

**Marine Corps Base Camp Pendleton
Environmental Management System Manual
(EMS Manual)**



Version Date: 31 May 2017

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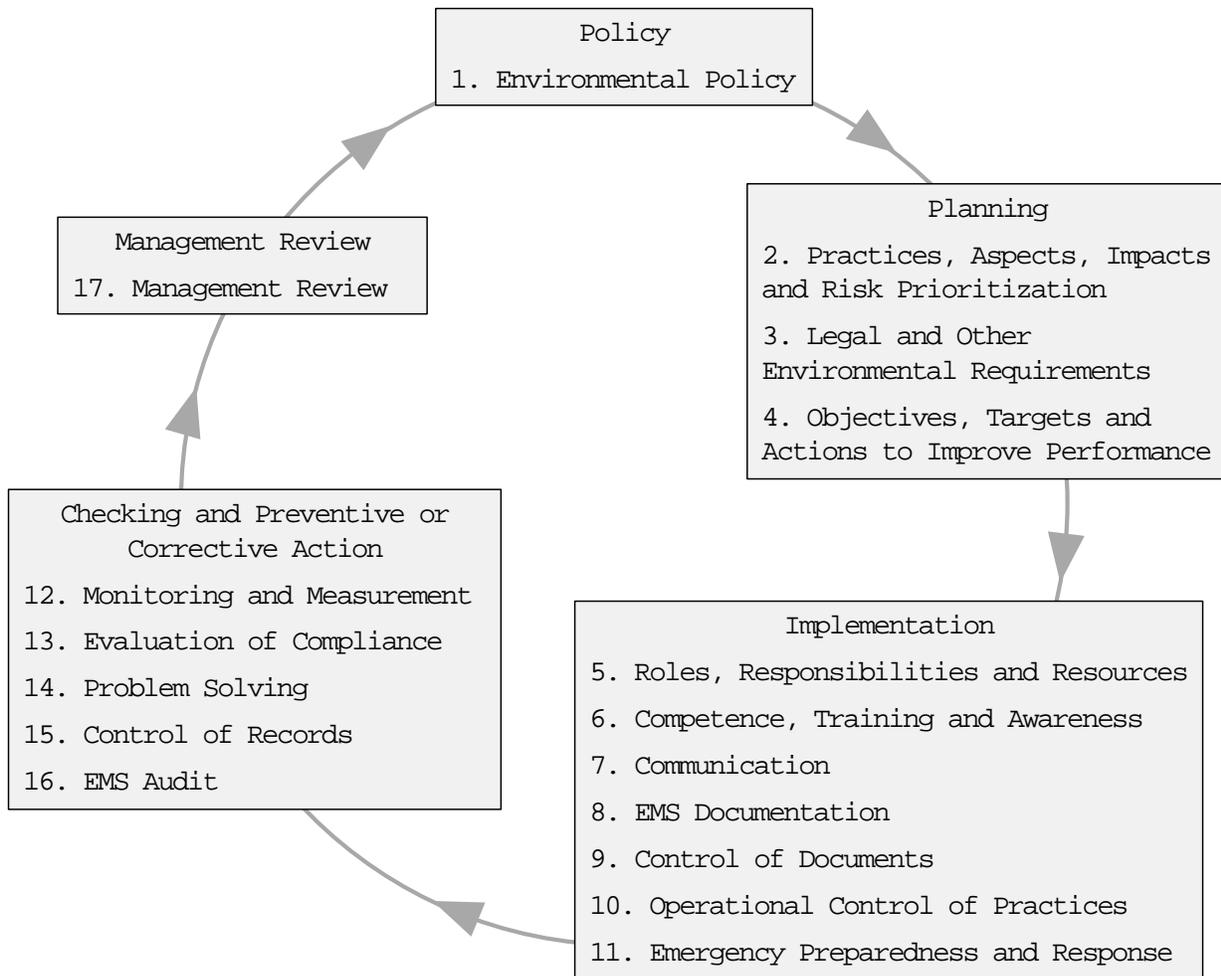
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Introduction

1. Purpose and Background

a. This EMS manual describes, in general terms, how Marine Corps Base Camp Pendleton (MCB CamPen) implements the 17 elements that are required of a conforming EMS. As such, this manual guides the installation's overall environmental management effort and forms the basis by which to audit the EMS.

b. MCO P5090.2A establishes the requirements of a conforming EMS. Patterned loosely after the international standard contained in ISO 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 and paradigms.



2. Scope and Applicability

a. Broadly defined, MCB CamPen's EMS is the sum total of policies, processes, and procedures--in short, the overall "system"--by which MCB CamPen conducts its environmental affairs. MCB CamPen's EMS addresses matters such as how the installation 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 non-compliance; improves environmental performance; and mitigates environmental risk. In this respect, MCB CamPen's *environmental management system* is much more than merely the performance of the EMS elements addressed in this document.

b. The procedures outlined in this manual augment the environmental policies, instructions, and requirements that are contained in MCB CamPen's official governing directives (e.g., Base orders), environmental management plans, and duly let government contracts. Base orders with the 5090 Standard Subject Identification Code, along with relevant sections of MCIWEST-MCB CAMPENO 3500.1_ (Range AND Training Area Standing Operating Procedures) and MCIWEST-MCB CAMPENO 5000.2_ (Base Regulations), and various other orders, convey policy, roles, responsibilities, and requirements for environmental stewardship at MCB CamPen. Various environmental management plans, such as MCB CamPen's Integrated Natural Resources Management Plan, Fire Management Plan, and Pesticide Management Plan, also establish requirements and explain how the installation manages its environmental compliance and resource stewardship obligations. The provisions that are contained in government contracts, to include real estate agreements, inter-service support agreements, and memorandums of understanding or agreement, govern the activities and outputs of these contractual and mutual support arrangements. In this manner and through these mechanisms, MCB CamPen's EMS encompasses and applies to all installation tenants, lease holders, contractors, and patrons.

3. Mission and the Environment. MCB CamPen 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 region now rely, in some respects solely, on MCB CamPen for their continued survival and posterity. MCB CamPen's environmental management efforts have shown that it is possible to sustain both mission readiness and environmental resources. MCB CamPen's EMS seeks to build upon this tradition and provide a framework to ensure that the

training opportunities, resources, and landscapes enjoyed by today's Marine will be available for the benefit and use of future generations of Marines.

4. Opportunity to Participate. MCB CamPen welcomes all appropriate and value-added participation in its environmental management efforts. MCB CamPen's EMS lead is the Environmental Security Department (ENVSEC).

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Definitions

1. Aspect. The manner or means by which a practice is able to interact with, and therefore impact, the environment (e.g., air emissions, water discharges).
2. Document. Information, stored on paper, electronic, or other media, that describes the organization, its goals or intent, or its procedures. Documents, unlike records, are subject to change over time.
3. Impact. Any change to the environment resulting from the environmental aspects of a practice.
4. Objective. A statement that defines an end-state, supporting goals of the environmental policy statement. Objectives must be achievable and measurable, and should be quantifiable when practicable.
5. Practice. 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. Practice Owner. 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 results achieved or provides evidence of activities performed. Records, unlike documents, 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. Target. 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.

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EMS Element 1

Environmental Policy

1. Purpose and Overview

a. This EMS element describes how MCB CamPen establishes and communicates environmental policy.

b. MCO P5090.2A requires installation commanders to publish an environmental policy statement that expresses, among other themes, a commitment to environmental compliance, conservation, and continual EMS improvement. The current versions of MCO P5090.2A and the USMC supplement to the US TEAM Guide 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 MCO P5090.2A, 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) MCB CamPen promulgates environmental policy in Base Orders, environmental management plans, and the Commanding General's (CG) environmental policy statement. On occasion, MCB CamPen also communicates policy in official correspondence.

(2) To establish environmental policy, ENVSEC drafts and proposes environmental policy for CG review and approval by following established Base staffing procedures¹.

(3) Typical policy inputs include command prerogative and environmental directives issued by higher authority (e.g., MCO P5090.2A, Command of the Marine Corps White Letters, and Presidential Executive Orders).

¹ The proposing directorate staffs the policy with the agencies that will be affected by it; addresses concerns that are identified during staffing; submits the revised policy with routing sheet through the Base Adjutant for CG consideration and signature; and coordinates with the Adjutant to formally communicate the policy (reference: MCIWEST-MCB CAMPEN Order 5000.3).

b. CG's Environmental Policy Statement

(1) Annual Review. The EMS Coordinator annually reviews the environmental policy statement to ensure it remains appropriate to MCB CamPen's mission and activities. If the document requires revision, the EMS Coordinator drafts a revised environmental policy statement for CG's review and consideration.

(2) Command Changes. Following a change of command, the EMS Coordinator drafts a proposed environmental policy statement for CG's review and consideration.

(3) Internal Routing. The EMS Coordinator routes the proposed draft of the CG's environmental policy statement by following established Base staffing procedures.

(4) Communication. To communicate the CG's environmental policy statement, MCB CamPen:

(a) Posts the environmental policy statement on the Base website and directives control point intranet site.

(b) Includes the environmental policy statement, where appropriate, in environmental training curriculum.

(c) Distributes the environmental policy statement to unit environmental compliance coordinators through recurring environmental training program venues.

(5) Document Control. The Base Adjutant maintains the environmental policy statement on the Marine Corps Installations West-Marine Corps Base, Camp Pendleton (MCIWEST-MCB CAMPEN) directives control point intranet site.

(6) Records Control. The EMS Coordinator archives former environmental policy statements on the Environmental Management Portal (EM Portal).

EMS Element 2

Practices, Aspects, Impacts, and Risk Prioritization

1. Purpose and Overview

a. This EMS element describes how MCB CamPen evaluates the environmental risk of its mission supporting activities and practices.

b. MCO P5090.2A requires installation commanders to maintain an inventory of installation practices and, through the use of a repeatable and defensible procedure, quantify the risk-to-mission that may occur from the environmental aspects of these practices. The current versions of MCO P5090.2A and the USMC supplement to the US TEAM Guide 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 is able to 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.

d. The output of this EMS element is the installation'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 installation 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 means to help guide subsequent environmental management efforts. Practices that pose the most risk warrant further review to

determine whether current policies, training curriculum, 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. MCB CamPen evaluates the environmental risk of its mission supporting activities and practices to achieve MCO P5090.2A requirements, determine aspect significance, and guide subsequent environmental management efforts.

b. MCB CamPen 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 both (1) likely to occur and (2) able to exert a major impact.

		<u>Likelihood</u>			
		likely	unlikely		
<u>Impact</u>	major	Type I	Type II	4	3
	minor	Type III	Type IV	2	1
		4	3	2	1

c. The EMS Coordinator annually, or as required, assembles an interdisciplinary review 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 non-significant practice significant.

(1) To screen for risk, the practice review team assigns values for aspect likelihood and potential impact to the aspects of every installation practice using the definitions included in the last two pages of this EMS element.

(2) The EMS Coordinator, or team designee, enters the values assigned for aspect likelihood and (environmental, regulatory, public perception, and health and safety) impact into a spreadsheet file. The use of a spreadsheet:

(a) Allows for the evaluation of practice and aspect associations that are unique to MCB CamPen 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.

(3) The procedure uses a two digit *likelihood-impact* notation to express risk. The value assigned for aspect likelihood forms the left variable, and the highest rated environmental, regulatory, public perception, and health and safety impact value forms the right variable.

(4) Risk determination. The 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.

(c) "Type I" practices and aspects (or practice-aspect associations) are significant.

d. The EMS Coordinator 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 MCB CamPen's significant practices. (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. Communication. MCB CamPen currently does not communicate its significant environmental aspects to the public.

f. Monitoring. MCB CamPen monitors significant practices per [EMS Element 12: Monitoring and Measurement](#).

g. Document control. The EMS Coordinator maintains the risk-ranked practice inventory via memorandum on the EM Portal.

h. Records control. The EMS Coordinator archives records associated with this EMS Element on the EM Portal.

i. Management Review. To achieve MCO P5090.2A conformance criteria, [EMS Element 17: Management Review](#) includes a review of MCB CamPen's significant practices.

Alternate Aspect Risk Definitions

What consequence could result if the aspect were to occur?

	<u>Environmental</u>	<u>Regulatory</u>	<u>Public Perception</u>	<u>Human Health</u>
4	Extensive (i.e., widespread) or long-term damage to a key environmental resource ¹ .	Aspect/impact draws [could draw] regulatory agency attention to a military training activity; NOVs with large fines.	Public outrage; scandalous or criminal activity; national pressure to suspend or curtail a military training activity.	Casualty potential; carcinogenic exposure risk.
3	Recurring or potential lasting damage to a key environmental resource; recurrent "take".	Aggressively regulated activity; NOVs with fines; recurrent or widespread environmental non-compliance.	Widespread community concern or pressure to suspend military training; sense of injustice or negligence; lawsuit potential.	Serious injury (e.g., lost work days) or potential for serious long-term impairment.
2	Localized resource impact (e.g., small spill); occasional "take". Does not endanger or impair resource viability.	Regulated activity; EA potential.	Isolated public or special interest concern; sense of irresponsibility or unfairness; occasional complaints.	Minor injury or potential for minor long-term impairment (e.g., hearing loss).
1	Minimal environmental impact.	Unregulated activity.	Public concern/interest consistent with the issue at large (e.g., resource conservation)	Temporary discomfort; no lasting effects.

¹ Per MCO P5090.2A, key environmental resources include, but are not limited to, training lands, drinking water sources including groundwater and surface water bodies, indoor and outdoor air quality, Federally-recognized threatened and endangered species, wetlands and other sensitive ecosystems, and cultural and archaeological sites.

Alternate Likelihood Definitions

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 Definitions

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

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

Note: these mission impact scores are only necessary to populate and run the USMC prescribed risk algorithm.

Conversion Table

- converting from Modified to WEBCASS Definitions -

Alternate Definitions	Likelihood Conversion	Risk (E,R,P,H) Conversion	Mission Impact Conversion
4	9	8	10
3	7	6	8
2	6	4	6
1	4	2	4
0	1	1	1

EMS Element 3

Legal and Other Environmental Requirements¹

1. Purpose and Overview

a. This EMS element describes how MCB CamPen 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, MCB CamPen must comply with all state and local environmental compliance requirements where Congress expressly waives federal sovereign immunity. This duty to comply extends to all personnel, to include tenants and contractors, who live, train, do business on, or otherwise frequent the Base. To ensure awareness of bona fide compliance requirements, MCO P5090.2A 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 MCO P5090.2A and the USMC supplement to the US TEAM Guide prescribe EMS conformance criteria for this EMS element.

c. The output of this EMS element are identified requirements to which the installation is 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. Relative importance of EMS element. Environmental compliance requirements in southern California abound and typically are among the most stringent and standard setting in the nation. In many cases, the environmental compliance requirements that govern MCB CamPen's mission supporting activities and practices mandate controls and protections that, if properly implemented, effectively control or mitigate

¹ *Legal and other requirements* include all Federal, State, and local environmental laws and regulations (for which the Federal Government's waiver of sovereign immunity does not apply) and all environmental directives issued by higher command authority (e.g., MCO, DON and DoD Instructions, and Presidential Executive Orders).

environmental risk. Because bona fide legal and other environmental requirements are by default obligatory and thus compel or require compliance, they serve as the basis for funding DoD environmental programs. They also serve as the primary centerline for MCB CamPen's environmental program and, therefore, the overall EMS.

e. The following complementary staff offices participate in the performance of this EMS element.

(1) ENVSEC. ENVSEC manages MCB CamPen's environmental program and consults with the staff and officials of local and regional environmental regulatory agencies for all of MCB CamPen.

(2) Assistant Chief of Staff (AC/S) G-7, Regional Environmental Coordination Office and DON/DoD Western Region Environmental Coordinator (WREC). These offices monitor legislative and regulatory developments and advocate military training and readiness requirements at the state level and within Environmental Protection Agency (EPA) Region IX.

(3) Western Area Counsel's Office (WACO). WACO provides environmental legal counsel to MCIWEST Installations.

2. Environmental Management Procedure

a. General. ENVSEC's environmental media managers review and stay 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 chapters of MCO P5090.2A, biological opinions, and binding compliance agreements that apply to their programs. A diverse array of web-based resources (e.g., regulatory agency websites, DENIX, RegScan) allow for ready access to the legal and regulatory requirements that apply to MCB CamPen's mission supporting activities and practices. For assistance with requirements that may not be clear, the environmental media managers consult with staff counterparts at MCIWEST, WACO, Navy Region Southwest, Marine Corps Installations Command (MCICOM), and environmental regulatory agencies as appropriate.

b. Emerging or changing requirements. 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 DoD WREC frequently hosts telephone conference calls to discuss impacts and obtain positions on upcoming environmental legislation and regulation. MCB CamPen's environmental media managers thoroughly review all draft permit renewals and governing MCO P5090.2A chapter revisions and discuss major changes with impacted permit holders, practice owners, and WACO. The environmental media managers consult with WACO to verify the Federal Government's duty to comply before communicating any new regulatory requirement to Base personnel.

c. Communication. MCB CamPen communicates legal and other environmental compliance requirements through a number of routine command and staff venues.

(1) The primary formal, written means used to convey environmental requirements include: Base orders; environmental management plans; environmental planning documents; government contracts; support agreements (e.g., ISSAs, MOUs, MOAs); and official correspondence. [EMS Element 8: EMS Documentation](#) briefly describes the predominant use and process by which MCB CamPen 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 (ESOP), area commander's meetings, environmental coordinators meetings, and S3/S4 seminars.

d. Document control. MCB CamPen maintains EMS documents per [EMS Element 9: Control of Documents](#) and as follows:

(1) Base orders. MCB CamPen maintains orders and directives on the MCIWEST-MCB CAMPEN Adjutant intranet site.

(2) Environmental management plans. ENVSEC maintains environmental management plans (that are required by law, regulation, or higher directive) on the EM Portal, Base website, and/or Base intranet site as appropriate.

(3) Support agreements. AC/S G-3/5 maintains support agreements (i.e., Interservice Support Agreements (ISSA), Memorandums of Understanding (MOU), and Memorandums of Agreements (MOA)) for MCB CamPen that do not include reimbursable agreements. The AC/S G-8 maintains support agreements for MCB CamPen that include reimbursable agreements. ENVSEC maintains environmental boilerplate language for such documents.

(4) Government contracts

(a) AC/S G-F maintains copies of real estate agreements that involve MCB CamPen.

(b) Designated contracting officer's representatives maintain and oversee service contracts that are let by regional and Base contracting offices.

e. Records control

(1) ENVSEC maintains National Environmental Policy Act (NEPA) environmental planning records in NEPA/PAMS in addition to the originals of these documents, which it provides to the project proponent.

(2) [EMS Element 15: Control of Records](#) provides additional information regarding the control of EMS records.

f. Release of information. [EMS Element 7: Communication](#) addresses the release of information conformance criteria requirements that MCO P5090.2A prescribes for this EMS element.

EMS Element 4

Objectives, Targets, and Actions to Improve Performance

1. Purpose and Overview

a. This EMS element describes how MCB CamPen develops, objectives, targets, and action plans to improve environmental performance.

b. MCO P5090.2A 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 MCO P5090.2A and the USMC supplement to the US TEAM Guide 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 installation'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. Objectives¹

(1) Objectives are set at varying levels and by various personnel (generally environmental managers) throughout the EMS.

(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 CG's environmental policy statement establishes/infers overall objectives for the EMS.

¹ A statement that defines an end-state, supporting goals of the Environmental Policy Statement. Objectives must be achievable and measurable, and should be quantifiable when practicable.

b. Targets²

(1) Intermediate targets may or may not be necessary or set to detail how an objective will be met³. 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 the EMS, the sustainability mandates established by Presidential Executive Order often include and provide excellent examples of targets that have been set to achieve an overall performance end-state.

c. Actions to improve performance

(1) MCB CamPen's environmental media managers plan for and implement the action that is necessary to achieve the environmental objectives and targets that are set by management and to sustain, improve, or restore compliance for their managed program(s). Generally speaking, the process to plan for and, subsequently, implement action is more continuous and routine than it is sequential or rote. The environmental media managers determine what needs to be done, develop plans, identify and program for resource deficiencies, coordinate with affected commanders and staff, and implement the necessary action.

(2) Environmental programming. For actions that require environmental funding, the environmental media managers identify, forecast, and maintain (i.e., keep current) their environmental program's fiscal requirements in the Status Tool for Environmental Program (STEP) system per [EMS Element 5: Roles, Responsibilities, and Resources](#).

d. Contributing inputs to this EMS element may include:

² 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.

³ *Plans of action and milestones* serve a similar function as targets and may be set in support or in lieu of targets for actions that are uniquely complex or require cross-functional engagement to affect.

(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 MCB CamPen's other 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.

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

e. Communication. 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.

f. Documentation

(1) MCB CamPen documents environmental objectives and targets in Base orders, environmental management plans, and through means such as negotiated environmental agreements, opinions, and permits.

(2) ENVSEC 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 on an annual basis.)

(3) ENVSEC personnel document their progress in responding to Environmental Compliance Evaluation findings through annual progress updates.

g. Monitoring and measurement. MCB CamPen tracks its progress in meeting objectives and targets per [EMS Element 12: Monitoring and Measurement](#).

h. Records control. Where appropriate, MCB CamPen documents its progress in achieving its EMS objectives and targets through [EMS Element 17: Management Review](#) meeting minutes. MCB CamPen archives these minutes in accordance with [EMS Element 15: Control of Records](#).

EMS Element 5

Roles, Responsibilities, and Resources

1. Purpose and Overview

a. This EMS element describes how MCB CamPen prescribes roles and responsibilities and provides resources to sustain the EMS.

b. MCO P5090.2A requires installation commanders to define EMS roles and responsibilities and commit resources to provide for effective environmental management. The current versions of MCO P5090.2A and the USMC supplement to the US TEAM Guide prescribe EMS conformance criteria for this EMS element.

c. The output of this EMS element guides the implementation of MCB CamPen's EMS.

2. Environmental Management Procedure

a. Roles and Responsibilities

(1) General Process. MCB CamPen establishes roles and responsibilities in Base orders; environmental management plans; working group charters; government contracts; support agreements (e.g., ISSAs, MOUs, MOAs); ESOP; and employee position descriptions. [EMS Element 8: EMS Documentation](#) briefly describes how MCB CamPen establishes these forms of EMS documentation.

(2) The following summarizes roles and responsibilities conveyed through the aforementioned means of EMS documentation.

(a) MCIWEST-MCB CAMPEN

1. CG. As the steward of Federal lands, the CG is ultimately responsible for environmental compliance at MCB CamPen. The CG has delegated environmental management authority to the Director, ENVSEC.

2. ENVSEC

a. The Director, ENVSEC is responsible to the CG for the management and oversight of MCB CamPen's environmental program. Within ENVSEC, designated environmental media managers manage media-specific (e.g., air quality, land

management) environmental programs. ENVSEC consults with environmental regulatory agencies for all of MCB CamPen.

b. The Director, ENVSEC is MCB CamPen's EMS Manager. The EMS Manager ensures the EMS conforms to MCO P5090.2A requirements and advises the CG on EMS matters. Within ENVSEC, the EMS Coordinator assists the director by providing caretaker support of the EMS.

3. AC/S G-7. The G-7 tracks legislative and regulatory developments within EPA Region IX and advocates military training and readiness requirements at the State level.

4. Base Safety and Standardization. Base Safety provides subject matter expert support on occupational and workplace safety matters to include hazardous materials compliance.

5. The AC/S and Directors of Special Staff. The AC/S and directors of Base staff sections often incur environmental responsibilities that are consistent with those listed below for unit Commanders.

(b) Installation tenants

1. Unit Commanders. Commanders at all levels are responsible for complying with the environmental requirements that apply to their activities and practices. MCO P5090.2A requires commanders to appoint an environmental coordinator in writing to assist with environmental management and coordinate with the installation's environmental office.

2. WACO. WACO provides environmental legal counsel to MCIWEST installations.

3. U.S Naval Hospital, Preventive Medicine and Occupational Health Departments. These offices provide support and subject matter expert advice on a diverse array of preventive medicine and occupational health matters.

(c) Unit Environmental Compliance Coordinators. Designated tenant unit and Base staff personnel coordinate with ENVSEC on matters that pertain to tenant unit and Base staff directorate operations and activities.

(d) All persons, to include contractors and lease holders, who train, work, or otherwise do business on MCB CamPen

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).

(e) EMS Team. MCO P5090.2A requires the assignment of cross-functional team to participate in the installation's EMS. MCB CamPen employs established, chartered environmental management committees to achieve this requirement.

1. Environmental Impact Review Board (EIRB). The EIRB is MCB CamPen's executive level review board for initiatives (i.e., proposed actions) that require NEPA review and subsequent approval or forwarding endorsement by the CG. EIRB membership is chartered by the installation's NEPA directive. Consistent with its role under NEPA, the EIRB also serves as MCB CamPen's executive level review board for the EMS.

2. Environmental Impact Working Group (EIWG). The EIWG represents the interests of the EIRB members for proposed actions and action alternatives that are under NEPA review. Consistent with its role under NEPA, the EIWG also provides MCB CamPen with a standing forum to engage on EMS matters that span directorates. The EIWG members, or their designated appointees, perform the following EMS functions:

a. Engage on practices that logically fall within their area of responsibility to control.

b. Participate in problem solving for EMS issues that merit EIWG-level engagement to resolve.

c. Provide the EMS Coordinator with information to prepare for [EMS Element 17: Management Review](#).

3. Other standing working groups that also provide for cross-functional engagement on environmental or natural resource matters include the: monthly Environmental Compliance Coordinator's meetings; Mitigation Technical Advisory Group (MTAG); Base Water Steering Committee; Executive Water Steering Committee; and Stormwater Steering Committee.

b. Resources. MCB CamPen commits resources to the EMS by adhering to established staffing and budgeting procedures.

(1) Manpower. Manpower for environmental management is prescribed through staffing allowances, temporary assignment, or as a collateral duty.

(a) Tables of organization (T/O) prescribe manpower allowances and provide the basis to fund employee payroll. Accordingly, MCB CamPen's T/O apportions structure for environmental management and other Base support functions. By design, most T/O positions for environmental management reside within ENVSEC. However, environmental funds also pay for environmental positions in other Base staff directorates, and structure allowances in the AC/S G-7 and WACO support MCB CamPen's overall environmental management effort. Requests to change or realign T/O allowances require Headquarters Marine Corps (HQMC) concurrence and approval.

(b) Most tenant units do not have designated T/O positions for environmental management. Instead, tenant units, and most Base staff directorates, assign environmental responsibilities as a collateral duty. Designated unit environmental compliance coordinators assist with environmental compliance and coordinate unit matters with the installation's environmental staff. Unit S-3 and S-4 officers also regularly incur ancillary environmental compliance responsibilities. Per MCO P5090.2A, Marines that handle hazardous materials or wastes should pursue qualification for the "HAZMAT" Marine Occupational Specialty (MOS) 8056. MCB CamPen's Environmental Training Program offers training courses that can qualify Marines for this additional MOS.

(2) Fiscal

(a) General

1. DoD agencies. Commanders and supervisors at all levels are responsible for resourcing the funds they require to achieve their environmental compliance obligations.

2. Non-DoD tenants and contractors. Non-DoD tenants and contractors bear all costs that are necessary to achieve environmental compliance unless otherwise provided for by contract or land use agreement with the Federal government.

(b) Funding of DoD "environmental" requirements

1. Environmental program funds. MCB CamPen's ENVSEC identifies, acquires, and commits the funds that are

necessary to manage the CG's environmental program. Environmental program funds pay for the environmental compliance and stewardship obligations that are incurred by the CG 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.

2. Environmental permit compliance. 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 ENVSEC to determine whether any of the conditions stipulated in their environmental permits qualify for environmental funding.

3. Hazardous waste management. Per MCO P5090.2A, the 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 waste in an environmentally compliant manner.

4. Hazardous substance spills. Per MCO P5090.2A, commands or units responsible for hazardous substance spills fund the cleanup and disposal of contaminated media.

5. NEPA review. Per MCO P5090.2A, project proponents pay for the environmental review, monitoring, and mitigation costs that are necessary to fulfill the Federal Government's obligations under NEPA. MCIWEST-MCB CAMPENO 5090.2, NEPA Procedures for Marine Corps Base, Camp Pendleton, prescribes the NEPA process at MCB CamPen.

6. Exercise related. Per MCO P5090.2A, exercise funds pay for hazardous waste management and disposal costs (in like fashion as exercise funds pay for fuel, portable toilets, and similar such exercise related expenditures).

(c) Types of environmental program funds

1. Operations and Maintenance, Marine Corps (O&M,MC) Account. O&M,MC funds are the primary funding source used to resource MCB CamPen's environmental program. 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.

a. Operational Budget (OPBUD). OPBUD funds pay for 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 MCB CamPen's environmental program.

b. Centrally Managed Environmental Program (CMEP). 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. CMEP 22 funds pay for studies, equipment, and emergent (i.e., unanticipated) environmental funding requirements. CMEP 10 funds pay for environmentally-driven Facilities Sustainment, Repair, and Modernization (FSRM) projects¹.

2. Environmental Restoration Navy Account (ERNA). The DON programs for and acquires ERNA funds that are necessary to clean up contaminated Installation Restoration program sites on MCB CamPen.

3. Defense Logistics Agency (DLA) Energy funds reimburse MCB CamPen for environmental compliance costs, including cleanup, fines, and penalties that are incurred at DLA contractor operated military refueling stations.

4. Reimbursable Accounts. A portion of the hunting and fishing program fees collected by ENVSEC may be applied to the installation's conservation and hunting and fishing programs. A portion of the installation's Qualified Recycling Program revenues managed by AC/S G-F may be applied to pollution prevention, environmental compliance, energy conservation, occupational health and safety, and morale and welfare initiatives.

¹ Per MCO P5090.2A, HQMC can approve FSRM *construction* projects up to \$750,000 and FSRM *repair* projects up to \$5,000,000. Construction projects over \$750,000 require military construction (MILCON) funding and approval by Congress, and repair projects over \$5,000,000 require Secretary of the Navy or higher approval.

(d) Planning and programming

1. MCB CamPen 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:

a. ENVSEC's environmental media managers identify their environmental program's fiscal requirements in the USMC STEP system.

b. ENVSEC's environmental media managers keep their environmental program's fiscal requirements current in STEP and update STEP in response to HQMC budgeting cycles and data calls.

3. The programming cycles and documentation requirements in STEP 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, the environmental media managers enter their environmental program's requirements into STEP when identified and keep STEP current with changes as they occur.)

a. OPBUD. OPBUD requirements must depict current year costs and funding estimates for future years forecasted seven years out. A 1.5% annual increase for inflation is appropriate when forecasting for future years.

b. CMEP 10. CMEP 10 projects require a DD Form 1391, completed NEPA documentation, and validation by HQMC. Although CMEP 10 requirements presume a two year appropriation cycle, CMEP 10 funding may be available for emergent requirements provided the necessary project documentation is complete and resident in STEP and HQMC validates the project.

4. Contract Advertisement Forecast (CAF). MCB CamPen identifies, via the semi-annual CAF submission, the CMEP

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. Annual budget review. The USMC annually solicits installations to validate their environmental funding projections that are resident in STEP 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. Spend plan. ENVSEC's environmental program manager annually solicits the environmental media managers, and their supervisors, for their prioritized spending plan for the upcoming fiscal year. The spend plan helps to prioritize the allocation of funds that are subsequently distributed by HQMC.

3. HQMC augments the installation's OPBUD funds and provides CMEP 22 funds at the beginning of the new fiscal year. HQMC holds CMEP 10 funds in abeyance until the applicable contract oversight office is ready to award these funds. ENVSEC coordinates with the Base Comptroller's office to obligate allocated funds per the ENVSEC's spend plan.

4. Execution. The process whereby ENVSEC commits allocated environmental funds is beyond the scope of how MCB CamPen resources the EMS and, therefore, is not included herein. However, future revisions of this EMS manual may include this information if warranted.

EMS Element 6

Competence, Training, and Awareness

1. Purpose and Overview

a. This EMS element describes how MCB CamPen ensures competence, provides necessary environmental training, and promotes awareness of the EMS.

b. MCO P5090.2A 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 MCO P5090.2A and the USMC supplement to the US TEAM Guide prescribe EMS conformance criteria for this EMS element.

c. The output of this EMS element guides the implementation of MCB CamPen's EMS.

d. Relative importance of EMS element. 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) MCB CamPen 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 contract.

(b) Providing and/or resourcing environmental training for installation personnel and tenants.

(c) Providing supervisory, contract, and environmental compliance oversight to ensure that personnel are trained and competent to perform their work in an environmentally compliant and responsible manner.

(2) MCB CamPen prescribes environmental training and/or certification requirements through various means.

(a) MCIWEST-MCB CAMPENO 5090.3 (Comprehensive Environmental Training and Education Program) prescribes environmental training requirements for installation personnel and tenants. Personnel with a common access card (CAC) can also determine the environmental training they require by accessing the USMC Environmental Learning Management System (ELMS).

(b) Employee position descriptions prescribe the qualifications (e.g., wastewater licenses) that are necessary for some jobs and work requirements.

(c) Contract scopes of work prescribe the training and/or certification requirements that are necessary for work performed via contract.

(3) MCB CamPen provides environmental training as outlined in paragraph 2.b. below.

(4) MCB CamPen 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) Contract oversight personnel ensure that contract employees are trained and certified to provide for sufficient control of work performed via contract.

(c) ENVSEC provides environmental compliance oversight of installation programs and activities per [EMS Element 13: Evaluation of Compliance](#).

b. Training

(1) Program administration

(a) ENVSEC manages MCB CamPen's Comprehensive Environmental Training and Education Program (CETEP). Per MCO P5090.2A, CETEP meets all requirements for the environmental training component of the USMC EMS.

(b) The ENVSEC's CETEP Coordinator maintains and implements MCB CamPen's CETEP plan. The CETEP plan identifies MCB CamPen's environmental training requirement by type of

training and the installation's strategy to achieve the training need. To maintain the CETEP plan, the CETEP Coordinator:

1. Conducts periodic training needs assessments to quantify the training need of installation personnel.

2. Chairs course content review boards to validate the suitability of the training provided.

3. Engages MCB CamPen's environmental media managers to ensure the environmental curriculum offered meets their environmental program's training and outreach needs.

4. Revises the CETEP plan as necessary to ensure MCB CamPen continues to provide relevant and appropriate environmental training to installation personnel.

(2) Available training

(a) ENVSEC provides environmental training through its environmental training classroom, through distance learning venues (e.g., ELMS, 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 contract vendors.

(b) ENVSEC provides environmental training for requirements that are explicitly prescribed by, or reasonably inferred in, environmental laws and regulations¹ and to provide for sufficient control of MCB CamPen's significant practices².

(c) In addition to providing job required training, ENVSEC also provides or coordinates professional development training, to include unit environmental coordinator and S3/S4 seminars, to enhance the knowledge and skills of personnel that incur environmental compliance responsibilities.

(d) The training available through ENVSEC is open to installation tenants and staff that operate under, or receive support through, a MCB CamPen acquired environmental permit or

¹ As identified in MCB CamPen's environmental training needs assessment.

² As determined in accordance with [EMS Element 2: Practice, Aspect, Impact, and Risk Prioritization](#).

registration (e.g., EPA ID number) or as provided for in government contracts and support agreements.

(e) Personnel with a CAC can determine and enroll in the environmental training they require by logging into the ELMS and MarineNet or by contacting ENVSEC's training section.

(3) Documentation. MCB CamPen documents the environmental training it provides in accordance with the CETEP plan and through ELMS.

(4) Professional certifications (e.g., licenses). Some MCB CamPen 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 is generally a personal responsibility, unit (work unit) funds may be appropriate, if available, to reimburse personnel for the training they require.

c. EMS awareness. MCB CamPen promotes awareness of the EMS through various means such as:

(1) EMS Documentation, such as orders and directives.

(2) The installation's environmental training program.

(3) Media, such as posters, booklets, and the MCB CamPen intranet and internet sites.

(4) Routine interactions between the environmental media managers and their customary staff counterparts.

(5) Events, such as the annual Earth Day observance.

EMS Element 7

Communication

1. Purpose and Overview

a. This EMS element describes how MCB CamPen communicates internal and external to the EMS.

b. MCO P5090.2A requires installation commanders to implement documented procedures to communicate matters internal and external to the EMS. The current versions of MCO P5090.2A and the USMC supplement to the US TEAM Guide prescribe EMS conformance criteria for this EMS element.

c. The output of this EMS element guides the implementation of MCB CamPen's EMS.

2. Environmental Management Procedure

a. Internal communication

(1) MCB CamPen uses standard business means to communicate internal to the EMS.

(a) Typical formal written means to communicate include: naval correspondence, Base orders, environmental management plans, environmental planning documents, support agreements (e.g., ISSAs, MOUs, MOAs), and government contracts.

(b) Other routine means to communicate include: emails, meetings, conversations, intranet and internet pages, environmental training courses and program venues (e.g., environmental coordinators meetings, S3/S4 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 MCB CamPen (Base staff) personnel also formally communicate written matters "By direction" of the CG.

(3) The EMS Team members communicate with the CG, as required.

b. External communication

(1) MCB CamPen 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) ENVSEC. ENVSEC liaises with environmental regulatory agencies, Native American tribal governments, and recognized environmental groups for all of MCB CamPen. ENVSEC personnel consult with WACO prior to releasing non-routine, controversial, or precedence setting information to these organizations.

(b) Joint Public Affairs Office (JPAO). Per MCIWEST-MCB CAMPENO 5000.2_, JPAO is MCB CamPen's sole authority for the release of information to the general public. All requests for environmental information received from the media and public must be referred to JPAO for coordination.

(c) Base Inspector. The Base Inspector's Office coordinates and tracks resolution of Congressional Inquiries on behalf of the CG.

(d) Freedom of Information Act (FOIA) Coordinator. The FOIA Coordinator of the Base Adjutant's office coordinates FOIA requests. The Base website and MCIWEST-MCB CAMPENO 5720.2_ explain and instruct on the FOIA process.

(e) AC/S G-7. The G-7, Community Plans and Liaison Officer coordinates matters with local communities and major landowners surrounding MCB CamPen and works with the directors of other Base staff sections to promote a positive image within the regional area. The G-7, Regional Environmental Coordinator tracks environmental legislation and advocates military training and readiness requirements at the State level.

(f) WACO. WACO coordinates environmental legal matters with the DoD WREC and legal counsel of environmental regulatory agencies.

(3) Release authority. Only designated personnel with "release authority" are authorized to represent their respective staff interests and formally communicate with persons and agencies external to MCB CamPen. Persons with release authority archive communication with external agencies in accordance with their staff directorate's policies and procedures.

(4) Information security

(a) The Federal Government shares information with persons who are entitled to receive such information. The MCB CamPen 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) Geographic information system (GIS). GEOFidelis establishes the policies, protocols, and conditions for sharing GIS layers with contractors who do work for MCB CamPen.

(5) Reporting of environmental noncompliance

(a) Designated ENVSEC personnel report instances of environmental non-compliance to regulatory authorities in accordance with governing regulatory and environmental permit requirements.

(b) To achieve MCO P5090.2A requirements, designated ENVSEC personnel notify HQMC (G-5, MCICOM) of formal regulatory enforcement actions received by MCB CamPen by entering enforcement action information into the USMC Environmental Data Repository intranet site (<https://em.usmc.mil/EDR/Pages/Home.aspx>).

(c) To achieve MCO P5090.2A requirements, designated ENVSEC personnel quarterly verify the accuracy of noncompliance information, if any, contained on the US EPA's Online Targeting Information System and Enforcement and Compliance History Online databases.

(6) DoD Interactive Customer Evaluation (ICE) system. The ICE system is an internet-based application that allows tenants and patrons to comment on or critique the quality of support provided by MCB CamPen. MCIWEST-MCB CAMPENO 5224.1_ instructs on the use of this system.

(7) Handling sensitive, controversial, or potentially precedence setting issues. Future revisions to this EMS element may include guidance on handling sensitive, controversial, and potentially precedence setting issues.

(8) Recordkeeping. The aforementioned lead offices document their communication with external parties in accordance with their office's established records maintenance and retention policies.

(a) Within ENVSEC, Environmental Program Managers maintain and archive written correspondence as a record on the EM Portal or in hard copy files, as appropriate.

EMS Element 8

EMS Documentation

1. Purpose and Overview

a. This EMS element describes how MCB CamPen documents the EMS.

b. MCO P5090.2A 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 MCO P5090.2A and the USMC supplement to the US TEAM Guide prescribe EMS conformance criteria for this EMS element.

c. The output of this EMS element guides the implementation of MCB CamPen's EMS.

2. Environmental Management Procedure

a. MCB CamPen documents its EMS through the use of this EMS Manual and a number of other key means.

b. EMS manual

(1) MCB CamPen has established this EMS Manual to achieve MCO P5090.2A and US TEAM Guide requirements.

(2) This EMS Manual is intentionally not overly prescriptive or constraining in nature. Rather, it provides guidance akin to Commander's intent and describes, in general terms, how MCB CamPen 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 MCB CamPen implements the EMS element.

(4) Where essential, the EMS elements reference how they relate to other EMS elements, how MCB CamPen communicates essential EMS information, and how and where MCB CamPen maintains documents and records that are relevant to the EMS.

c. Other forms of EMS documentation

(1) Base orders and directives

(a) Base orders and directives (e.g., Bulletins, BASEGRAMS) are the primary means MCB CamPen uses to establish and communicate policy, roles, responsibilities, and requirements. Governing environmental directives include Base orders with the 5090 Standard Subject Identification Code and relevant sections of MCIWEST-MCB CAMPENO 3500.1_ and MCIWEST-MCB CAMPENO 5000.2_.

(b) MCIWEST-MCB CAMPEN Order 5000.3 prescribes format requirements and staffing procedures¹ for Base orders.

(2) Environmental management plans

(a) 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 Base Orders. Examples of such plans include MCB CamPen's Integrated Natural Resources Management Plan, Integrated Pest Management Plan, and Hazardous Waste Management Plan.

(b) 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 similar to the process used to establish a Base order.

(3) NEPA documents. 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 into the NEPA Process Automation and Management Support Module (NEPA PAMS); ENVSEC, in turn, provides oversight of the NEPA process to ensure that MCB CamPen achieves its environmental review obligations under NEPA. MCIWEST-MCB CAMPENO 5090.2_ (NEPA Compliance) prescribes the NEPA process at MCB CamPen.

¹ The proposing directorate staffs the proposed order with affected agencies, addresses concerns that are identified during staffing, and submits the revised order through the Base Adjutant for CG consideration and signature.

(4) Working group charters. Environmental working group charters establish roles and responsibilities for matters that require a multidiscipline, task-organized management approach. Standing charters include the: EIWG, MTAG, Executive Water Steering Committee, Base Water Steering Committee, and Storm Water Steering Committee. The CG enacts/approves working group charters through a similar process as that used to establish Base orders.

(5) Support agreements (e.g., ISSAs, MOUs, MOAs). 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 Base orders or other governing directives. The AC/S G-3/5 and AC/S G-8 maintain ISSAs, MOUs and MOAs for MCB CamPen and staffs all new and renewing support agreements for review with the Base staff directorates affected by such agreements.

(6) Government contracts. 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 South West (Real Estate) prescribes contract provisions for real estate agreements. Regional and Base contracting offices prescribe contract provisions for service contracts. ENVSEC coordinates with regional and Base contracting offices and legal counsel to ensure that government contracts contain necessary environmental compliance provisions.

(7) ESOP. ESOPs prescribe operational controls for the installation's significant practices, as determined in accordance with [EMS Element 2: Practices, Aspects, Impacts, and Risk Prioritization](#), where control of the practice is not already addressed in sufficient detail by a higher-tiered directive, practice owner procedure, or unit (work unit) SOP. ENVSEC and/or lead practice owners, as appropriate, establish ESOPs per [EMS Element 10: Operational Control of Practices](#).

(8) Employee positions descriptions. 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 MCB CamPen's Human Resource Office.

(9) Base intranet and internet sites. MCB CamPen augments some of the aforementioned means of EMS documentation by using the MCB CamPen internet or intranet websites.

d. Document control. MCB CamPen maintains EMS documents per [EMS Element 9: Control of Documents](#) and as follows:

(1) EMS Manual. The EMS Coordinator maintains the EMS manual on the EM Portal.

(2) Base orders. The Adjutant's office maintains Base orders on the MCIWEST-MCB CAMPEN directives control point.

(3) Environmental management plans. Plan sponsors/owners maintain environmental management plans on the EM Portal, Base website, and/or Base intranet site as appropriate.

(4) Support agreements. The AC/S G-3/5 maintains ISSAs, MOUs, and MOAs for MCB CamPen.

(5) Government contracts

(a) Real estate agreements. AC/S G-F maintains copies of real estate agreements that involve MCB CamPen.

(b) Service contracts. Designated contracting officer's representatives maintain and oversee the service contracts that are let by regional and Base contracting offices.

(6) Unit SOPs and ESOPs. Practice owners maintain unit SOPs in the workplace; ENVSEC avails ESOPs for use by MCB CamPen personnel through training venues and the MCB CamPen internet site.

e. Records control

(1) NEPA records. ENVSEC maintains NEPA records in NEPA-PAMS in addition to the originals of these records, which it provides to the project proponent.

(2) [EMS Element 15: Control of Records](#) provides additional information regarding the control of EMS records.

EMS Element 9

Control of Documents

1. Purpose and Overview

a. This EMS element describes how Camp Pendleton maintains documents that are essential to the efficient operation of the EMS.

b. MCO P5090.2A requires installation commanders to maintain *documents*¹ that are appropriate or essential to the efficient operation of the installation's EMS. MCO P5090.2A stipulates that EMS documents must be maintained in such a manner that they can be located, are reviewed and updated as necessary, are 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 MCO P5090.2A and the Marine Corps supplement to the US TEAM Guide prescribe EMS conformance criteria for this EMS element.

c. The output of this EMS element guides the implementation of Camp Pendleton's EMS.

2. Environmental Management Procedure

a. MCB CamPen maintains EMS documents as follows:

(1) Base orders. The Adjutant's office maintains Base orders on the MCIWEST-MCB CAMPEN directives control point.

(2) Environmental management plans. Plan sponsors maintain environmental management plans in accordance with directorate specific records management procedures.

(3) Government contracts

¹ Information, stored on paper, electronic, or other media, that describes the organization, its goals or intent, or its procedures. Documents are subject to change over time. Examples of documents include the EMS Manual and procedures, the Environmental Policy Statement, the practice inventory and risk data, objectives and targets, installation plans (e.g., emergency response plans), the installation environmental compliance and protection standard operating procedure (ECPSOP), and regulatory permits.

(a) Real estate agreements. AC/S G-F maintains copies of real estate agreements that involve MCB CamPen.

(b) Service contracts. Designated contracting officer's representatives maintain and oversee the service contracts that are let by regional and Base contracting offices.

(4) Support agreements. AC/S G-3/5 maintains support agreements (i.e., Interservice Support Agreements (ISSA), Memorandums of Understanding (MOU), and Memorandums of Agreements (MOA)) for MCB CamPen that do not include reimbursable agreements. The AC/S G-8 maintains support agreements for MCB CamPen that include reimbursable agreements.

(5) Environmental Standard Operating Procedures (ESOP). Practice owners maintain unit SOPs in the workplace. The EMS Coordinator ensures that the official version of ESOPs are on the MCB CamPen internet site.

b. Document review

(1) Base orders. The MCIWEST-MCB Camp Pendleton Adjutant's office annually directs, via Base bulletin, the review of orders maintained on the directives control point.

(2) Environmental management plans. Plan sponsors review and update environmental plans as necessary or in accordance with prescribed regulatory review requirements.

(3) Government contracts. Contracting officers review and modify contracts prior to initiation and renewal.

(4) Support agreements. AC/S G-3/5 and AC/S G-8 distribute support agreements for review and update prior to initiation or renewal.

(5) ESOPs. The EMS Coordinator ensures ESOPs are annually reviewed and updated as necessary.

EMS Element 10

Operational Control of Practices

1. Purpose and Overview

a. This EMS element describes how MCB CamPen controls its significant practices.

b. MCO P5090.2A 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 MCO P5090.2A and the USMC supplement to the US TEAM Guide prescribe EMS conformance criteria for this EMS element.

c. The output of this EMS element guides the implementation of MCB CamPen's EMS.

2. Environmental Management Procedure

a. MCB CamPen controls its *significant practices*² by providing training, oversight, and practice control procedures.

b. Training. MCB CamPen develops and avails training for significant practices in accordance with [EMS Element 6: Competence, Training, and Awareness](#).

(1) MCB CamPen's ENVSEC works with lead practice owners to develop curriculum and provide training for MCB CamPen'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 contract employees are trained and certified to provide for sufficient control of work performed via contract.

c. Oversight. MCB CamPen monitors and provides oversight of significant practices in accordance with [EMS Element 12: Monitoring and Measurement](#) and [EMS Element 13: Evaluation of Compliance](#), respectively.

² MCB CamPen identifies significant practices in accordance with [EMS Element 2: Practices, Aspects, Impacts and Risk Prioritization](#).

(1) MCB CamPen's ENVSEC annually inspects, for environmental compliance, installation tenants and Base staff directorates that operate under, or obtain support through, a MCB CamPen 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) MCB CamPen prescribes roles, responsibilities, and requirements for environmental compliance in Base orders, environmental management plans, NEPA documents, support agreements (ISSAs, MOUs, MOAs), government contracts, and ESOP. 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, MCB CamPen either revises an existing directive (preferred) or establishes a new practice-specific ESOP.

(3) Responsibility for developing ESOPs rests with the lead practice owner for that practice.

(4) To achieve MCO P5090.2A 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) ENVSEC posts ESOPs on the Base internet or intranet sites, as appropriate, and disseminates new or revised ESOPs to

unit environmental coordinators during monthly environmental coordinator meetings.

(6) ENVSEC inspectors verify, in accordance with [EMS Element 13: Evaluation of Compliance](#), that practice owners and operators maintain practice control procedures in the workplace³ and train to these procedures.

(7) ENVSEC reviews orders that are staffed by the MCIWEST-MCB CAMPEN Adjutant for the potential to cause significant environmental impact and ensures that practice control requirements are incorporated or referenced as needed⁴.

³ Commanders and supervisors that incorporate into their unit (work unit) SOPs the substantive requirements, as prescribed in paragraph 2.d(4), of ESOPs developed for MCB CamPen significant practices meet the requirement of this EMS element to maintain practice control procedures in the workplace.

⁴ Base orders that involve land use activities have the greatest potential to impact the environment. MCIWEST-MCB CAMPENO 3500.1_ (Range Regulations) and MCIWEST-MCB CAMPEN 5000.2_ (Base Regulations) are the primary Base orders that govern land use activities at Camp Pendleton. Accordingly, these orders prescribe environmental controls to limit the potential for adverse environmental impact and outcomes that are contrary to MCB CamPen' environmental management objectives.

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EMS Element 11

Emergency Preparedness and Response

1. Purpose and Overview

a. This EMS element describes, in general terms, how MCB CamPen prepares for and responds to accidents and emergencies, hazardous substance releases, and sewage spills.

b. MCO P5090.2A 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 MCO P5090.2A and the USMC supplement to the US TEAM Guide prescribe EMS conformance criteria for this EMS element.

c. The output of this EMS element guides the implementation of MCB CamPen's EMS.

2. Environmental Management Procedure

a. MCB CamPen 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. Accidents and emergencies

(1) Incident planning. MCB CamPen's All-Hazards Protection Plan governs how the installation prepares for and responds to all forms of crisis events. All other installation contingency plans fall under the general umbrella of this plan.

(2) Emergency response

(a) The military police and fire fighters of MCB CamPen's Security and Emergency Services (SES) Battalion form the core of the installation's incident response capability.

(b) The senior SES Battalion first responder assumes duties as the *on-scene commander* or *incident commander* until the incident concludes or control transitions to a higher level supervisor within the SES Battalion chain of command.

(c) Incidents that exceed the SES Battalion's incident response capability may require activation of mutual aid agreements with local fire and emergency services organizations and/or activation of the MCB CamPen Command Center to coordinate support internal and external to the Base.

(d) The MCB CamPen Command Center coordinates disaster preparedness and response activities for events that require a sustained and integrated facility response. The AC/S G-3/5 coordinates the efforts of command center personnel.

(e) ENVSEC engages on accidents and emergencies that impact environmental resources and provides advice or direction on how to mitigate environmental impacts.

c. Hazardous substance releases

(1) Spill planning

(a) Oil and Hazardous Substances Spill Contingency Plan. This plan governs how the installation prepares for and responds to the release of oil and other hazardous substances. The Oil Pollution Act of 1990 requires these plans for facilities that pose a substantial threat of a discharge with an aggregate oil storage capacity of less than one million gallons.

(b) Spill Prevention, Control, and Countermeasures (SPCC) Plan. This plan documents spill prevention measures and containment systems for petroleum storage tanks, to include oil-water separator tanks and other non-tank oil storage containers, and describes inspections, integrity testing, recordkeeping, security, and training practices. 40 CFR Part 112 requires SPCC plans for facilities that have the potential to discharge oil in harmful quantities into navigable waters of the United States.

(c) Hazardous Material Business Plans

1. Hazardous material business plans contain *site-specific* information on the location, type, and quantity of hazardous materials or wastes stored, and they outline *site-specific* spill response procedures to facilitate response action by the spilling unit or first responder personnel.

2. Local regulations require the preparation of hazardous material business plans for sites that store hazardous materials or wastes at or above the following amounts:

Type hazard	Quantity
Solid	500 pounds
Liquid	55 gallons
Compressed gas	200 cubic feet
Highly toxic compressed gas ¹	any amount
Extremely hazardous substance ²	Threshold Planning Quantity

3. MCB CamPen uses the Spill, Hazmat, and Response Planning System (SHARPS) to prepare and maintain its hazardous material business plans. SHARPS is a web-based system that provides a standard template for hazardous material business plans, which practice owners or designated site personnel prepare and submit electronically to ENVSEC for review and approval.

4. Units/activities maintain approved hazardous material business plans at the site of storage to guide response activities. ENVSEC forwards copies of approved plans to the MCB CamPen Fire Department so that they are aware, in the event of a response, of the location and types of hazardous materials or wastes stored on site.

(2) Spill response. MCB CamPen responds to hazardous substance release events as follows:

(a) Tier 1 events: ***the spilling unit (or discoverer) responds.*** To qualify as and remain a Tier 1 event, all of the following conditions must apply:

1. The release is not life threatening or the subject of an uncontrolled chemical reaction or fire.

2. The released substance is not in or threatening water or able to migrate off-Base.

3. The released substance is not a stray military munition or compressed gas.

4. The released substance is known to the spiller/discoverer and below the following threshold amounts:

¹ Compressed gases with a [Threshold Limit Value](#) of 10 parts per million or less as referenced by the American Conference of Governmental Industrial Hygienists.

² As defined by Appendices A and B of 40 CFR Part 355.

Substance	Threshold amount
POLS, JP5, JP8, Diesel	42 gallons
Gasoline	5 gallons
Paint	42 gallons
STB Bleach	1 gallon
DS-2	1 gallon
Sulfuric acid	1 gallon
Other chemicals	CERCLA reportable quantity

(b) Tier 2 events: **the MCB CamPen Fire Department responds.** Tier 2 events exceed the capability of the spilling unit (or discoverer) to safely respond or they do not conform to all of the aforementioned Tier 1 event criteria.

(c) Tier 3 events: **agencies external to MCB CamPen respond or aid in response.** Tier 3 events exceed the response capability of the MCB CamPen Fire Department and require assistance by agencies external to MCB CamPen.

(3) Internal communication

(a) Tier 1 events. The spilling unit or discoverer notifies ENVSEC of the release as soon as feasible on a not to interfere basis with response activities.

(b) Tier 2 and Tier 3 events: the spilling unit or discoverer notifies the MCB CamPen Fire Department of the release by calling 911. The MCB CamPen Fire Department notifies ENVSEC of the release as soon as feasible on a not to interfere basis with response activities.

(c) ENVSEC logs the release in MCB CamPen's Environmental Incident Reporting System (EIRS). EIRS alerts designated MCB CamPen personnel of the release and provides an enduring digital record of the release event.

(4) External communication

(a) Regulatory agency notification. ENVSEC affects verbal notification within 24 hours and written notification within 30 days for Tier 2 and Tier 3 events.

(b) Requests for outside agency assistance. The MCB CamPen Fire Department or Command Center coordinates assistance from external agencies for Tier 3 events.

(5) Recovery

(a) Tier 1 events: the spilling unit recovers and packages contaminated media in approved hazardous waste storage containers and contacts ENVSEC for disposal.

(b) Tier 2 and Tier 3 events: ENVSEC coordinates cleanup with AC/S G-F or obtains support through a standing Navy cleanup contract.

(6) Post Incident Response Critiques. ENVSEC and Fire Department personnel jointly coordinate critiques for Tier 2 and Tier 3 events. ENVSEC documents and maintains post incident critique summaries and updates MCB CamPen's Oil and Hazardous Substances Spill Contingency Plan as necessary.

d. Sanitary sewage releases

(1) Spill prevention and planning

(a) Sanitary Sewer Management Plan (SSMP). The SSMP outlines prevention, response, and reporting protocols for sewage releases that occur upstream of a wastewater treatment plant. MCB CamPen's National Pollutant Discharge Elimination System (NPDES) permit requires this plan.

(b) Wastewater treatment plant spill prevention and response plans. These plans outline the prevention and response actions that personnel take for sewage spills, whether untreated, partially treated, or fully treated, that occur within or after a wastewater treatment plant. MCB CamPen's NPDES permit requires these plans.

(2) Spill response

(a) AC/S G-F responds to spills that occur in the wastewater collection system, wastewater treatment plants, and reclamation infrastructure that is operated and maintained by government personnel.

(b) MCB CamPen's water/wastewater contractor responds to spills that occur in portions of the wastewater collection system, wastewater reclamation system, and in the drinking water and wastewater treatment plants that are operated and maintained by the water/wastewater contractor.

(3) Internal communication

(a) Persons report spills they observe to AC/S G-F. AC/S G-F notifies the water/wastewater contractor for spills that occur within the contractor's area of responsibility.

(b) AC/S G-F or the water/wastewater contractor, as appropriate, notifies ENVSEC of the spill as soon as possible on a not interfere basis with response activities.

(c) ENVSEC logs sewage spills in MCB CamPen's EIRS. EIRS alerts designated MCB CamPen personnel of the release and provides an enduring digital record of the release event.

(4) External communication. ENVSEC affects regulatory agency notifications per the protocols and/or requirements that are outlined in MCB CamPen's SSMP and wastewater permits.

(5) Recovery. Responding personnel, in consultation with ENVSEC, recover as much sewage and contaminated soil and water as possible.

(6) Post Incident Response Critiques. AC/S G-F, or the wastewater contractor, conducts post incident response critiques on an as needed basis.

e. Out-lease arrangements

(1) General. The grantees of leases and easements are responsible for, and respond to, spills that occur within the boundary of the lease or easement. Grantees notify the MCB CamPen Fire Department of spills that migrate, or have the potential to migrate, off the boundary of the lease or easement.

(2) Military housing. The military housing private partner venture contractor responds to sewage blockages and spills that occur within and from military housing laterals.

(3) ENVSEC coordinates with grantees to obtain a copy of their spill prevention and response plan(s) where required by regulation or real estate agreement.

EMS Element 12

Monitoring and Measurement

1. Purpose and Overview

a. This EMS element describes how MCB CamPen monitors and measures its environmental performance and ensures data quality for the environmental monitoring it performs.

b. MCO P5090.2A requires installation commanders to: (1) track and document progress toward meeting EMS objectives and targets; (2) monitor practices that can have significant impacts and, where appropriate, the resources that are vulnerable to these practices; and (3) calibrate environmental monitoring equipment and maintain associated records. The current versions of MCO P5090.2A and the USMC supplement to the US TEAM Guide 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](#), and it is briefed, in some fashion, during [EMS Element 17: Management Review](#); consequently, the output of this EMS element may affect change to other processes and procedures internal to the EMS.

d. Relative importance of EMS element. Observations and data obtained through monitoring provide a means to analyze trends, evaluate the effectiveness of MCB CamPen's environmental management efforts, and influence subsequent environmental management decisions.

2. Environmental Management Procedure

a. Objectives and targets¹

(1) MCB CamPen's lead practice owners and their supervisors meet as necessary to assess their progress in achieving assigned objectives, targets, and planned actions.

(2) The EMS Coordinator solicits progress updates from the supervisors of the environmental media managers, lead practice owners, and lead responsible offices for sustainability mandates, as appropriate, to document MCB CamPen's progress in

¹ MCB CamPen sets EMS objectives and targets in accordance with [EMS Element 4: Objectives, Targets, and Actions to Improve Performance](#).

achieving assigned EMS objectives and targets and to prepare for [EMS Element 17: Management Review](#).

(3) MCB CamPen's ENVSEC Director annually briefs senior leadership, as per [EMS Element 17: Management Review](#), on the installation's progress in meeting its EMS objectives and targets.

b. Practices, aspects, and impacted resources

(1) Incident review. ENVSEC personnel monitor the adequacy of controls that are set for MCB CamPen's *significant practices*² through trend analysis of:

(a) Incidents that are archived in various reporting databases, such as MCB CamPen's EIRS, the California Integrated Water Quality System (CIWQS) Project, and the Game Warden's Code 12 Database.

(b) Compliance observations that are captured in accordance with [EMS Element 13: Evaluation of Compliance](#).

(2) Environmental monitoring. Environmental monitoring provides a means to demonstrate compliance, evaluate the impacts of MCB CamPen's activities and practices, and determine whether objectives and targets are being met.

(a) ENVSEC 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.

(b) MCB CamPen 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 2.c. below.

c. Data quality assurance and management

(1) Monitoring equipment calibration. Practice owners and personnel that use monitoring equipment to demonstrate environmental compliance calibrate their monitoring equipment in accordance with manufacturer's specifications or established

² MCB CamPen determines significant practices in accordance with [EMS Element 2: Practices, Aspects, Impacts, and Risk Prioritization](#).

scientific or industry protocols and maintain records of their calibration activities.

(2) Government contract provisions. MCB CamPen 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, 10(a)(1)(A) certification under the Endangered Species Act). 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) Quality assurance reviews. Practice owners and ENVSEC personnel review the results of environmental monitoring performed under contract to ensure that data quality requirements were met. Subsequent review, per [EMS Element 13: Evaluation of Compliance](#), determines whether environmental permit or other regulatory requirements were met.

(4) Data management. ENVSEC personnel electronically store data on local files, archive incidents within MCB CamPen's EIRS, and upload environmental monitoring data and report incidents to online reporting databases such as the CIWQS.

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EMS Element 13

Evaluation of Compliance

1. Purpose and Overview

a. This EMS element describes how MCB CamPen evaluates environmental compliance.

b. MCO P5090.2A requires installation commanders to (1) evaluate all commands, units, and tenants for environmental compliance at least annually and (2) ensure that all other installation activities, such as contractor and out-lease activities, comply with the same. The current versions of MCO P5090.2A and the USMC supplement to the US TEAM Guide prescribe EMS conformance criteria for this EMS element.

c. The output of this EMS element serves as an input [EMS Element 14: Problem Solving](#) and 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. Relative importance of EMS element. The adage that "An organization does well only those things the boss checks¹" bears true for environmental compliance. A proactive and effective environmental oversight program: 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. Environmental Management Procedure

a. MCB CamPen evaluates compliance at varying levels and by various means, both internal and external to the EMS.

b. 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 at MCB CamPen.

¹ General Bruce C. Clarke, USA.

(2) Contract oversight. 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.

c. Environmental program (i.e., installation) level

(1) Environmental monitoring. ENVSEC 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) Environmental mitigation. ENVSEC personnel, and the offices that oversee the execution of contracts or actions that underwent NEPA review, ensure that the Federal government's obligations, as outlined in decision memorandums (for categorically excluded actions), Environmental Assessments, and Environmental Impact Statements, are met.

(3) Environmental program reviews. MCB CamPen's environmental media managers, or their supervisors, periodically arrange to have their environmental program's compliance posture 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.

(4) Environmental inspections

(a) The inspectors that are resident within MCB CamPen's ENVSEC annually inspect, for environmental compliance, all installation tenants and Base staff directorates that operate under, or obtain support through, a MCB CamPen acquired environmental permit or registration (e.g., EPA ID number). Per MCIWEST-MCB CAMPENO 5040.1A, these inspections serve as an integral component of the CG's inspection program (CGIP).

(b) ENVSEC's chief inspector prepares an annual schedule of tenants and Base staff directorates to be inspected during the upcoming fiscal year.

(c) ENVSEC inspectors use the environmental functional area checklist (checklist #764: Environmental Management) from the Inspector General of the Marine Corps Automated Inspection Reporting System, augmented with a

checklist of local requirements, to conduct environmental inspections.

(d) ENVSEC's chief inspector engages the inspected unit, per [EMS Element 14: Problem Solving](#), over areas of noncompliance that are identified through MCB CamPen's environmental self-audit program.

(e) ENVSEC inspectors annually verify and document whether contracting and real estate offices have evaluated contractor and grantee operations for environmental compliance.

(f) MCB CamPen's environmental media managers and practice owners, as appropriate, augment the environmental inspectors' annual environmental self-audit program effort via contract for practices and permitted activities that require specialized skills or credentials to properly perform the evaluation (e.g., wastewater source control and pretreatment contract, industrial storm water program inspections).

(5) Compliance assistance

(a) The environmental compliance requirements that are prescribed in Base orders, ESOP, and environmental permits provide a means by which to evaluate compliance for unit, work unit, and contractor activities and practices.

(b) ENVSEC avails advice and instruction, upon request, to commanders, supervisors, and contract oversight personnel on how to evaluate (i.e., self-audit) compliance for the activities and practices they oversee.

(c) ENVSEC provides *technical assist visits*, upon request, to installation tenants and Base staff directorates that operate under, or receive support from, a MCB CamPen acquired environmental permit or registration (e.g., EPA ID number). Technical assist visits provide the requesting command/directorate with a candid assessment of their unit's (work unit's) environmental compliance posture and are conducted independent of the installation's CGIP.

d. External Inspections. External inspections occur frequently at MCB CamPen and, like the inspections performed by installation personnel, provide an important perspective of MCB CamPen's environmental compliance posture.

(1) Environmental Compliance Evaluation (ECE)

(a) HQMC triennially inspects USMC installations for environmental compliance.

(b) ENVSEC coordinates the ECE and follows up on areas of noncompliance per [EMS Element 14: Problem Solving](#).

(c) MCO P5090.2A provides additional detail on the conduct of the HQMC ECE.

(2) Environmental Regulatory Agency Inspections

(a) A number of environmental regulatory agencies perform frequent inspections of MCB CamPen activities that generate a waste or operate under a MCB CamPen acquired environmental permit or registration (e.g., EPA ID number).

(b) ENVSEC's inspectors accompany environmental regulatory agency personnel during all inspections of Base activities.

(c) ENVSEC handles and resolves instances of environmental noncompliance per [EMS Element 14: Problem Solving](#).

EMS Element 14

Problem Solving

1. Purpose and Overview

a. This EMS element describes how MCB CamPen identifies and resolves EMS problems and issues.

b. MCO P5090.2A 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. MCO P5090.2A further requires installation commanders to document their corrective and preventive action efforts, their progress in implementing such action, and the results/success of the corrective and preventive actions taken. The current versions of MCO P5090.2A and the USMC supplement to the US TEAM Guide prescribe EMS conformance criteria for this EMS element.

c. The output of this EMS element may determine that process-oriented 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. Relative importance of the EMS element. Problem solving contributes to the central EMS aim of continual improvement.

2. Environmental Management Procedure

a. Identification. Problems manifest as outputs of [EMS Element 12: Monitoring and Measurement](#), [EMS Element 13: Evaluation of Compliance](#), 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. Various chartered environmental working groups at MCB CamPen allow for problem solving through standing committee.

(4) Problems that cannot be resolved and corrected at a lower level proceed through successive levels of management for resolution. Ultimately, the CG of MCIWEST-MCB CAMPEN is the final resolution authority for EMS problems and issues at MCB CamPen.

(5) While MCB CamPen 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 action

(a) MCB CamPen's ENVSEC receipts for and alerts, per MCO P5090.2A, the WACO, and HQMC (G-5, MCICOM) of the alleged infraction.

(b) ENVSEC forwards the regulatory enforcement action, via formal letter, to the tenant unit, Base staff directorate, or contract oversight office that is ultimately responsible for the infraction.

(c) The ENVSEC 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.

(d) ENVSEC, in conjunction with WACO, reviews the corrective action report for adequacy. If inadequate, ENVSEC

reengages the responsible organization/person to resolve. If adequate, ENVSEC sends the report via cover letter to the environmental regulatory agency that issued the enforcement action.

(e) ENVSEC follows up with the issuing regulatory agency to determine whether MCB CamPen'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 closed, ENVSEC notifies the responsible organization, WACO, and HQMC. If open, ENVSEC reengages the issuing regulatory agency as appropriate.

(f) If the issuing regulatory agency levies a fine, ENVSEC consults with WACO to determine whether MCB CamPen is legally able to pay the fine and, if so, at what amount. If obligated, ENVSEC pays and/or coordinates reimbursement/payment from the responsible unit.

(g) ENVSEC's Inspections and Compliance Branch archives, on the EM portal, all official communication associated with the processing and resolution of regulatory enforcement action.

(h) Note: the aforementioned procedures apply to tenants, Base staff, and contractors who operate under a MCB CamPen acquired environmental permit or registration (e.g., EPA ID number). Contractors and tenants who, by nature of their government contract or support agreement, operate independent of MCB CamPen's environmental permits and registrations are directly responsible to the issuing regulatory agency for resolving any enforcement action(s) they receive while conducting business aboard MCB CamPen.

(2) ECE findings and issues

(a) MCB CamPen's ENVSEC coordinates the installation's response to findings that are identified through the HQMC triennial ECE.

(b) Within 60 days of the ECE and annually thereafter, ENVSEC's chief inspector consolidates and documents in WEBCASS the corrective action plans of the environmental media program managers that respond to the installation's ECE findings.

(c) MCB CamPen's 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) MCB CamPen's ENVSEC audits tenant units for environmental compliance in accordance with [EMS Element 13: Evaluation of Compliance](#).

(b) ENVSEC 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) ENVSEC's chief inspector archives the results of the inspection along with the unit's corrective action report in the EM Portal.

d. Resolving EMS nonconformance

(1) The EMS Coordinator engages the EMS Team on matters of EMS nonconformance that require their involvement to resolve.

(2) The EMS Coordinator 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 POA&M.

(3) The EMS Coordinator documents problem solving efforts for matters of EMS nonconformance via memorandum.

e. Documentation. The documentation for problems addressed by standing committee occurs through meeting minutes. The documentation for problems worked through venues other than standing committee occurs by means such as memorandums, briefs, correspondence, emails, or as described elsewhere herein.

EMS Element 15

Control of Records

1. Purpose and Overview

a. This EMS element describes how MCB CamPen maintains records that are appropriate or essential to demonstrate the proper execution of the EMS.

b. MCO P5090.2A requires installation commanders to maintain *records*¹ that are appropriate or essential to demonstrate the proper execution of the EMS. MCO P5090.2A 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 MCO P5090.2A and the USMC supplement to the US TEAM Guide 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

a. MCB CamPen maintains EMS records on the EM Portal in accordance with the [EM Portal Business Rules](#) and directorate specific records management procedures.

(1) MCB CamPen's environmental media program managers maintain records that are appropriate or essential for the efficient operation of the programs they manage.

(2) The EMS Coordinator maintains records that are appropriate or essential for the efficient operation of the EMS.

(3) The Environmental Security Department's (ENVSEC) Records Manager maintains hard copy records generated by ENVSEC personnel prior to 2017 in designated filing locations. The

¹ Information, stored on paper, electronic, or other media, that *states results achieved or provides evidence of activities performed*. Records are not subject to change and, once created, cannot be modified. Examples of records include regulatory monitoring records, routine practice monitoring/inspection records, results of tracking objectives and targets, and results of past EMS and compliance audits.

ENVSEC Records Manager uploads records into the Marine Corps Tool for Information Lifecycle Management System (MCTILMS) for records generated by ENVSEC personnel dated 2017 and forward.

b. Annual records review. MCB CamPen's environmental media managers and the EMS Coordinator determine whether the records they maintain in the EM Portal remain current or need to be removed from circulation. The Record Managers annually review hard copy records for those that require archive in accordance with SECNAV M-5210.1 (Records Management Manual).

c. Obsolete records. MCB CamPen destroys, as appropriate, obsolete records per the records management and disposition requirements contained in SECNAV M-5210.1 (Records Management Manual). Records uploaded to MCTILMS are automatically destroyed once they reach their retention period.

EMS Element 16

EMS Audit

1. Purpose and Overview

a. This EMS element describes how MCB CamPen audits the EMS to ensure conformance with USMC EMS requirements.

b. MCO P5090.2A 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 MCO P5090.2A and the USMC supplement to the US TEAM Guide 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 MCO P5090.2A, 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.

2. Environmental Management Procedure

a. The EMS Coordinator coordinates with ENVSEC's chief inspector to have a *certified EMS auditor* annually audit the EMS. Per MCO P5090.2A,

(1) The annual audit must occur prior to 30 September.

(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.

(3) Certified EMS auditors must either (1) complete a resident EMS Lead Auditor Training course or (2) keep their certification current by completing EMS Lead Auditor Refresher Training, as appropriate, within the three-year period preceding the audit. HQMC periodically avails EMS Lead Auditor Training on a regional basis and Lead Auditor Refresher Training via webinar and on a regional basis.

b. The EMS audit determines whether the EMS achieves MCO P5090.2A requirements for a conforming EMS and whether the EMS manual reflects how MCB CamPen implements the EMS.

c. The EMS Coordinator or EMS auditor, as appropriate, documents the results of the annual EMS self-audit, and corrective action that occurs in accordance with [EMS Element 14: Problem Solving](#), in WEBCASS using the WEBCASS auditing software.

d. By 30 September of each year, the EMS Coordinator: (1) uploads the results of MCB CamPen's annual self-audit to the EM Portal and (2) emails the results of the self-audit to HQMC via .pdf attachment. To achieve MCO P5090.2A requirements, the EMS Coordinator assembles this annual notification requirement under cover letter that: (1) is signed "By Direction" of the CG, (2) is titled (i.e., subject line) "USMC ANNUAL EMS CONFORMANCE SUMMARY", (3) states whether MCB CamPen IS or IS NOT in conformance with USMC standards, and (4) includes the following as 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 copy of the meeting minutes from the installation's most recent annual Management Review attended or reviewed by MCB CamPen's CG.

(3) As enclosure (3), a copy of each EMS auditor's EMS Lead Auditor Training certificate with refresher training dates annotated, as applicable.

e. MCB CamPen's ENVSEC Director briefs the results of the annual EMS audit to the CG during [EMS Element 17: Management Review](#).

f. Self-conformance declaration. MCB CamPen self declares EMS conformance triennially, or more frequently as directed, to achieve DoD Instruction 4715.17 (Environmental Management Systems, April 15, 2009) requirements². The results of MCB CamPen's triennial benchmark ECE provide the basis for this declaration.

² All declarations of conformance will be based upon an audit by a qualified party outside the control or scope of the EMS.

EMS Element 17

Management Review

1. Purpose and Overview

a. This EMS element describes how MCB CamPen's conducts its annual EMS management review.

b. MCO P5090.2A 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 MCO P5090.2A and the USMC supplement to the US TEAM Guide prescribe EMS conformance criteria for this EMS element.

c. This EMS element provides the CG 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.

2. Environmental Management Procedure

a. The ENVSEC Directorate annually briefs the CG on the state of the EMS and the progress in achieving its assigned EMS objectives.

b. To achieve MCO P5090.2A conformance criteria, the annual EMS review includes the following:

(1) A review of MCB CamPen's significant practices, highlighting those with the highest environmental risk.

(2) Results of the annual EMS self-audit and conformance status, or results of the external EMS audit if conducted that year, and progress in executing POA&Ms to correct identified EMS nonconformance, highlighting any compliance deficiencies over one year old or that require the CG'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.

(6) Requests for senior management support to promote continued performance improvement, if necessary.

c. Subsequent to the annual EMS management review, the ENVSEC Directorate implements necessary action, and engages the EMS Team as necessary, to ensure that the EMS remains suitable to MCB CamPen's mission and effective in achieving the installation's policy, objectives, and targets.

d. Documentation

(1) The EMS Coordinator 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 ENVSEC Director signs these meeting minutes "By direction".

(2) The EMS Coordinator maintains the results of the annual management review on the EM Portal per [EMS Element 15: Control of Records](#).