

Environmental Compliance Officers in Iraq

By Major Kenneth D. Kozak

Environmental compliance officers (ECOs) in Iraq face big challenges. They deal with issues such as hazardous waste; radioactive lightning arrestors; petroleum, oil, and lubricant (POL) spills and contaminated soils; and hazardous waste pickups. In addition, ECOs oversee hazardous material and waste storage, wastewater/sewage facilities, burn-pit/trash operations, and fuel storage. They conduct environmental assessments, environmental baseline surveys, cultural and archeological resource protection programs (there are more than 8,000 of these sites in theater), endangered-species management, and environmental site closure of bases. Environmental training is the key to enabling ECOs to appropriately manage these issues.

After serving as a civil/structural engineer for the past five years with the 99th Regional Readiness Command, I was assigned to Iraq to oversee the country's ECO program. To garner command emphasis for ECO appointments and training, I prepared an ECO fragmentary order (FRAGO) for staffing with the Multinational Corps-Iraq (MNC-I). The FRAGO (Training for Major Subordinate Command [MSC] and Base Camp Environmental Compliance Officers) was approved and made part of the MNC-I operation order (OPORD). The purpose of this FRAGO was to identify and train an ECO at the MSC

level and at least one ECO on each forward operating base/base camp in theater.

Wanting to ensure that all appointed ECOs received the appropriate training, I contacted the Directorate of Environmental Integration (DEI), United States Army Engineer School, at Fort Leonard Wood, Missouri, and requested assistance in making training available to all the ECOs stationed in Iraq.

One training option is for MNC-I C-7 (engineer section) Environmental to deliver classroom training to ECOs in theater that need certification or recertification. With the support of the information management section, Soldiers also have the option of accessing the ECO course on the MNC-I C-7 Environmental Web site or through Army Knowledge Online (AKO). The third training option is a compact disk (CD) developed by DEI that contains the ECO course and test. MNC-I C-7 would provide each MSC several of these CDs, and the respective MSC ECO would be responsible for distributing the course, tracking the test results, and submitting the results to MNC-I C-7 on the provided ECO spreadsheet.

Soldiers must receive a minimum score of 70 percent on the test to become ECO-qualified. The MNC-I C-7 will submit all



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passing scores and names to the Army Training Support Center, at Fort Eustis, Virginia, for credit.

I am also working to provide support through an information network for ECOs. A previous FRAGO (Hazardous Materials and Hazardous Waste Procedures) to MNC-I OPOD requires that all bases appoint an ECO. Each MSC should have a list of ECOs for the forward operating bases/base camps. If there is not a current list, Task No. 5 of a recent FRAGO reinforces the

order to comply by stating that not only will all ECOs be identified and trained, but a chain of command to address environmental concerns, problems, and any questions will be established. The ECOs have reachback capability to MNC-I C-7 if an environmental issue does occur or questions arise.

It is a challenge for the ECO Soldiers stationed in Iraq, who use the Overseas Environmental Baseline Guidance Document (OEBGD), the United States Army Forces Central Command (ARCENT), and MNC-I C-7 Environmental standing operating procedures as the standard for environmental issues.

Currently, there are no environmental guidelines set by the government of Iraq. But with training and an information network, the ECOs are providing a better environment to sustain the mission and secure the future for our Soldiers and the Iraqi people.



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