

# CHAPTER 1: ENVIRONMENTAL QUALITY ASSESSMENT (EQA) ASHORE

This chapter provides background on the development of the EQA Program and covers its key concepts and major elements.

## 1.1 Background

The Navy is committed to compliance with environmental and natural resource laws and regulations and considers compliance vital to operational readiness and mission accomplishment. Over the past decade, the Navy has developed important capabilities to achieve, maintain, and monitor compliance. Key among these capabilities was the Environmental Compliance Evaluation (ECE) Program, established in 1989, which was essential to building and improving the Navy's environmental program.

Based on nine years of experience in implementing the ECE program, the Navy has recognized opportunities for improvement. The ECE program, with its primary focus on the Major Claimant's Tier 2 ECE once every three years, provided only a snapshot view of an installation's compliance status and was not the best approach to support day-to-day compliance. With little guidance on Tier 1 self-ECEs, the installations did not clearly understand the scope and objectives, and, in many cases, self-ECEs did not add much value. To some installations, a self-ECE meant a simple review of previous Tier 2 ECE findings or a quick run-through of a requirements-based checklist without even getting up from the desk. Other installations recognized that a thorough and comprehensive compliance assessment provided valuable information that program managers could use to improve their programs.

In applying the principle of continuous improvement, the Director, Environmental Protection, Safety, and Occupational Health Division, Chief of Naval Operations (CNO-N45) tasked a Process Action Team made up of representatives from across the Navy to examine the ECE process and recommend a more effective and efficient program. The team designed the EQA program to support the following goals:

- Integrating environmental leadership into every level of management by promoting full awareness through effective training and by clearly defining environmental quality expectations.
- Implementing a quality assessment program that clearly defines internal and external assessments yet is flexible and tailored to the needs of the command.
- Identifying problems and their root causes, identifying and implementing quality improvements and pollution prevention opportunities, and developing corrective action plans including identification of funding sources.
- Providing COs and their chains-of-command with the tools and technical expertise necessary to verify whether effective management processes are in place, resources are adequate and efficiently used, and compliance is achieved.
- Providing technical assistance for corrective actions through an effective support network.

While considering the EQA program, the team recognized that not every installation is the same. Mission, size, organizational structure, program maturity, environmental performance, and other

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circumstances may vary significantly. A “one size fits all” program would not offer the efficiencies the Navy needs. In addition, the team recognized a need to go beyond merely auditing for compliance toward a more proactive approach that incorporates the following:

- Problem solving and root cause analysis,
- Identification of pollution prevention opportunities,
- Implementation and evaluation of corrective and preventive actions, and
- Other process improvements.

### 1.2 Key Concepts of the EQA Program

Table 1- 1 summarizes key concepts of the EQA Program:

<b>Table 1-1: Key EQA Program Concepts</b>	
<b>Concept</b>	<b>Description</b>
Internal and external assessments tailored to meet installation’s needs.	Design internal assessments to address all applicable requirements and to focus resources on practices that pose the highest risks. Design schedule and scope of external assessments based on information known about and/or provided by the installation.
Increased emphasis on compliance evaluations by installation personnel.	Conduct compliance evaluations and inspections to better ensure day-to-day compliance. Shift in responsibility for conducting compliance assessments from Major Claimants to installations.
Change of external assessment focus from compliance auditing to EMS reviews.	Examine a new dimension of the program by looking at individual components of the EMS that apply across all environmental program areas. Focus of the Major Claimant external assessment shifts from compliance to management system review.
Problem solving and root cause analysis	Seek an understanding of the underlying causes of current or potential compliance problems by probing beyond the immediate symptoms of non-compliance and attempting to identify and address underlying causes, including management system deficiencies.
Self-correcting compliance programs.	Installations implement compliance evaluations and inspections and apply problem solving techniques incorporating root cause analysis targeted at correcting deficiencies and preventing them from happening again. Demonstrated effectiveness of self-correcting programs at installation level minimizes requirement for higher headquarters to inspect for compliance.
Proactive and promotes continuous improvement.	Identify and follow up on pollution prevention opportunities and other process improvements to address compliance problems. Periodically review program effectiveness and revise policy/procedures accordingly.

### 1.3 Major Elements of the EQA Program

Major elements of the EQA Program include internal and external assessments. Each element is discussed briefly in this section. Table 1-2 compares the internal and external assessment processes.

<b>Table 1-2: Comparison of Internal and External Environmental Quality Assessments</b>		
<b>Characteristic</b>	<b>Internal Assessment</b>	<b>External Assessment</b>
<b>Responsibility</b>	Installation/host activity	Major Claimant of host activity
<b>Frequency</b>	At least annual. May be continuous throughout the year in accordance with the Internal Assessment Plan (IAP).	An annual document review. Site visit at Claimant’s discretion and in accordance with the External Assessment Plan.
<b>Scope</b>	Development of an IAP. Performance of compliance evaluations, inspections, and problem solving. Preparation of an EQA Report. May also include EMS review.	Review the IAP, EQA Report, and other environmental performance data. Site visit is scheduled at Claimant’s discretion. At a minimum during a site visit, the claimant evaluates the EMS and internal assessment documentation.
<b>Primary Focus</b>	Compliance	EMS effectiveness
<b>Secondary Focus, as Appropriate</b>	EMS effectiveness	Compliance
<b>Target</b>	All commands within the fenceline or regional complex (tenants, contractors and other governmental activities).	All commands within the fenceline or regional complex (tenants, contractors and other governmental activities).
<b>Standards of Measure</b>	<ul style="list-style-type: none"> <li>- Regulatory requirements</li> <li>- Navy policy</li> <li>- Best business practices</li> <li>- Benchmarks</li> <li>- Installation targets and goals</li> <li>- Measures of merit</li> </ul>	<ul style="list-style-type: none"> <li>- Regulatory requirements</li> <li>- Navy policy</li> <li>- Best business practices</li> <li>- Benchmarks</li> <li>- Installation targets and goals</li> <li>- IAP</li> <li>- Internal Assessment documentation including Plan of Action and Milestones</li> <li>- EQA Report</li> <li>- Measures of merit</li> </ul>

**1.3.1 Internal Assessment**

As defined in Chapter 20 of OPNAVINST 5090.1B, an internal assessment is:

A systematic, documented, objective, and comprehensive environmental compliance review of installation processes, facilities, and practices completed within a 12-month period. Installation personnel or their designees conduct the assessment.<sup>1</sup>

The host activity, in coordination with tenant activities, conducts the internal assessment, which addresses, on a schedule based on the relative environmental impacts associated with various activities on the installation, all applicable compliance requirements within the “fenceline”. The internal assessment may also include review of the EMS. For regional complexes, the Regional Commander is the host activity and the property owner, and the “fenceline” refers to all properties under direct control of the Regional Commander.

An internal assessment should provide for:

- Development of an Internal Assessment Plan (IAP);

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<sup>1</sup> See Appendix H.

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- Compliance evaluations by environmental professionals to identify, characterize, and document compliance deficiencies related to individual practices and environmental programs;
- Inspections of practices and associated environmental control measures by practice owners;
- Problem solving to define compliance problems, analyze their causes, and then select, implement, monitor, and modify corrective and preventive actions to achieve specified results;
- Preparation of an EQA Report annually; and
- Management review of problem solving results, the IAP, and EQA.

Chapter 4 of this guide describes how to develop an IAP.

### **1.3.2 External Assessment**

As defined in the Chapter 20 of OPNAVINST 5090.1B, an external assessment is:

A systematic, documented, objective and periodic review of the installation's environmental management system that may include compliance reviews of selected program areas. Designated persons from outside the organization of the inspected installation conduct the assessment. Those designated persons may be members of the Major Claimant, Naval Inspector General, Naval Audit Service, and/or others. In terms of the EQA Program, regulatory inspections are not considered external assessments.

The Major Claimant of the host installation, in coordination with Major Claimants of tenant organizations, usually conducts the external assessment. An external assessment has two main parts:

1. An annual document review of the installation's IAP and EQA Report, plus any other information available on the installation's environmental performance.
2. A site visit with a schedule and scope determined by the Major Claimant, based on review of the installation's IAP, EQA Report, environmental performance record, and other available information.

The schedule and scope of the site visit are flexible and should be tailored to meet the installation's needs. This allows for varied degrees of compliance or oversight assessments.

*Schedule.* Based on the results of the annual document review, the Major Claimant may elect to visit the installation immediately, once a year, once every two years, or less often, if appropriate, depending on the installation's condition and circumstances.

*Scope.* At a minimum, the Claimant will evaluate the installation's EMS and internal assessment documentation to determine if the installation is effectively evaluating its compliance status. A site visit may also include compliance reviews of all environmental program areas or target particular program areas, as appropriate. The external assessment site visit may be accomplished through the traditional command inspection process or as a separate assessment/assistance visit. Major Claimants are required to document their decisions regarding the scope and frequency of the site visits in an External Assessment Plan (EAP) that must be submitted annually to CNO/N45.

Chapter 5 of this guidance document presents guidelines for planning, conducting, and documenting the external assessment.

### 1.4 Key Terms

Several terms have specific meanings as used in this guide:

*Compliance evaluation* - Identification, characterization, and documentation of compliance deficiencies related to either practices or environmental programs conducted by environmental management office personnel or other environmental professionals designated by the installation. Includes oversight of any inspections that have been performed by practice owners.

*Inspection* - On-site examination of practices and related environmental control measures by or on behalf of practice owners to determine whether environmental compliance requirements are being satisfied. Includes documentation and reporting of deficiencies as arranged with the installation's environmental management office and any sampling, analysis, or other monitoring activities that the practice owners perform in order to maintain compliance.

*Problem solving* - The sequence of steps taken to define a compliance problem, analyze its causes, and then select, implement, monitor, and modify corrective actions to achieve specified results.

*Practice* - Any activity conducted by an installation or its tenants in performing their missions that has an actual or potential impact on the installation's assets. The term includes the processes, equipment, and facilities used in conducting the activities. Practices may be further distinguished as business practices and management practices:

*Business Practice* - Work-related activities including operation and maintenance of industrial processes, pollution control equipment, and mission-critical equipment and facilities; weapons systems training operations; etc.

*Management Practice* - Activities conducted to manage, coordinate, or support business practices, such as provision of environmental training for personnel, documentation of EMS elements, development and implementation of plans and standard procedures, etc.

*Practice Owner* - The person, unit, or organization that operates, conducts, controls, or is otherwise responsible for a "practice".

*Asset (or Vulnerable Asset)* - A resource on which the installation depends or over which it has some responsibility, and which may be impacted (adversely or beneficially) by the conduct of practices, such as environmental, historical, and cultural areas on and off the installation; personnel health and safety; mission effectiveness; military training lands; real property; financial resources; and public relations status.

*Impact* - The positive or negative effects on assets of conducting business and management practices.

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