From: Chief, Bureau of Medicine and Surgery

Subj: ENVIRONMENTAL PROGRAM ROLES AND RESPONSIBILITIES

Ref: (a) OPNAV M-5090.1 of September 2019
(b) OPNAVINST 5090.1E

Encl: (1) Activities Requiring an Environmental Program Manager
(2) Sample Appointment Letter for Environmental Program Manager
(3) Sample Appointment Letter for Environmental Point of Contact

1. Purpose. To establish interim Bureau of Medicine and Surgery (BUMED) guidance and direction for the designation and delineation of environmental program roles and responsibilities for facilities that fall under the authority of the BUMED environmental compliance program.

2. Scope and Applicability. This notice applies to personnel at shore facilities and commands where BUMED retains responsibility for the environmental compliance program including, but not limited to: medical treatment; dental treatment; veterinary treatment; preventive medicine; public health; research, development, training, and education activities; BUMED echelon 3 commands; Navy Medicine Readiness and Training Commands and Navy Medicine Readiness and Training Units. Shore-based activities subordinate to the activities identified in enclosure (1), but are exclusively administrative in nature and have no responsibility over environmental aspects at their activities are excluded from these requirements; however, they must be identified to BUMED headquarters as excluded by the appropriate echelon 3 environmental program manager (EPM).

3. Definitions

   a. Environmental Management System (EMS). A plan-do-check-act business model implemented at designated activities per the requirements of references (a) and (b) and established by reference (a). The activities requiring implementation of an EMS are stated in enclosure (1).

   b. Environmental Program. A comprehensive program for managing all aspects of environmental compliance per Federal (e.g., Environmental Protection Agency), State, local, or applicable overseas regulations and policies. Depending on the site-specific operations and mission of an activity, the environmental program may encompass all or some environmental compliance aspects. Such environmental compliance aspects may include, but are not limited to,
the management of hazardous and regulated medical waste, drinking water testing and compliance, discharges to the sanitary sewer, management of fuel storage tanks, disposal of hazardous materials, compliance with air emissions standards, and implementation of an EMS.

c. **Environmental Program Manager.** A person appointed in writing by the parent activity commanding officer (CO) or officer in charge (OIC) or local senior leadership equivalent who is assigned the responsibility to manage the environmental program at the activities identified in enclosure (1) or at the echelon 3 or headquarters level of the organization. The activity senior leadership may elect to appoint the EPM as either a full-time or collateral duty, provided the appointee is an environmental compliance technical subject matter expert (SME). General responsibilities and training required for an EPM are outlined in subparagraph 5g of this notice.

d. **Environmental Point of Contact (EPOC).** A person appointed in writing, by the parent or subordinate activity CO, OIC, or local senior leadership equivalent, who is assigned the responsibility to manage the environmental compliance requirements at an individual facility that is subordinate to the facilities identified in enclosure (1). This is typically a collateral duty position. While the appointee is not required to be an environmental compliance technical SME, the appointee is required to obtain the required training within 90 days of appointment. General responsibilities and training required for an EPOC are outlined in subparagraph 5h of this notice.

e. **Echelon 3 Commands.** Naval Medical Forces Atlantic, Naval Medical Forces Pacific, and Naval Medical Forces Support Command are echelon 3 commands. Echelon 3 environmental program area of responsibility (AOR) includes activities where authority, direction, and control has been transferred to the Defense Health Agency (DHA) for which BUMED (on behalf of the Department of Navy (DON)) retains environmental compliance program authority.

4. **Background**

   a. Per references (a) and (b), BUMED has the responsibility to serve as the environmental program manager for budget submitting office 18 for all environmental program requirements associated with operations at facilities that fall under the BUMED environmental compliance program AOR. To achieve the requirements of this responsibility, it is imperative BUMED environmental program be managed and resourced properly at each level. Properly appointed and trained personnel are critical to programmatic success and reduced risk of noncompliance.

   b. For the scope of this notice, environmental responsibility will pertain to all chapters of reference (a), as applicable. Environmental program staff must be extra vigilant in the following compliance media areas: regulated medical waste, hazardous waste and hazardous material management, drinking water, waste water and storm water management, solid waste and pollution prevention, air quality, petroleum oils and lubricants, and spill prevention. BUMED designates these media areas for extra attention based on mission and past deficiencies identified during external environmental assessments.
c. Environmental management and compliance is a critical aspect to ensure mission success. There is a direct link between EMS, environmental compliance, staff and patient safety, and The Joint Commission or laboratory accreditations. Additionally, there is substantial risk associated with failing to manage environmental compliance requirements at any location. BUMED must identify and mitigate risk to our patients, visitors, and staff. Regulatory agencies may levy monetary fines and costly mandatory corrective actions upon activities and installations for poor performance and noncompliance. Such agencies may also deny environmental permits (e.g., permits for air emissions or hazardous waste storage), preventing or negatively impacting the operations of commands, the host installation, or both.

d. Reference (a), chapter 3, subparagraphs 3-3.3, 3-3.4, and 3-3.6 outline the minimum general training criteria for all personnel with environmental duties, including collateral duties. Additional chapters within reference (a) outline training requirements for the management of specific environmental compliance media.

5. Action

a. Deputy Chief, Business Operations must:

   (1) Appoint in writing an EPM for BUMED. Appointee must be a technical SME in the environmental compliance field and must be the recognized authority and lead program manager for the BUMED environmental program AOR.

   (2) Receive annual metrics regarding environmental program performance and status.

   (3) Provide environmental program direction and support to ensure the vision and priorities of BUMED senior leadership are reflected in programmatic strategies and goals.

   (4) Coordinate with Deputy Chief, Resources and Requirements (BUMED-M8/9) to ensure the environmental program has sufficient funding to plan and execute programmatic requirements including, but not limited to, travel for technical assist visits and environmental audits.

   (5) Coordinate with the appropriate counterparts at DHA, Office of the Chief of Naval Operations (OPNAV), and Chief, Naval Installations Command to ensure resourcing to BUMED for the Environmental Program.

   (6) Appoint in writing the assistant EPM for BUMED.

b. BUMED Environmental Program Manager must:

   (1) Report directly to Director, Facilities and Environment (BUMED-M41) and oversee the environmental program per Department of Defense (DoD), DON, DHA, and BUMED guidance.
(2) Coordinate and respond to DoD, DON, DHA, and OPNAV environmental program
data calls.

(3) Coordinate with appropriate counterparts at DHA to develop and maintain
environmental program policies for facilities under the authority of the BUMED environmental
program.

(4) Responsible for the financial functions of planning, programming, budgeting and
execution for the environmental program. Ensure the environmental program has sufficient
funding to plan and execute programmatic requirements including, but not limited to, travel for
technical assist visits and environmental audits. Additionally, collaborate with BUMED-M8/9 to
ensure proper budgetary planning and data call responses for DoD, DON, and DHA.

(5) Oversee and execute an environmental audit program per references (a) and (b).

(6) Coordinate closely with echelon 3 EPMs, as well as with other BUMED codes on
matters pertaining to BUMED environmental management to foster an open and collaborative
culture in the program.

(7) Advocate for BUMED interests among OPNAV; Assistant Secretary of the Navy
(Energy, Installations, and Environment); Secretary of Defense; DHA; Naval Facilities
Engineering Command; Commander, Naval Installations Command; and other environmental
program stakeholders.

c. Echelon 3 Commanders must:

(1) Appoint in writing an echelon 3 EPM, using the letter sample in enclosure (2) of this
notice. Appointee must be an environmental compliance technical SME and must be the
recognized authority and lead EPM for the command’s AOR.

(2) Provide environmental program direction and support to ensure the vision and
priorities of BUMED, DHA, and echelon 3 senior leadership are reflected in programmatic
strategies and goals.

(3) Ensure echelon 3 EPM has sufficient funding and resources to plan and execute
training, professional licensure, travel for technical assist visits, environmental auditing, and
other requirements, as applicable.

d. Echelon 3 Environmental Program Managers must:

(1) Oversee all programmatic actions at the echelon 3 level, including frequent
communication and coordination with echelon 3 leadership, the BUMED EPM, activity EPMs
and EPOCs, and other stakeholders.
(2) Serve as the principal consultant within the echelon 3 AOR for the management of the environmental program, including environmental compliance and EMS technical assistance and guidance to subordinate activities.

(3) Liaise and coordinate environmental programmatic data calls between BUMED and subordinate activities. Provide programmatic and technical updates and data call responses to the BUMED EPM.

(4) Review and consolidate funding requests during the annual budget data call and coordinate the information submitted to BUMED with the echelon 3 comptroller.

(5) Monitor activity execution of funds on a quarterly basis to ensure appropriate execution and provide this information to BUMED EPM.

(6) Participate in external environmental audits at subordinate activities as required by references (a) and (b) and scheduled by BUMED.

(7) Routinely visit subordinate activities to perform the following duties: provide technical assistance, support program status, provide training, and work with new EPMs.

(8) Review and monitor progress of activity-submitted plan of action and milestones (POA&M) in EMSWeb available at Navy’s environmental portal, https://emsweb2.cnic.navy.mil, for corrective actions associated with deficiencies (e.g., compliance, EMS, or financial).

(9) Monitor instances of environmental-related visits by external parties (e.g., Federal or State regulatory agencies) to subordinate activities, and share results and follow-up actions with chain of command and BUMED EPM. Ensure situation reports (SITREP) are prepared by activities and submitted as required by this notice or higher level guidance.

(10) Provide expert guidance on environmental matters, including the National Environmental Policy Act, during the planning and development of facilities projects and equipment procurement or disposal.

e. COs or OICs or Senior Leadership Equivalent at Activities Requiring an Environmental Program Manager must:

(1) Appoint in writing an activity EPM based on the definition provided in subparagraph 3c of this notice, using the letter sample in enclosure (2). Appointee is the recognized authority and lead EPM for the activity’s AOR.

(2) Ensure subordinate commands have assigned an EPOC in writing, using the letter sample in enclosure (3). The subordinate command will assign an EPOC based on the definition in subparagraph 3d of this notice.
(3) Ensure the echelon 3 EPM is provided contact information for the activity EPM and subordinate command EPOCs.

(4) Ensure the EPM has successfully completed required environmental training identified in subparagraph 5g of this notice.

(5) Ensure compliance with applicable environmental requirements.

(6) Ensure execution of environmental program requirements is coordinated with your host installation environmental program staff, per reference (a).

(7) Ensure annual self-assessments and management reviews are conducted and POA&M for corrective actions are completed at activities requiring an EMS, identified by an asterisk in enclosure (1), per reference (a).

f. COs or OICs or Senior Leadership Equivalent at Activities Subordinate to those Activities Listed in enclosure (1) must:

(1) Appoint an EPOC in writing based on the definition in subparagraph 3d of this notice.

(2) Ensure the activity EPM is provided contact information for the EPOC at the subordinate command.

(3) Ensure EPOC has successfully completed required environmental training identified in subparagraph 5h of this notice.

(4) Ensure compliance with applicable environmental requirements.

(5) Ensure execution of environmental program requirements is coordinated with your host installation environmental program staff per reference (a).

(6) Allow the activity EPM to provide guidance and direction to the EPOC on environmental concerns.

g. Activity Environmental Program Manager must:

(1) Be appointed in writing by the CO or OIC or local senior leadership equivalent using the letter sample in enclosure (2).

(2) Complete the training listed in subparagraphs 5g(2)(a)1 through 5g(2)(a)1 as soon as practicable upon assuming the assignment, per regulatory requirements, but within 1 year of appointment. Ensure records are kept per applicable regulations per paragraph 7 of this notice,
or at least for the entirety of appointment as the EPM, whichever is later. Required training varies based on facility-specific requirements. A large number of the training courses are offered at no-cost through the Civil Engineer Corps Officer School (CECOS).

(a) Training required by media-specific regulation or reference (a) (e.g., for hazardous waste and medical waste management). Examples include, but are not limited to:


2. OSHA Hazardous Waste Operations and Emergency Response Standard and Annual Refresher (29 CFR Part 1910.120(e)).

3. Introduction to Hazardous Waste Generation and Handling (CECOS course number A-493-0080) or Overseas Hazardous Waste Generator (A-493-0094), as applicable.

4. EMS General Awareness Training (provided by the local command per reference (a)).

(b) EPMs at activities required to implement an EMS as part of their environmental program (as identified by an asterisk in enclosure (1)) must maintain the EMS per reference (a), and must take the listed CECOS courses or equivalents in subparagraphs 5g(2)(b)1 and 5g(2)(b)2:

1. Advancing an Effective EMS (A-4A-0098).

2. Integrated EMS and Compliance Auditing (A-4A-0079).

(c) The listed CECOS courses or equivalent in subparagraphs 5g(2)(c)1 and 5g(2)(c)2 are optional for the activity environmental program manager, but they are highly recommended.


(3) Maintain, manage, and report environmental data metrics to include hazardous waste, regulated medical waste, solid waste, recycling efforts, assessment deficiency close-out, financial execution, etc., and provide such information upon request.

(4) Respond to environmental program data calls as required.
(5) Oversee environmental compliance operations at the activity, including coordination with host installation environmental department staff and maintenance of pertinent copies of all contracts, service agreements, memorandum of agreements, and memorandum of understanding affecting the environmental program.

(6) Audit parent and subordinate commands annually at a minimum. EMSWeb must be used to track this annual internal audit. The facility environmental data sheet, within EMSWeb, must be updated as a function of the annual internal audit.

(7) Initiate environmentally-related SITREPs for parent and subordinate. Provide SITREP to the echelon 3 EPM, and document external environmental audits in EMSWeb as a regulatory inspection.

(8) Provide technical support, assistance, and guidance for environmental compliance activities at the subordinate commands including, but not limited to, annual visits and assessments of subordinate commands to evaluate compliance posture, provide support, communication of environmental compliance requirements, conduct training as necessary, and support the preparation and submission of annual budget requests, as well as development of requests for technical support projects.

(9) Provide data for the annual budget data call and ensure execution of funds is occurring properly at activity and subordinate commands. Provide quarterly updates to the echelon 3 EPM on budget execution.

(10) Ensure POA&Ms for external environmental audits are managed within the EMSWeb tracking system and quarterly updates are included as milestones within each POA&M for the echelon 3 EPM review. The EPM is responsible for ensuring POA&M development and completion for external environmental audits at both the activity and subordinate commands. Overdue POA&Ms will need justification on a quarterly basis on the quarterly BUMED external environmental audit POA&M status update tasker.

(11) Coordinate throughout the activity to ensure special program areas typically overseen by other departments, such as safety or industrial hygiene, are appropriately covered with respect to environmental aspects. Examples include, but are not limited to, hazardous material management, spill response planning and management, and storage tank management.

(12) Maintain a copy of required environmental permits, contracts, inspections, and any memorandum of understanding or memorandum of agreements with the host installation environmental department at activity and subordinate commands. EMSWeb may be used as a document repository. These documents will be shared with the respective echelon 3 EPM.

(13) Provide guidance and direction to the EPOCs via the appropriate chain of command.
h. Environmental POC must:

(1) Be appointed in writing by the CO or OIC or local senior leadership equivalent using the letter sample provided in enclosure (3).

(2) Complete training as soon as practicable upon assuming the assignment, per regulatory requirements, but within 1 year of appointment. Ensure records are kept per applicable regulations, but at least for the entirety of appointment as the EPOC. Required training varies based on facility-specific requirements. Examples include, but are not limited to:


(b) Introduction to Hazardous Waste Generation and Handling (A-493-0080) or Overseas Hazardous Waste Generator (A-493-0094), as applicable.

(c) EMS General Awareness Training (provided by the local command per reference (a)).

1. Coordinate with your facility EPM for requirements including, but not limited to, communication of environmental compliance requirements, external regulatory agency or host installation inspections and subsequent results, submittal of budget and environmental program requirement requests, response to data calls, maintenance and submittal of environmental metrics, and other programmatic requirements.

2. Oversee daily environmental compliance operations, including coordination with host installation environmental department staff.

6. Reporting

a. The activity EPM must forward the name and contact information, as well as a copy of the signed appointment letter, to the echelon 3 EPM within 30 days of a designation change for the EPM or EPOC. These records must be uploaded to EMSWeb.

b. The echelon 3 EPM must forward the updated information from subparagraph 6a of this notice to the BUMED EPM within 15 calendar days of learning of a designation change.

7. Records Management

a. Records created as a result of this notice, regardless of format or media, must be maintained and dispositioned per the records disposition schedules located on the DON Directorate for Administration, Logistics, and Operations, Directives and Records Management Division portal page at https://portal.secnav.navy.mil/orgs/DUSNM/DONAA/DRM/Records-and-Information-Management/Approved%20Record%20Schedules/Forms/AllItems.aspx.
b. For questions concerning the management of records related to this notice or the records disposition schedules, please contact the local records manager or the DON Directorate for Administration, Logistics, and Operations, Directives and Records Management Division program office.

8. **Information Management Control.** The reports required in subparagraphs 5b(1), 5b(2), 5b(4), and 5b(9) of this notice are exempt from reports control per Secretary of the Navy Manual 5214.1 of December 2005, part IV, paragraph 7j.

Releasability and distribution:
This notice is cleared for public release and is available electronically only via the Navy Medicine Web site, [http://www.med.navy.mil/directives/Pages/BUMEDNotes.aspx](http://www.med.navy.mil/directives/Pages/BUMEDNotes.aspx)
ACTIVITIES REQUIRING AN ENVIRONMENTAL PROGRAM MANAGER

Naval Medical Forces Atlantic
2nd Dental Battalion, Naval Dental Center Camp Lejeune
Captain James A. Lovell Federal Health Care Center North Chicago
Naval Health Clinic Annapolis
Naval Health Clinic Charleston
Naval Health Clinic Cherry Point
Naval Health Clinic Corpus Christi
Naval Health Clinic New England
Naval Health Clinic Patuxent River
Naval Health Clinic Quantico
Naval Hospital Beaufort
Naval Hospital Jacksonville
Naval Hospital Pensacola
Naval Medical Center Camp Lejeune
Naval Medical Center Portsmouth
Navy and Marine Corps Public Health Center
Navy Expeditionary Medical Support Command
U.S. Naval Hospital Guantanamo Bay
U.S. Naval Hospital Naples
U.S. Naval Hospital Rota
U.S. Naval Hospital Sigonella

Naval Medical Forces Pacific
1st Dental Battalion, Naval Dental Center Camp Pendleton
3rd Dental Battalion, U.S. Naval Dental Clinic Okinawa
Naval Health Clinic Hawaii
Naval Health Clinic Lemoore
Naval Health Clinic Oak Harbor
Naval Hospital Bremerton
Naval Hospital Camp Pendleton
Naval Hospital Twenty-Nine Palms
Naval Medical Center San Diego
Naval Medical Research Center
U.S. Naval Hospital Guam
U.S. Naval Hospital Okinawa
U.S. Naval Hospital Yokosuka

Naval Medical Forces Support Command
Navy Medicine Operational Training Center

Enclosure (1)
Notes:

1. Activities requiring implementation of an EMS:

   Naval Hospital Beaufort
   Naval Hospital Bremerton
   Naval Hospital Camp Pendleton
   Naval Hospital Jacksonville
   Naval Hospital Pensacola
   Naval Hospital Twenty-Nine Palms
   Naval Medical Center Camp Lejeune
   Naval Medical Center Portsmouth
   Naval Medical Center San Diego
   U.S. Naval Hospital Guam
   U.S. Naval Hospital Guantanamo Bay
   U.S. Naval Hospital Naples
   U.S. Naval Hospital Okinawa
   U.S. Naval Hospital Rota
   U.S. Naval Hospital Sigonella
   U.S. Naval Hospital Yokosuka

2. Activities re-designated as Naval Health Clinic and elected to maintain the EMS:

   Naval Health Clinic Lemoore
   Naval Health Clinic Oak Harbor

3. Facilities subordinate to the activities listed in enclosure (1) of this notice are required to identify an EPOC per this notice.
From: Activity head, name of activity, location when needed
To: I. M. Environmental

Subj: APPOINTMENT AS THE ENVIRONMENTAL PROGRAM MANAGER

Ref: (a) BUMEDNOTE 5090 of ____May 2021 (Canc: May 2022)
     (b) OPNAVINST 5090.1E
     (c) OPNAV M-5090.1 of September 2019

1. You are hereby appointed as the environmental program manager for [name of activity]. In this role, you are responsible for management of the [name of activity] environmental program as defined in reference (a) in coordination with the [name of activity] environmental program staff. You are also responsible for providing oversight, support, and assistance regarding the management of the environmental programs at all [name of activity] subordinate commands.

2. To fulfill this responsibility, you are required to familiarize yourself with the duties and responsibilities as they are listed in references (a) through (c), and obtain all training requirements as specified therein.

3. At any time you anticipate a change in your availability for responsibilities of this appointment, you must notify the commanding officer at your earliest opportunity via your chain of command.

A. B. COMMANDER

Copy to:
BUMED-M41
5090
Ser XXX/XXXXXX
Date

From: Activity head, name of activity, location when needed
To: I. M. Environmental

Subj: APPOINTMENT AS THE ENVIRONMENTAL POINT OF CONTACT

Ref: (a) BUMEDNOTE 5090 of ____ May 2021 (Canc: May 2022)
(b) OPNAVINST 5090.1E
(c) OPNAV M-5090.1 of September 2019

1. You are hereby appointed as the environmental point of contact for [name of activity]. In this role, you are responsible for management of the [name of activity] environmental program as defined in reference (a) in coordination with the environmental program manager at [name of activity] and the [name of activity] environmental program staff.

2. To fulfill this responsibility, you are required to familiarize yourself with the duties and responsibilities as they are listed in references (a) through (c), and obtain all training requirements as specified therein.

3. At any time you anticipate a change in your availability for responsibilities of this appointment, you should notify the officer in charge at your earliest opportunity via your chain of command.

A. B. COMMANDER

Copy to:
BUMED-M41

Enclosure (3)