collected on records may include:

(1) Record Title.

(2) Record Creator/Owner.

(3) Date Created or Dates Covered by Record.

(4) Retention Location.

(5) Retention Time.

(6) Regulatory Driver, if applicable.

d. E^2MS Implementation Team and/or Program Managers review their ECPSOP Chapters, turnover folders, and media-specific management plans on an annual basis and update the record requirements as needed.

e. Guidance on the disposal and/or archiving of records is conducted in accordance with references listed in the MCO P5090.2A w/Ch3 as well as specific Federal or state guidance.

3. References and Related EMS Documents

a. ISO 14001:2004, Element 4.5.4

b. MCO P5090.2A, w/Ch3, Element 15

c. MCBO 5090.2D

d. MCBQ ECPSOP

e. MCBQ IAP

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CHAPTER 16

EMS Audit

1. Purpose and Applicability

a. This chapter describes how MCBQ conducts EMS Audits to ensure conformance with MCO P5090.2A w/Ch3. EMS Audits are conducted at least once a year and triennially, in conjunction with Internal ECEs and Benchmark ECEs, respectively.

b. This chapter applies to all MCBQ personnel and contractors involved in EMS Audits.

c. This chapter is designed to meet the requirements of MCO P5090.2A, w/Ch3, Element 16.

2. Definitions

a. Conformance Summary. A conformance summary is a formal transmittal to HQMC that includes the following:

(1) A summary of MCBQ's EMS conformance, by element.

(2) A copy of meeting minutes from the most recent Management Review.

(3) A copy of each EMS Auditor's EMS Lead Auditor Training certificate.

(4) A cover letter that is signed by the Base Commander and states if MCBQ is in conformance with USMC EMS standards.

b. EMS Audit. An EMS Audit is a systematic and documented verification process that objectively obtains and evaluates evidence to determine whether an installation's EMS conforms to the USMC EMS standards and is effectively implemented.

c. Major Nonconformance. A major nonconformance is a systemic weakness within the EMS that indicates the EMS is either failing or close to failure, or an issue that could lead to increased risk to mission. Refer to MCO P5090.2A, w/Ch3, Paragraph 2104.11 for examples of a major nonconformance.

d. Minor Nonconformance. A minor nonconformance is an isolated EMS shortcoming that should not, by itself, cause the EMS to fail or cause an increase in risk to mission. Refer to MCO P5090.2A, w/Ch3, Paragraph 2104.12 for examples of a minor nonconformance.

e. TEAM Guide. Refer to Chapter 13, Evaluation of Compliance.

3. Responsibilities

a. E^2MS Core Team

(1) Review results, POA&Ms, and EAPs from EMS Audits.

(2) Approve and sign USMC Annual EMS Conformance Report, in accordance with MCO P5090.2A, w/Ch3, Paragraph 2216.4.

b. The Chair, E^2MS Implementation Team approves corrective actions for EMS Audit findings and provides direction and support for corrective actions that require “higher-level” endorsement.

c. In conjunction with the EMS Coordinator, the E^2MS Implementation Team develops corrective actions for EMS Audit findings, tracks corrective action progress, and provides additional support as needed.

d. EMS Coordinator

(1) Coordinate and perform Internal EMS Audits (as part of Internal ECE schedule).

(2) Determine audit scope with assistance from the Lead Environmental Auditor.

(3) Enter EMS findings into WEBCASS.

(4) With support from the E2MS Implementation Team and/or Program Managers, create corrective actions (i.e., POA&Ms and/or EAPs) for findings identified during EMS Audits and enter them into WEBCASS.

(5) Brief EMS Audit findings (and corrective actions), if part of Internal ECEs, to E^2MS Core Team.

(6) Track corrective actions for EMS Audit findings.

(7) Prepare and submit USMC Annual EMS Conformance Report, in accordance with MCO P5090.2A, w/Ch3, Paragraph 2216.4.

4. Procedures

a. EMS Audits

(1) MCO P5090.2A, w/Ch3 requires MCBQ to conduct an annual audit that gauges performance against USMC EMS standards. MCBQ is not required to conduct an Internal EMS Audit in the years it conducts a Benchmark ECE.

(2) The Internal EMS Audit is conducted as part of MCBQ’s Internal ECE Program. For these audits, the EMS Coordinator performs

as the Lead EMS Auditor and is supported by the E^{2}MS Implementation Team and the Lead Environmental Auditor.

(a) Results from the basewide Internal ECE are evaluated against the 17 EMS Elements. Trends for programmatic or systemic deficiencies are identified. These results are the basis for the Internal EMS Audit and identify if there are minor or major conformance issues.

(b) These results are briefed to the E^{2}MS Core Team during a Management Review (refer to Chapter 17, Management Review). Suggested corrective actions are also briefed to the E^{2}MS Core Team. The E^{2}MS Core Team either approves or denies a corrective action. Once approved, corrective actions are executed by the E^{2}MS Implementation Team.

(c) Following the completing of the Internal EMS Audit, and prior to 30 September, the EMS Coordinator reports to HQMC the requirements outlined in MCO P5090.2A, w/Ch3, Paragraph 2216.4. Refer to Chapter 13, Evaluation of Conformance for more information on MCBQ's internal ECE.

(3) External EMS Audits are conducted as part of HQMC's Benchmark ECE Program. For these audits, a representative from HQMC performs as the Lead EMS Auditor. Refer to MCO P5090.2A, w/Ch3, Chapter 4 for more information on the HQMC's ECE Program. The results of these audits are also briefed during Management Reviews (refer to Chapter 17, Management Review).

(4) The training requirements for USMC EMS Lead Auditors is described in MCO P5090.2A, w/Ch3, Paragraph 2206.4.

(5) Corrective actions are distributed by the EMS Coordinator to pertinent staff. This includes explicit responsibilities or steps needed to correct the finding. (i.e., targets, milestones, or EPIs). Corrective actions are conducted in accordance with Chapter 14, Problem Solving.

(6) Progress on corrective actions is tracked by the EMS Coordinator reported to the E^{2}MS Implementation Team. The EMS Coordinator briefs the E^{2}MS Core Team on the corrective action status at least annually. Refer to Chapter 17, Management Review for more information.

(7) Document and record control of EMS Audits is conducted in accordance with Chapter 9, Control of Documents and Chapter 15, Control of Records.

(8) All internal and external EMS audits are for agency internal guidance purposes only and are not to be released to the public or regulatory authorities unless required by law or court order.

b. EMS Reviews

(1) EMS reviews constitute a continual, informal look at MCBQ's EMS conformance outside of EMS Audits. Members of the E2MS Teams, EMS Coordinator, or Lead Environmental Auditor conduct these reviews. They may be triggered by root cause analysis results, new or modified practices, negative or positive trends, emergencies, stakeholder concerns, public complaints, negative compliance inspection results, regularly scheduled EMS updates, and any other action that results in a specific part of the EMS to be closely examined.

(2) The EMS Coordinator determines the scope of the EMS review with assistance from members of the E^2MS and/or the Lead Environmental Auditor. If necessary, the EMS Coordinator notifies Activity ECs and/or practice owner of the EMS Review. Input is requested if needed.

(3) The assessment tool to be used for EMS reviews is determined at the time of the review by the EMS Coordinator. The basis for selection of the tool is the scope of the EMS review and the reason for the review.

(4) Results of the EMS Review are reported to the appropriate E^2MS Team and are also be communicated to Activity ECs and/or practice owners that may be affected or could influence future results.

(5) Document control for EMS Reviews follows the process presented in Chapter 9, Control of Documents.

(6) Corrective actions (i.e., POA&Ms and/or EAPs) that may result from EMS Reviews are conducted in accordance with Chapter 14, Problem Solving.

(7) The results of EMS Reviews may be briefed at Management Reviews at the discretion of the E^2MS Implementation Team and EMS Coordinator. Refer to Chapter 17, Management Review for more information on Management Reviews.

5. References and Related EMS Documents

a. ISO 14001:2004, Element 4.5.5

b. MCO P5090.2A, w/Ch3, Element 16

c. MCBO 5090.2D

d. MCBQ ECPSOP

e. MCBQ IAP

CHAPTER 17

Management Review

1. Purpose and Applicability

a. This chapter describes how MCBQ incorporates Management Review procedures to promote continual improvement of the Base's EMS over time.

b. Management Review involves the E^2MS Core Team and ensures that the suitability, adequacy, and effectiveness of the Base's EMS is appropriately related to the Base's current mission, MCBQ's Environmental Policy, and Objectives and Targets. For a list of information that should be included in each Management Review, refer to MCO P5090.2A, w/Ch3, Paragraph 2217.2.

c. This chapter is designed to meet the requirements of MCO P5090.2A, w/Ch3, Element 17.

2. Definitions

a. E^2MS Team. The E^2MS Team consists of a group of MCBQ personnel assigned to a working committee with specific responsibilities related to the implementation and operation of the Base's EMS. The two E^2MS Teams at MCBQ are the E^2MS Core Team and the E^2MS Implementation Team. Refer to Chapter 5, Roles, Resources, and Responsibilities for more information.

b. EMS Coordinator. The EMS Coordinator is a person in the NREA Branch who is the single POC for EMS matters. The EMS Coordinator is appointed by the Base Commander to implement MCBQ's EMS.

c. Management Review. A Management Review is a top-level review of MCBQ's EMS that is conducted to determine continued suitability, adequacy, and effectiveness of the EMS.

3. Responsibilities

a. E^2MS Core Team

(1) Attend biannual Management Reviews.

(2) Ensure that MCBQ's EMS is suitable to the current mission and that the EMS is effective in achieving the Environmental Policy.

(3) Review and update Environmental Policy if there is a change in mission or policy direction.

(4) Ensure that EAPs and Objectives and Targets are consistent with the Environmental Policy.

(5) Provide guidance to E^{2}MS Implementation Team and EMS Coordinator on completing EAPs and Objectives and Targets.

(6) Review results of Benchmark ECEs and compliance inspections performed by regulatory agencies.

b. EMS Coordinator

(1) Schedule biannual Management Reviews.

(2) Outline topics for Management Review.

(3) Assist in providing and/or briefing any appropriate EMS material during Management Review.

(4) Maintain documentation associated with Management Reviews.

4. Procedure for Conducting Management Reviews

a. EMS Management Reviews occur twice per year in order to assess EMS implementation. Management Reviews may be requested at other appropriate times as identified by the EMS Coordinator.

(1) The first Management Review is conducted as a review of the previous year's EMS implementation.

(2) The second Management Review is conducted as a mid-year review of EMS implementation, a status review of EAPs and Objectives and Targets, and a review of any upcoming events or other concerns.

b. In conducting Management Reviews, the EMS Coordinator establishes an outline for the brief/meeting, including any input from the Chair, E^{2}MS Core Team. The agenda highlights, at a minimum, the purpose of the Management Review, provides information and material to be reviewed, and highlights any decisions that need to be made.

c. Once the EMS Coordinator has created the initial outline, it is presented to the E^{2}MS Core Team for review and input. At this point, the E^{2}MS Core Team assesses the suitability, adequacy, and effectiveness of the Base's EMS. Recommendations for EMS improvement are encouraged during Management Review meetings. Improvements may be aimed at revising the Environmental Policy (as shown in Figure 2-1), changing procedures and/or projects to support current Objectives and Targets/EAPs, creating new objectives and targets/EAPs, or clarifying EMS roles and responsibilities.

d. Management Review Topics

(1) The E^{2}MS Core Team analyzes EMS implementation efforts by reviewing progress of EAPs and objectives and targets as well as their status towards meeting Base Objectives and Targets and consistency with the Environmental Policy.

(2) The E^{2}MS Core Team reviews significant practices to ensure that those with the highest risk to mission are being prioritized.

(3) In the case of EMS Audits and reviews, the E^{2}MS Core Team evaluates the results to determine progress towards correcting identified nonconformities to ensure the Base's effectiveness in achieving the Environmental Policy, the Base's Objectives and Targets/EAPs, and applicable USMC EMS requirements, as appropriate.

(4) Requests for senior management to continue to support continual improvement of environmental performance.

e. Management Reviews are documented by the EMS Coordinator. The initial outline may include the following sections:

(1) Implementation Status. Schedule, progress achieved since last Management Review, progress yet to be achieved (e.g., milestones, task, responsibility, sorted by "outstanding," "on track," "short term," "long term").

(2) Operations Status. Schedule, progress achieved since last Management Review (including MCP updates, Objectives, Targets, EAPs, ECE POA&M status, Problem Solving efforts), and progress yet to be achieved.

(3) EMS Audits and/or EMS reviews

(4) Decision/Action Items. May list areas where there are problems/concerns, recommendations, or where management support or guidance is requested.

f. Management Review documentation includes both the initial outline and a final document which records any evaluative comments or guidance on future actions from senior leadership. The final document should clearly illustrate the outline topics; comments, discussion, guidance, and decisions on the outline topics; and a summary of action items to include task, responsibility, and timeline/due date as well as who participated in the Management Review. Management reviews are posted to the EM Portal.

g. The E^{2}MS Implementation Team incorporates any changes to the EMS, as requested, by the Management Review.

5. References and Related EMS Documents

a. ISO 14001:2004, Element 4.6

b. MCO P5090.2A, w/Ch3, Element 17

c. MCBO 5090.2D

d. MCBQ ECPSOP

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Appendix A
Marine Corps EMS Policy

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DEPARTMENT OF THE NAVY
HEADQUARTERS UNITED STATES MARINE CORPS
2 NAVY ANNEX
WASHINGTON, DC 20380-1775

IN REPLY REFER TO:
5090
L/S-040101
MAR 0 3 2004

From: Commandant of the Marine Corps

Subj: MARINE CORPS ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)

Ref: (a) Executive Order 13148 "Greening the Government Through Leadership in Environmental Management" of 21 Apr 00
(b) DoD Environmental Management System (EMS) Policy of 5 Apr 02
(c) MCO P5090.2A of 10 Jul 98

Encl: (1) The Marine Corps Environmental Management System (EMS) & Marine Corps EMS Policy

1. The Marine Corps has made significant strides in achieving and maintaining environmental compliance at our active installations and reserve centers. To continue improving on that outstanding record of success and to meet the growing challenge of encroachment, the Marine Corps is enhancing and formalizing its Environmental Management System (EMS). The Marine Corps EMS provides a systematic approach to integrating environmental considerations into mission decisions and operations, while continuing to improve upon our environmental compliance posture. We are doing this by institutionalizing processes for continual environmental improvement and reducing risks to mission through effective and continual planning, review, and preventive and corrective actions. This will allow us to sustain and ultimately enhance mission readiness and access to training areas.

2. The Marine Corps EMS directly supports the requirements of references (a) and (b) by integrating environmental considerations and accountability into day-to-day decision-making and long-term planning processes across all missions, activities, and functions. The Marine Corps EMS and related policy on applicability, implementation criteria, and reporting requirements are defined in the enclosure, and will be incorporated into the next revision of reference (c). All addressees are directed to implement the requirements of the enclosure.

Subj: MARINE CORPS ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)

3. The Headquarters Marine Corps (LFL) point of contact is Mr. James Wozniak, 703-695-8302, (x3335), DSN 225-8302, wozniakjm@hqmc.usmc.mil.

RICHARD L. KELLY
DEPUTY COMMANDANT
INSTALLATIONS AND LOGISTICS

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2

The Marine Corps Environmental Management System (EMS)
&
Marine Corps EMS Policy

1. Overview:

Executive Order (EO) 13148 "Greening the Government Through Leadership in Environmental Management" requires an Environmental Management System (EMS) to be implemented at all applicable federal facilities by 31 December 2005. Consistent with that EO and subsequent, related Department of Defense (DoD) EMS policy, this document defines the Marine Corps EMS and related Marine Corps policy on applicability, implementation criteria and metrics, and reporting requirements.

2. The Marine Corps Environmental Management System (EMS):

The Marine Corps EMS is a framework of five interrelated components. This framework is consistent with those used by other military services and federal agencies, and with ISO 14001, an international standard for EMS. Together, the components emphasize continual improvement through effective policy, planning, implementation, checking and preventive/ corrective action, and management review. These components are explained below.

a. Policy: A public commitment by senior leadership that, at a minimum, expresses commitment to environmental compliance, pollution prevention, and continual improvement of the installation's environmental performance.

b. Planning: The integration of environmental considerations into mission operations through: identification of mission-supporting practices and the aspects of those practices that have the potential to impact the environment; analysis and prioritization of risks to mission posed by those practices and aspects; development of objectives and targets (goals and metrics) for minimizing the risks to mission posed by those practices and aspects; and identification of resources and timelines for achieving those objectives and targets.

c. Implementation: The development and documentation of roles and responsibilities for controlling practices and managing environmental resources to sustain and enhance the installation's mission and mission-supporting capabilities.

d. Checking and Preventive/Corrective Action: The establishment of procedures for self-evaluation and preventive

and corrective action of the EMS, environmental media programs, practice controls, and resource management.

e. Management Review: A senior leadership review of the EMS followed up by changes, as appropriate.

3. Applicability:

The Marine Corps EMS directly supports the EO13148 and DoD EMS requirements by integrating environmental considerations and accountability into day-to-day decision-making and long-term planning processes across all missions, activities, and functions. Thus, it is Marine Corps policy that:

a. Each active installation will implement the Marine Corps EMS covering all installation commands, to include Department of Defense tenant organizations, that have activities and functions potentially impacting the environment;

b. Marine Forces Reserve (MARFORRES) will implement a programmatic, organizational EMS for all Marine Corps Reserve Centers (MCRCs); and

c. All Marine Corps commands, both active and reserve, that are tenants will participate in their host facility's EMS.

Therefore all commands and tenant organizations operating on Marine Corps installations or other host facilities are stakeholders in their installation or host facility EMS. As such, they must exercise their authorities for preventing and controlling the potential environmental impacts inherent in their operations, and in so doing, continually improve their environmental performance.

4. Implementation Criteria:

To successfully meet the EMS requirements of EO13148 and DoD policy, all installations and MARFORRES are required by 31 December 2005 to:

a. Develop an EMS implementation plan that includes defined milestones and identifies resources and organizational responsibilities for implementing an EMS consistent with this letter;

b. Publish a signed environmental policy document consistent with paragraph 2.a. above;

c. Establish an EMS team;

d. Perform awareness-level and other appropriate, stakeholder-specific EMS training;

e. Publish procedures for conducting internal EMS self-assessments and management reviews;

f. Publish an EMS Manual that for mission-supporting practices and aspects of those practices that have the potential to impact the environment includes, at a minimum:

1) an inventory of those practices and aspects prioritized based on risk to mission;

2) objectives and targets (goals and metrics) for minimizing risk to mission; and

3) management review procedures;

g. Publish a plan of action and milestones to mitigate risks to mission from mission-supporting practices and the aspects of those practices that have the potential to impact the environment and begin mitigation actions; and

h. Complete and document at least one internal EMS self-assessment and one management review conducted in accordance with the installation's EMS procedures.

5. **Reporting:**

Installations and MARFORRES shall report on their EMS implementation progress by posting the above-required documents and supporting documentation, as applicable, as actions are accomplished. Reporting shall be posted to the EMS section of the Headquarters U.S. Marine Corps Environmental Applications Portal (HEAP), https://usmcportal.phe.com.

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2 NAVY ANNEX
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IN REPLY REFER TO:
5090
L/S-041201
DEC 2 9 2004

From: Commandant of the Marine Corps

Subj: MARINE CORPS ENVIRONMENTAL MANAGEMENT SYSTEM (EMS) CONFORMANCE AND SELF-DECLARATION

Ref: (a) Marine Corps Environmental Management System (EMS) Policy of 3 Mar 04
(b) Executive Order 13148 "Greening the Government Through Leadership in Environmental Management" of 21 Apr 00
(c) DoD Environmental Management System (EMS) Policy of 5 Apr 02
(d) DoD Environmental Management System (EMS) Self-Declaration Policy of 16 Jul 04
(e) MCO P5090.2A of 10 Jul 98

Encl: (1) Marine Corps Environmental Management System (EMS) Conformance Guide

1. Established by reference (a), the Marine Corps EMS directly supports the requirements of references (b) and (c) to implement an EMS by 31 December 2005 that integrates environmental considerations and accountability into day-to-day decision-making and long-term planning processes across all missions, activities, and functions. This letter reiterates that EMS implementation requirement, and also supports the reference (d) requirement and protocol for DoD Components to establish policy on procedures for evaluating, certifying and self-declaring, and reporting full conformance with their respective EMS's. In doing so, this letter establishes as Marine Corps policy that:

a. All active Marine Corps installations and MARFORRES will fully conform with the Marine Corps (EMS) by 31 December 2007;

b. All Marine Corps commands, both active and reserve, that are tenants will fully support their host facility in attaining and maintaining conformance with their EMS;

c. The enclosed Marine Corps EMS Conformance Guide will be used for evaluating, certifying, self-declaring, and reporting conformance with the Marine Corps EMS; and

Subj: MARINE CORPS ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)

d. The Marine Corps Environmental Compliance Evaluation (ECE) Program (established via reference (e)) will be expanded starting in 2005 to include EMS conformance evaluations as noted and described in the enclosure.

2. The Headquarters Marine Corps (LFL) point of contact is Mr. James Wozniak, 703-695-8302, (x3335), DSN 225-8302, wozniakjm@hqmc.usmc.mil.

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By direction

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Appendix B
EC Roles and Responsibilities

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EC Roles and Responsibilities

1. Environmental Coordinators (ECs) must act as the activity's official liaison with NREA Branch on environmental matters, including mandatory NREA Branch meeting attendance, required reports to NREA Branch, and relaying environmental compliance matters from NREA Branch to the activity. The following roles and responsibilities (by Element) are required of all appointed ECs.

2. These requirements are further specified in:

    a. MCO 5090.2A (w/Ch.3)

    b. MCBQ, MCBO 5090.2D

    c. MCBQ, ECPSOP and all associated, stand-alone program plans

    d. MCBQ, MCP

Environmental Policy

ECs ensure that the current Environmental Policy is available (i.e., posted at organization work centers) to staff belonging to their activity. They also ensure that activity staff are familiar with the Environmental Policy and how it relates to their job function.

Practices, Aspects, Impacts, and Risk Prioritization

1. PAI Inventory

    a. Assist with developing activity-level PAI Inventories.

    b. Identify specific locations and practices for each activity.

    c. Update and validate activity-level PAI Inventories when practices are altered, discontinued, or added; and communicate changes to the EMS Coordinator.

    d. Review activity-level PAI Inventories for accuracy.

    e. Ensure practice owners are aware of practices they are associated with.

2. Risk Prioritization

    a. Review activity-specific risk prioritization, be aware of significant practices, and communicate general awareness to practice owners.

b. Identify and forward information that may affect risk prioritization to the EMS Coordinator.

c. In general, site visits consist of a physical walk-through of each activity accompanied by the site's EC and/or other relevant personnel who answer questions pertaining to onsite practices.

Legal and Other Environmental Requirements

1 Ensure that practice owners are aware of, and are following, the environmental requirements for their activity's practices.

2. Ensure that contractors under the control of the activity perform significant practices in accordance with approved ESOPs.

Objectives, Targets, and Actions to Improve Performance

1. ECs must be aware of base wide Objectives and Targets (refer to Environmental Policy) and ensure their activity's practices are implemented in a manner that supports meeting MCBQ's Objectives and Targets.

2. The approved basewide Objectives and Targets are communicated to appropriate Base employees through activity ECs.

Roles, Responsibilities, and Resources

1. Assist in identifying activity practices that may have an impact on the environment (i.e., participate in PAI Inventories). ECs will coordinate with NREA Branch personnel for meetings and facilitate access to all applicable spaces as needed for PAI Inventories, environmental training, and environmental inspections.

2. Report any perceived or known environmental concerns to appropriate NREA Branch personnel.

3. Maintain a general awareness of environmental regulations as applicable, and communicate Base environmental initiatives, policies, and procedures to activity personnel.

4. Ensure practice owners and workers receive training in accordance with the Base CETEP.

5. Participate in NREA Branch EC training and meetings, and assist NREA Branch in environmental data collection, and the facilitation and tracking of corrective actions (i.e., POA&Ms and EAPs).

6. Maintain a turnover folder and provide adequate notification to activity heads, ensuring alternate personnel are successfully transitioned when required.

Competence, Training, and Awareness

1. Complete TNA for responsible activity.

2. Identify and coordinate EMS training.

3. Ensure practice owners participate in applicable training and communicate training to organization personnel, as required.

4. Maintain copies of Practice Owner(s) and worker training certificates in the EC Turnover binder.

5. ECs are responsible for training and dissemination to their Practice Owners and retaining records documenting that Practice Owners are familiar with and understand the contents of the ESOP. ECs choose the best method for dissemination of information. This is maintained as a record in the EC's turnover folder.

Communication

1. Communicate and document environmental information related to their practices.

2. The approved basewide Objectives and Targets must be communicated to appropriate Base employees through ECs.

3. Notify Practice Owners/workers when a new process is implemented that may impact the environment or there is a change or alteration to the practices currently performed.

EMS Documentation

1. Maintain copies of EMS documentation in turnover folders.

2. Provide copies of EMS documentation to Practice Owners.

3. Provide EMS documentation awareness to Practice Owners.

Control of Documentation

1. Ensure EC Turnover binder contents and guidance documents (e.g., ESOPs, copies of environmental plans as applicable, etc.) are current.

2. Ensure Practice owners/workers are familiar with applicable current environmental documents and familiar with where the most current version may be found (e.g., Sharepoint).

3. After revisions, ESOPs are disseminated to ECs by the EMS Coordinator. ECs disseminate and train their Practice Owners and Workers on their ESOPs and document that training has occurred. ECs ensure their Practice Owners maintain current copies of ESOPs in their work center(s). The EC may choose to print paper copies of ESOPs (for

those without computer or SharePoint access) or show their Practice Owners where ESOPs may be downloaded from the MCBQ SharePoint site.

Operational Control of Practices

1. Provide input during ESOP development, as required.

2. Ensure that ESOPs are disseminated to all appropriate personnel, personnel (including contractors and suppliers, as necessary) receive training, and implemented and maintained in appropriate work centers. If requested, participate in the review of ESOPs.

3. Provide recommendations to the EMS Coordinator for suggested ESOP revisions should ESOPs provide incorrect information.

4. ECs retain records showing the Practice Owners have been trained on the contents of each ESOP.

Emergency Preparedness and Response

1. Be aware of emergency preparedness and response instructions included in the ISMP and applicable ESOPs. ECs provide general awareness training to workers within their organization.

2. Assist in the coordination and participation of emergency response drills, as applicable.

Monitoring and Measurement. Assist the E2MS Implementation Team and/or Program Managers in monitoring and measuring tasks that apply to their unit's practices.

Evaluation of Compliance. ECs must participate in activity-specific Internal ECEs as directed by E2MS Teams and the Lead Environmental Auditor. ECs also program POA&Ms that result from findings at their activity. Refer to Chapter 14 of the MCP, Problem Solving, for further guidance.

Problem Solving

1. Provide input for problem solving efforts, as applicable.

2. Implement practice control improvements.

Control of Records

1. Review ECPSOP Chapters, turnover folders, and Environmental Programs Document Status Form to ensure an accurate inventory of records is maintained.

2. Conduct an annual review of records on conjunction with activity-specific or basewide Internal ECE. Refer to Chapter 13 of the MCBQ MCP, Evaluation of Compliance and Chapter 15, EMS Audit.

3. Ensure that EMS records are accessible to appropriate personnel for use in management and maintenance of practices and environmental programs aboard MCBQ.

EMS Audit. ECs are responsible for preparing for EMS Audits, briefing and debriefing staff both up and down the chain of command. ECs are also responsible for preparing and coordinating any Plans of Action and Milestones (POA&M) to correct any findings.

Management Review. Brief staff, both up and down the chain of command, accordingly with meeting minutes, provided by EMS Coordinator.