



USMC EMS Conformance Guide

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Enclosure (1)

Executive Summary

Executive Order (EO) 13148 "Greening the Government Through Leadership in Environmental Management" requires an Environmental Management System (EMS) to be implemented at all applicable federal facilities by 31 December 2005. Consistent with that EO and subsequent, related Department of Defense (DoD) EMS policy, the Marine Corps EMS provides a systematic approach to integrating environmental considerations into mission decisions and operations, while continuing to improve upon our environmental compliance posture. We are doing this by institutionalizing processes for continual environmental improvement and reducing risks to mission through effective and continual planning, review, and preventive and corrective action.

The mission focus of the Marine Corps EMS highlights the fact that the authority and principle responsibility for controlling the potential for environmental impacts belong to those commands, units, and offices whose mission-supporting activities, called *practices*, have the potential to impact the environment. For example, units that train in/around endangered species habitats, or that use clean weapons systems using hazardous materials, or that perform vehicle maintenance or wash down, are responsible for controlling the potential for environmental impacts from those practices. Accordingly, the Marine Corps EMS focuses on ensuring that all such *practice owners* are aware of any potential for their mission-supporting practices to impact the environment and of the related, underlying risk to the mission of the installation or Reserve Center posed by those practices.

Thus, in support of the vision of the Marine Corps EMS to sustain and enhance mission readiness and access to training environments through effective and efficient environmental management, it is Marine Corps policy that:

- Each active installation will implement and fully conform with the Marine Corps Environmental Management System (EMS) covering all installation commands, to include Department of Defense tenant organizations, that have activities and functions potentially impacting the environment;
- Marine Forces Reserve (MARFORRES) will implement and fully conform with a programmatic, organizational EMS for all Marine Corps Reserve Centers (MCRCs); and
- All Marine Corps commands, both active and reserve, that are tenants will participate in their host facility's EMS and will fully support their host facility in attaining and maintaining conformance with their EMS.

The Marine Corps EMS is a framework of five interrelated components (Policy, Planning, Implementation, Checking and Preventive/Corrective Action, and Management Review) that together define and emphasize a process of continual improvement. This Guide further defines these components and supporting elements and the actions necessary to conform with those components and elements, and also how the well-established Marine Corps Environmental Compliance Evaluation (ECE) Program serves as the mechanism for evaluating, certifying, self-declaring, and reporting conformance with the Marine Corps EMS.

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Section 1. Introduction to the Marine Corps EMS Conformance Guide

Purpose of the EMS Conformance Guide

This Marine Corps Environmental Management System (EMS) Conformance Guide is intended to support Marine Corps Commanders, their staffs, tenants, and contractors in successfully attaining and maintaining full conformance with the Marine Corps EMS. In doing so, this Guide walks through the five components and their subordinate eighteen elements of the Marine Corps EMS, describing each part and the actions necessary to conform with them, and also how the well-established Marine Corps Environmental Compliance Evaluation (ECE) Program serves as the mechanism for evaluating, certifying, self-declaring, and reporting conformance with the Marine Corps EMS.

Structure of the EMS Conformance Guide

Section 2 describes the Marine Corps EMS vision, discusses key concepts, and defines the Marine Corps EMS components and elements and conformance requirements thereof.

Section 3 describes the Marine Corps ECE Program's role as the mechanism for performing both Headquarters Marine Corps triennial and the facility annual self-EMS audits, EMS auditor qualifications, and certifying, self-declaring, and reporting conformance with the Marine Corps EMS.

Conformance & Continual Improvement

Beginning in 2005, the Headquarters Marine Corps triennial ECE's of active and reserve facilities will include an EMS conformity audit. With the initial EMS implementation and conformance deadlines of 31 December 2005 and 2007, respectively, Headquarters Marine Corps expects to see varying degrees of conformance with the Marine Corps EMS over the course of performing the 2005, 2006, and 2007 ECE's. Through the use of the continual improvement mechanisms of the EMS to include annual self-ECE's, though, all facilities will be able to attain and self-declare full conformance with the EMS by the 31 December 2007 deadline. Thus the Headquarters Marine Corps triennial 2008 - 2010 ECE's and ECE's thereafter are expected to verify that all facilities are sustaining conformance with the Marine Corps EMS.

Section 2. The Marine Corps EMS Conformance Requirements

The Marine Corps EMS Vision

The Marine Corps vision is that we will use EMS principles, procedures, and tools to sustain and enhance mission readiness and access to training environments through effective and efficient environmental management.

Effectiveness in environmental management will be manifested by maintaining readiness and access to military training environments, complying with environmental regulations and policies, protecting human health and natural and cultural resources, and considering public concerns.

Efficiency in environmental management will be achieved by continuously improving measures implemented to control practices and their impacts, and by prioritizing our efforts and our resources in accordance with the risks that practices present. We will thereby minimize the overall costs of environmental management and mission accomplishment.

The vision for EMS will be realized by integrating environmental considerations into day-to-day decision-making and long term planning processes at installations and at higher headquarters.

Components of the Marine Corps EMS

The Marine Corps EMS is based on components and elements common to existing, accepted EMS frameworks. A fundamental similarity is that all EMS frameworks, including the Marine Corps EMS, are grounded in the principle of continual improvement. EMS is a cyclic or ongoing process, continually seeking better environmental performance.

Our EMS provides a systematic approach to environmental management that strives for continual improvement through effective planning, implementation, checking and preventive/corrective action, and management review. An EMS integrates environmental considerations into mission decisions and operations. An EMS is a critical component of installation management, as it helps guide allocating resources and assigning responsibilities and ongoing evaluation of practices, procedures, and processes that an organization needs to integrate environmental concerns into its daily mission practices.

Successful EMS's are built on the "Plan, Do, Check, Act" model. The Marine Corps EMS adds a policy component so that there are five components, as follow:

- **Policy** -- Public commitment by senior leaders to the management of the organization's environmental affairs, including environmental compliance, pollution prevention, natural/cultural resource management, cleanup, risk to mission and continual improvement of the management system;

- **Planning** -- Integrated planning including inventorying practices, their aspects and impacts; inventorying environmental resources and assessing their vulnerabilities; analyzing and prioritizing risks to missions resulting from environmental impacts; developing objectives and targets for reducing environmental impacts and risks to mission; and identifying/implementing actions to achieve the targets;
- **Implementation** – Definition, documentation and implementation of responsibilities and procedures for sustaining the EMS, managing media programs, controlling practices, and managing environmental resources to enhance mission capabilities;
- **Checking and Preventive/Corrective Action** – Execution of procedures for self-evaluation and preventive/corrective action of the EMS, media programs, practice controls, and resource management; and
- **Management Review** -- Periodic review of the management system by senior leadership, followed up by actions, including changes to the EMS as indicated by the review.

Conformance with the Marine Corps EMS

Each component is comprised of one or more elements for a total of 18 elements in the Marine Corps EMS. Those elements are defined by the conformance criteria in the Table 2-1, as follows:

Table 2-1: Marine Corps EMS Components, Elements, and Conformance Criteria

COMPONENT	
Element	Conformance Criteria
POLICY	
1. Environmental Policy Statement	<ul style="list-style-type: none"> • The installation has an environmental policy statement that: <ul style="list-style-type: none"> - Is documented and signed by the installation CO; - Reflects the vision of the Marine Corps EMS to sustain and enhance mission readiness and access to training environments through effective and efficient environmental management. - Commits to: <ul style="list-style-type: none"> • compliance with relevant environmental legislation, regulations, and policy; • pollution prevention; • conservation of natural and cultural resources; • clean up of contaminated sites, • minimizing risks to mission, • continual improvement in performance of the EMS; and - Is communicated to installation personnel and made available to the public. • The environmental policy is implemented and maintained.

COMPONENT	
Element	Conformance Criteria
PLANNING	
2. Requirements	<ul style="list-style-type: none"> • The installation has in place and implements documented procedures to identify Federal, state, local, DoD, DON, Marine Corps, and installation-level environmental requirements applicable to its practices and environmental programs. • The installation disseminates specific and pertinent information regarding requirements to appropriate personnel (e.g., environmental media managers and practice owners) in procedures and checklists as appropriate to all levels and functions operating aboard the installation.
3. Practices, Aspects, Impacts	<ul style="list-style-type: none"> • The installation implements a documented procedure for inventorying practices and updates the inventory as practices are altered, discontinued or added. • The installation identifies aspects and impacts associated with each practice on the inventory. • The installation inventories its environmental resources and assesses each resource's vulnerability to the aspects of existing and planned practices.
4. Risk Prioritization	<ul style="list-style-type: none"> • The installation implements a documented procedure to prioritize practices based on risk to mission. The procedures are repeatable and defensible and include a schedule for periodic review and update of the prioritization results.
5. Environmental Objectives and Targets	<ul style="list-style-type: none"> • The installation establishes and documents environmental objectives and targets and communicates them to installation employees at all appropriate levels and functions. • The installation's objectives and targets: <ul style="list-style-type: none"> - Reflect risks to mission determined through prioritization of aspects and practices, - Are consistent with and supportive of the installation's environmental policy statement and environmental requirements, - Are achievable within economic and technological restraints, and - Are reviewed and revised according to a schedule established by the installation. • The installation institutes documented methods for tracking progress toward meeting objectives and targets.

COMPONENT	
Element	Conformance Criteria
6. Actions to Improve Performance	<ul style="list-style-type: none"> • The installation identifies actions to achieve objectives and targets. • The installation implements identified behavioral and administrative actions. • The installation programs for and executes actions (projects) requiring external funding and/or expertise.
IMPLEMENTATION	
7. Structure, Responsibilities, and Programs	<ul style="list-style-type: none"> • The installation documents, and communicates EMS roles, responsibilities, and authorities for: <ul style="list-style-type: none"> - the EMS Team, - environmental program managers and staff, and - practice owners including tenants and on-site contractors. • The installation reviews and modifies media programs to ensure that they contribute to achieving the installation's Policy, Objectives and Targets.
8. Funding and Manpower	<ul style="list-style-type: none"> • The installation identifies projects for external funding either as actions to achieve objectives and targets or as corrective/preventive measures identified through problem solving. • The installation tracks expenditures and executes funds through existing budget mechanisms. • The installation periodically evaluates manpower dedicated to environmental management and realigns roles and responsibilities as indicated by the installations objectives and targets and improvements planned for the EMS elements.
9. Training	<ul style="list-style-type: none"> • The installation identifies, provides, and documents training and instruction needed to: <ul style="list-style-type: none"> - comply with regulations, - ensure that appropriate personnel understand their responsibilities for implementing the EMS, and - ensure practice owners understand procedures for controlling their practices.

COMPONENT

Element	Conformance Criteria
10. Communication	<ul style="list-style-type: none"> • The installation implements documented procedures for internal communication among the Installation Commander, the EMS Team, the environmental office, all units and offices which own practices, and others within the Marine Corps interested in the installation's environmental affairs. • The installation implements documented procedures for receiving, recording, and responding to communications from regulatory agencies, the public, and others outside the Marine Corps who are interested in the installation's environmental affairs.
11. Emergency Preparedness and Response	<ul style="list-style-type: none"> • The installation documents its procedures for identifying and responding to accidents and emergencies and for mitigating the environmental impacts that might result. • The installation reviews and revises its emergency preparedness and response procedures when new practices are initiated and after the occurrence of accidents or emergencies. • Procedures to be followed in the event of an accident or emergency are communicated to building managers and practice owners in scope and detail appropriate to their responsibilities.
12. Document and Record Control	<ul style="list-style-type: none"> • The installation inventories all document and record requirements appropriate to its environmental programs and practices, and identifies other documents and records essential to the efficient operation of its EMS. • The installation implements a system to maintain documents and records, so that they <ul style="list-style-type: none"> - Can be located - Are reviewed and updated as necessary (documents) - Are protected from alterations or damage (records) - Are available when and where needed - Are removed or archived, as appropriate, when obsolete.

COMPONENT	
Element	Conformance Criteria
13. Environmental SOPs	<ul style="list-style-type: none"> • The installation prepares and distributes to each practice owner an Environmental SOP for each practice under the practice owner's control. • Environmental SOPs include instructions for operational control, internal communication, emergency preparedness and response, inspection and corrective action, and training and awareness applicable to the practice. • Environmental SOPs identify who is responsible for implementing each instruction and how often the instruction is to be carried out. • Practice owners and operators maintain current Environmental SOPs in the workplace and ensure that they are addressed in employee training.
14. EMS Document	<ul style="list-style-type: none"> • The installation maintains, and the Installation Commander has approved, an EMS document that includes the installation's environmental policy statement and describes <ul style="list-style-type: none"> - EMS elements including Environmental Management Procedures (EMP's) to implement them; - How elements relate to each other; and - Where other documents and records relevant to the EMS are maintained.
CHECKING AND PREVENTIVE/CORRECTIVE ACTION	
15. Monitoring and Measurement	<ul style="list-style-type: none"> • The installation implements a compliance self-audit plan. • The installation implements methods for tracking progress toward meeting objectives and targets. • The installation monitors practices that may have a significant impact on the environment and, where appropriate, the resources that may be impacted.
16. Problem Solving	<ul style="list-style-type: none"> • The installation follows a structured problem solving process that identifies and defines problems with compliance or the EMS, analyzes causes and alternative solutions, selects and implements actions, and follows up to ensure problems are solved. • The installation documents its problem solving efforts.

COMPONENT	
Element	Conformance Criteria
17. EMS Review	<ul style="list-style-type: none"> • The installation evaluates its EMS against the criteria listed here at intervals appropriate to the size of the installation. • The installation supports the Headquarters, Marine Corp EMS Review conducted as part of the HQMC ECE every three years.
MANAGEMENT REVIEW	
18. Management Review	<ul style="list-style-type: none"> • The Installation Commander designates and authorizes an EMS Team to analyze EMS implementation efforts and the results of EMS reviews. • The EMS Team takes actions that ensure the EMS is suitable to the current mission and is effective in achieving the installation's policy, objectives, and targets. • The EMS Team implements improvements to the EMS including but not limited to revising the installation's EMS policy; changing procedures, projects or actions to ensure current objectives and targets are met; establishing new objectives and/or targets, or clarifying/assigning roles and responsibilities.

Section 3. The Marine Corps ECE Program, EMS Conformance, and Self-Declaration

The Marine Corps ECE Program & EMS Conformance Audits

The ECE Program as the EMS Audit Mechanism

Beginning in 2005, the Marine Corps ECE Program established per MCO P5090.2A serves as the mechanism for evaluating, certifying, self-declaring, and reporting conformance with the Marine Corps EMS. Thus, starting in 2005, an EMS audit will be performed as a part of each triennial Headquarters ECE at active and reserve facilities, with facility EMS conformance status and any requisite actions to attain or reestablish conformance with the Marine Corps EMS being an outcome of those Headquarters ECE's. The subsequent, annual, facility self ECE's will then be used to either confirm continued EMS conformance or that the appropriate steps are being taken with the appropriate results to lead to or lead back to EMS conformance.

However, as the deadline for full conformance with the Marine Corps EMS is 31 December 2007, and as Headquarters Marine Corps expects to see varying degrees of conformance with the Marine Corps EMS over the course of performing the 2005, 2006, and 2007 Headquarters ECE's, the Headquarters ECE's cannot by themselves be the sole mechanism for establishing, certifying, and reporting each active installation's and MARFORRES's EMS conformance by the 31 December 2007 deadline. Therefore, beginning in 2005, all annual, facility self ECE's will include an EMS conformance audit using the ACE EMS conformance audit checklist (see below). Those audits will annually establish EMS conformance status and any requisite actions to attain or reestablish conformance with the Marine Corps EMS. Those audit results will be reported to Headquarters Marine Corps as described later in this section and those requisite actions to attain or reestablish conformance with the Marine Corps EMS will be incorporated into the plan of actions and milestones resulting from the most recent headquarters ECE.

The EMS Conformance Checklist & Certifying Conformance

To fully conform with the Marine Corps EMS, a facility must meet all of the conformance criteria as detailed in the previous section in Table 2-1 "Marine Corps EMS Components, Elements, and Conformance Criteria." Accordingly, checklists to be used in the course of performing an EMS conformance audit mirror the Table 2-1 criteria. Also, as the Marine Corps Automated Compliance Evaluation (ACE) tool houses the Marine Corps ECE checklists, the Marine Corps EMS conformance audit checklist will also be maintained within ACE. A hard copy of the EMS conformance audit checklist from ACE must be signed by the EMS Auditor to certify conformance or non-conformance with the Marine Corps EMS, as appropriate, and will be submitted to Headquarters Marine Corps as part of the EMS conformance audit report as described later in this section.

EMS Auditor Qualifications

Persons responsible for conducting the EMS Audit portion of the ECE must have completed successfully an EMS Lead Auditor training course within the five (5) years immediately preceding any EMS audit in which they are to serve as the EMS auditor. A copy of those persons EMS Lead Auditor training records will become part of each EMS conformance audit records and therefore also part of each Headquarters and annual, facility self ECE records.

Reporting EMS Conformance Audit Results and Self-Declaring Conformance

The results from the EMS conformance audit portion of each annual, facility self-ECE will be reported to Headquarters Marine Corps, LFL, within 45 days of the conclusion of each self-ECE but no later than 30 September of each year starting with 2005. Those reports will be signed by the active facility Commander, or by the Commander, MARFORRES, as applicable. Those reports will include a summary of the EMS conformance status, the signed EMS auditor's EMS conformance audit checklist from ACE as described above, a copy of each EMS auditor's lead auditor training certificate, and a plan of actions and milestones to attain or reestablish conformance with the Marine Corps EMS. In the event of reporting full compliance with the Marine Corps EMS, the subject line of the report letter will read "SELF-DECLARATION OF CONFORMANCE WITH THE MARINE CORPS EMS" and state that the purpose of the letter is to self-declare that conformance. Otherwise, the subject line of the letter will read "ANNUAL SELF-EMS CONFORMANCE AUDIT RESULTS."