

#### UNITED STATES MARINE CORPS

MARINE CORPS INSTALLATIONS EAST-MARINE CORPS BASE
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MCIEAST-MCB CAMLEJO 5090.2B G-F/BEMD

### 1 2 MAY 2025

MARINE CORPS INSTALLATIONS EAST-MARINE CORPS BASE CAMP LEJEUNE ORDER 5090.2B

From: Commander

To: Distribution List

Subj: CAMP LEJEUNE ENVIRONMENTAL MANAGEMENT SYSTEM IMPLEMENTATION

Ref: (a) MCO 5090.2

(b) U.S. TEAM Guide

Encl: (1) Marine Corps Installations East-Marine Corps Base Camp Lejeune Environmental Management System Manual (EMS Manual) for Marine Corps Base Camp Lejeune

#### 1. Situation

- a. Per reference (a), an Environmental Management System (EMS) is a systematic approach of integrating environmental considerations into day-to-day operations to minimize operational and mission impact. Five major components of an EMS are effective policy, planning, implementation, auditing with appropriate preventative/corrective action, and management review. The overarching goal of the program is to promote continuous improvement by routinely evaluating daily operations and their potential environmental impacts. EMS requirements of reference (a) apply to all active duty Installations. As required by United States Marine Corps (USMC) EMS criteria, Marine Corps Base Camp Lejeune (MCB CAMLEJ) EMS Manual (enclosure 2) has been developed.
- b. Evaluation of the potential impacts of daily operations will be effectively done through a multi-disciplinary core Working Group (WG). The WG identifies Practices (P) that have environmental Aspects (A) and impacts (I), rank the P/A/Is based on risk criteria defined in the reference, and develop, implement, and monitor related objectives, targets, and Plans of Actions & Milestones (POA&Ms). The WG meets semi-annually to review progress towards achieving the established objectives and targets. MCB CAMLEJ contracted consultants verified each practice, environmental aspect, and impact, producing the foundation of the P/A/I inspections during Environmental Compliance Evaluations.
- c. Management review is an ongoing process by which senior management periodically reviews the EMS to ensure its continuing suitability, adequacy, and effectiveness. Management review promotes environmental awareness and accountability and supports the commitment

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of resources for continual improvement. The Management Review Board considers potential changes to the EMS based on emerging requirements, organizational changes, and a review of environmental performance. Items reviewed during the environmental performance review include progress in meeting objectives and targets, identified high risk PAIs, identified noncompliance and nonconformance, the status of corrective actions, and regulatory inspections. Results of the management review are forwarded to the Installation Commander for concurrence and distribution to Installation leadership.

- 2. Cancellation. MCIEAST-MCB CAMLEJO 5090.2A.
- 3. <u>Mission</u>. This Order formalizes the EMS aboard MCB CAMLEJ and appoints personnel to the EMS WGs and the Management Review Board in order to ensure comprehensive participation and command emphasis on EMS objectives and goals.

#### 4. Execution

- a. Commander's Intent and Concept of Operations
- (1) <u>Commander's Intent</u>. The purpose of the MCB CAMLEJ EMS is to enable Installation, command, unit, and tenant personnel to minimize environmental risks to mission, achieve and maintain environmental compliance and protection, and sustain resources essential to combat training and readiness.

#### (2) Concept of Operations

- (a) In accordance with reference (a), the following program will be chaired by the EMD Deputy Director and has the primary responsibility for implementation and maintenance of the EMS:
  - 1. Environmental Management System Manager
  - 2. Air Quality Air Program Manager
  - 3. Conservation Conservation Branch Head
- $\underline{\underline{4}}\,.\quad \text{Hazardous Waste/Hazardous Materials } \text{Hazardous}$  Waste/Hazardous Material Program Manager
  - 5. Solid Waste Solid Waste Program Manager
  - 6. Water Quality Water Quality Program Manager
- (b) The core WG chair will invite additional working group members when the agenda requires input from their respective organization.

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- (c) Additional Working Group members:
  - (1) Environmental Subject Matter Experts
- $(\underline{2})$  Environmental Compliance Officers (from the following):
  - (a) II Marine Expeditionary Force
  - (b) 2D Marine Division
  - (c) 2D Marine Corps Logistics Group
  - $(\underline{d})$  U.S. Marine Special Forces, Special Operations

Command

- (e) MCB-CAMLEJ Installation
- (3) Representative. Environmental Affairs Department, Marine Corps Air Station, New River.

#### b. Tasks

- (1) The Management Review Board is established per reference (a), and shall conduct an annual review of EMS performance and present a summary of major issues to the Installation Commander for comments/recommendations and concurrence. The Management Review Board includes:
- (a) Assistant Chief of Staff (AC/S) and/or Deputy, G-F, MCIEAST-MCB CAMLEJ.
- (b) Director, Environmental Management Division (EMD), MCIEAST-MCB CAMLEJ.
- (2) <u>Director, EMD, G-F</u>. By direction of the Commanding General, the Director, EMD, G-F will designate the EMS Manager, who will administer the EMS audit and provide data for additional reviews.
- 5. Administration and Logistics. Annually, each Installation command, unit, and tenant organization will ensure that a copy of the current Commanding General's Environmental Policy is posted on Official Bulletin Boards. The Commanding General's Environmental Policy Statement is located at: https://www.lejeune.marines.mil/Portals/27/Documents/EMD/Environmental Management\_and\_Conservation\_Policy.pdf. Within six months of a Commanding Officer assuming command, they must attend EM-100 for awareness.

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### 6. Command and Signal

- a. <u>Command</u>. This Order is applicable to MCB CAMLEJ, all tenant commands, contractors, and staff sections.
  - b. Signal. This Order is effective the date signed.

B. PACE Acting

DISTRIBUTION: A/C (plus NMCCCL, MCAS NR, H&S Bn, and WTBn)

Marine Corps Installations East-Marine Corps
Base Camp Lejeune Environmental Management
System Manual (EMS Manual) for Marine Corps
Base Camp Lejeune



Version Date: 2024

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#### Introduction

### 1. Purpose and Background

- a. This Environmental Management System (EMS) Manual describes, in general terms, how Marine Corps Installations East-Marine Corps Base Camp Lejeune (MCIEAST MCB CAMLEJ) implements the 17 elements that are required of a conforming EMS for activities on MCB CAMLEJ. As such, this manual guides the command's overall environmental management effort and forms the basis by which to audit the EMS.
- b. Reference (a) establishes the requirements of a conforming EMS. Patterned loosely after the international standard contained in International Organization for Standardization (ISO) standard 14001, the United States Marine Corps (USMC) EMS consists of five distinct management components and 17 interrelated EMS elements. The five components and 17 elements, depicted below, provide a "plan-do-check-act" framework that is common to many standard management systems.

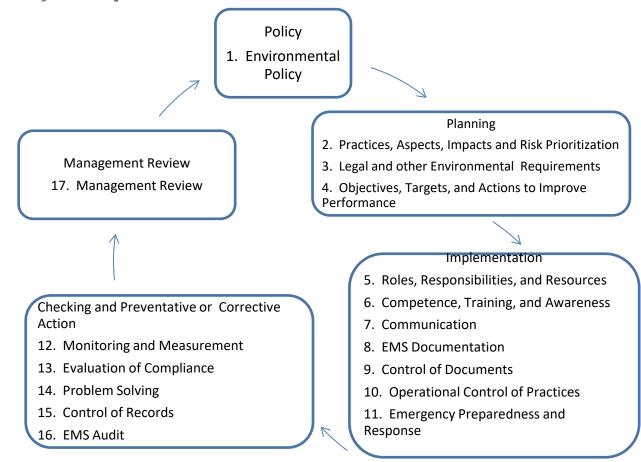


Figure 1-1. Chart

#### 2. Scope and Applicability

- a. Broadly defined, MCIEAST-MCB CAMLEJ's EMS for MCB CAMLEJ is the sum of policies, processes, and procedures. In short, it is the overall "system" by which MCIEAST-MCB CAMLEJ conducts its environmental activities on MCB CAMLEJ. MCB CAMLEJ's EMS addresses matters such as how the command establishes and communicates environmental policy, prevents and controls pollution, manages wastes, responds to spills, stewards natural and cultural resources, avails environmental training, assesses compliance, corrects noncompliance, improves environmental performance, and mitigates environmental risk. In this respect, MCIEAST-MCB CAMLEJ EMS for MCB CAMLEJ is much more than merely the performance of the EMS elements addressed in this order.
- b. The procedures outlined in this manual augment the environmental policies, instructions, and requirements that are contained in MCIEAST-MCB CAMLEJ's official governing directives (e.g., general orders), environmental management plans, and government contracts. Command orders with the 5090 Standard Subject Identification Code (SSIC), along with relevant sections of MCIEAST-MCB CAMLEJO 3570.1B (Range Control Standard Operating Procedure), MCIEAST-MCB CAMLEJO 5100.29C Vol 2 (Safety Program/Risk Management), and various other orders, convey policy, roles, responsibilities, and requirements for environmental stewardship on MCB CAMLEJ. Various environmental management plans, such as the Integrated Natural Resources Management Plan (INRMP) for MCB CAMLEJ, Fire Management Plan, and Pesticide Management Plan, also establish requirements and explain how the command manages its environmental compliance and resource stewardship obligations on MCB CAMLEJ. Provisions contained in government contracts, including real estate agreements and support agreements, govern the activities and outputs of the contracts. In this manner and through these mechanisms, MCIEAST-MCB CAMLEJ's EMS for MCB CAMLEJ encompasses and applies to all installation tenants, contractors, and other individuals on the base.
- c. The mission of MCIEAST-MCB CAMLEJ has long been recognized as being a responsible and effective steward of the resources in its trust. Amidst the backdrop of one of the busiest military installations in the nation, the species and landscapes that once defined the entire East Coast region now rely, in some respects solely, on MCB CAMLEJ for their continued survival and posterity. MCIEAST-MCB CAMLEJ's environmental management efforts have shown that it is possible to sustain both mission readiness and environmental resources. This EMS seeks to build upon this tradition and provide a framework to ensure that the training opportunities, resources, and landscapes enjoyed by today's Marines will be available for the benefit and use of future generations of Marines.

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3. Opportunity to Participate. MCIEAST-MCB CAMLEJ welcomes all appropriate and value-added participation in its environmental management efforts. MCIEAST-MCB CAMLEJ's EMS lead is the Environmental Management Division (EMD).

#### Definitions

- 1.  $\underline{\text{Aspect}}$ : The manner or means by which a practice can interact with, and therefore impact, the environment (e.g., air emissions, water discharges).
- 2. <u>Document</u>: Information, stored on paper, electronic, or other media, that describes the organization, its goals or intent, or its procedures.
- 3. <u>Impact</u>: Any change to the environment resulting from the environmental aspects of a practice.
- 4. <u>Objective</u>: A statement that defines an end-state, supporting goals of the environmental policy statement. Objectives must be achievable, measurable and should be quantifiable when practicable.
- 5. <u>Practice</u>: A unit process, operation, or product that supports the mission and has or can have aspects that can interact with, and therefore impact, the environment.
- 6. <u>Practice Owner</u>: The command, unit, or office responsible for day-to-day implementation of a practice. Practice owners have the authority to accomplish or support their mission by implementing the practice and, thus, have the responsibility for procedures needed to keep it under control.
- 7. Record: Information, stored on paper, electronic, or other media, that states result achieved or provides evidence of activities performed. Records are not subject to change and, once created, cannot be modified.
- 8. Requirement: Legislation, regulation, or policy issued by any Executive, Federal, State, local, Department of Defense (DoD), Department of Navy (DON), or USMC authority that addresses environmental considerations and requires action by USMC personnel.
- 9. <u>Target</u>: A detailed performance requirement that sets a limit, usually a quantity and/or a time frame, for the achievement of objectives. An objective may have more than one target.

#### Chapter 1

## Element 1 Environmental Policy

### 1. Purpose and Overview

- a. This EMS element describes how MCIEAST-MCB CAMLEJ establishes and communicates environmental policy.
- b. Reference (a) requires installation commanders to publish an environmental policy statement that expresses, among other reference (a) themes, a commitment to environmental compliance, conservation, and continual EMS improvement. Reference (a) and the USMC supplement to reference (b) prescribe EMS conformance criteria for this EMS element.
- c. The output of this EMS element is policy that guides the installation's overall environmental management effort. Per reference (a), this output may serve as an input to EMS Element 4: Objectives, Targets, and Actions to Improve Performance.

#### 2. Environmental Management Procedure

#### a. General Process

- (1) MCIEAST-MCB CAMLEJ promulgates environmental policy in command orders, environmental management plans, and the Commander's environmental policy statement. MCIEAST-MCB CAMLEJ also communicates policy in other official correspondence.
- (2) The EMD drafts and proposes environmental policy for command review and approval by following established MCIEAST-MCB CAMLEJ staffing procedures.

### b. Command Environmental Policy Statement

- (1) The EMS Manager annually reviews the environmental policy statement to ensure it remains appropriate to MCIEAST-MCB CAMLEJ mission and activities.
- (2) Following a change of command, the EMS Manager will receive a new environmental policy statement.
- (3) To communicate the command's environmental policy statement, MCIEAST-MCB CAMLEJ:
- (a) Posts the environmental policy statement on the command's website and corresponds through email to all units on the installation.

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- (b) Includes the environmental policy statement, where appropriate, in environmental training curriculum; and
- (c) Distributes the environmental policy statement to unit environmental compliance coordinators through recurring environmental training program venues.
- (4) The command Adjutant maintains the environmental policy statement on MCIEAST-MCB CAMLEJ directives control point internet site.
- (5) The EMS Manager archives former environmental policy statements on the Environmental Management Portal (EM Portal).

#### Chapter 2

# Element 2 Practices, Aspects, Impacts, and Risk Prioritization

#### 1. Purpose and Overview

- a. This EMS element describes how MCIEAST-MCB CAMLEJ evaluates the environmental risk of its mission supporting activities and practices.
- b. Reference (a) requires installation commanders to maintain an inventory of installation practices, and using a repeatable and defensible procedure, quantify the risk to mission that may occur from the environmental aspects of these practices. Reference (a) and the USMC supplement to reference (b) prescribe EMS conformance criteria for this EMS element.

#### c. Practices, Aspects, Impacts, and Risk Prioritization

- (1) A practice is a unit process or operation that supports the mission and has aspects that can interact with, and therefore impact, the environment.
- (2) An aspect is the "how" or means by which an activity or practice can interact with the environment (e.g., air emissions, water use, soil disturbance).
- (3) Practices can have more than one aspect; aspects have one or more impacts; impacts are generally adverse.
- (4) The USMC assesses and assigns risk to the environmental aspects of its practices; practice risk equals the highest aspect risk for a particular practice.
- (5) The output of this EMS element is the command's risk-ranked practice inventory. This output, along with the review of environmental aspects that occurs during this EMS element, serves two main purposes. First, the review of environmental aspects logically precedes and informs EMS Element 3: Legal and Other Requirements, whereby the command identifies the environmental compliance requirements that apply to, and therefore govern, its aspects. Second, the risk-ranked practice inventory is a potential input to EMS Element 4: Objectives, Targets, and Actions to Improve Performance, and a means to help guide subsequent environmental management efforts. Practices that pose the most risk warrant further review to determine whether current policies, training curricula, practice controls, contingency procedures, and oversight protocols are sufficient to effectively mitigate risk. Therefore, the output of this EMS element may affect the output of other EMS elements.

#### 2. Environmental Management Procedure

- a. A command evaluates the environmental risk of its mission supporting activities and practices to achieve requirements, determine aspect significance, and guide subsequent environmental management efforts.
- b. A command screens for practice risk by evaluating the likelihood of an aspect to occur against the potential environmental, regulatory, public perception, and health and safety consequence or "impact" if the aspect were to occur. Using this approach, significant aspects are aspects that are <a href="both">both</a> (1) likely to occur <a href="mailto:and">and</a> (2) able to exert a major impact.
- c. The EMS Manager annually, or as required, assembles an interdisciplinary review team (EMS Team) whenever a comprehensive or practice specific reevaluation of risk is necessary. Review triggers include EMS Team consensus, management direction, and (environmental, regulatory, public perception, and health and safety) events that make a formerly insignificant practice significant.
- (1) To screen for risk, the EMS Team assigns values (i.e., scores) for aspect likelihood and potential impact to the aspects of every installation practice using the scores listed in the last two pages of this EMS element.
- (2) The EMS Manager, or EMS Team designee, enters the scores assigned for aspect likelihood and (environmental, regulatory, public perception, and health and safety) impact into a spreadsheet. The use of a spreadsheet:
- (a) Allows for the evaluation of practice and aspect associations that are unique to MCB CAMLEJ but not currently included on the USMC prescribed practice list.
- (b) Allows for the application of conversion factors to approximate numeric risk scores, if required or desired, per the USMC prescribed risk algorithm.
- (c) Allows EMD to use a database with the Marine Corps Environmental Compliance Management System (ECMS).
- (3) The procedure uses a two-digit *likelihood-impact* notation to express risk. The score assigned for aspect likelihood forms the left variable, and the <u>highest rated</u> environmental, regulatory, public perception, and health and safety impact score form the right variable.
- (4) The risk determination procedure places aspects and practices into quadrants or bins of relative risk.

- (a) Aspect risk is based on an aspect's likelihood to occur and highest rated environmental, regulatory, public perception, and health and safety impact variable.
- (b) Practice risk is based on the highest aspect risk for the practice.
- d. The EMS Manager documents and provides the results of the risk-ranked practice inventory via memorandum to the supervisors of the environmental media managers and/or practice owners for each affected command (subsequent environmental staff and practice owner review determines whether current policies, training curriculum, practice controls, contingency procedures, and oversight protocols are sufficient to effectively manage and mitigate risk for these practices).
- e. MCIEAST-MCB CAMLEJ currently does not communicate its significant environmental aspects to the public.
- f. Commands monitor significant practices per EMS Element 12: Monitoring and Measurement.
- g. The EMS Manager maintains the risk-ranked practice inventory via a database on the EM Portal.
  - h. The EMS Coordinator archives records associated with this EMS

#### Element on the EM Portal.

#### Alternate Likelihood Scores

How likely is the aspect to occur, or what is the observed frequency of reoccurrence?

- 4. Very likely/ routine or unavoidable
- 3. Likely/ frequent
- 2. Possible/ periodic or occasional
- 1. Unlikely/ infrequent

#### Alternate Mission Impact Scores

If the practice were interrupted, it would have an impact on installation operations and mission?

- 4. Catastrophic or severe
- 3. Heavy or major
- 2. Serious or moderate
- 1. Minor, mild, insignificant, negligible

 $\underline{\text{Note}}$ : These mission impact scores are only necessary to populate and run the USMC prescribed risk algorithm.

Figure 2-1. Alternate Likelihood Scores

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#### Chapter 3

## Element 3 Legal and Other Environmental Requirements

#### 1. Purpose and Overview

- a. This EMS element describes how MCIEAST-MCB CAMLEJ identifies the environmental compliance requirements that apply to its activities and practices and communicates this information to persons who, by nature of their supervisory role or job requirements, incur environmental compliance responsibilities.
- b. As a Federal agency, MCIEAST-MCB CAMLEJ must comply with all applicable state and local environmental compliance requirements where Congress has expressly waived federal sovereign immunity. This duty to comply extends to all personnel, to include tenants and government contractors, who live, train, do business on, or otherwise frequent the Base. To ensure awareness of bona fide compliance requirements, reference (a) requires installation commanders to identify the environmental laws and other legal requirements that apply to the installation's activities and practices and avail such information to persons who, by nature of their work, incur environmental compliance responsibilities. The current versions of reference (a), and the USMC supplement to reference (b) prescribe EMS conformance criteria for this EMS element.
- c. The output of this EMS element is identified requirements to which commands are obliged to conform. For requirements that are not already sufficiently addressed in existing policies, training curriculum, practice controls, contingency procedures, and compliance oversight protocols, the output of this EMS element serves as an input to EMS Element 4: Objectives, Targets, and Actions to Improve Performance.
- d. Environmental compliance requirements in North Carolina abound and typically are among the most stringent in the nation. In many cases, the environmental compliance requirements that govern MCIEAST-MCB CAMLEJ's mission supporting activities and practices mandate controls and protections that, if properly implemented, effectively control, or mitigate environmental risk. Because bona fide legal and other environmental requirements are by default obligatory and compel or require compliance, they serve as the bases for funding Depart of Defense environmental programs. They also collectively serve as the primary centerline for MCIEAST-MCB CAMLEJ's environmental program and, therefore, the overall EMS for MCB CAMLEJ.
- e. The following complementary staff offices participate in the performance of this EMS element.

- (1) EMD manages MCIEAST-MCB CAMLEJ's environmental program on MCB CAMLEJ and consults with the staff and officials of local and regional environmental regulatory agencies for activities on MCB CAMLEJ.
- (2) The MCIEAST-MCB CAMLEJ Assistant Chief of Staff (AC/S) G-7 monitors legislative and regulatory developments and advocates military training and readiness requirements at the state level and within Environmental Protection Agency (EPA), Region IV.
- (3) The Eastern Area Counsel Office (EACO) provides environmental legal counsel to MCIEAST-MCB CAMLEJ.

#### 2. Environmental Management Procedure

- a. EMD's environmental media managers review and remain familiar with the environmental laws, regulations, and higher headquarters directives that apply to their programs. To sustain familiarity, the environmental media managers periodically review the environmental permits, governing volumes of biological opinions, and binding compliance agreements that apply to their programs. A diverse array of web-based resources (e.g., regulatory agency websites) allow for ready access to the legal and regulatory requirements that apply to MCIEAST-MCB CAMLEJ's mission supporting activities and practices. For assistance with requirements that may not be clear, the environmental media managers consult with staff counterparts working on MCB CAMLEJ, EACO, Marine Corps Installations Command (MCICOM), and environmental regulatory agencies as appropriate.
- b. The environmental media managers routinely consult with staff counterparts at local, regional, and in some cases state and federal environmental regulatory agencies and often learn of proposed and pending regulatory changes through these contacts. Standard rulemaking procedures require regulatory agencies to formally notify affected parties of new regulations and proposed changes, and many regulatory agency websites offer electronic mail alert services that automatically notify subscribers to this end. The EMD's environmental media managers thoroughly review all draft permit renewals and governing reference (a) revisions and discuss them with impacted permit holders, practice owners, and EACO. Environmental media managers consult with EACO to verify the Federal Government's duty to comply before communicating any new regulatory requirement to installation personnel.
- c. MCIEAST-MCB CAMLEJ communicates legal and other environmental compliance requirements through several routine command and staff venues.
- (1) The primary formal, written means used to convey environmental requirements include command orders; environmental management plans; environmental planning documents; government contracts; support agreements (e.g., Inter-service Support Agreements (ISSAs), Intragovernmental Support Agreements (IGSAs), Memoranda of

Understanding (MOUs), Memoranda of Agreement (MOAs); and official correspondence. EMS Element 8: EMS Documentation briefly describes the predominant use and process by which MCIEAST-MCB CAMLEJ establishes these forms of EMS documentation.

- (2) Environmental personnel also communicate environmental requirements through emails, conversations, meetings, internet/intranet pages, environmental training curriculum, environmental inspections and assist visits, Environmental Standard Operating Procedures (ESOPs), area commander's meetings, environmental coordinators meetings, and S-3/S-4 seminars.
- d. MCIEAST-MCB CAMLEJ maintains EMS documents per EMS Element 9: Document Control, and as follows:
- (1) The command maintains orders and directives on the command Adjutant intranet site.
- (2) EMD maintains environmental management plans (that are required by law, regulation, or higher directive) on the EM Portal, the installation website, and/or the command intranet site, as appropriate.
- (3) The MCIEAST-MCB CAMLEJ AC/S G-7, via its Business Performance Office (BPO), administers and maintains all installation support agreements for MCB CAMLEJ. The lone exception is that Marine Corps Community Services (MCCS) administers and maintains agreements for approved private organizations on the installation. In both cases, copies of signed agreements incorporating EMS activities are provided to the AC/S General-Facilities (G-F) for their immediate access.
- (4) The MCIEAST-MCB CAMLEJ AC/S G-F maintains copies of real estate agreements involving MCB CAMLEJ.
- (5) Designated contracting officer's representatives maintain and oversee service contracts that are let by the regional contracting office.
- e. The EMD maintains National Environmental Policy Act (NEPA) environmental planning records in National Environmental Policy Act-Process Automation and Management Support (NEPA/PAMS) in addition to the originals of these documents, which it provides to project proponents. EMS Element 15: Records Control provides additional information regarding the control of EMS records.

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#### Chapter 4

# Element 4 Objectives, Targets, and Actions to Improve Performance

#### 1. Purpose and Overview

- b. Reference (a) requires installation commanders to develop objectives, targets, and action plans that are necessary to implement policy, effect compliance, mitigate risk, and improve environmental performance. The current versions of reference (a) and the USMC supplement to the reference (b) prescribe EMS conformance criteria for this EMS element.
- c. The output of this EMS element are objectives, targets, and plans for action that guide the command's overall environmental management effort. Accordingly, the output of this EMS element may affect change to the output or conduct of the other EMS elements or processes internal to the EMS.

#### 2. Environmental Management Procedure

#### a. Objectives

- (1) Objectives are set at varying levels and by various personnel (generally environmental managers) throughout this EMS plan.
- (2) Objectives establish/describe a performance end-state (e.g., "comply with environmental requirements to the extent permitted by law") but do not detail how to achieve it.
- (3) By design, objectives are generally more overarching and enduring than the targets and/or action plans that are or may be subsequently developed to achieve them.
- (4) The command's environmental policy statement establishes/infers overall objectives for this EMS plan.

#### b. Targets

(1) Intermediate targets may or may not be necessary or set to detail how an objective will be met. For instance, an objective to "comply with environmental requirements to the extent permitted by law" is overarching, aspirational, and binary in nature, and therefore, may not require the crafting of one or more targets to demonstrate that it is being met.

- (2) Targets may be set concurrent with an objective or by intermediate-level managers between the person who set the objective and those who will implement action to achieve it.
- (3) Although established external to this EMS plan, the sustainability mandates established by a Presidential Executive Order often include and provide excellent examples of targets that have been set to achieve an overall performance end state.

#### c. Action Plans

- (1) The EMD's environmental media managers plan for and implement the actions that are necessary to achieve the environmental objectives and targets that are set by management and to sustain, improve, or restore compliance for their managed programs. The process to plan for and subsequently implements action is more continuous and routine than it is sequential. Environmental media managers determine what needs to be done, develop plans, identify timeframes for achieving objectives and targets, identify and program for resource deficiencies, coordinate with affected commanders and staff, and implement the necessary action.
- (2) For actions that require environmental funding, EMD media managers identify, forecast, and maintain (i.e., keep current) their environmental program's fiscal requirements in the Environmental Compliance and Operational Reporting (ENCORE) system per EMS Element 5: Roles, Responsibilities, and Resources.
- d. <u>Contributing Inputs</u>. Contributing inputs to this EMS element may include:
  - (1) Environmental policy developed and communicated per EMS.
- Element 1: Environmental Policy.
  - (2) The risk-prioritized practice inventory of EMS.
- Element 2: Practices, Aspects, Impacts, and Risk Prioritization.
- (3) The environmental compliance obligations determined through EMS.
- Element 3: Legal and Other Requirements.
- (4) The resource needs of MCIEAST-MCB CAMLEJ staff directorates that qualify for environmental funding.
- (5) Environmental program deficiencies identified during the Checking and Preventive or Corrective Action phase of the EMS, to include instances of noncompliance cited by environmental regulatory agencies.

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(6) Recommendations of the EMS Team or command direction expressed during EMS Element 17: Management Review.

The objectives, targets, and action plans that proceed from this EMS element guide the installation's overall environmental management effort. When appropriate, action leads communicate their objectives, targets, and planned actions through routine staff interactions.

#### e. Documentation

- (1) MCIEAST-MCB CAMLEJ documents environmental objectives and targets in command orders, environmental management plans, and through means, such as negotiated environmental agreements, opinions, and permits.
- (2) EMD's personnel document their environmental objectives, targets, and action plans, and their status in achieving them, in environmental program briefs, employee performance objectives, and through other appropriate means (note: these venues generally occur annually).
- (3) EMD's personnel document their progress in responding to Environmental Compliance Evaluation (ECE) findings through semiannual progress updates.
- f. <u>Monitoring and Measurement</u>. The command tracks progress in meeting objectives and targets per EMS Element 12: Monitoring and Measurement.
- g. Records Control. Where appropriate, EMD documents its progress in achieving its EMS objectives and targets through EMS Element 17: Management Review meeting minutes. The EMD archives these minutes in accordance with EMS Element 15: Records Control.

#### Chapter 5

## Roles, Responsibilities, and Resources

#### 1. Purpose and Overview

- a. This EMS element describes how MCIEAST-MCB CAMLEJ prescribes roles and responsibilities and provides resources to sustain the EMS.
- b. Reference (a) requires commands to define EMS roles and responsibilities and commit resources to provide for effective environmental management. The current versions of reference (a) and the USMC supplement to reference (b) prescribe EMS conformance criteria for this EMS element.
- c. The output of this EMS element guides the implementation of MCIEAST-MCB CAMLEJ's EMS for MCB CAMLEJ.

#### 2. Environmental Management Procedure

#### a. Roles and Responsibilities

- (1) MCIEAST-MCB CAMLEJ establishes roles and responsibilities in command orders; environmental management plans; working group charters; government contracts; support agreements (e.g., ISSAs, IGSAs, MOUs, MOAs); ESOPs; and employee position descriptions. EMS Element 8: EMS Documentation briefly describes how the command establishes these forms of EMS documentation.
- (2) The following summarizes roles and responsibilities conveyed through the means of EMS documentation.
- (a) The MCIEAST-MCB CAMLEJ Commanding General is the steward of Federal lands and ultimately responsible for environmental compliance at MCB CAMLEJ. The Commanding General has delegated environmental management authority on MCB CAMLEJ to the Director, EMD.
- (b) The EMD Director is responsible to the command for the management and oversight of environmental programs on MCB CAMLEJ. Within EMD, designated environmental media managers manage media-specific (e.g., air quality, land management) environmental programs. The EMD consults with environmental regulatory agencies for activities on MCB CAMLEJ. The Director of EMD is MCB CAMLEJ's EMS Manager. The EMS Manager ensures the EMS conforms to reference (a) requirements and advises the command on EMS matters. Within EMD, the EMS Coordinator assists the director by providing caretaker support of the EMS.

- (c) The MCIEAST-MCB CAMLEJ AC/S G-7 tracks legislative and regulatory developments within EPA Region IV and advocates military training and readiness requirements at the state level.
- (d) Base Safety/Resource Conservation and Recovery Section (RCRS) provides subject matter expert support on occupational and workplace safety matters to include hazardous materials compliance.

#### (e) Installation Tenants

- $\underline{1}$ . Unit Commanders at all levels are responsible for complying with the environmental requirements that apply to their activities and practices. Reference (a) requires commanders to appoint an environmental coordinator in writing to assist with environmental management and coordinate with the installation's environmental office. The EACO provides environmental legal counsel for MCIEAST-MCB CAMLEJ.
- $\underline{2}$ . The Naval Medical Center Camp Lejeune Preventive Medicine and Occupational Health departments provide support and subject matter expert advice on a diverse array of preventive medicine and occupational health matters.
- (f) Environmental Compliance Officers, Environmental Compliance Coordinators (ECC) within designated tenant units, and MCIEAST-MCB CAMLEJ staff coordinate with EMD on matters that pertain to tenant units and staff directorate operations and activities.
- (g) All persons, to include Government contractors and lease holders, who train, work, or otherwise do business on MCB CAMLEJ have a duty to comply with the environmental policies and requirements that apply to their activities and practices. Ultimately, however, the responsibility to comply rests with the person in charge of the activity or practice (i.e., the commander, director, supervisor, permit holder, practice owner, lease holder, or contract provider).
- (h) Reference (a) requires the assignment of a cross-functional team to participate in the installation's EMS. This order employs chartered environmental management committees to achieve this requirement. Within reference (a) appears a detailed breakdown of which representatives are assigned to the EMS working group.
- $(\underline{i})$  The Environmental Impact Review Board (EIRB) is an executive body formed to make recommendations to the command regarding NEPA documents for activities on MCB CAMLEJ. EIRB membership is chartered by the command's NEPA order (MCIEAST-MCB CAMLEJO 5090.12A).
- $(\underline{j})$  Other standing working groups that provide for crossfunctional engagement on environmental or natural resource matters include the semiannual ECC's meetings.
- b. Resources. MCIEAST-MCB CAMLEJ commits resources to the EMS by adhering to established staffing and budgeting procedures.

- (1) Manpower for environmental management is prescribed through staffing allowances, temporary assignments, or collateral duties.
- (2) Tables of Organization (T/Os) prescribe manpower allowances and provide the basis to fund employee payroll. Accordingly, MCIEAST-MCB CAMLEJ's T/Os apportion structure for environmental management and other command support functions. By design, most T/O positions for environmental management reside within EMD. However, environmental funds also pay for environmental positions in other staff directorates, and structure allowances in the AC/S G-7 and EACO support MCIEAST-MCB CAMLEJ's environmental management efforts. Requests to change or realign T/O allowances require Headquarters Marine Corps (HQMC) concurrence and approval.
- (3) Most tenant units do not have designated T/O positions for environmental management. Instead, tenant units and most command staff directorates assign environmental responsibilities as collateral duties. Designated unit ECCs assist with environmental compliance and coordinate unit matters with the command's environmental staff. Unit S-3 and S-4 officers also regularly incur ancillary environmental compliance responsibilities. Per reference (a), Marines that handle hazardous materials or wastes should pursue qualification for the "HAZMAT" Marine Occupational Specialty (MOS) 8056. EMDs Environmental Training Program offers training courses that can qualify Marines for this additional MOS.

#### c. Fiscal

- (1) Commanders and supervisors at all levels are responsible for resourcing the funds that are required to achieve their environmental compliance obligations.
- (2) Non-DoD tenants and government contractors bear all costs that are necessary to achieve environmental compliance on MCB CAMLEJ, unless otherwise provided for by contract or another agreement.
- (3) EMD identifies, acquires, and commits the funds that are necessary to manage the command's environmental programs on MCB CAMLEJ. Environmental program funds pay for the environmental compliance and stewardship obligations that are incurred by the command and centrally managed by the installation's environmental staff. Examples of requirements that qualify for environmental funding include environmental permit fees, hazardous waste disposal, environmental studies, habitat management, and environmental restoration.
- (4) Although compliance is an environmental permit holder's responsibility, some environmental permit requirements may be eligible for environmental funding. Environmental permit holders can consult with EMD to determine whether any of the conditions stipulated in their environmental permits qualify for environmental funding.

- (5) Per reference (a), generators of hazardous waste pay for the supplies and equipment they require {e.g., waste containers and labels, personal protective equipment, and spill contingency supplies) to manage their wastes in an environmentally compliant manner.
- (6) Per reference (a), commands or units responsible for hazardous substance spills fund the cleanup and disposal of contaminated media.
- (7) Per (a), project proponents pay for the environmental review, monitoring, and mitigation costs that are necessary to fulfill the Federal Government's obligations under NEPA. MCIEAST-MCB CAMLEJO 5090.12A, NEPA Procedures for Marine Corps Base, Camp Lejeune, prescribes the NEPA process at MCB CAMLEJ.
- (8) Per reference (a), exercise funds pay for hazardous waste management and disposal costs (in like fashion as exercise funds pay for fuel, portable toilets, and other exercise expenditures).
- (9) Operations and Maintenance, Marine Corps (O&M, MC) funds are the primary funding source used to resource MCIEAST-MCB CAMLEJ's environmental program for MCB CAMLEJ. HQMC provides O&M, MC funds as either Operational Budget or Centrally Managed Environmental Program funds. O&M, MC funds must be obligated during the fiscal year in which they are apportioned using the appropriate environmental accounting codes in the Standard Accounting, Budgeting and Reporting System.
- (10) Base Operating Support (OPBUD) funds are O&M, MC funds available for the purpose of paying recurring environmental program requirements. Examples of OPBUD requirements include payroll for environmental staff, environmental permit fees, hazardous waste disposal, hazardous waste minimization service contracts, habitat management, and environmental monitoring and reporting. HQMC annually augments the installation's operating budget with OPBUD funds that are earmarked to support environmental programs on MCB CAMLEJ.
- (11) Centrally Managed Environmental Program (CMEP) funds pay for nonrecurring environmental program requirements. Requirements appropriate for CMEP funding include environmental studies, equipment, and projects that are needed to comply with new regulations or resolve noncompliance. Environmental Program Management (CMP 22) funds pay for studies, equipment, and emergent (i.e., unanticipated) environmental funding requirements. Environmental Projects Program (CMP 10) funds pay for environmentally driven Facilities Sustainment, Repair, and Modernization (FSRM) projects.
- (12) The DON programs for and acquires environmental restoration funds that are necessary to clean up contaminated Installation Restoration program sites on MCB CAMLEJ.
- (13) Defense Logistics Agency (DLA) Energy funds reimburse MCIEAST-MCB CAMLEJ for environmental compliance costs, including

cleanup, fines, and penalties that are incurred at DLA contractor operated military refueling stations on MCB CAMLEJ.

(14) A portion of the hunting and fishing program fees collected by EMD may also be applied to the installation's conservation and hunting and fishing programs.

#### d. Planning and Programming

- (1) EMD identifies environmental funding requirements during the planning phase of the EMS. Environmental funds are generally sought to:
- (a) Achieve, sustain, or restore compliance, with environmental requirements, as identified in accordance with EMS Element 3: Legal and Other Environmental Requirements.
- (b) Implement initiatives, as established in accordance with EMS Element 4: Objectives, Targets, and Actions to Improve Performance, to improve environmental performance.
- (2) To obtain environmental funds, EMD undertakes the following actions:
- (a) Environmental media managers identify their environmental program's fiscal requirements in the USMC ENCORE system.
- (b) EMD environmental media managers keep their environmental program's fiscal requirements current in ENCORE and update ENCORE in response to HQMC budgeting cycles and data calls.
- (3) Programming cycles and documentation requirements in ENCORE vary based on the type of environmental requirement and funding source that is appropriate to pay for the requirement (irrespective of the programming cycle and type of requirement, environmental media managers enter their environmental program requirements into ENCORE when identified and keep ENCORE current with changes as they occur).
- (4) OPBUD requirements must depict current year costs and funding estimates for future years forecasted seven years out. A 3% annual increase for inflation is appropriate when forecasting for future years.
- (5) CMP 10 projects require a DD Form 1391, completed NEPA documentation, and validation by HQMC. Although CMP 10 requirements presume a two-year appropriation cycle, CMP 10 funding may be available for emergent requirements provided the necessary project documentation is complete and resident in ENCORE and HQMC validates the project.
- (6) EMD identifies, via the semi-annual Contract Advertisement Forecast submission, the CMP-10 projects that it will be ready to advertise and award at the end of the current or during the upcoming fiscal year.

#### e. Budgeting and Execution

- (1) The USMC annually solicits installations to validate their environmental funding projections that are resident in ENCORE prior to the upcoming fiscal year. The annual budget review helps the USMC to refine its upcoming fiscal year budget requirement and plan the subsequent distribution of allocated funds.
- (2) EMD's environmental program managers annually solicit the environmental media managers and their supervisors for their prioritized spending plans for the upcoming fiscal year. The spending plans help to prioritize the allocation of funds that are subsequently distributed by HQMC.
- (3) HQMC augments the command's OPBUD funds and provides CMP22 funds at the beginning of the new fiscal year. HQMC holds CMP10 funds in abeyance until the applicable contract oversight office is ready to award the funds. EMD coordinates with the MCIEAST-MCB CAMLEJ Comptroller's office to obligate allocated funds per EMD's spending plan.
- (4) Budget execution, where EMD commits allocated environmental funds, is currently beyond the scope of how MCIEAST-MCB CAMLEJ resources the EMS for MCB CAMLEJ. However, revisions of this EMS manual may include this information.

#### Chapter 6

## Element 6 Competence, Training, and Awareness

#### 1. Purpose and Overview

- a. This EMS element describes how MCIEAST-MCB CAMLEJ ensures competence, provides necessary environmental training, and promotes awareness of the EMS.
- b. Reference (a) requires installation commanders to determine the environmental training needs of installation personnel, avail and document the delivery of necessary environmental training, and promote awareness of the EMS throughout the installation. The current versions of reference (a) and the USMC supplement to the reference (b) prescribe EMS conformance criteria for this EMS element.
- c. The output of this EMS element guides the implementation of the command's  ${\tt EMS}$ .
- d. The knowledge and competencies acquired through training promote workplace safety and limit the potential for adverse environmental consequence.

#### 2. Environmental Management Procedure

#### a. Competence

- (1) The command assures environmental competence by:
- (a) Prescribing the environmental training and/or certification (e.g., licensing) requirements that are necessary for certain positions, jobs, or work performed via Government contract;
- (b) Providing and/or resourcing environmental training for command personnel and tenants; and
- (c) Providing environmental compliance oversight to ensure that personnel are trained and competent to perform their work in an environmentally compliant and responsible manner.
- (2) EMD prescribes environmental training and/or certification requirements through various means.
- (a) Reference (a) (Comprehensive Environmental Training and Education Program) prescribes environmental training requirements for command personnel and tenants.
- (b) Employee position descriptions prescribe the qualifications (e.g., wastewater licenses) that are necessary for some jobs and work requirements.

- (c) Government contract scopes of work prescribe the training and/or certification requirements that are necessary for work performed via contract.
- (3) EMD provides environmental training as outlined in paragraph 2b below.
- (4) The command provides oversight to ensure environmental competence as follows:
- (a) Commanders and supervisors are responsible for ensuring that unit (work unit) personnel receive environmental training, and they provide training and oversight to ensure that work is performed in an environmentally compliant manner.
- (b) Government contract oversight personnel ensure that contractor employees are trained and certified per government contract requirements for performing contracted work.
- (c) EMD provides environmental compliance oversight of installation programs and activities per EMS Element 13: Compliance Evaluation.

#### b. Training

#### (1) Program Administration

- (a) EMD manages the command's Comprehensive Environmental Training and Education Program (CETEP). Per reference (a) CETEP meets all requirements for the environmental training component of the USMC EMS.
- (b) The CETEP Coordinator maintains and implements the CETEP plan. The CETEP plan identifies environmental training requirements by type of training and the command's strategy to achieve the training need. To maintain the CETEP plan, the CETEP Coordinator:
- $\underline{1}$ . Conducts periodic training needs assessments to quantify the training need of installation personnel.
- $\underline{2}\,.$  Chairs course content review boards to validate the suitability of the training provided.
- $\underline{3}$ . Engages EMDs environmental media managers to ensure the environmental curriculum offered meets their environmental program's training and outreach needs.
- $\underline{4}$ . Revises the CETEP plan as necessary to ensure the command continues to provide relevant and appropriate environmental training to personnel on the installation.
- (c) EMD documents the environmental training it provides in accordance with the CETEP plan.

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(d) Some jobs require specialized certifications and licenses to be held by the persons who perform the work (e.g., wastewater treatment plant operators, pesticide applicators). Although the training that is necessary to acquire and maintain these certifications are generally a personal responsibility, unit (work unit) funds may be available to reimburse personnel for the training they require.

#### (2) Available Training

- (a) EMD provides environmental training through its environmental training classroom, through distance learning venues (e.g., MarineNet), and by means external to the EMS. External means include DoD organizations such as the Naval Civil Engineer Corps Officers School, local environmental agencies, and government contract vendors.
- (b) EMD provides environmental training for requirements that are explicitly prescribed by, or reasonably inferred in, environmental laws and regulations that are applicable to environmental compliance practices on MCB CAMLEJ.
- (c) In addition to providing job required training, EMD also provides or coordinates professional development training, to include unit environmental coordinator and S-3/S-4 seminars, to enhance the knowledge and skills of personnel that incur environmental compliance responsibilities.
- (d) The training available through EMD is open to installation tenants and staff that operate under, or receive support through, environmental permits or registration (e.g., EPA ID number) or as provided for in government contracts and support agreements.
- (e) Personnel with a Common Access Card can determine and enroll in the environmental training they require by logging into MarineNet or by contacting EMD's training section.
- c.  $\underline{\text{Awareness}}$ . MCIEAST-MCB CAMLEJ promotes awareness of the EMS through  $\overline{\text{various}}$  means such as:
  - (1) EMS Documentation, such as orders and directives;
  - (2) The command's environmental training program;
- (3) Media, such as posters, booklets, and the command intranet and internet sites;
- (4) Routine interactions between the environmental media managers and their customary staff counterparts; and
  - (5) Events, such as the annual Earth Day observance.

#### Chapter 7

## Element 7 Communication

#### 1. Purpose and Overview

- a. This EMS element describes how MCIEAST-MCB CAMLEJ communicates internal and external to the EMS.
- b. Reference (a) requires installation commanders to implement documented procedures to communicate matters internal and external to the EMS. The current versions of reference (a) and the USMC supplement to reference (b) prescribe EMS conformance criteria for this EMS element.
- c. The output of this EMS element guides the implementation of the command's EMS.

#### 2. Environmental Management Procedure

#### a. Internal Communication

- (1) MCIEAST-MCB CAMLEJ uses standard business means to communicate internal to the EMS.
- (a) Typical formal written means to communicate include naval correspondence, command orders, environmental management plans, environmental planning documents, support agreements (e.g., ISSAs, IGSAs, MOUs, MOAs), and government contracts.
- (b) Other routine means to communicate include emails, meetings, conversations, intranet and intranet pages, environmental training courses and program venues (e.g., environmental coordinators meetings, S-3/S-4 seminars), environmental inspections and assist visits, ESOPs, and area commander's meetings.
- (2) Although staff generally coordinate with staff at a commensurate level of accountability, designated command personnel also formally communicate written matters.
- (3) The EMS Team members communicate with the command, as required.

#### b. External Communication

- (1) The command communicates with external parties by using typical business means (e.g., conversations, meetings, emails, formal correspondence).
- (2) The lead office for external communication depends on the topic and originator/recipient of the communication.

- (a) EMD liaises with environmental regulatory agencies, Native American tribal governments, and recognized environmental groups for all MCB CAMLEJ. EMD personnel consult with the EACO prior to releasing non-routine, controversial, or precedence setting information to external organizations and individuals.
- (b) All requests for environmental information received from the media and public must be referred to Communication Strategy & Operations (COMMSTRAT) for coordination. Requests for agency records are processed under Freedom of Information Act procedures.
- (c) The Adjutant's office coordinates and tracks resolution of Congressional inquiries on behalf of the command.
- (d) The MCIEAST-MCB CAMLEJ AC/S, G-7, Community Plans and Liaison Officer, coordinates matter with local communities and major landowners surrounding the base and works with the directors of other staff sections to promote a positive image within the region. The G-7's Regional Environmental Coordinator tracks environmental legislation and advocates military training and readiness requirements at the State level.
- (e) EACO coordinates environmental legal matters and provides legal counsel for all environmental regulatory agencies.
- (3) Only designated personnel with "release authority" are authorized to represent their respective staff interests and formally communicate with persons and agencies external to the command. Persons with release authority archive communication with external agencies in accordance with their staff directorate's policies and procedures.
- (4) The Federal Government shares information with persons who are authorized to receive such information.
- (a) The command staff agencies listed previously are responsible for the security of the information they maintain and the content of the information they share with external agencies.
- (b) Unit security managers enforce unit security policies and are responsible for the security of classified information within their care. Unit security managers ensure that only persons with the requisite security clearance and "need to know" receive access to classified information and work areas where classified information is maintained.
- (c) The geographic information system staff establishes the policies, protocols, and conditions for sharing Geographic Information System (GIS) layers with Government contractors.

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- (5) Designated EMD personnel report instances of environmental non-compliance to regulatory authorities in accordance with governing regulatory and environmental permit requirements.
- (6) To achieve reference (a) requirements, designated EMD personnel notify HQMC (G-5, MCICOM) of formal regulatory enforcement actions by entering enforcement action information into the USMC Environmental Compliance Environmental System.
- (7) The DoD Interactive Customer Evaluation (ICE) system is an internet-based application that allows tenants and patrons to comment on or critique the quality of support provided by the command.
- (8) The command documents their communication with external parties in accordance with their office's established records maintenance and retention policies.
- (9) Within EMD, Environmental Program Managers maintain and archive written correspondence as agency records within the EM Portal or in hard copy files, as appropriate.

#### Chapter 8

## $\begin{array}{c} \underline{\text{Element 8}} \\ \text{EMS} \end{array}$

#### 1. Purpose and Overview

- a. This EMS element describes how MCIEAST-MCB CAMLEJ documents  ${\tt EMS}\,.$
- b. Reference (a) requires installation commanders to approve and maintain an EMS document that (1) describes the EMS elements, procedures to implement them, and how they interrelate and (2) references other key EMS documents and records and where they are maintained. The current versions of reference (a) and the USMC supplement to reference (b) prescribe EMS conformance criteria for this EMS element.
- c. The output of this EMS element guides the implementation of MCIEAST-MCB CAMLEJ's EMS for MCB CAMLEJ.

#### 2. Environmental Management Procedure

a. <u>General</u>. The command documents its EMS using this EMS Manual and several other key means.

#### b. EMS Manual

- (1) EMD has established this EMS Manual to achieve reference (a) and reference (b) requirements.
- (2) This EMS Manual is intentionally not overly prescriptive or constraining in nature. Rather, it provides guidance akin to the Commander's intent and describes, in general terms, how this command implements the 17 EMS elements that are required of a conforming EMS.
- (3) Each of the 17 EMS elements contained in this manual includes a general description of the (1) purpose and overview of the EMS element and (2) environmental management procedure by which this command implements the EMS element.
- (4) Where essential, the EMS elements reference how they relate to other EMS elements, how the command communicates essential EMS information, and how and where it maintains documents and records that are relevant to the EMS.

#### c. Other EMS Documentation

(1) Command orders and directives (e.g., Bulletins) are the primary means MCIEAST-MCB CAMLEJ uses to establish and communicate policy, roles, responsibilities, and requirements. Governing environmental directives include command orders with the 5090 SSIC.

- (2) Environmental management plans (that are required by law, regulation, or higher directive) typically prescribe environmental policy, roles, responsibilities, and compliance requirements in a similar fashion as command orders. Examples of such plans include the INRMP, Integrated Pest Management Plan, and Hazardous Waste Management Plan.
- (3) Environmental laws or associated implementing instructions sometimes prescribe content and/or format requirements for required environmental management plans. The process to establish an environmental management plan is like the process used to establish a command order.
- (4) NEPA documents prescribe environmental compliance and mitigation requirements that are incurred by project proponents. Project proponents initiate the NEPA process by submitting a Request for Environmental Impact Review (REIR) into the NEPA PAMS. EMD, in turn, provides oversight of the NEPA process to ensure that the command achieves its environmental review obligations under NEPA. MCIEAST-MCB CAMLEJO 5090.12A (NEPA Environmental Impact Review Procedures) prescribes the NEPA process.
- (5) Support agreements outline roles, responsibilities, and compliance requirements for the supported and supporting agency. Oftentimes, such agreements defer to and direct compliance with the roles, responsibilities, and requirements that are contained in command orders or other governing directives.
- (6) Government contracts include real estate agreements and service contracts. The provisions contained in government contracts generally convey roles, responsibilities, and requirements for environmental compliance. Naval Facilities Engineering Command, Mid-Atlantic (Real Estate) prescribes contract provisions for real estate agreements. Regional and installation contracting offices prescribe contract provisions for service contracts. EMD coordinates with these contracting offices and legal counsel to ensure that government contracts contain necessary environmental compliance provisions.
- (7) ESOPs prescribe operational controls for the command's significant practices, as determined in accordance with EMS Element 2: Practices, Aspects, Impacts, and Risk Prioritization, where control of the practices is not already addressed in sufficient detail by a higher-tiered directives, practice owner procedures, or unit (work unit) SOPs. EMD and/or lead practice owners, as appropriate, establish ESOPs per EMS Element 10: Operational Control of Practices.
- (8) Employee position descriptions define environmental responsibilities for authorized environmental management positions. Employee position descriptions conform to the occupational series classification standards prescribed by the Office of Personnel Management and are locally classified, approved, and maintained by MCIEAST-MCB CAMLEJ's Civilian Human Resource Office at MCB CAMLEJ.

- (9) MCIEAST-MCB CAMLEJ augments some of the means of EMS documentation by using the command internet websites.
- d. MCIEAST-MCB CAMLEJ maintains EMS documents per EMS Element 9: Document Control, and as follows:
- (1) The EMS Coordinator maintains the EMS manual on the EM Portal;
- (2) The Adjutant's office maintains command issuances on the MCIEAST-MCB CAMLEJ directives control point;
- (3) Plan sponsors/owners maintain environmental management plans on the EM Portal, command website, and/or command intranet site, as appropriate.
- (4) The MCIEAST-MCB CAMLEJ AC/S, G-7, via its BPO, administers and maintains all installation support agreements for MCB CAMLEJ. The lone exception is that MCCS administers and maintains agreements for approved private organizations on the installation. Both BPO and MCCS entities ensure that all EMS related agreements are staffed through the appropriate installation departments to ensure compliance with all applicable Orders, Policy, and procedures. Copies of these agreements are sent to the G-F for immediate access.
- (5) The MCIEAST-MCB CAMLEJ AC/S, G-F maintains copies of real estate agreements involving MCB CAMLEJ;
- (6) Designated Contracting Officer's representatives maintain and oversee the service contracts that are let by contracting offices;
- (7) Practice owners maintain unit SOPs in the workplace; EMD avails ESOPs for use by personnel through training venues and the command's internet site; and
- (8) EMD maintains NEPA records in NEPA-PAMS in addition to the originals of these records, which it provides to project proponents.
- e. EMS Element 15: Records Control provides additional information regarding the control of EMS records.

# EMS Element 9 Document Control

# Official Document Inventory (ODI) Procedures

## 1. Purpose and Overview

- a. This procedure establishes a protocol for controlling MCIEAST-MCB CAMLEJ environmental records, and this procedure will address record preservation requirements related to any applicable litigation holds. Records shall be:
  - (1) Preserved as required and easily located.
  - (2) Reviewed and updated as necessary.
  - (3) Protected from alteration or damage.
  - (4) Available when and where needed; and
  - (5) Removed or archived, as appropriate, when obsolete.
- b. Reference (a) requires installation commanders to maintain documents that are appropriate or essential to the efficient operation of the installation's EMS. Reference (a) stipulates that EMS documents must be maintained in such a manner that they can be located, reviewed, and updated as necessary; made available when and where needed in their current versions; and that older versions are removed from circulation and destroyed or archived as appropriate. The current versions of reference (a) and the Marine Corps supplement to reference (b) prescribe EMS conformance criteria for this EMS element.
- c. The output of this EMS element guides the implementation of this command's EMS.

- a. MCIEAST-MCB CAMLEJ maintains EMS documents as follows:
- (1) The Adjutant's office maintains command orders on the MCIEAST-MCB CAMLEJ directives control point.
- (2) Environmental management plans sponsors maintain environmental management plans in accordance with directorate specific records management procedures.
- (3) The MCIEAST-MCB CAMLEJ AC/S, G-F maintains copies of real estate agreements that involve MCB CAMLEJ.

- (4) Designated Contracting Officer's representatives maintain and oversee service contracts that are let their contracting offices;
- (5) The MCIEAST-MCB CAMLEJ AC/S, G-7, BPO maintains the installation repository of all support agreements except for those agreements maintained by MCCS for private organizations operating on the Base. Additionally, both the BPO and MCCS provide the AC/S, G-F, with copies of all signed EMS related agreements for their immediate access.
- (6) Practice owners maintain unit SOPs in the workplace. The EMS Manager ensures that the official version of ESOPs is on the command internet site.

### b. Document Review

- (1) The MCIEAST-MCB CAMLEJ Adjutant's office annually directs, the review of orders maintained on the directives control point.
- (2) Plan sponsors review and update environmental plans as necessary or in accordance with prescribed regulatory review requirements.
- (3) Contracting officers review and modify contracts prior to initiation and renewal.
- (4) The EMS Manager ensures ESOPs are annually reviewed and updated as necessary.

# Element 10 Operational Control of Practices

### 1. Purpose and Overview

- a. This EMS element describes how MCIEAST-MCB CAMLEJ controls its significant practices.
- b. Reference (a) requires installation commanders to ensure that the owners and operators of the installation's significant practices have procedures that provide for the proper control of such practices. The current versions of reference (a) and the USMC supplement to the reference (b) prescribe EMS conformance criteria for this EMS element.
- c. The output of this EMS element guides the implementation of the command's EMS.

- a. MCIEAST-MCB CAMLEJ controls its significant practices by providing training, oversight, and practice control procedures.
- b. The command develops and avails training for significant practices in accordance with EMS Element 6: Competence, Training, and Awareness.
- (1) EMD works with lead practice owners to develop curriculum and provide training for the command's significant practices.
- (2) Commanders and supervisors are responsible for ensuring that unit (work unit) personnel are properly trained to control the aspects of their significant practices.
- (3) Contract oversight personnel are responsible for ensuring that contractor employees are trained and certified to provide for sufficient control of work performed via contract.
- c. The command monitors and evaluates significant practices in accordance with EMS Element 12: Monitoring and Measurement, and EMS Element 13: Compliance Evaluation.
- (1) EMD annually inspects, for environmental compliance, installation tenants and command staff directorates that operate under, or obtain support through, an acquired environmental permit or registration (e.g., EPA ID number).
- (2) Commanders and supervisors provide oversight to ensure control of work performed by unit (work unit) personnel.

(3) Contract oversight personnel provide oversight to ensure control of work performed via contract.

### d. Practice Control Procedures

- (1) EMD prescribes roles, responsibilities, and requirements for environmental compliance in command orders, environmental management plans, NEPA documents, support agreements (ISSAs, IGSAs, MOUs, MOAs), government contracts, and ESOPs. This occurs according to the procedures that are outlined in EMS Element 5: Roles, Responsibilities, and Resources; EMS Element 3: Legal and Other Requirements; and EMS Element 8: EMS Documentation.
- (2) Where control of a significant practice is not already addressed in sufficient detail through an existing EMS document, practice-specific operating manual, or unit (work unit) SOP, the command either revises an existing directive (preferred) or establishes a new practice-specific ESOP.
- (3) Responsibility for developing an ESOP rest with the lead practice owner for that practice.
- (4) To achieve reference (a) requirements, lead practice owners ensure that ESOPs:
- (a) Include instructions for operational control, internal communication, emergency preparedness and response, inspection and corrective action, and training and awareness applicable to the practice.
- (b) Identify who is responsible for implementing each action and how often it is to be carried out.
- (5) EMD posts ESOPs on the command internet or intranet sites, as appropriate, and disseminates new or revised ESOPs to unit environmental coordinators during monthly environmental coordinator meetings.
- (6) EMD inspectors verify, in accordance with EMS Element 13: Compliance Evaluation, that practice owners and operators maintain practice control procedures in the workplace and train to these procedures.
- (7) EMD reviews orders that are staffed by the Adjutant for the potential to cause significant environmental impact and ensures that practice control requirements are incorporated or referenced as needed.

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# 1. Purpose and Overview

- a. This EMS element describes, in general terms, how MCIEAST-MCB CAMLEJ prepares for and responds to accidents and emergencies, hazardous substance releases, and sewage spills.
- b. Reference (a) requires installation commanders to document procedures for identifying and responding to accidents and emergencies and for avoiding, if possible, or mitigating the resultant environmental impacts. The current versions of reference (a) and the USMC supplement to reference (b) prescribe EMS conformance criteria for this EMS element.
- c. The output of this EMS element guides the implementation of the command's EMS.

- a. MCIEAST-MCB CAMLEJ prepares for and responds to crisis events by adhering to established contingency planning and response protocols. These protocols are consistent with the National Incident Management System and allow for ready integration with regional crisis planning and response efforts.
- b. The command's All-Hazards Plan governs how the command prepares for and responds to environmental incident's on MCB CAMLEJ. All other contingency plans for the installation fall under this plan.
- c. The command's Spill Response Decision Tree has been designated to include all situations regarding spill and emergency procedures. Included within the decision tree are actions pertaining to petroleum, oil, and lubricants; aqueous film-forming foam; hazardous substance; wastewater; and drinking water.

# $\frac{\text{Element } 12}{\text{Monitoring and Measurement}}$

## 1. Purpose and Overview

- a. This EMS element describes how MCIEAST-MCB CAMLEJ monitors and measures its environmental performance and ensures data quality for the environmental monitoring it performs.
- b. Reference (a) requires installation commanders to: (1) conduct environmental monitoring consistent with regulatory requirements and, if appropriate or feasible, monitor the aspects and impacts of significant practices; and (2) calibrate and verify environmental monitoring and measuring equipment and maintain associated records. The current versions of reference (a) and the USMC supplement to the reference (b) prescribe EMS conformance criteria for this EMS element.
- c. The output of this EMS element may serve as an input to EMS Element 14: Problem Solving. Consequently, the output of this EMS element may affect change to other processes and procedures internal to the EMS.
- d. Observations and data obtained through environmental monitoring provide a means to assess compliance, analyze trends, and influence subsequent environmental management decisions.

- a. Environmental monitoring provides a means to demonstrate compliance, evaluate the impacts of MCIEAST-MCB CAMLEJ's activities and practices, and determine whether objectives and targets are being met.
- (1) EMD and practice owner personnel, as appropriate, monitor environmental aspects (e.g., air emissions, wastewater discharges) and resources as set forth in or by regulatory mandates, environmental permits, and environmental management plans.
- (2) EMD conducts environmental monitoring by adhering to prescribed and/or commonly accepted scientific protocols and methods using calibrated equipment or via contract as outlined in paragraph 2b(1) below.

### b. Data Quality Assurance and Management

- (1) Practice owners and personnel that use monitoring equipment to demonstrate environmental compliance calibrate their monitoring equipment in accordance with manufacturer's specifications or established scientific or industry protocols and maintain records of their calibration activities.
- (2) The command conducts most of the environmental monitoring it performs via contract. Contract scopes of work prescribe monitoring requirements, methods, and protocols; data quality objectives; and necessary certifications to be held by the contractor (e.g., Environmental Laboratory Accreditation Program). Government review ensures the adequacy of environmental monitoring or survey plans prepared by the contractor as a contract deliverable. To promote consistency, environmental monitoring contracts often specify protocols that are established or recommended by state and federal regulatory agencies (e.g., Surface Water Ambient Monitoring Protocol).
- (3) Practice owners and EMD personnel review the results of environmental monitoring performed under contract to ensure that data quality requirements were met. Subsequent review, per EMS Element 13: Compliance Evaluation, determines whether environmental permit or other regulatory requirements were met.
- (4) EMD personnel electronically store data on local files, archive incidents within MCB CAMLEJ's ECMS, and upload environmental monitoring data and report incidents to the North Carolina Division of Environmental Quality.

# Element 13 Compliance Evaluation

#### 1. Purpose and Overview

- a. This EMS element describes how MCIEAST-MCB CAMLEJ evaluates environmental compliance.
- b. Reference (a) requires installation commanders to: (1) evaluate all commands, units, and tenants for environmental compliance semiannually and (2) ensure that all other installation activities, such as contractor and out-lease activities, comply with the same. The current versions of reference (a) and the USMC supplement to reference (b) prescribe EMS conformance criteria for this EMS element.
- c. The output of this EMS element serves as an input for EMS Element 14: Problem Solving, and as an agenda item for EMS Element 17: Management Review. Consequently, the output of this EMS element could affect change to other processes and procedures internal to the EMS.
- d. A proactive and effective environmental oversight helps to detect and correct noncompliance and reduce the associated risks to mission; augments efforts to integrate environmental considerations into day-to-day decision making throughout all levels of the EMS; and promotes the central EMS aim of continual improvement.
- 2. <u>Environmental Management Procedure</u>. The command evaluates compliance at varying levels and by various means, both internal and external to the EMS.

## a. Activity and Practice Level

- (1) Commanders and supervisors are directly accountable for the actions and outcomes of the persons in their charge. Therefore, persons in charge at all levels provide the first level of environmental oversight.
- (2) The offices and persons who oversee Government contracts, to include real estate agreements, evaluate compliance for the activities they oversee to ensure that the terms of the contract, to include those that are prescribed for environmental compliance, are met.

### b. Environmental Program (i.e., Installation) Level

(1) EMD and practice owner personnel, as appropriate, review the analytical results of environmental monitoring (performed by Government employees or contract personnel in accordance with EMS

- Element 12: Monitoring and Measurement) to determine whether environmental permit or regulatory requirements were met.
- (2) EMD personnel, and the offices that oversee the execution of contracts or actions that underwent NEPA review, ensure that the Government's obligations, as outlined in decision memoranda (for categorically excluded actions), Environmental Assessments, or Environmental Impact Statements, are met.
- (3) The command's environmental media managers or their supervisors periodically arrange to have their environmental programs' compliance postures assessed via contract where specialized skills are necessary to adequately conduct the assessment. This can occur on an overall environmental program or topic specific basis.
- c. Environmental Inspections. EMD inspectors semiannually inspect environmental compliance of all installation tenants and MCIEAST-MCB CAMLEJ staff directorates that operate under, or obtain support through, an acquired environmental permit or registration (e.g., EPA ID number).
- (1) EMD's ECE Manager prepares an annual schedule of tenants and staff directorates to be inspected the upcoming fiscal year.
- (2) EMD inspectors use the ECE checklist with any other requirements to conduct environmental compliance inspections.
- (3) EMD's EMS Manager engages the inspected unit, per EMS Element 14: Problem Solving, over areas of noncompliance that are identified through the command's environmental self-audit program.
- (4) EMD inspectors annually verify and document whether contracting and real estate offices have evaluated contractor and real estate grantee operations for environmental compliance.

#### d. Compliance Assistance

- (1) The environmental compliance requirements that are prescribed in command orders, ESOPs, and environmental permits provide units, work units, and contractors several means to evaluate their environmental compliance.
- (2) EMD provides advice and instruction, upon request, to commanders, supervisors, and contract oversight personnel to support them in evaluating (i.e., self-auditing) their organizations' environmental compliance.
- (3) EMD provides technical assist visits, upon request, to installation tenants and MCIEAST-MCB CAMLEJ staff directorates that operate under, or receive support from, an acquired environmental permit or registration (e.g., EPA ID number). Technical assist visits provide the requesting organizations candid assessments of their environmental compliance postures.

#### e. Environmental Compliance Evaluation (ECE)

- (1) HQMC triennially inspects USMC installations for environmental compliance.
- (2) EMD coordinates the ECE and follows up on areas of noncompliance per EMS Element 14: Problem Solving.
- (3) Reference (a) provides additional detail on the conduct of the  $\mbox{HQMC}$  ECE.

## f. Environmental Regulatory Agency Inspections

- (1) External environmental regulatory agency inspections occur frequently at MCB CAMLEJ, and like the inspections performed by installation personnel, provide important perspectives of the command's environmental compliance posture on MCB CAMLEJ.
- (2) Several environmental regulatory agencies frequently inspect the command's activities that generate wastes or operate under an acquired environmental permit or registration (e.g., EPA ID number).
- (3) EMD's inspectors accompany environmental regulatory agency personnel during all inspections on MCB CAMLEJ.
- (4) EMD handles and resolves instances of environmental noncompliance per EMS Element 14: Problem Solving.

# Element 14 Problem Solving

#### 1. Purpose and Overview

- a. This EMS element describes how MCIEAST-MCB CAMLEJ identifies and resolves EMS problems and issues.
- b. Reference (a) requires installation commanders to follow a structured problem-solving process that: identifies and defines problems or potential problems with compliance or EMS conformance; analyzes root causes and alternative solutions; selects and implements actions; and follows up to ensure resolution, mitigate impacts, and avoid recurrence. Reference (a) further requires installation commanders to document their corrective and preventive actions, their progress in implementing such actions, and the results/success of the corrective and preventive actions taken. The current versions of reference (a) and the USMC supplement to reference (b) prescribe EMS conformance criteria for this EMS element.
- c. The output of this EMS element may determine that processoriented changes internal to the EMS are necessary. Consequently, the output of this EMS element may serve as an input to EMS Element 17: Management Review and EMS Element 4: Objectives, Targets, and Actions to Improve Performance.
- d. Problem solving contributes to the central EMS aim of continual improvement.

#### 2. Environmental Management Procedure

a. Problems may manifest as outputs of EMS Element 11: Monitoring and Measurement, EMS Element 13: Compliance Evaluation, and EMS Element 16: EMS Audit. Problems can also be observed and identified by persons and processes external to the EMS (e.g., regulatory agencies).

## b. General Problem-Solving Approach

- (1) Problem solving occurs throughout varying levels of command and along delegated lines of management authority.
- (2) Ideally, the resolution of problems and issues occurs at the lowest possible level {e.g., the environmental permit holder, practice owner, or media program manager level).
- (3) Problems that span functional areas or commands may require a team approach or stakeholder involvement to resolve.

- (4) Problems that cannot be resolved and corrected at a lower level proceed through successive levels of management for resolution. Ultimately, the Commander, MCIEAST-MCB CAMLEJ is the final resolution authority for EMS problems and issues on MCB CAMLEJ.
- (5) While the command does not prescribe a specific problem-solving method, the following serves as a general model:
- (a) Root cause analysis: define the problem and attribute causative factors.
- (b) Alternatives development and analysis: identify and evaluate the merits of viable resolution alternatives.
- (c) Course of action selection and planning: select and plan to implement the most promising resolution alternative.
- (d) Implementation and follow-up: implement corrective action, monitor, and follow-up to ensure resolution.

#### c. Resolving Environmental Noncompliance

## (1) Regulatory Enforcement Actions

- (a) When EMD receives an enforcement action from an environmental regulatory agency, EMD reports the action within the ECMS website.
- (b) The EMD transmittal letter directs the responsible unit/department to submit a corrective action report that outlines the action it will take to correct each element of cited noncompliance.
- (c) The EMD Director reviews the corrective action report for adequacy. If inadequate, EMD reengages the responsible organization/person to resolve. EMD sends the report via cover letter to the environmental regulatory agency that issued the enforcement action.
- (d) EMD follows up with the issuing regulatory agency to determine whether the command's response formally resolved the enforcement action, and the agency considers the matter closed or the enforcement action remains open and a fine is forthcoming. If open, EMD reengages the issuing regulatory agency with EACO support as needed.
- (e) If the issuing regulatory agency levies a fine, EMD further consults with EACO in determining an appropriate response.
- (f) Contractors and tenants who, by nature of their government contracts or support agreements, operate on MCB CAMLEJ independent of the command's environmental permits and registrations are responsible, to the extent permitted by law, for resolving their own enforcement actions.

#### (2) ECE Findings and Issues

- (a) EMD coordinates the command's response to findings that are identified through the HQMC triennial ECE.
- (b) Within 60 days after the ECE and annually thereafter, EMD's EMS Manager consolidates and documents in ECMS the corrective action plans of the environmental media program managers that respond to the ECE findings.
- (c) EMD environmental media program managers that require funding to correct ECE findings program for, acquire, and obligate the funding they receive per EMS Element 5: Roles, Responsibilities, and Resources.

# (3) Environmental Self-Audit Findings

- (a) EMD audits tenant units for environmental compliance in accordance with EMS Element 13: Compliance Evaluation.
- (b) EMD informs the inspected unit of the inspection results via formal letter. The inspection results advise on whether corrective action is necessary and, if so, direct the unit to submit a corrective action report.
- (c) EMD's EMS Manager archives the results of the inspection along with the unit's corrective action report in the EM Portal.
- $\underline{\textbf{1}}$ . The EMS Manager engages the EMS Team on matters of EMS nonconformance that require their involvement to resolve.
- $\underline{2}$ . The EMS Manager engages the EMS Team or environmental media program managers, as appropriate, to discuss EMS target milestones that will not be met (or are not being met) to document why and, if necessary, obtain a revised plan of action and milestones.
- $\underline{\mathbf{3}}$ . Via memoranda, the EMS Manager documents problem solving efforts for matters of EMS nonconformance.
- (d) Documentation for problems addressed by an EMS working group occurs through meeting minutes. Documentation for problems worked through venues other than an EMS working group occurs by other means, including memoranda, briefs, correspondence, and email.

# Element 15 Records Control

## 1. Purpose and Overview

- a. This EMS element describes how MCIEAST-MCB CAMLEJ maintains records that are appropriate or essential to demonstrate the proper execution of the EMS.
- b. Reference (a) requires installation commanders to maintain records that are appropriate or essential to demonstrate the proper execution of the EMS. Reference (a) stipulates that EMS records must be maintained so that they can be located, are protected from alteration or damage, are available when and where needed, and are removed from circulation when obsolete and destroyed or archived as appropriate. The current versions of reference (a) and the USMC supplement to reference (b) prescribe EMS conformance criteria for this EMS element.
- c. The output of this EMS element helps to demonstrate the proper execution of the EMS.
- 2. Environmental Management Procedure. EMD maintains EMS records on the EM Portal in accordance with the ODI Procedures and directorate specific records management procedures.
- a. The command's environmental media program managers maintain records that are appropriate or essential for the efficient operation of the programs they manage.
- b. The EMS Manager maintains records that are appropriate or essential for the efficient operation of the EMS.
- c. The EMD Records Manager maintains hard copy records generated by EMD personnel for seven years in designated filing locations.
- d. EMD environmental media managers and the EMS Manager determine whether the records they maintain in the EM Portal remain current or need to be removed from circulation. Records custodians annually review their hard copy records for those that require archiving in accordance with SECNAV M-5210.1 (Records Management Manual).

# Element 16 EMS Audit

### 1. Purpose and Overview

- a. This EMS element describes how MCIEAST-MCB CAMLEJ audits the EMS to ensure conformance with USMC EMS requirements.
- b. Reference (a) requires installation commanders to audit the EMS, at least annually, to ensure that it conforms to USMC EMS requirements and to self-declare EMS conformance every three years. The current versions of reference (a) and the USMC supplement to reference (b) prescribe EMS conformance criteria for this EMS element.
- c. Areas or instances of nonconformance that are identified through this EMS element become an input to EMS Element 14: Problem Solving. Per reference (a) the output of this EMS element is also a required agenda item during EMS Element 17: Management Review. Consequently, the output of this EMS element may affect change to other EMS processes and procedures.

- a. The EMS Manager annually audits the EMS. Per reference (a):
  - (1) The annual audit must occur before 30 September; and
- (2) The EMS Audit performed triennially in conjunction with the HQMC benchmark ECE serves as the installation's EMS Audit during the year in which it is conducted.
- b. The EMS audit determines whether the EMS achieves reference (a) requirements for a conforming EMS and whether the EMS manual reflects how the command implements the EMS.
- c. The EMS Manager as appropriate, documents in ECMS the results of the annual EMS self-audit, and corrective action that occurs in accordance with EMS Element 14: Problem Solving.
- d. Before 30 September of each year, the EMS Manager: (1) uploads the results of the annual self-audit to the ECMS and (2) emails the results of the self-audit to HQMC via Portal Document Format (PDF) attachment. To achieve reference (a) requirements, the EMS Manager assembles this annual notification requirement under cover letter that: (1) is signed "By Direction" of the command; (2) is titled in the subject line, "USMC ANNUAL EMS CONFORMANCE SUMMARY"; (3) states whether the command is or is not

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in conformance with USMC standards; and (4) includes the following enclosures:

- (1) As enclosure (1), a summary of the installation's EMS conformance by element (in years in which a Benchmark ECE takes place, the annual conformance summary is based on the results of the Benchmark EMS audit);
- (2) As enclosure (2), a Point Paper describing the audit; and
  - (3) enclosure (3) will describe the Objectives and Targets.
- e. The EMD Director briefs the results of the annual EMS audit to the command per EMS Element 17: Management Review.
- f. MCIEAST-MCB CAMLEJ self-declares EMS conformance triennially, or more frequently as directed, to achieve DoD Instruction 4715.17 change 2 requirements. The results of the command's triennial benchmark ECE provide the basis for this declaration.

## Element 17 Management Review

### 1. Purpose and Overview

- a. This EMS element describes how MCIEAST-MCB CAMLEJ conducts its annual EMS management review.
- b. Reference (a) requires installation commanders to be briefed by the EMS Team, at least annually, on the state of the EMS and its progress in achieving the installation's EMS objectives. The current versions of reference (a) and the USMC supplement to reference (b) prescribe EMS conformance criteria for this EMS element.
- c. This EMS element provides the command with a scheduled and structured venue to provide command level direction to the EMS. Consequently, the results of this EMS element may prompt or direct change to other areas of elements of the EMS.

- a. EMD annually briefs the command on the state of the EMS and the progress in achieving its assigned EMS objectives.
- b. To achieve reference (a) conformance criteria, the annual EMS review includes the following:
- (1) A review of the command's significant practices, highlighting those with the highest environmental risk.
- (2) The results of the annual EMS self-audit and conformance status, or results of the external EMS audit if conducted that year, and the progress in correcting EMS nonconformance, highlighting any compliance deficiencies over one year old or that require the command's attention to resolve.
- (3) A review of the installation's EMS objectives and targets and status in meeting them.
- (4) Results of regulatory agency inspections conducted during the year.
- (5) Any other pertinent indicators of environmental performance to include program trends and root causal factors for compliance deficiencies; and
- (6) Requests for senior management support to promote continued performance improvement, if necessary.
- c. After the annual EMS management review, EMD implements necessary action, and engages the EMS Team as necessary, to ensure

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that the EMS remains suitable to command's mission and effective in achieving the command's policy, objectives, and targets.

### d. Documentation

- (1) The EMS Manager documents the results of the annual EMS review via meeting minutes which include, at a minimum, an attendee list, the meeting's agenda, a summary of discussions, and action items with dates. The EMD Director signs these meeting minutes "By direction.
- (2) The EMS Manager maintains the results of the annual management review on the EM Portal per EMS Element 15: Records Control.