



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
WASHINGTON, D.C. 20314-1000

REPLY TO
ATTENTION OF:

CECW-ON

DEC 18 2003

MEMORANDUM FOR COMMANDERS, MAJOR SUBORDINATE COMMANDS,
CHIEFS, OPERATIONS DIVISIONS

SUBJECT: Environmental Compliance Assessments Conducted at Civil Works Projects and Facilities

1. Purpose. Clarify existing guidance for conducting INTERNAL environmental compliance assessments at Civil Works projects and facilities found in Engineer Regulation 200-2-3, Environmental Compliance Policies, 30 Oct 96. The environmental compliance assessments are commonly called ERGO assessments.
2. Background.
 - a. The environmental compliance program mission is to assure that all Corps facilities and associated lands (including outgrants) meet environmental standards contained in relevant Federal, State and local environmental laws and regulations.
 - b. A recent Department of Defense Inspector General audit identified a need to clarify the requirements for environmental compliance internal assessments. These requirements are found in Engineer Regulation 200-2-3. This memorandum serves as interim guidance until ER 200-2-3 is updated and released.
 - c. This memorandum addresses only one type of assessment, internal. The guidance in Engineer Regulation 200-2-3 remains in force for the external environmental compliance assessments.
3. Applicability. This interim guidance applies to all USACE commands having responsibility for civil works functions.
4. Internal environmental compliance assessments are self-assessments of a project or facility. Internal Assessments shall be conducted at each facility annually, except for the year in which an external assessment is performed. Internal assessments may be conducted by the District and/or Project ECC, or other trained project personnel. Each USACE operated project or facility shall provide funding needed to conduct its internal assessments.
5. Districts shall decide if an internal assessment is necessary at outgrants of real property on Civil Works projects. The District ECC shall ensure that internal assessments conducted at outgrants are incorporated in real estate compliance inspections or otherwise coordinated with the District Real Estate element

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6. Internal assessments shall include the following requirements.

a. Review and follow-up on all incomplete corrective actions for findings from any previous assessment.

b. Review and follow-up on all incomplete corrective actions for Notices of Violation or other regulatory actions.

c. Evaluate compliance with any new regulatory requirements promulgated since the previous year's assessment. Prior coordination with the District ECC is required when the Project ECC conducts the internal assessment.

d. Evaluate compliance with respect to any special emphasis areas specified by higher command. Prior coordination with the District ECC is required when the Project ECC conducts the internal assessment.

7. Documentation. Internal assessments and all associated findings shall be documented in the Operations and Maintenance Business Information Link (OMBIL) web based online data management system. The data shall be entered into OMBIL by the District or Project ECC.

8. Coordination. Coordination is required for internal assessments as follows. Internal assessments shall be coordinated with the project/facility Operations Manager. When the internal assessment is to be conducted by the Project ECC, he/she shall coordinate with the District ECC prior to start (see paragraph 8 above). Coordination after the internal assessment is completed shall be through the project/facility chain of command to the District ECC. The District ECC shall coordinate with the District Chief of Operations. The District or Project ECC shall retain proof that coordination was completed.

9. MSC Commanders, district commanders and commanders/directors of facilities outside the district structure shall assure that internal assessments are conducted in accordance with this directive.

10. The point of contact for this action is Janice Smith, CECW-ON, at (202) 761-4657.

FOR THE COMMANDER:



MICHAEL B. WHITE
Chief, Operations Division
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