



UNITED STATES MARINE CORPS
MARINE CORPS INSTALLATIONS EAST-MARINE CORPS BASE
PSC BOX 20005
CAMP LEJEUNE NC 28542-0005

MCIEAST-MCB CAMLEJO 5090.4
G-F/EMD

JUN 05 2019

MARINE CORPS INSTALLATIONS EAST-MARINE CORPS BASE CAMP LEJEUNE ORDER
5090.4

From: Commander
To: Distribution List

Subj: ENVIRONMENTAL COMPLIANCE EVALUATION PROGRAM ABOARD MARINE CORPS
BASE CAMP LEJEUNE

Ref: (a) MCO 5090.2
(b) MCIEAST-MCB CAMLEJO 5090.9

Encl: (1) 4.101 Installation Environmental Audit Program
Environmental Standing Operating Procedures (ESOP)
(2) 4.102 Development of Unit-Level Environmental Program ESOP

Report Required: I. Oil Spill Report (Reports Control Symbol DD-
5090-10), par. 3b(7)(k)1

1. Situation. The reference requires installations to conduct environmental auditing (i.e., self-evaluations) to evaluate installation and unit environmental compliance. Enclosure (1) establishes guidance for Marine Corps Installations East-Marine Corps Base Camp Lejeune's (MCIEAST-MCB CAMLEJ) Environmental Compliance Evaluation (ECE) program to assess the Installation's, as well as each command's compliance level, identifies actions necessary to correct compliance deficiencies, monitor corrective measures, and facilitate continual improvement of environmental compliance and performance. MCIEAST-MCB CAMLEJ's ECE program is managed by the Environmental Management Compliance Branch (ECB), Environmental Management Division (EMD), G-F Department.

2. Mission

a. Implement requirements and guidelines for conducting ECEs, other audits, and management reviews undertaken for the purposes of preventing, identifying, and correcting environmental management and protection deficiencies affecting compliance with Federal, state, and local environmental statutes and regulations.

b. Encourage and assist commanders and heads of organizations to utilize their Major Subordinate Command (MSC) Environmental Compliance Coordinators (ECCs) and Command/Department Environmental Compliance Officers (ECOs) as effective mechanisms when preparing for the various external inspections by Federal, state, and local regulatory agencies and in dealing with inspectors during on-site visits.

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3. Execution. Specific aspects applicable to the implementation of the Installation ECE program with respective responsibilities are as follows:

a. Commander's Intent and Concept of Operations

(1) Commander's Intent. Implement an ECE program for MCB CAMLEJ, subordinate, and tenant commands, referred to as the Installation, and MCB CAMLEJ managed environmental areas at Marine Corps Air Station New River (MCAS NR) that ensures the day-to-day Installation activities are performed in compliance with the specific environmental regulations that impact those activities.

(2) Concept of Operations. Establish and utilize procedures and associated tasks required for implementing a robust ECE program on the Installation.

b. Tasks

(1) Assistant Chief of Staff, G-F shall: Serve as, or appoint a representative to serve as, the principal staff assistant to the Commanding General (CG) on environmental compliance issues.

(2) Director, EMD, G-F shall:

(a) Provide trained environmental personnel to perform ECEs utilizing standardized checklists.

(b) Perform the ECEs in close cooperation with tenant command ECCs, ECOs, and the Environmental Affairs Department, Marine MCAS NR, as appropriate.

(c) Provide a representative to accompany site visits by Federal and state regulatory personnel.

(d) Ensure prompt notification to cognizant commanding officers (CO), senior managers, ECCs, and ECOs of proposed site visits by environmental representatives of higher headquarters, and Federal, state, and county environmental regulatory agencies.

(e) Serve as the Installation point of contact (POC) during the planning, implementation, and follow-up of Headquarters, U.S. Marine Corps (HQMC) conducted ECEs, and in this capacity:

1. Ensure cognizant senior command officials are given sufficient prior notification of scheduled HQMC conducted ECEs.

2. Arrange a workspace for the ECE team and access to the official environmental records.

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3. Coordinate site visits by ECE team in cooperation with cognizant tenant command ECCs and ECOs.

4. Review and provide comments on daily ECE team reports as required to assist in the identification of inaccuracies of information utilized or, when appropriate, to dispute the findings reached and recommended corrective actions.

5. Immediately initiate appropriate corrective actions and begin initial steps in the development and implementation of an ECE plan of action and milestones (POA&M) in cooperation with affected organizations within the Installation.

(f) Oversee an environmental training program for the Installation and assist tenant commands with the conduct of their respective awareness programs.

(3) ECB, EMD, G-F: Provide management support required to ensure the effectiveness of the ECE program to installation personnel, including, but not limited to:

(a) Ensuring cognizant senior command officials are given sufficient prior notification of biannual scheduled ECEs.

(b) Reviewing and providing comments on ECE reports and recommended corrective actions.

(c) Ensuring EMD-sponsored training is available.

(4) Environmental Assessment Section, ECB, EMD, G-F:

(a) Performs ECEs of the environmental activities aboard MCIEAST-MCB CAMLEJ to determine and improve the status of compliance with Federal, state, and Marine Corps environmental laws.

1. Ensure evaluations will be scheduled, conducted, and reported to the activity in a timely manner.

2. Evaluate compliance deficiencies and ensure that appropriate corrective action is incorporated into formal written reports and provided to the MCIEAST-MCB CAMLEJ Command Inspector General (upon request) and the inspected organization.

(b) Oversee participation of ECB specialists in the environmental review and approval of proposed actions and other requests for assistance.

(c) Provide technical assistance and guidance to ECCs and ECOs required to implement their environmental programs.

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(5) All Tenants and Organizations aboard MCB CAMLEJ

(a) Conduct all operations and training aboard the Installation in compliance with the regulations promulgated from environmental laws, regulations, and local orders. Coordinate with EMD to establish and review the organization's environmental management program.

(b) Appoint personnel to serve as ECC, Assistant ECC (AECC), ECO, Assistant ECO (AECO), if needed, in writing, no later than two weeks after verbal assignment.

1. Appointment letters for ECCs and ECOs, must be signed by the CO/department head.

2. Unit ECOs should contact higher headquarters ECCs to obtain templates for command-specific appointment letters.

(c) Ensure cognizant primary and assistant ECCs and ECOs have sufficient rank (determined by CO/officer-in-charge/supervisors), authority and resources to properly manage the organization's environmental program.

(d) Ensure participation of cognizant environmental personnel in EMD scheduled biannual ECEs, investigations, and site visits.

(e) Ensure training of ECC, AECC, ECO, and AECO is accomplished within three months of assignment and documented on the Environmental Personnel Training Record (figure 1, enclosure (2)). The form is located on the website <https://www.lejeune.marines.mil/Offices-Staff/Environmental-Mgmt/ECObinder/>.

(f) Ensure the environmental personnel training record form is signed by the appointed personnel and then signed by the next highest billet in the personnel's chain of command (ECO, ECC, supervisor, or command appointed representative).

1. An appointment letter, certifications, and record of training must be included in the appointed personnel's training file.

2. Training files must be maintained on file for review.

(g) Develop and maintain command Environmental Hazardous Waste/Hazardous Material Operations (EHW/HM Ops) Binder to implement and execute the environmental management program and command-specific environmental requirements. Enclosure (2) provides the requirements and a template for the EHW/HM Ops Binder.

(h) Ensure the command EHW/HM Ops Binder is readily available to all personnel.

(6) ECC

(a) Serve as the POC for matters involving environmental issues and compliance with this Order. The II Marine Expeditionary Force ECC shall act as the ECC for the 22d, 24th, and 26th Marine Expeditionary Units, due to the operational tempo of these units.

1. Ensure a POC roster of all unit-level ECOs and AECOs is submitted to EMD on a quarterly basis.

2. Ensure all commands within their cognizance adhere to the ESOPs.

(b) Ensure that ECOs, AECOs, and other environmental staff required are appointed in writing two weeks after being verbally appointed, and properly trained.

1. The appointment letter will include a written description of their duties. Appointment letter examples are located on the EMD website listed in enclosure (2).

2. Initial training must be accomplished within three months of assignment and documented on the EMD Form 27 found in enclosure (2).

3. The ECC must verify that appointed personnel have signed their individual record of training, and an appropriate supervisor has signed as well.

(c) Schedule and participate in the ECE and corresponding follow-up of organization/command operations per this Order, reference (a), and Federal and state regulations.

(d) Ensure discrepancies identified through ECE are corrected. Corrective actions must be documented in writing, signed by the CO/department head (By direction authority permitted), and provided to EMD within 30 days of receiving written report.

(e) Develop and maintain the EHW/HM Ops Binder to implement the environmental management program and command-specific requirements. Management efforts should promote minimization and other pollution prevention objectives to the maximum extent practicable, within mission and resource constraints.

(f) Provide assistance to ECOs and site managers in resolving environmental problems affecting their commands.

(g) Conduct four, documented, quarterly inspections annually (ECCs can substitute one EMD conducted ECE) of all environmental areas utilizing the EMD approved format and ensure that any issues identified during the quarterly inspection are corrected.

(h) Ensure all unit/department required inspections are conducted. In the absence of the unit ECO/AECO, conduct required monthly, weekly, and daily inspections.

(i) Monitor the respective environmental training program to ensure personnel in positions of environmental responsibility are trained, per the Installation Comprehensive Environmental Training and Education Program.

1. Participate and ensure those personnel in positions of environmental responsibility are enrolled in training sessions and workshops conducted or sponsored by the command ECC and/or EMD.

2. Review ECO duties and training on a semi-annual basis and submit requests for additional training to EMD.

3. Maintain current environmental training records for themselves, ECOs, and AECOs within their command.

4. Ensure that former command environmental personnel training records are maintained for a period of three years after being removed from the command environmental program; the closed out records must include the date that they were closed.

(j) Identify facilities' deficiencies, as pertaining to environmental associated sites, to the appropriate Installation authorities.

(k) Ensure that deploying units will follow, and abide by, all procedures outlined in the ESOP for environmental management preparations for deploying units.

(l) Conduct documented quarterly meetings with unit-level ECOs.

(m) Consolidate units' environmental POC rosters and provide EMD the contact information for all unit-level ECOs and AECOs on a monthly basis, or when there has been a change to a unit's environmental program.

(7) ECOs

(a) Serve as the unit/department POC for matters involving environmental issues and compliance with this Order.

(b) Ensure all ESOPs are adhered to and placed in the unit's environmental operating file. ESOPs can be downloaded from the EMD website at <https://www.lejeune.marines.mil/Offices-Staff/Environmental-Mgmt/ECPSOP/>.

(c) Develop and maintain the unit/department EHW/HM Ops Binder, in accordance with this Order, to implement the environmental management program and command-specific requirements. Environmental management efforts should promote HM/HW minimization and other pollution prevention objectives to the maximum extent practicable, within mission and resource constraints. A compact disc or hard drive may be used to meet this requirement as long as they can be accessed upon request.

(d) Ensure that an updated unit environmental POC roster is submitted to their ECC on a monthly basis.

(e) Keep key command and environmental personnel informed of any changes in regulations affecting environmental activities within the ECO/AECO's cognizance, and ensure SOPs and Unit-Level Contingency Plans (ULCP) are up-to-date and readily available for review by personnel.

(f) Maintain a list of the locations, as well as a numerical count by location, of all environmental-related sites (to include HM/HW/Medical waste generation sites, oil-water separators, tanks, generators, and air emission sources) within the command. Update this list on a semi-annual basis, or when there is a change, and ensure a current copy is placed in the unit's environmental operating file.

(g) Conduct documented monthly inspections of environmental-related sites. Perform follow-up actions required to ensure correction deficiencies.

(h) Inform the ECC when the ECO is unavailable to conduct a required inspection and verify that the AECO, or other trained and appointed personnel, will be available.

(i) Ensure all required environmental inspections are conducted. If there is no one trained and appointed, contact the higher headquarters ECC so they may fill in until an appointed and trained individual returns.

(j) Oversee the management of the environmental training program, including, but not limited to, the following:

1. Maintain a current roster and training records of all environmental personnel within the command.

a. Ensure appointed personnel sign their individual training record upon written appointment.

b. Ensure you, as the ECO, sign individual training records once appointed personnel have signed. Training must be entered using EMD Form 27 found in enclosure (2) of this Order.

c. Ensure training records for environmental personnel transferring to another installation or being released from active duty are retained for a period of three years from the date removed from the program.

2. Participate in and ensure environmental personnel take part in regular environmental training sessions (to include hazard communication training) and workshops conducted/sponsored by the command ECC or EMD.

3. Participate in quarterly ECO meetings held by the ECC.

4. Review environmental personnel training records on a semi-annual basis and submit requests for additional training via the cognizant command ECC to EMD.

(k) Ensure all leaks, releases, or spills are managed according to this Order.

1. All leaks, releases, or spills should be reported to 911; a Unit Level Spill Form must be completed and maintained in the unit's environmental operating file for review upon request by EMD.

2. Copies of the EMD Form 18 (Unit Level Spill Form) form can be obtained from the ECC or from the EHW/HM Ops Binder webpage located at <https://www.lejeune.marines.mil/Offices-Staff/Environmental-Mgmt/ECObinder/>.

3. Ensure that all procedures outlined in the ESOP for environmental management preparations for deploying forces are followed at the unit level, and EMD and the higher headquarters ECC are notified of any pending deployment.

4. Administration and Logistics. Not applicable.

5. Command and Signal

a. Command. This Order is applicable to MCB CAMLEJ including subordinate and tenant commands and organizations, all MCIEAST-MCB CAMLEJ staff sections, and contractors.

b. Signal. This Order is effective the date signed.


S. A. BALDWIN
Acting

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

Title: 4.101 - INSTALLATION ENVIRONMENTAL AUDIT PROGRAM ENVIRONMENTAL
STANDING OPERATING PROCEDURES (ESOP)

Related: MCIEAST-MCB CAMLEJO 5090.4

PURPOSE. This ESOP establishes the requirements and procedures for conducting installation ECEs. These requirements are established to ensure compliance with Federal, state, HQMC, and MCIEAST-MCB CAMLEJ plans, policies, and orders. Ensure this ESOP is included in the unit's EHW/HM Ops Binder.

APPLICABILITY. MCIEAST-MCB CAMLEJ conducts ECEs through its EMD, G-F, ECE program. The ECEs provide MCIEAST-MCB CAMLEJ a management tool to achieve, maintain, monitor, and continually improve environmental compliance and performance, and reduce environmental risks. Different types of ECEs are to be conducted at the ECO level, the ECC level, the EMD Environmental Assessment Section (EAS), ECB level and the HQMC level. This section applies to all environmental programs covered by reference (a) and MCIEAST-MCB CAMLEJ environmental orders, to include those programs that are utilized at MCAS NR and are under control of MCIEAST-MCB CAMLEJ.

RESPONSIBILITY. All personnel that are responsible for maintaining compliance with any environmental program requirements.

PROCEDURE

1. HQMC Benchmark ECE. HQMC conducts Benchmark ECEs of the Installation every three years. The Head, EAS, will serve as the central POC for the ECE. Installation environmental personnel will assist HQMC and its contractors in the Benchmark ECE by providing the following:

a. Coordinate scheduling of the ECE with all command/unit and tenants and ensure any information for pre-ECE checklists and POCs are obtained and provided to the HQMC inspectors.

b. Accompanying HQMC inspectors on field visits to provide additional information/answers to questions and to take field notes to assist the Installation in responding to identified deficiencies.

c. Attend daily out-briefs to discuss evaluation progress, problem areas, and coordinate the schedule.

d. Assist in developing the POA&Ms to correct Benchmark ECE deficiencies and perform annual follow-up of corrective actions in order to update the POA&Ms.

2. Installation ECEs (Self-Audit). Installation ECEs are performed by personnel in the EAS, ECB. These ECEs assess compliance with all environmental program requirements and include all operations and activities within the installation boundary, to include tenant activities and programs at MCAS NR which fall under the cognizance of MCB CAMLEJ environmental program managers. This is accomplished by:

a. Developing Inspection Schedule (Self-Audit Plan)

(1) Unit/Command ECE. All departments, commands, and tenants are inspected twice a year. The EAS ECE team leader will generate a schedule for distribution in January and May. The MSC ECC will review dates with unit ECOs for scheduling conflicts and either confirm date or request an alternate date. Once all dates have been confirmed, the ECE team leader will finalize a schedule with assigned evaluator(s) and submit to Director, EMD for concurrence. In the event that an ECE has to be re-scheduled, the appropriate MSC ECC will coordinate an alternate date with ECE team leader.

(2) Program ECE. For those environmental programs that are not inspected during unit/command ECEs, the EAS head and ECE team leader will generate an annual schedule and distribute to the cognizant environmental program manager.

b. Conducting the ECE

(1) Unit/Command ECE. Checklists utilized during unit/command ECEs are developed from applicable Federal and state regulations, permits, Marine Corps orders and local installation orders. Unit/command ECOs and/or ECCs accompany the EAS inspectors who inspect the applicable environmental media within the command. Inspectors record deficiencies and any additional information and provide feedback to the ECO/ECC during the course of the ECE. At the conclusion of the ECE, the inspector will provide an out-brief of the results of the ECE to a senior unit/command leadership official. Also at the time of the out-brief, a commander's awareness brief is provided to ensure senior leadership understands their environmental program responsibilities.

(2) Program ECE. Checklists utilized during Unit/command ECEs are developed from applicable Federal and state regulations, permits, management plans and Benchmark ECE questions. Senior EAS inspectors interview applicable program managers and any other program-related personnel and conduct site visits when required. Inspectors record deficiencies and any additional information. At the conclusion of the ECE, the inspector will provide an out-brief of the results of the ECE to the program manager and their supervisor.

c. Reporting the ECE

(1) Unit/Command ECE. Upon completion of the ECE, inspectors will produce an ECE report consisting of a summary table of sites visited, deficiencies identified, detailed explanations, and an associated corrective action. Final reports are disseminated to appropriate unit/command staff personnel. The unit/command is required to take immediate action to correct the noted deficiencies. Documentation of correction action must be forwarded to EMD within 30 days of the date of report. For those commands with extensive issues, a follow-up site visit may be warranted to ensure all corrective actions have been completed. All ECE reports and associated corrective action letters will be maintained in EMD's Office Document Inventory (ODI) database.

(2) Program ECE. Upon completion of the ECE, inspectors will produce a Program ECE Report consisting of all the questions asked and corresponding answers/notes to each. Any identified deficiencies will require development of a POA&M to correct deficiencies. Final reports are disseminated to the program manager's supervisor and the program manager for action. All ECE reports and associated POA&Ms will be maintained in EMD's ODI database.

3. ECC ECE. The ECC is the main POC for the MSC for all matters involving environmental issues and compliance. The ECC is appointed by the MSC CG and oversees the ECOs of the units under the MSC. The ECC's responsibilities in the ECE process are as follows:

a. The ECC will conduct documented quarterly inspections of all environmental areas utilizing the EMD Form 29 (Quarterly ECC Checklist) and ensure that any issues identified during the quarterly inspections are corrected. The ECC must conduct four, documented ECC quarterly inspections annually, and may use one EMD-conducted ECE to satisfy this requirement.

b. The ECC will ensure that all unit/department required inspections are conducted. In the absence of the unit ECO/AECO, the ECC will conduct any required monthly, weekly, and daily inspections.

c. The ECC will coordinate with EMD to schedule and participate in the EMD ECEs and corresponding follow-up of units under their cognizance. This includes ensuring that corrective actions are forwarded to EMD in the required timeframes. Annually, EMD will conduct an audit of the ECC's environmental program management to ensure all requirements are being conducted properly.

4. ECO ECE. The ECO serves as the unit/department POC for matters involving environmental issues and compliance. All units/departments are required to assign an ECO; the ECO is appointed by the unit CO/department head. The ECO is responsible for ensuring that unit

personnel with environmental responsibilities adhere to the requirements set forth in regulations, orders, and environmental SOPs. The ECO's responsibilities in the ECE process are as follows:

a. The ECO will conduct documented monthly inspections of all environmental areas utilizing the EMD Form 26 (Monthly ECO Checklist) and ensure that any issues identified during the monthly inspections are corrected. The ECO will inform the ECC when they are unavailable to conduct a required inspection and verify that the AECO, or other trained and appointed personnel, will be available.

b. The ECO will ensure that all unit/department required inspections are conducted. Ensures weekly turn-in of unit generated hazardous material occurs, and that any medical waste, if applicable, is transferred within the specified period of time. When site managers or handlers are unavailable, ensure that an environmentally trained individual conducts the required inspections. If there is no one trained and appointed, contact the ECC to fill in until an appointed or trained individual returns.

c. The ECO will coordinate with EMD to schedule and participate in the EMD ECEs and corresponding follow-up. This includes ensuring that corrective actions are forwarded to EMD in the required timeframes.

REFERENCES:

MCO 5090.2 - Environmental Compliance and Protection Manual

EHW/HM Ops Binder Webpage <https://www.lejeune.marines.mil/Offices-Staff/Environmental-Mgmt/ECObinder/>

TRAINING: Training required for all EMD personnel who conduct ECEs, ECCs, and ECOs:

- EM 101 - HM/HW Initial Training
- EM 102 - HM/HW Refresher Training
- EM 104 - ECC/Officer Workshop
- EM 106 - Air Quality Training
- EM 108 - Oil/Water Separator (OWS) and Pollution Abatement System (PAS) Training
- EM 109 - Medical Waste Training
- MarineNet Course: MCIESTM01A USMC-SPCC and Tank Management

- EMD personnel who conduct ECEs (recommended when possible)
 - CECOS Environmental Law
 - McCoy's Five-Day RCRA Seminar

DEFINITIONS:

Environmental Compliance Coordinator (ECC). An individual with sufficient rank, staff noncommissioned officer (SNCO) or higher, assigned by their respective CG, or by the CO MCAS NR that is responsible for the management and implementation of the command environmental program. In addition, this term will include the assistant(s) assigned to this position of AECC.

Environmental Compliance Officer (ECO). An individual with sufficient rank, SNCO or higher, assigned at the regimental, battalion, and base agency (or equivalent) responsible for the management and implementation of the command environmental program. In addition, this term will include the assistant(s) assigned to this position of AECO.

Finding. The result of noncompliance with an applicable Federal, state, local law, or permit and may result in a notice of violation (NOV), a fine, or other enforcement action if discovered by a regulatory agency.

Discrepancy. A direct failure to follow the Installation-mandated base orders, directives, or best management practices, but normally does not result in a NOV or fine.

Command Issue. A finding/discrepancy that has been identified as a recurring deficiency throughout the command.

Repeat Finding/Discrepancy. A finding/discrepancy that was previously identified and addressed/closed, but is subsequently re-identified. The intent of the repeat is to highlight problems that have been identified in the past, but which have not received adequate corrective action.

Title: 4.102- DEVELOPMENT OF UNIT-LEVEL ENVIRONMENTAL PROGRAM ESOP

Related: MCIEAST-MCB CAMLEJO: 5090.4

PURPOSE: This ESOP establishes the procedures for the development of all unit level environmental programs. Ensure this ESOP is included in the unit's EHW/HM Ops Binder.

APPLICABILITY: These requirements are applicable to all organizations aboard MCB CAMLEJ, to include: any command, active or reserve component; staff organization; or supporting agency which is affiliated with the United States Marine Corps, Department of the Navy, United States Coast Guard, Department of Homeland Security, or Department of Defense. This section also applies to organizations and contractors organic to or tenant aboard MCB CAMLEJ, including those in transit or otherwise temporarily resident because of training or mobilization.

RESPONSIBILITY: All personnel who have environmental responsibilities.

PROCEDURE:

1. Appoint Personnel to Environmental Positions. All personnel with environmental responsibilities will be assigned in writing by the organizational CO/department head within two weeks of assignment. By-name authorizing appointment letters must be kept within the unit's EHW/HM Ops Binder and a copy forwarded to the unit's ECO/ECC. Appointment letters must include the appropriate environmental responsibility ESOP as an attachment. Responsibility ESOPs are provided at <https://www.lejeune.marines.mil/Offices-Staff/Environmental-Mgmt/ECPSOP/Shop-Level-Standard-Operating-Procedures/>, or by request at 910-451-5837.

a. Positions of environmental responsibility include but are not limited to the following: ECC, AECC, ECO, AECO, HW/HM site managers/handlers, and their assistants.

b. All personnel appointed to environmental responsibilities must receive training within three months of assignment (EM-101) followed by an annual review of the initial training (EM-102). Training should be scheduled by the ECOs through the command's ECC.

c. Ensure ECCs and ECOs have sufficient rank and resources to properly manage the organization's environmental program.

2. EHW/HM Ops Binder. Each major tenant command and organizational element routinely generating, handling, or storing HW will develop an ESOP binder. An outline of the EHW/HM Ops Binder requirements and

required forms can be located at the EHW/HM Ops Binder webpage <https://www.lejeune.marines.mil/Offices-Staff/Environmental-Mgmt/ECObinder/>. The EHW/HM Ops Binder must include:

a. POC List. Names and telephone numbers of the ECC, ECO, assigned unit environmental personnel, unit safety representative and the EMD directory. The POC list will be updated on a monthly basis or when changes occur. Updated POC lists will be forwarded to the EMD/EAS supervisor.

b. Environmental Policies/References

(1) MCIEAST Policy Statement on Environmental Management and Conservation (current).

(2) Hazardous Waste Minimization (HazMin) Policy. The HazMin policy will reflect the unit CO's goals to reduce HW generation by reducing p Practices through source reduction, material substitution, process changes, reuse and recycling, and proper shelf-life management.

(3) References. Guidance provided by the ECC and/or ECO to implement the HW disposal program. This section should consist of required orders, a CD containing the required orders, or a reference to the MCIEAST-MCB CAMLEJ Adjutant's website <https://www.mcieast.marines.mil/Staff-Offices/Adjutant/Orders/5000/> with the required orders listed.

c. Plans/Procedures

(1) ESOPs. Periodically, EMD will issue ESOPs for particular practices that have environmental impacts. These must be included in the unit-level EHW/HM Ops Binder and maintained for each applicable environmental function.

(2) ULCP. Copies of a current ULCP that specifically addresses provisions for spills and response actions for each type of environmentally associated site listed in paragraph 2.c(3) At a minimum, the ULCP will contain the following:

(a) List of POCs, and phone numbers of the ECC and ECO.

(b) Arrangements with local authorities. For ULCP purposes, contacting the fire and emergency services division (FESD) at 911 satisfies this requirement at the unit-level.

(c) Immediate actions that personnel will take upon discovering any type of HM/HW/oil spill or fire hazard. This will include sounding an identified alarm by either voice command or mechanical device. These actions will be strictly defensive in nature

and commensurate with the personal protective equipment available at the time of the incident. Spill response actions for petroleum oil lubricants (POL) and coolants will be governed by the ULCP. Spill response for materials not covered by the ULCP will be conducted at the direction and/or under the supervision of FESD or EMD.

(d) List of equipment and quantities of material sufficient for conducting defensive actions for the waste accumulated.

(e) Evacuation and Staging Routes. Evacuation routes may be the same used in the fire escape plan as long as access is not impinged by the release. A staging area is defined as a pre-designated area out of the potential area of danger where personnel will assemble in the event of an emergency. The ULCP must state a primary and alternate staging area in the event of an emergency.

(3) Location Map and Listing of all Environmental-Associated Sites. A current map and listing of all sites that have environmental requirements (i.e., HM/HW accumulation/storage areas, storage tanks, oil-water separators) within each command. Each site should be reflected on the location map. This section can also include the site's evacuation/staging route map.

(4) Hazardous Waste Management Plan (if applicable).

d. Appointment Letters. All personnel with environmental responsibilities will be assigned in writing by the organizational CO/department head within two weeks of assignment. By-name authorizing appointment letters must be kept within the unit's EHW/HM Ops Binder and a copy forwarded to the unit's ECO/ECC.

e. Training Records (Current/Archived). Training should be recorded using EMD Form 27 (figure 1). Training records should be available for each current assigned employee. Copies of training certificates include course information and should be included in the training record, along with a copy of signed appointment letters detailing their duties. Training documents will be signed by the individual and their supervisor or ECO. There should also be a section containing training records for each employee that has been removed from the environmental program for the past three years.

f. Unit Authorized Use List (AUL). An AUL is an approved list of HM needed to meet the operational requirements of a command, facility, or work center. An effective AUL process supports the reduction of on-hand HM inventory levels, efficient tracking and visibility of HM inventory, "cradle-to-grave" management, reduces the amount of HM that becomes HW, and promotes the use of environmentally-preferred products. Each unit/organization that utilizes HM is required to maintain an AUL (preferably by workcenter). Only products approved on the unit AUL may be purchased, stored, or used by that individual

unit's workcenters. The AUL will be reviewed quarterly and signed by the ECO. The AUL excludes HM such as ammunition, explosives, nuclear, radioactive, or biological HM or waste, in-theater, wartime operations, and pharmaceuticals (complete listing found in reference (b), enclosure (1)).

g. Accumulation Site Authorization Letter(s)/Hazardous Waste Profile Sheet(s) (HWPS) DD-1930 (If Applicable). Copies of current SAA/Universal Waste Site/MW site authorization letters and current HWPS DD-1930s for the waste being accumulated in the SAA.

h. Inspections. Copies of all daily/weekly/monthly required inspections conducted during the past three years.

i. Copies of Completed HM/HW Turn-In Worksheets. Copies of Completed HM/HW turn-In worksheets and attachments for each HW/HM turned in during the preceding 52 weeks. Worksheets must have proper resource conservation and recovery section/ECO/ECC signatures verifying turn-ins.

j. Spill Reporting Forms. Spills must be reported immediately to the FESD by calling 911. A Unit Level Spill Reporting Form, EMD Form 18 (figure 2), must be filled out and forwarded to the unit ECO and ECC and maintained in the unit EHW/HM Ops Binder. Copies of EMD Form 18 (Unit Spill Reporting Form) can be obtained by the unit ECO or command ECC or by visiting the EHW/HM Ops Binder webpage.

3. Spill Reporting and Response Requirements. All units are required to publish a ULCP. The ULCP contains policies/procedures for the control and prevention of oil and hazardous material spills. The ULCP must be posted prominently and all personnel must know its location and contents.

REFERENCES:

MCO 5090.2: Environmental Compliance and Protection Manual

EHW/HM Ops Binder Webpage: <https://www.lejeune.marines.mil/Offices-Staff/Environmental-Mgmt/ECObinder/>.

TRAINING: Training must be requested through the unit ECO via the higher headquarters ECC, to EMD:

EM 101- HM/HW Initial Training - Required for all HM handlers, HM site managers, ECOs, and ECCs.

- EM 102- HM/HW Refresher Training - Required annually for all HM handlers, HM site managers, ECOs, and ECCs who have completed EM 101.

- EM 104 - ECC/Officer Workshop - Required for all ECOs, and ECCs who have completed EM 101.
- EM 106 - Air Quality Training - Required air emission source operators, ECOs, and ECCs who have air emission sources in their command
- EM 108 - OWS and PAS Training - Designed to provide practical on-site instruction in the operation and maintenance of oil/water separators and associated appurtenances.
- EM 109 - Medical Waste Training. Designed to provide a basic understanding of medical waste management and recordkeeping requirements at the battalion aid station/regiment aid station and including an overview of the Naval Hospital Camp Lejeune's Medical Waste SOP.
- MarineNet Course: MCIESTM01A USMC-SPCC and tank management.

DEFINITIONS:

Environmental Compliance Coordinator (ECC). An individual with sufficient rank, SNCO or higher, assigned by their respective CG, or by the CO MCAS NR that is responsible for the management and implementation of the command environmental program. In addition, this term will include the assistant(s) assigned to the position of AECC.

Environmental Compliance Officer (ECO). An individual with sufficient rank, SNCO or higher, assigned at the regimental, battalion, and base agency (or equivalent) responsible for the management and implementation of the command environmental program. In addition, this term will include the assistant(s) assigned to this position as AECO.

Release. The uncontrolled loss of a HM/HW from its storage vessel, to include POLs. All releases are required to be reported to the FESD. Releases of POLs that occur within an enclosed and contained maintenance facility are not subject to this reporting requirement provided they do not have the potential to impact the environment.

Unit Level Contingency Plan (ULCP). The purpose of the ULCP is to minimize the potential hazards to human health, the environment, and property associated with hazardous releases. The ULCP is the first line of defense against possible releases and tie into higher level plans such as those required for HM/HW facilities, emergency response plans, facility response plans, spill prevention, control and countermeasure plans, regional and national contingency plans.

FIGURE 1 ENVIRONMENTAL PERSONNEL TRAINING RECORD

[illegible]

Print Form

FIGURE 2 MCIEAST-MCB CAMP LEJEUNE SPILL REPORT

| MCIEAST-MCB CAMP LEJEUNE SPILL REPORT | | | | |
|---|--|--|--|--|
| SHADED AREAS ARE FOR RCRS USE ONLY | | | | |
| TITLE/LOCATION | | | | |
| DATE | TIME | | | |
| RESPONSE NAME/UNIT: | | | | |
| SPILL CATEGORY (SELECT ONE) <input type="checkbox"/> HAZMAT <input type="checkbox"/> HAZWASTE <input type="checkbox"/> POL <input type="checkbox"/> WASTEWATER <input type="checkbox"/> OTHER | | | | |
| PRODUCT SPILLED | | | | |
| QUANTITY SPILLED | | | | |
| LATITUDE | | LONGITUDE | | |
| HOW WAS SPILL DISCOVERED | | | | |
| SOURCE OF THE SPILL | | | | |
| CAUSE OF THE SPILL | | | | |
| MISSION IMPACT | | | | |
| WERE SAMPLES TAKEN (CHECK ONE) <input type="checkbox"/> YES <input type="checkbox"/> NO | | | | |
| ANALYSES REQUESTED / PERFORMED ON SAMPLES | | | | |
| DID THE SPILL (CHECK ONE) | ENTER A WATERWAY? | REACH WITHIN 100' OF SURFACE WATER? | REACH WITHIN 1500' OF A WATER SUPPLY WELL? | GO OFF BASE? |
| | <input type="checkbox"/> YES <input type="checkbox"/> NO | <input type="checkbox"/> YES <input type="checkbox"/> NO | <input type="checkbox"/> YES <input type="checkbox"/> NO | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| HOW WAS THE SPILL CONTAINED? | | | | |
| WHAT DANGERS DID THE SPILL PRESENT? | | | | |
| WHAT WERE THE ENVIRONMENTAL IMPACTS? | | | | |
| WHAT RECOVERY EFFORTS WERE USED? | | | | |
| IF OIL SPILLED, WHAT PERCENT WAS RECOVERED? | | | | |
| HOW WERE RESIDUALS DISPOSED OF? | | | | |
| WEATHER CONDITIONS? | | | | |
| REPORTABLE SPILL? (CHECK ONE) <input type="checkbox"/> YES <input type="checkbox"/> NO | | | | |
| WAS A REGULATORY AGENCY CONTACTED? <input type="checkbox"/> YES <input type="checkbox"/> NO | | | | |
| AGENCY NAME (IF) <input type="checkbox"/> NCEQ NCEQ REPORT# <input type="checkbox"/> NCEM NCEM REPORT# | | | | |
| REGULATORY DRIVER | | | | |
| NRC NOTIFIED <input type="checkbox"/> YES <input type="checkbox"/> NO NRC INCIDENT NUMBER: | | | | |
| WHAT MEASURES WERE PUT IN PLACE TO PREVENT RECURRENCE? | | | | |
| ADDITIONAL INFORMATION OR COMMENTS | | | | |
| SPILL POC | | E-MAIL | PHONE | |