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Environmental Standard Operating Procedures (ESOP)

Title: ESOP 4.9 - ENVIRONMENTAL MANAGEMENT PREPARATIONS FOR DEPLOYING UNITS' ENVIRONMENTAL STANDARD OPERATING PROCEDURES (ESOP)

Purpose: This ESOP establishes the preparations required to ensure that a unit's garrison obligations are met during any period that the unit will be deployed. This ESOP must be placed in the unit's Environmental Hazardous Waste/Hazardous Material Operations (EHW/HM Ops) Binder.

Applicability: This ESOP applies to all organizations organic to or tenanted aboard Marine Corps Installations East-Marine Corps Base Camp Lejeune (MCIEAST-MCB CAMLEJ), Marine Corps Air Station New River (MCASNR) and those in transit or otherwise temporarily resident because of training or mobilization.

Responsibility: All personnel holding Major Subordinate Command (MSC) level Environmental Compliance Officer (ECO) and Environmental Compliance Coordinator (ECC) billets.

Responsibilities:

1. Establish a Pre-Deployment Timeline and Evaluate Rear Party Requirements:

a. Garrison environmental responsibilities are not eliminated due to deployment. The unit's pre-deployment timeline must include delineation of environmental responsibilities.

b. Determine what practices, if any, will be conducted by the remain behind element. Practices that continue to operate under the cognizance of the rear party, must be conducted by properly trained individuals and in compliance with all applicable orders pertaining to their operation, including:

(1) Satellite accumulation areas (SAA) & universal waste (UW) areas (if applicable):

(a) Maintenance of Unit's Environmental Operations binder required forms and inspections.

(b) Maintenance of SAA and Universal Waste areas to include proper container labeling, signage requirements and required inspections.

(2) Hazardous material (HM) needs & storage requirements:

(a) Maintenance and accuracy of the unit's Authorized Use List (AUL). Ensuring accurate on-hand HM inventory and required labeling of HM inventory, as applicable.

(b) Ensuring turn-in of all excess, expired shelf- life, and/or unwanted HM.

(c) Reference (a) identifies requirements for HM. The rear party is responsible for compliance with all facets of the ESOP unless a site is decommissioned during deployment.

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(3) Aboveground storage tank (AST) needs:

- (a) Daily inspections are conducted as applicable.
- (b) Operator maintenance of ASTs as necessary.
- (c) Procedures to submit service requests related to ASTs.

(d) Reference (b) identifies requirements for ASTs. The rear party is responsible for compliance with all facets of the ESOP unless a site is decommissioned during deployment.

(4) Title V air emission sources:

- (a) Ensure frequency inspections are conducted as applicable.
- (b) Maintenance of the Title V Binder and associated recordkeeping forms.

(5) Pollution abatement facilities and oil-water separators (OWS):

- (a) Ensure frequency inspections are conducted as applicable.
- (b) Ensure operator maintenance of pollution abatement facilities as necessary.

(c) Procedures to submit service requests related to pollution abatement facilities.

(d) Reference (c) identifies requirements for pollution abatement facilities. The rear party is responsible for compliance with all facets of the ESOP unless a site is decommissioned during deployment.

(6) Rear party appointments and training requirements: The ECO is responsible for environmental sites in cases where the ECC deploys.

(a) Ensure appointment letters for appropriate personnel are completed as necessary.

(b) Ensure required training is completed, as necessary, prior to performing environmental duties. IT IS ESSENTIAL THAT THE REAR PARTY INCLUDES PERSONNEL TRAINED BY ENVIRONMENTAL MANAGEMENT DIVISION (EMD), as applicable, to perform any environmental management requirements that are associated with practices to be conducted in garrison by the rear party. At a minimum EM-101 Initial HM and Hazardous Waste (HW) Training, is required. However, all applicable training, including EM-106 Air Quality Training if Title V air emission operations apply to the rear party's duties, will be completed. Contact the unit ECC or command ECO to determine what type of training is needed. It is important to note that the unit ECC must retain control of environmental management requirements and practices until trained personnel are available to perform these duties.

(c) Reference (d) identifies requirements for ECOs. Reference (e) identifies requirements for ECCs. The rear party is responsible for compliance with all facets of the ESOPs during deployment.

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2. Secure Operation of Non-Essential Practices: The following actions will be taken for practices that discontinue while the unit is deployed.

a. Turn-in all HW. It is required that all HW be removed from the site. Arrangements will be made through the ECO for turn-in. Standard turn-in procedures will apply. Contact the unit ECC and EMD/Resource Conservation and Recovery Section (RCRS) to request an SAA closure. SAA inspection requirements will continue to apply up to and including the closure date (established in paragraph 4.a.(2)(a)). Once closed, monthly SAA site inspections are no longer required. SAA Closure letters must be maintained in the Unit's Environmental Operational Binder in accordance with reference (f).

b. Turn-in all HM and secure HM storage areas. Unit personnel must maintain inventory of all HM based on service-life expiration dates. Any HM associated with a discontinued practice should be turned in to prevent the generation of any HW.

(1) Unit personnel must take inventory of all HM regarding service-life expiration dates and ensure that all HM has at least one year of service-life remaining.

(2) HM that will not be used prior to its expiration date by the trained rear party may be either transferred to another unit within the MSC or turned in through the HM Curbside Service. EMD/RCRS will determine what is taken to the HM Re-Issue Facility. Contact your ECC for assistance.

(3) HM storage lockers will be consolidated to limit locations of HM inspections. HM compatibility requirements will continue to apply.

(4) Empty lockers will be unlocked when stored to clearly indicate no HM are present.

c. Turn-in all medical waste (MW). If deployment will result in the closure of an Aid Station, ensure all MW is turned in to the unit's authorized MW site in accordance with reference (f).

d. Secure ASTs. The following actions will be taken for all ASTs associated with practices that will be discontinued while the unit is deployed.

(1) Off specification (off spec) fuel, used oil and used antifreeze will be appropriately removed from ASTs. Fill out Form MCIEAST-MCB CAMLEJ/G-F/EMD/14 (MCIEAST-MCB CAMLEJ Service Request), which can be found at <https://www.lejeune.marines.mil/Offices-Staff/Environmental-Mgmt/emd-approved-Forms/> and email to lejuene_pas@usmc.mil to arrange commodity pick-up.

(2) After the tank has been emptied, EMD/RCRS will secure and tag the AST as "EMPTY".

e. Secure 55-Gallon Drums. Approved off spec fuel, used oil, or used antifreeze stored in 55-gallon drums will be appropriately removed. Units will fill out Form MCIEAST-MCB CAMLEJ/G-F/EMD/14 (MCIEAST-MCB CAMLEJ Service Request), and email to lejuene_pas@usmc.mil to arrange pick-up. When the approved off spec fuel, used oil or used antifreeze stored in 55-gallon drums has been removed, the unit will triple rinse the POL containers, as long as they are empty, and prepare them for turn in to DLA.

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Antifreeze drums will have the inner liner removed and both the liner and drum will be turned in during their next scheduled Curbside Service.

3. Inspections:

a. ECO/ECC Inspection: The ECO will ensure that execution of this ESOP has been completed. Any errors noted during the evaluation process will be corrected prior to the required EMD/Environmental Compliance Branch (ECB) deployment preparation inspection.

b. EMD/ECB Inspection: EMD/ECB will evaluate the unit to ensure the unit's deployment preparations are complete.

c. Inspections During Deployment: The rear party will perform, and document all required inspections based on the practices still being conducted (i.e., vehicle washing operations would require daily OWS inspections).

4. Administrative File Retention: Regardless of the unit deployment status, all records must be maintained. Options available to ensure effective file retention are as follows:

a. Rear Party Retention: This method is required in the event the rear party continues operations of any industrial practices assigned to the unit.

b. ECO Retention: This is the preferred method. All records are turned over to the unit's MSC ECO. The ECC will retain and store all records until the unit's appointed ECC returns to receive the unit EHW/HM Ops Binder.

5. Post-Deployment Re-Establishment:

a. Retrieve unit Environmental Operations binder from ECO. Resume normal operations. Contact EMD/ECB for assistance.

b. Review unit training records. Ensure that all training applicable to any personnel associated with the unit's environmental program is current. Contact ECO to schedule any required training.

c. Re-Establish SAAs. Site requirements must be met prior to the reactivation of any site in accordance with reference (f). Once requirements have been met, schedule an inspection to open the temporarily closed site(s). (Note: Sites are not activated until the inspection is complete and the EMD SAA Authorization Letter is posted, therefore industrial processes associated with the site cannot resume and the SAA is not activated until the required inspection has been completed and the EMD SAA Authorization Letter has been received and posted at the site).

d. Re-Establish AST Operation.

e. Re-Establish HM Storage Areas.

6. Spill Reporting and Response Requirements:

a. All units are required to have a Unit Level Contingency Plan (ULCP) per reference (g). Ensure the ULCP contains policies and procedures for the control and prevention of oil and hazardous material spills. The ULCP must be posted prominently.

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b. Any releases or spills that occur in and around the area of responsibility must be reported immediately to the Base Fire and Emergency Services Division (FESD) by dialing 911. A Spill Report, Form MCIEAST-MCB CAMLEJ/G-F/EMD/5090.91/18, must be completed and forwarded to the command Environmental Compliance Officer (ECO) via the unit ECC or Alternate Environmental Compliance Coordinator (AECC). A copy of the completed Spill Report must also be maintained in the unit Environmental Operations Binder. Forms can be obtained by the unit ECC or command ECO and may also be downloaded at <https://www.lejeune.marines.mil/Portals/27/Documents/EMD/HW-MM/UNIT%20LEVEL%20SPILL%20FORM.pdf>.

c. Units must stock appropriate amounts of spill containment and control equipment onsite for use in the event of a spill.

d. Signs are to be posted in the vicinity of the used oil, off spec fuel, used antifreeze, hazardous material, or pollution abatement facilities that will indicate the following information:

**IN CASE OF AN OIL OR HAZARDOUS MATERIALS SPILL CALL FIRE and
EMERGENCY SERVICES DIVISION AT 911 NOTIFY YOUR
COMMANDER/SUPERVISOR IMMEDIATELY**

The sign must have yellow background and black lettering. Information to purchase the signs can be acquired from the cognizant ECO.

References:

1. 9.01 - Hazardous Material Management Program ESOP
2. 9.102 - Management of Pollution Abatement Facilities ESOP
3. 4.1 - ECO Responsibilities ESOP
4. 4.2 - ECC Responsibilities ESOP
5. MCIEAST-MCB CAMLEJO 5090.9A
6. MCIEAST-MCB CAMLEJO 5090.4D

Training:

1. Unit personnel shall be trained on all provisions of this ESOP. All training must be requested through unit ECC or AECCs - ECO-> EMD/Environmental Compliance Branch (ECB)
2. Unit commanders shall ensure that personnel who perform operations such as vehicle maintenance, fueling, or washing are properly trained in the operation and maintenance of pollution abatement facilities. Personnel shall be trained on the environmental impact of oil and HM spills, and prevention of such incidents.
3. EM 101 - Initial Hazardous Material and Hazardous Waste Training - Required for all ECOs, AECOs, ECCs, AECCs, and AST Operators.
4. EM 102 - Refresher Hazardous Material and Hazardous Waste Training - Required annually for all ECOs, AECOs, ECCs, AECCs, and AST Operators who have received EM 101.

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5. EM 103 - HM Transportation for Drivers - Required annually for all ECOs, AECOs, ECCs, AECCs, and AST Operators.
6. EM 104 - ECO/ECC Training Class - Required for all ECOs, AECOs, AECCs, and ECCs.
7. EM 106 - Air Quality Training - Required for all ECOs, AECOs, ECCs, AECCs, and Air Emission Source Operators.
8. Shop-Level Training Modules - Modules which involve various environmental media topics applicable to shop level personnel.
9. Computer-Based Training (CBT) - Numerous CBTs are provided within the Environmental Learning Management System (eLMS) for military & civilian Marines to utilize to improve their environmental knowledge. These CBTs can be accessed at <https://www.marinenet.usmc.mil/marinenet/Courses/Catalog.aspx>.
10. Training should be documented in the individuals' training record using Form MCIEAST-MCB CAMLEJ/G-F/EMD/5090.9/27 (EMD Form 27) and must be retained for at least seven (7) years for military personnel and 30 years for civilian personnel. This form can be found at <https://www.lejeune.marines.mil/Offices-Staff/Environmental-Mgmt/emd-approved-Forms/>.

Definitions:

1. Authorized Use List (AUL) - A list identifying all potential HM stored or used by an End-User and maximum storage quantities.
2. Environmental Compliance Officer (ECO) - An individual with sufficient rank, Staff Non-Commissioned Officer or higher, assigned by their respective Commanding General, Commanding Officer, MCIEAST-MCB CAMLEJ, or by the Commanding Officer, MCAS, New River 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 (AECO).
3. Environmental Compliance Coordinator (ECC) - An individual with sufficient rank, Staff Non-Commissioned Officer 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 (AECC).
4. Hazardous Material (HM) - A chemical compound or combination of compounds which have been identified by DOT posing or capable of posing a significant risk to public health, safety, or the environment due to its quantity, concentration, or physical/chemical, and/or infectious properties, and/or characteristics while transported in commerce.
5. Oil-Water Separator - A waste management unit, generally a tank, that is used to separate oil or organics from water. A separator consists of not only the separation unit but also the forebay and other separator basins, skimmers, grit chambers, and bar screens.
6. Pollution Abatement Facility - Any equipment, plant, treatment works, structure, machinery, apparatus or land, or any combination thereof, acquired, used, constructed, or operated for the storage, collection,

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reduction, recycling, reclamation, disposal, separation or treatment of water or wastes, or for the final disposal or residues resulting from the treatment of water or wastes.

7. Hazardous Waste - A waste is a waste with properties that make it dangerous or capable of having a harmful effect on human health or the environment.