

VOLUME 4

“ENVIRONMENTAL COMPLIANCE EVALUATION PROGRAM”

SUMMARY OF VOLUME 4 CHANGES

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- (a) DoD Instruction 4715.6, "Environmental Compliance," May 4, 2015
- (b) Page 25004 of Volume 51, Federal Register, July 9, 1986 (51 FR 25004)
- (c) Department of Justice, "Factors in Decisions on Criminal Prosecutions for Environmental Violations in the Context of Significant Voluntary Compliance or Disclosure Efforts by the Violator," July 1, 1991
- (d) 60 FR 66705, December 22, 1995
- (e) 65 FR 19617, April 11, 2000
- (f) MCO 5040.6H
- (g) Part 1910 of Title 29, Code of Federal Regulations (29 CFR 1910)
- (h) 5 U.S.C. §552
- (i) SECNAV Instruction 5720.42F
- (j) USMC, "Environmental Compliance Evaluation (ECE) Assistance Guide," April 2011

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VOLUME 4: CHAPTER 1

“SCOPE”

SUMMARY OF SUBSTANTIVE CHANGES

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CHAPTER 1

SCOPE

0101 PURPOSE

This Volume establishes Marine Corps policy and responsibilities for Environmental Compliance Evaluation (ECE) Program implementation. The ECE Program supports the checking, preventive, and corrective action components of the Marine Corps Environmental Management System (EMS) while fulfilling the third-party “external” assessment pursuant to DoD Instruction 4715.6 (Reference (a)).

0102 APPLICABILITY

010201. See paragraph 1101.

010202. The ECE Program is intended to ensure compliance with all environmental policies and programs and is related to all other volumes in this Order.

0103 BACKGROUND

010301. Federal regulations, Executive Orders, and the U.S. Environmental Protection Agency’s (EPA’s) federal facility compliance policy encourage regular self-evaluations to ensure environmental compliance. Department of Defense (DoD) policy requires internal assessments annually and an external assessment every three years.

010302. The Marine Corps ECE Program evaluates Marine Corps unit, tenant, command, and installation environmental compliance and conformance. In doing so, the ECE Program seeks to identify corrective actions for observed deficiencies as well as root causes and preventive actions so that observed deficiencies do not recur. The ECE Program also seeks to identify efficiencies that help the Marine Corps become more proactive and continually improve its environmental programs.

010303. EPA encourages federal facilities to adopt sound environmental management practices, particularly environmental auditing, “a systematic, documented, periodic, and objective review by regulated entities of facility operations and practices related to meeting environmental requirements,” to help achieve and maintain environmental compliance in accordance with Page 25004 of Volume 51, Federal Register (51 FR 25004) (Reference (b)). Environmental auditing includes a variety of compliance assessment techniques and may be used to verify environmental compliance, evaluate EMS effectiveness, or assess risks from materials and practices, both regulated and unregulated.

010304.The Department of Justice and EPA have emphasized the importance of environmental auditing in Department of Justice, “Factors in Decisions on Criminal Prosecutions for Environmental Violations in the Context of Significant Voluntary Compliance or Disclosure Efforts by the Violator,” July 1, 1991 (Reference (c)) and 60 FR 66705 (Reference (d)). 65 FR 19617 (Reference (e)) clarifies EPA’s environmental auditing policy.

VOLUME 4: CHAPTER 2

“AUTHORITY”

SUMMARY OF SUBSTANTIVE CHANGES

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CHAPTER 2

AUTHORITY

0201 FEDERAL STATUTES

No federal statutes are specifically discussed in this Volume.

0202 EXECUTIVE ORDERS

Executive Order (E.O.) 13693, “Planning for Federal Sustainability in the Next Decade,” March 19, 2015.

0203 DOD POLICY

DoD Instruction 4715.6, “Environmental Compliance,” May 4, 2015.

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VOLUME 4: CHAPTER 3

“REQUIREMENTS”

SUMMARY OF SUBSTANTIVE CHANGES

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CHAPTER 3

REQUIREMENTS

0301 ENVIRONMENTAL COMPLIANCE EVALUATION (ECE) PROGRAM
INTRODUCTION

The Marine Corps conducts Benchmark ECEs and self-audits through its ECE Program. The ECE Program provides each installation with a management tool to achieve, maintain, monitor, and continually improve environmental compliance and performance, and reduce environmental risks. The Commandant of the Marine Corps, Facilities Branch (CMC (LFF))/Marine Corps Installations Command, Facilities Directorate (MCICOM (GF)) uses Benchmark ECE Reports and installation Plans of Action and Milestones (POA&Ms) to plan, program, budget, and execute projects to correct Benchmark ECE findings.

0302 APPLICABILITY

All Marine Corps installations shall participate in the ECE Program. ECEs assess compliance with all environmental program requirements and include all operations and activities within the installation boundary. Evaluations include tenant activities, out grants, leases, and other activities under the purview of the United States Marine Corps. This program includes self-evaluations of installation programs with environmental requirements, evaluations of installation commands and tenants, and CMC (LFF)/MCICOM (GF) Benchmark ECE Program.

0303 BACKGROUND

Benchmark ECEs are conducted using Inspector General of the Marine Corps (IGMC) inspection principles. MCO 5040.6H (Reference (f)) contains a discussion of the inspection principles.

0304 GOALS

The ECE Program:

030401. Provides installation Commanding Generals/Commanding Officers (CGs/COs) with a management tool to assess, report, and correct environmental deficiencies.

030402. Assesses installation environmental compliance and EMS conformance and identify corrective and preventive actions that address the root causes to reduce environmental risks.

030403. Provides installations and units with a forum for exchanging information on successful environmental compliance strategies, best practices, and technologies for enhancing compliance postures.

030404. Supports the installation mission by identifying risks to public health and the environment.

030405. Provides CMC (LFF)/MCICOM (GF) an accurate assessment of Marine Corps environmental compliance.

030406. Continuously improves Marine Corps environmental compliance and program performance.

0305 WEB-BASED COMPLIANCE ASSISTANCE AND SUSTAINMENT SOFTWARE (WEBCASS)

030501. Purpose

WEBCASS is the primary information technology component used to assess, track, and manage environmental compliance across the Marine Corps. Environmental personnel shall use WEBCASS to record installation compliance assessments. WEBCASS also tracks POA&Ms, which installations prepare and use to address and resolve findings through the implementation of corrective and preventive actions.

030502. Permissions and Reports

Users are assigned WEBCASS access and permissions based on their job requirements. Higher headquarters (for both operational and installation hierarchy) has visibility of subordinate unit information. WEBCASS has a number of reports available for installation, command, and higher headquarter use.

030503. The Environmental Assessment Manual (TEAM) Guide Checklists

WEBCASS identifies installation environmental requirements using the TEAM Guide checklists. Each installation shall audit using checklist questions in the federal TEAM Guide, state and local requirements unique to each installation, and the Marine Corps Team Guide Supplement or Marine Forces Reserve (MARFORRES) Team Guide Supplement, as applicable. Environmental program managers shall determine additional local requirements from installation policies, plans, and standard operating procedures. If necessary, environmental professionals and legal counsel should be consulted to interpret these requirements.

030504. Suitable Substitute for WEBCASS

In the event WEBCASS is not available due to connectivity, a suitable substitute can be used to document findings and develop a plan of action and milestones. The most likely substitute will be an Excel Spreadsheet developed by the evaluation team.

0306 BASELINE ECE SCHEDULING

Commandant of the Marine Corps, Facilities and Services Division (CMC (LF))/ Marine Corps Installations Command, Facilities Directorate (MCICOM (GF)) publishes a Baseline ECE schedule annually. The schedule establishes a 3-year Baseline ECE cycle with a Benchmark ECE conducted at each installation every third year. ECE schedules are coordinated with the installations and Headquarters, Marine Corps, Facilities Division ((HQMC) (LF))/MCICOM (GF) contractors and are

difficult to change. CMC (LFF)/MCICOM (GF) evaluates all installation requests for waivers. Benchmark ECEs are generally scheduled for a 2-week period. MARFORRES Benchmark ECEs generally last 1 week.

0307 BENCHMARK ECE TIMELINE SUMMARY

- 030701. August prior to fiscal year: Fiscal year ECE schedule released.
- 030702. 60 days before arrival date: ECE notification sent to installation.
- 030703. 30 days before arrival date: Installation pre-ECE checklists and point of contact (POC) sheets due to CMC (LFF)/MCICOM (GF).
- 030704. Arrival date through completion date: ECE onsite.
- 030705. Seven days after completion date: CMC (LFF)/MCICOM (GF) Program Manager review and publication of final ECE Report.
- 030706. 14 days after completion date: Installation assessments of ECE team due to CMC (LFF)/MCICOM (GF) (.pdf email preferred).
- 030707. 60 days after completion date: Installation POA&Ms due in WEBCASS. Final report and executive summary submitted to installation.

0308 CONDUCT OF BENCHMARK ECE

030801. Notification

CMC (LFF)/MCICOM (GF) provides each installation a 2-month advance notice of the Benchmark ECE via the Marine Corps action tracking system. In this notice, the installation is tasked with providing a pre-ECE questionnaire and POC information. The installation provides the requested information to CMC (LFF)/MCICOM (GF) at least 30 days before the Benchmark ECE begins. The installation also coordinates any security requirements for evaluator access to the installation.

030802. ECE Workplan

CMC (LFF)/MCICOM (GF) uses the POC list and pre-ECE questionnaire provided by the installation to develop an ECE Workplan. The workplan schedule informs the installation when specific environmental media will be evaluated. CMC (LFF)/MCICOM (GF) gives this schedule to the installation no later than 1 week before the Benchmark ECE. After receiving the media evaluation schedule, the installation POCs should contact the Benchmark ECE evaluators to schedule site visits. The site visit schedule shall give Benchmark ECE evaluators flexibility to evaluate sites of particular interest and permit them the opportunity to evaluate a representative sample of installation units and operations. Evaluators assess at least one-third of all units, practice locations, and environmental structures to the maximum extent possible.

030803. In-Brief

The CMC (LFF)/MCICOM (GF) ECE representative conducts an in-brief with the installation Commanding General/Commanding Officer (CG/CO). The ECE representative explains the Benchmark ECE goals and gives the commander an opportunity to express any areas of concern for the evaluation.

030804. Daily Out-Brief

The Benchmark ECE team should meet each afternoon to discuss evaluation progress, problem areas, and coordinate the next day's schedule. Installation representatives are encouraged to attend these meetings. Concurrently with daily out-briefs, the CMC (LFF)/MCICOM (GF) ECE representative may allow installation or unit staff to read draft finding write-ups prior to the installation CG/CO out-brief or publication on the final ECE Report.

030805. Formal Out-Brief

The CMC (LFF)/MCICOM (GF) ECE representative conducts an out-brief with the installation CG/CO. The out-brief summarizes significant findings or concerns, including any that are important for the commander's awareness or that require the commander's authority to correct.

030806. Document Review

Installation environmental documents are made available to the contractor evaluators prior to the ECE via the Environmental Management (EM) Portal. Reviewing documents offsite allows the evaluators to maximize their onsite time with interviews and site visits during the ECE.

030807. Benchmark ECE Reports

A. Benchmark ECE Report

This report is a summary of the installation's environmental compliance and conformance assessment. It includes an executive summary, statistics, programmatic narratives, and details for all findings identified during the ECE compliance and EMS conformance assessments. All findings are entered into WEBCASS and shall be addressed, as necessary, by the appropriate responsible party. In order to facilitate prioritization, findings are assigned a risk category (high, medium, or low) based on a scoring system built into WEBCASS and evaluator discretion. Findings related to safety considerations in accordance with Part 1910 of Title 29, Code of Federal Regulations (29 CFR 1910) (Reference (g)) may be identified during a Benchmark ECE, but there is no requirement for the evaluators to do so. HQMC (LFF)/MCICOM (GF) prepares a Benchmark ECE Report cover letter addressed to the installation CG/CO requiring submission of the POA&M within 60 days and provides the IGMC a copy of the Benchmark ECE Final Report.

B. EMS Conformance Report

An EMS Conformance Report is developed to assess each EMS element and to determine the overall conformance of the installation's EMS to Marine Corps requirements. The

EMS Conformance Report is included in the Benchmark ECE Report, is referenced in the Benchmark out-brief, and meets the requirements for the annual EMS conformance assessment pursuant to Volume 2 of this Order. WEBCASS automatically associates findings with the EMS elements and formats a report; alternatively, a spreadsheet format is also available.

030808. Installation Feedback on Benchmark ECE

Installation staff involved in the ECE shall complete a critique of the ECE team and forward it to CMC (LFF)/MCICOM (GF) within two weeks of the out-brief.

0309 **ROOT CAUSE ANALYSIS**

Whenever possible, corrections for identified deficiencies should address the root cause of the deficiency. Findings generated in WEBCASS include a root cause analysis that assists in correcting the cause of the finding. The Marine Corps associates its 17 EMS elements as the root cause of compliance deficiencies. This not only identifies the cause of the problem, but also helps to identify weaknesses in the EMS. Root cause determination is at the evaluator’s discretion but needs to be justified. Preventive actions are tied to root cause.

0310 **PLAN OF ACTION AND MILESTONE (POA&M)**

An integral part of all evaluations is appropriate follow-up to ensure that corrective and preventive actions are completed. Following a Benchmark ECE, WEBCASS is used to create a POA&M to respond to all findings identified in the Benchmark ECE Report. The POA&M shall be input into WEBCASS within 60 days after completion of the audit. The POA&M is then reviewed by HQMC (LFF)/MCICOM (GF). Once approved in WEBCASS, the POA&M is submitted to HQMC (LFF)/MCICOM (GF) via the installation CG/CO. POA&Ms are updated using WEBCASS until they are completed and available for HQMC (LFF)/MCICOM (GF) review on an annual basis. Installations notify HQMC (LFF)/MCICOM (GF) when their annual review is complete the year after the Benchmark ECE.

0311 TREND ANALYSIS REPORTS

Trend analysis reports are available through WEBCASS and can be tailored as required using the available filters.

0312 **RELEASABILITY**

031201. Public disclosure of ECE Program records are governed in accordance with Section 552 of Title 5, United States Code (5 U.S.C. §552), also known and referred to in this order as “Freedom of Information Act,” (Reference (h)) and SECNAV Instruction 5720.42F (Reference (i)). Installations and units receiving Freedom of Information Act requests for ECE Program records shall always consult counsel and HQMC (LFF)/MCICOM (GF) before releasing them.

031202. Within the Benchmark ECE Final Report itself, the preliminary executive overview, media overview, recommended corrective action, and installation CG/CO and higher headquarters’ comments may be subject to discretionary disclosure.

031203. As a matter of policy, EPA and many states do not routinely request ECE Program records in anticipation of, or as part of, an environmental compliance inspection. If an EPA or state inspector requests these records, the installation or unit receiving the request should immediately consult with counsel and HQMC (LFF)/MCICOM (GF) for recommendations on how to proceed.

031204. Installations and units receiving requests for ECE Program records in contemplation of, or during, litigation shall always consult counsel and HQMC (LFF)/MCICOM (GF) on how to proceed.

0313 BASE REALIGNMENT AND CLOSURE INSTALLATIONS

Marine Corps installations shall participate in the ECE Program until officially closed.

0314 MARINE FORCES RESERVE (MARFORRES) ECE PROGRAM

031401. In accordance with DoD policy, each MARFORRES tenant shall adhere to the host installation's environmental instruction, including the conduct of ECEs. Reserve units on non-Marine Corps sites shall participate in their hosts' ECE (or equivalent) programs and establish self-audit programs tied to the MARFORRES Commanding General's Inspection Program (CGIP).

031402. MARFORRES shall establish an ECE Program for Marine Corps-owned/leased reserve sites and facilities that is similar to the HQMC (LFF)/MCICOM (GF)-sponsored ECE Program. Due to the geographic spread of MARFORRES sites and the small Inspector and Instructor staffs at each MARFORRES site, the Environmental staff at MARFORRES Headquarters is responsible for all pre-ECE coordination, POA&M development, and execution. Benchmark ECEs for the MARFORRES sites are provided by and coordinated with HQMC (LFF)/MCICOM (GF). The MARFORRES TEAM Guide Supplement is maintained by HQMC (LFF)/MCICOM (GF) and is based on the MARFORRES Environmental Compliance and Protection Standard Operating Procedure (ECPSOP).

031403. MARFORRES Headquarters shall also participate in the HQMC (LFF)/MCICOM (GF) ECE Program, with a similar benchmark ECE of the environmental management program being conducted that focuses on environmental program management.

0315 SITE INSPECTIONS

Personnel authorized by the Marine Corps and possessing appropriate security clearances shall be allowed to enter Marine Corps commands, units, and tenants on Marine Corps installations to conduct ECEs.

0316 SELF-AUDIT PROGRAM

The Self-Audit Program gives commanders a tool to assess their commands' environmental compliance. This program shall be incorporated into the CGIP as described in Reference (f) and USMC, "Environmental Compliance Evaluation (ECE) Assistance Guide," April 2011 (Reference (j)).

031601. Installation CGs/COs

The installation CG/CO Self-Audit Program shall annually assess installation compliance by inspecting every permitted site and source, every process that generates a waste or may be considered a potential source, and every command/unit and tenant. Installations shall also perform an annual EMS evaluation in accordance with Volume 2 of this Order. Installations do not need to conduct a self-audit in the year in which a Benchmark ECE occurs.

031602. Other Commands

A. Non-installation commanders with inspection authority as defined by Reference (f) shall conduct annual self-audits within the CGIP. These commanders shall use the environmental functional area checklist from the IGMC Automated Inspection Reporting System (AIRS). While the installation CG/CO Self-Audit Program focuses on infrastructure and processes, the non-installation commander's Self-Audit Program focuses on subordinate commanders' readiness, support of the commander's environmental policies, and support of the host installation's EMS.

B. Commanders with geographically-separated subordinate units that are not tenants on other DoD installations shall ensure unit responsibilities are clearly delineated and shall annually audit these units as part of the Self-Audit Program. These commanders may also request Naval Facilities Engineering Command or HQMC (LFF)/MCICOM (GF) assistance to conduct Benchmark ECEs at these locations. Commanders with geographically-separated administrative units may request an ECE Program waiver from HQMC (LFF)/MCICOM (GF).

C. Marine Corps units on closed installations shall participate in the ECE Program with and under the cognizance of their higher headquarters.

031603. Self-Audit Program Development

Installations shall identify all significant environmental requirements and incorporate them into the Self-Audit Program. Existing environmental inspections and checklists should be incorporated into the installation Self-Audit Program where applicable. Reports, inspections, and evaluations currently being conducted in support of command environmental management programs include:

- A. Weekly hazardous waste satellite accumulation area inspections.
- B. Drinking water backflow prevention annual inspections.
- C. National Pollutant Discharge Elimination System dry weather inspections.
- D. National Environmental Policy Act decision document monitoring and measurement requirements.

E. Other physical inspections required by established plans and permits (e.g., oil storage containment structures under an installation Spill Prevention Control and Countermeasure Plan).

031604. Implementation of the Self-Audit Program

Installation Self-Audit Programs shall include:

A. Annual Self-Audit Plan

A detailed Self-Audit Plan shall be published each fiscal year. This annual environmental Self-Audit Plan helps determine which tenant units, subordinate units, and installation organizations, buildings, locations, or media areas shall be evaluated. A critical path method format helps to address environmental threats with the most significant risk.

B. Self-Audit Approaches

There are three general approaches for conducting annual self-audits:

1. Organizational Approach. Each installation activity and tenant unit receives a self-audit similar to a Benchmark ECE.

2. Media Area Approach. The self-audit evaluates compliance individually by media (e.g., air and hazardous waste).

3. Combined Organizational and Media Area Approach

C. Tracking and Resolution

A means to formally track and resolve findings identified at each command and ensure prompt corrective action.

D. Assessment

Assessment of the installation's EMS in accordance with Volume 2 of this Order.

031605. Self-Audit Records

Self-audit records shall be maintained by the installation or command conducting the self-audit. Commands should review these records during the EMS review. Annual audits shall be recorded in the IGMC/CGIP Annual Inspection Report that is incorporated into AIRS.

031606. Safety Coordination

While the function of the ECE is not to assess safety concerns, safety deficiencies should not be ignored when discovered. The TEAM Guide has current safety checklists in accordance with Reference (g) available to evaluators. When known safety findings are identified, they should be

written, assigned to the installation Safety Office, and tracked for resolution. Since the Safety program and Environmental program have similar oversight functions, it benefits both programs to cooperate on inspection requirements. A combined environmental, safety, and occupational health inspection arrangement (i.e., a coordinated inspection schedule) can minimize redundancy and conflicting guidance between the programs, reduce the burden on inspected units, and result in beneficial cross-training. Combined Safety/Environmental inspections are encouraged as appropriate to the installation.

0317 INSPECTOR GENERAL OF THE MARINE CORPS (IGMC) REVIEW

To assess tenant unit environmental compliance, the IGMC may use installation Environmental staff to augment IGMC inspections. This provides the Inspector General with evaluators who are knowledgeable about local requirements and provides installation Environmental staff an additional venue for assessing, commending, or correcting unit environmental performance. Installation-level environmental programs are no longer subject to IGMC inspection using the AIRS (764 Environmental Management) checklist due to the extensive oversight provided through the ECE Program.

VOLUME 4: CHAPTER 4

“RESPONSIBILITIES”

SUMMARY OF SUBSTANTIVE CHANGES

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CHAPTER 4

RESPONSIBILITIES

0401 CMC (LF)/COMMCICOM

CMC (LF)/COMMCICOM shall:

- 040101. Schedule and implement Benchmark ECEs at installations and MARFORRES Headquarters.
- 040102. Facilitate augments for IGMC inspections as requested.
- 040103. Review installations' annual validation of POA&M.
- 040104. Ensure corrective actions are taken on identified issues.
- 040105. Assess environmental trends so that enterprise corrective actions can be implemented.
- 040106. Ensure installations are conducting annual self-audits during years in which Benchmark ECEs do not occur.
- 040107. Resolve any issues that are identified and assigned to HQMC (LF)/MCICOM (GF) during Benchmark ECEs.
- 040108. Promote expansion of best practices identified in ECEs, where appropriate.

0402 IGMC

IGMC shall assess unit environmental compliance as applicable during IGMC inspections in accordance with the AIRS (764 Environmental Management) checklist. Environmental staff at each installation or at the regional level are available to augment IGMC inspections as requested. Coordinate installation contacts through the CMC (LF)/MCICOM (GF) Environmental Compliance Officer or through the installation command inspector. Note: Oversight of installation environmental management is fully addressed through the ECE Program.

0403 CG OF MCI EAST, WEST, PACIFIC, AND NATIONAL CAPITAL REGION

CG of MCI East, West, Pacific, and National Capital Region shall:

- 040301. Track installation POA&M corrective actions to ensure timely completion. Ensure high risk environmental findings at installations are adequately addressed.
- 040302. Use trends analysis, including trends data available in WEBCASS, in order to determine environmental compliance findings that affect the region and implement cost-effective solutions at the regional level.

040303. Promote expansion of best practices identified in ECEs, where appropriate.

0404 CG/CO OF MARINE CORPS INSTALLATIONS AND COMMARFORRES

CG/CO of Marine Corps installations and COMMARFORRES shall:

040401. Participate in the Marine Corps Benchmark ECE Program.

040402. Establish and implement a command Self-Audit Program that annually evaluates installation environmental compliance by visiting every permitted site and source; every practice that releases pollutants to air or water, generates a waste, or may be considered a significant environmental risk; and every command/unit and tenant.

040403. Publish ECE procedures as part of the installation ECPSOP or environmental order.

040404. Supplement the IGMC inspections with installation environmental staff as needed to assess tenant units at the installation.

040405. Encourage cooperation between installation Safety and Environmental programs. When identified, follow up on safety-related findings identified through the ECE.

VOLUME 4: APPENDIX A

“FEDERAL STATUTES, FEDERAL REGULATIONS, EXECUTIVE ORDERS, AND DOD POLICIES”

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APPENDIX A

**FEDERAL STATUTES, FEDERAL REGULATIONS, EXECUTIVE ORDERS, AND DOD
POLICIES**

1 **FEDERAL STATUTES**

No federal statutes are specifically discussed in Volume 4 of this Order.

2 **EXECUTIVE ORDERS**

E.O. 13693, “Planning for Federal Sustainability in the Next Decade,” March 19, 2015, has a goal to maintain Federal leadership in sustainability and greenhouse gas emission reductions. It revoked E.O. 13423 and E.O. 13514. This E.O. continues the policy of the United States that agencies shall increase efficiency and improve their environmental performance to help protect the planet for future generations and save taxpayer dollars through avoided energy costs and increased efficiency, while also making Federal facilities more resilient. To improve environmental performance and Federal sustainability, the E.O. states that priority should first be placed on reducing energy use and cost, then on finding renewable or alternative energy solutions. The E.O. sets goals for greenhouse gas emissions and for sustainability, including energy conservation, clean energy, renewable energy, alternative energy, water use efficiency, potable water consumption, fleet efficiency, building efficiency, sustainable acquisition, waste and pollution prevention, performance contracts, and electronics stewardship.

3 **DOD POLICY**

DoD Instruction 4715.6, “Environmental Compliance,” April 24, 1996, requires all installations to conduct internal compliance self-assessments at least annually and external compliance self-assessments at least once every three years.

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