

**Environmental Standing Operating Procedures (ESOP)**

Title: 4.101 - INSTALLATION ENVIRONMENTAL AUDIT PROGRAM

Purpose: This ESOP establishes procedures for conducting installation Environmental Compliance Evaluations (ECEs) to protect human health and the environment; protect, sustain, and enhance mission readiness; and promote compliance with all applicable Federal, state, and local requirements and policies. Ensure this ESOP is included in the unit's environmental operation binder.

Applicability: This ESOP applies to environmental policies and programs related to implementing Marine Corps Order (MCO) 5090.2 and Marine Corps Installations East-Marine Corps Base Camp Lejeune (MCIEAST-MCB CAMLEJ) environmental compliance orders, to include MCIEAST-MCB CAMLEJ programs that are implemented at Marine Corps Air Station New River (MCAS NR).

Responsibility: All personnel that are responsible for maintaining compliance with MCIEAST-MCB CAMLEJ environmental program requirements.

Procedure:

1. HQMC Benchmark ECE. The Marine Corps conducts a Benchmark ECE of Marine Corps Base Camp Lejeune (MCB CAMLEJ) and MCAS NR every three years. The MCIEAST-MCB CAMLEJ Environmental Management Division (EMD) Environmental Assessment Section, serves as the staff point of contact for the Benchmark ECE. MCIEAST-MCB CAMLEJ EMD personnel support the Benchmark ECE by providing the following:

a. Support the scheduling of the ECE with tenant organizations to be inspected.

b. Accompany ECE inspectors during the ECE and take notes of inspection findings.

c. Attend daily ECE out-briefs to discuss environmental deficiencies and environmental compliance strategies, best practices, and technologies for enhancing environmental compliance.

d. Assist in developing the Plan of Action and Milestones (POA&M) to correct Benchmark ECE deficiencies (e.g., findings) and perform annual follow-up of corrective actions to update the POA&M.

2. Installation ECEs (Self-Audit). The MCIEAST-MCB CAMLEJ EMD conducts ECEs on MCB CAMLEJ and MCAS NR to assess compliance with environmental program requirements. This is accomplished by:

a. Developing Inspection Schedule (Self-Audit Plan)

(1) Unit/Command ECE. The EMD inspects all departments, commands, and tenants twice a year, and EMD publishes the inspection schedule in December and June. Major Subordinate Command (MSC)-level Environmental Compliance Officers (ECOs) will review dates with their unit/department-level Environmental Compliance Coordinators (ECCs) for scheduling conflicts and confirm inspection dates or request alternate dates. Once all inspection dates have been confirmed, the EMD ECE Program Manager (PM) team leader will finalize the inspection schedule with assigned evaluator(s) and submit to Director, EMD for concurrence. In the event that an ECE has to be

rescheduled, the appropriate MSC ECO will coordinate an alternate date with the EMD ECE PM.

(2) Program ECE. For those environmental programs that are not inspected during unit/command ECEs, EMD will publish an annual inspection schedule.

b. Conducting the ECE

(1) Unit/Command ECE. ECE inspection checklists are developed from applicable Federal and state requirements, including Marine Corps orders and policies. Unit/command ECCs and/or ECOs should accompany EMD inspectors during the ECE. Inspectors record deficiencies and any additional information and provide feedback to the ECC/ECO during the the ECE of all findings, discrepancies, command issues, and any repeat findings/discrepancies. After the ECE, the EMD inspector will provide an out-brief of the ECE to a senior unit/command leadership official. A Commander's Environmental Awareness Brief (EM-100) can also be provided at the time of the debrief to ensure the Commander/senior leadership understands their environmental program responsibilities.

(2) Program ECE. ECE inspection checklists are developed from applicable Federal and state requirements, including Marine Corps orders and policies. EMD 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 a debrief of the results of the ECE to the program manager and their supervisor to correct any findings, discrepancies, command issues, and any repeat findings/discrepancies.

c. Reporting the ECE

(1) Unit/Command ECE. After the ECE, inspectors will produce a final ECE report consisting of a summary table of sites visited, deficiencies identified, and corrective actions. Final reports are given to appropriate unit/department staff personnel. The unit/department must immediately correct noted deficiencies and forward documentation of correction action to EMD within 30 days after the date of the report. For a unit/department with extensive deficiencies, a follow-up site visit may be warranted to ensure all corrective actions are complete. All ECE reports and associated corrective action letters will be maintained in EMD's Office Document Inventory (ODI) database. In the event a unit isn't available during the inspection timeframe, EMD will generate a response to the Commanding Officer of the Unit.

(2) Program ECE Report. After the ECE, EMD inspectors will produce a Program ECE Report consisting of all the questions asked and corresponding answers/notes. Any identified deficiencies will require development of a POA&M to correct deficiencies. Final reports are given 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) ECO ECE. The ECO is the main point of contact for the MSC for all matters involving environmental issues and compliance. The ECO is appointed by the MSC Commanding General and oversees the ECCs of the units/departments under the MSC. The ECO's responsibilities in the ECE process are as follows:

26 Aug 24

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

b. The ECO will ensure that all unit/department required inspections are conducted. In the absence of the unit/department ECC or Assistant Environmental Compliance Coordinator (AECC), the ECO will conduct any required monthly, weekly, and daily inspections.

c. The ECO 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 ECO's environmental program management to ensure all requirements are being conducted properly.

4. ECC ECE. The ECC serves as the unit/department point of contact for matters involving environmental issues and compliance. All units/departments are required to assign an ECC; the ECC is appointed by the unit CO/department head. The ECC is responsible for ensuring that unit/department personnel with environmental responsibilities adhere to the requirements set forth in regulations, orders, and ESOPs. The ECC's responsibilities in the ECE process are as follows:

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

b. The ECC 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 ECO to fill in until an appointed or trained individual returns.

c. The ECC will coordinate with the ECO and 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 to correct all deficiencies (i.e., findings, discrepancies, command issues, and any repeat findings/discrepancies).

#### References:

1. MCO 5090.2: Environmental Compliance and Protection Manual
2. Environmental Ops Binder Webpage:  
<https://www.lejeune.marines.mil/Offices-Staff/Environmental-Mgmt/ECObinder/>
3. MCIEAST-MCB CAMLEJO 5090.9A: Hazardous Material/Waste Management

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

26 Aug 24

1. Introduction to Environmental Compliance (EM 101 - HM/HW Initial Training)
2. Hazardous Waste Management Refresher On-line (EM 102 - HM/HW Refresher Training)
3. Hazardous Material Transportation for Drivers (EM 103)
4. ECC/Officer Workshop (EM 104)
5. Air Quality Training (EM 106)
6. Medical Waste Training (EM 109)
7. Commanders Environmental Brief (EM 100) - Contact EMD for scheduling.

Prerequisites:

1. MarineNet Course: USMC- HQ/MCICOM Environmental Compliance Coordinator (ECC Training)/HQMCCECC001 (EM 101)
2. MarineNet Course: MCIEHMT01A USMC-Hazardous Material Transportation for Drivers (EM 103)
3. MarineNet Course: HQMCFHST01 USMC HQ/MCICOM-Fuel Handling, Storage & Transportation (EM 103)
4. MarineNet Course: HQMCAQC001 USMC-Air Quality Compliance (EM 106)

Definitions:

1. Environmental Compliance Officer (ECO). An individual with sufficient rank, authority, and resources, to be responsible to the MSC for the management and implementation of the command environmental program. The respective Commanding General or Commander shall appoint the ECO and any Assistant ECO in writing.
2. Environmental Compliance Coordinator (ECC). An individual with sufficient rank, authority and resources, assigned at the regimental, battalion, and base agency (or equivalent) responsible to the unit/department for the management and implementation of the environmental program.
3. 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.
4. 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.
5. Command Issue. A finding/discrepancy that has been identified as a recurring deficiency throughout the command.
6. Repeat Finding/Discrepancy. A finding/discrepancy that was previously identified and addressed/closed, but is subsequently reidentified. The intent of the repeat is to highlight problems that have been identified in the past, but which have not received adequate corrective action.