

Environmental Management Systems External Review Protocol for U.S. EPA Facilities

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Acknowledgments

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Introduction

Within EPA, the Safety, Health and Environmental Management Division (SHEMD) within the Office of Administrative Services (OAS) is responsible for coordinating the implementation of Environmental Management Systems (EMS) at all designated EPA facilities in accordance with the requirements of Executive Order 13148—Greening the Government Through Leadership in Environmental Management (April 21, 2000). Section 401 of the Order directs all Federal agencies to implement an EMS at all “appropriate” facilities, using the criteria of facility size, complexity, and the environmental aspects of its operations to define appropriate facilities. EPA has designated 34 of its sites as appropriate for EMS implementation, including its Washington DC headquarters operations, all 10 of its regional office headquarters, all 10 of its regional laboratories, nine of its Office of Research and Development laboratories, and several of its program laboratories.

In addition to supporting EMS implementation, SHEMD is responsible for reviewing the EMSs put in place at these facilities and for self-declaring their conformance to the Executive Order 13148 requirements. In accordance with guidance developed by the Executive Order 13148 Interagency Environmental Management Workgroup (*Environmental Management Systems—Agency Self-Declaration Protocol for Appropriate Federal Facilities*, Final Version, September 10, 2003), EPA has developed this External Review Protocol. The External Review Protocol is part of a process the Agency intends to follow to ensure that EPA facility EMSs meet the requirements of the Executive Order and that EPA’s self-declaration procedure conforms to the principals established in the Interagency Workgroup *Protocol*. These include requirements that Agencies provide an independent basis for verifying the status of each facility’s EMS, and that system verification be based on more than just a documentation review (i.e., the review also considers the effectiveness of EMS implementation).

The External Review Protocol follows the 12-step EMS implementation process established by SHEMD for use by EPA facilities. While the 12-step process itself is not intended to serve as an EMS design standard, it reflects EPA understanding of best practices in EMS design and encourages implementation in a manner that would conform to EMS standards such as ISO 14001. The verification of each step through the use of this Protocol will further serve to benchmark EPA implementation practices against recognized standards. In this way, the use of this Protocol will help EPA demonstrate that its facility EMSs have been designed, implemented, and are being operated in a manner that conforms to the intent of Executive Order 13148.

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STEP 1

Identifying Primary EMS Contact

Step 1: Identifying a Primary EMS Contact and Backup

In this section, the key task is to determine whether the facility/office has taken the step of formally identifying a primary EMS contact, and a back-up EMS contact. These designations should be made in writing.

Department: _____

Auditor(s): _____

C – Conformance N – Nonconformance

Date: _____

| No. | Requirements | C/N | Relevant Documents | Observations |
|------------|--|------------|---------------------------|---------------------|
| 1 | By interviewing one or more of the following people (Facility Director, Operations Manager, EMS Contact) verify that the Facility/Office has designated a primary EMS Contact and backup personnel. Are these designations in writing? What are the dates of these appointments? | | | |

(NAME) – Auditor

Date

(NAME) – Client Department Manager

Date

STEP 2

EMS Self-Assessment

Step 2: Performing an EMS Self-Assessment

In this section the key task is to determine whether the facility/office has taken the step of conducting an EMS self-assessment or baseline survey of its existing environmental management programs and procedures that can be incorporated into or consolidated into a formal EMS.

Department: _____

Auditor(s): _____

C – Conformance N – Nonconformance

Date: _____

| No. | Requirements | C/N | Relevant Documents | Observations |
|------------|--|------------|---------------------------|---------------------|
| 1 | By interviewing one or more of the following people (Facility Director, Operations Manager, EMS Contact) verify that the Facility/Office has completed and documented an EMS self-assessment. What is the date of the EMS self-assessment? Has the EMS self-assessment been communicated to SHEMD? | | | |

(NAME) – Auditor

Date

(NAME) – Client Department Manager

Date

STEP 3

Local EMS Policy

Step 3: Putting a Local EMS Policy or Commitment in Place

In this section the key tasks are to determine that (1) a policy exists, (2) the policy has been communicated to employees and contractors working onsite and is understood by them, and (3) the policy is available to the public.

Additionally, employees who interact with SEAs should demonstrate they understand how their performance furthers the policy commitments.

STEP 3 Local EMS Policy

Department: _____

Auditor(s): _____

C – Conformance N – Nonconformance

Date: _____

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|---|-----|--------------------|--------------|
| 1 | Verify that the Policy has established a local EMS policy or commitment letter that has been signed by a top facility/office official. | | | |
| 2 | Verify that the local EMS Policy or commitment letter has been communicated to all facility/office employees and contractors working on-site. Interview at least one on-site contractor and at least two employees to determine if they are aware of the Policy and can (in general terms) explain the Policy. | | | |
| 3 | Verify that the Policy is available to the public. What is the process for providing access to the Policy to an external “interested party”? | | | |

STEP 3 Local EMS Policy

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|--|-----|--------------------|--------------|
| 4 | Interview one or more employees whose jobs are related to a Significant Environmental Aspect and ask each employee to explain their role in terms of furthering the Policy (e.g. by following the Work Instruction, I minimize a potentially significant environmental impact related to my work and this helps ensure facility's/office's commitment to compliance) | | | |

(NAME) – Auditor

Date

(NAME) – Client Department Manager

Date

STEP 4

Significant Environmental Aspects

Step 4: Identifying Significant Environmental Aspects

In this section the key tasks are to determine that (1) there is a procedure for identifying environmental aspects, (2) the identification of EAs involves appropriate personnel, (3) the list of EAs is appropriate for the facility, and (4) the list of aspects is regularly reviewed and updated in light of changes.

In addition, we determine (1) that a procedure exists for defining significant environmental aspects, and (2) that the identified SEAs are taken into consideration in establishing objectives and targets.

In general, regulated EAs are treated as SEAs in accordance with SHEMD Guidance to all facilities and offices. Therefore, another important task in this section is to determine whether the facility/office has established a procedure for identifying applicable legal and other requirements, whether its list of applicable legal and other requirements is current, and whether regulated EAs are classified as SEAs (unless special circumstances allow an exception).

STEP 4

Significant Environmental Aspects

Department: _____

Auditor(s): _____

C – Conformance N – Nonconformance

Date: _____

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|---|-----|--------------------|--------------|
| 1 | <p>Verify that the facility/office has established and maintains a documented procedure for identifying its environmental aspects (EAs) and for prioritizing EAs that are determined to be significant environmental aspects (SEAs).</p> <p><i>TIP:</i> Interview Management Representative and EMS Coordinator and determine how the facility/office defines:</p> <ul style="list-style-type: none"> • activities • products • services <p>for purposes of identifying environmental aspects?</p> <p>Do these definitions adequately cover possible interactions with the environment at the facility/office?</p> <p>Ask the EMR and/or EMS Coordinator to describe the procedure for identifying EAs and determining SEAs. Compare with written procedure.</p> | | | |

STEP 4

Significant Environmental Aspects

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|--|-----|--------------------|--------------|
| 2 | <p>Interview the EMR and EMS Coordinator and test their role in the environmental aspect identification process.</p> <p>What role did each of them play in identifying environmental aspects? Determine if the EMS Coordinator did all or virtually all of the work in identifying environmental aspects. If so, compare that with the documented Procedure.</p> <p>Interview at least two (non environmental) members of the cross-functional EMS implementation committee to test their understanding of their role in the environmental aspect identification process.</p> <p>Are the results of these interviews consistent with the applicable Procedure?</p> | | | |

STEP 4

Significant Environmental Aspects

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|--|-----|--------------------|--------------|
| 3 | <p>Interview the EMS Coordinator to determine if the applicable Procedure, as implemented, covers emissions to air, releases to water, contamination of land, waste management (including medical), chemical materials/products, energy and water usage, use of chemicals in landscaping, and any actual or potential interactions with the environment from start up, shut down operations.</p> <p>Ask who keeps a current record of identified EAs and SEAs.</p> <p>Review the record to determine if it is up to date, legible, and readily accessible.</p> | | | |
| 4 | <p>What process did the facility/office use to identify products or services provided by or used by on-site contractors? Were these products and services evaluated for EAs? SEAs?</p> <p>Have any SEAs been identified in connection with products and services provided by on-site contractors?</p> | | | |

STEP 4

Significant Environmental Aspects

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|--|-----|--------------------|--------------|
| 5 | <p>Verify that the facility/office has established and maintains a process to identify legal and other requirements to which the facility/office subscribes.</p> <p>Has the facility/office specifically identified how legal requirements apply to the environmental aspects of its activities, products, or services?</p> <p>Ask the EMS Coordinator to give you an example of an “other requirement” to which the facility/office voluntarily subscribes.</p> | | | |
| 6 | <p>Determine whether the facility/office maintains a current list or record of its applicable legal and other requirements.</p> <p>Review the list or record to determine if it is up to date, legible, and readily accessible by those who need to see it.</p> | | | |
| 7 | <p>Verify that the facility/office has assigned responsibility for periodic review (e.g., annually) of the list of Eas and SEAs identification to take into account any changes in materials, work processes, and other activities.</p> <p>Does the procedure for identifying environmental aspects specify that the list of environmental aspects be updated when changes occur.</p> | | | |

STEP 4

Significant Environmental Aspects

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|--|-----|--------------------|--------------|
| 8 | <p>Determine if the environmental aspects identification process is capable of identifying environmental aspects resulting from changes in the facility's/office's use of material, work processes, and/or from the introduction of new activities, products, or services.</p> <p>If the applicability of a new state or federal regulatory requirement is identified, is there a process for checking whether the underlying EA has already been identified, and for reclassifying the EA as an SEA (in appropriate cases)?</p> <p>If the procedure provides for annual review of environmental aspects, does the facility/office have any intermediate means for identifying new emerging Eas (e.g., NEPA review documents or form for identifying EAs in proposed new construction work to be carried out by a contractor)? If so, how is this information integrated into the list of EAs?</p> | | | |

(NAME) – Auditor

Date

(NAME) – Client Department Manager

Date

STEP 5

EMS Objectives and Targets

Step 5: Identifying EMS Objectives and Targets

In this section the key tasks are to determine whether (1) the facility has established objectives and targets (O&Ts), (2) SEAs and policy commitments were taken into consideration in setting O&Ts, (3) relevant levels and functions were involved in setting specific O&Ts, (4) environmental management programs (EMPs) are being implemented to achieve O&Ts, and (5) O&Ts are appropriately reviewed and kept up to date.

STEP 5 EMS Objectives and Targets

Department: _____

Auditor(s): _____

C – Conformance N – Nonconformance

Date: _____

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|---|-----|--------------------|--------------|
| 1 | <p>Has the facility/office established and maintained documented environmental objectives and targets?</p> <p><i>TIP:</i> The facility/office need not set an objective and target for each of its SEAs. It can select just one or two SEAs for a focused improvement effort by setting an objective (and appropriate targets) for these priority SEAs.</p> | | | |
| 2 | <p>Verify that the facility/office considered its Significant Environmental Aspects in setting its environmental objectives and targets.</p> <p><i>TIP:</i> Unless there are exceptional circumstances, the objectives (and targets) should only be established for SEAs.</p> | | | |

STEP 5 EMS Objectives and Targets

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|---|-----|--------------------|--------------|
| 3 | <p>How are the relevant facility/office Areas and Departments involved in helping to achieve the environmental objectives and targets?</p> <ul style="list-style-type: none"> • Review the objectives and targets. • Select one objective that requires involvement of more than one Area or Department (e.g. energy conservation). • Interview several different Area and Department Managers to determine the extent to which people in their Areas/Departments have documented roles and responsibilities to contribute effort towards achieving the objective. | | | |
| 4 | Are facility/office Senior Managers involved in reviewing progress towards meeting the O&Ts? | | | |
| 5 | Is the facility/office's commitment to prevention of pollution established within their O&Ts? | | | |
| 6 | Has the facility/office established and maintained: EMPs for achieving its O&Ts? (<i>Tip: Sample two EMPs</i>) | | | |

STEP 5 EMS Objectives and Targets

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|---|-----|--------------------|--------------|
| 7 | Verify that the EMPs for achieving O&Ts include the following: <ul style="list-style-type: none"> • specific actions or measures • responsibilities • time frames or milestones | | | |
| 8 | Determine whether the facility/office has a process for monitoring and measuring its progress towards achieving its O&Ts. | | | |
| 9 | Have the environmental program(s) been amended where relevant to ensure that it applies to: <ul style="list-style-type: none"> • new developments, activities, products, or services? • modified activities, products, or services? | | | |
| 10 | Determine whether the facility/office has conducted a NEPA review during the past year related to facility/office modifications or new construction. If so, determine whether the results of the NEPA review have been used for or linked to amendments to any EMPs, where relevant. Has the EMP been amended to incorporate environmental information from the NEPA reviews? | | | |

(NAME) – Auditor

Date

(NAME) – Department Manager

Date

STEP 6 EMS Manual

Step 6: Establishing the EMS Manual

In this section the key tasks are to determine whether an EMS manual has been established and whether the EMS manual sufficiently (1) describes the core elements of the EMS, (2) describes the interaction of the core elements, and (3) references relevant documentation outside the manual.

Additional key tasks are to ensure that (4) EMS documents are controlled, (5) changes are made by authorized personnel only, (6) EMS document changes are communicated to appropriate individuals, and (7) obsolete EMS documents are removed from service.

STEP 6 EMS Manual

Department: _____

Auditor(s): _____

C – Conformance N – Nonconformance

Date: _____

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|---|-----|--------------------|--------------|
| 1 | <p>Has the facility/office established and maintained information in an EMS Manual:</p> <ul style="list-style-type: none"> • describing the core elements of the management system? • on the interaction of the core elements of the management system? • on direction to related documentation? | | | |
| 2 | <p>Has the facility/office established a procedure for controlling EMS documents?</p> <p>Is the document control procedure readily available to facility/office managers who are involved in developing new EMS procedures and in periodically reviewing and updating existing EMS procedures?</p> | | | |
| 3 | <p>Review 3 different EMS procedures and 3 operational control procedures in different Areas / Departments. Identify procedures that have revision numbers and dates.</p> <p>Verify that the revisions to these procedures were done by authorized employees in accordance with the document control procedure.</p> | | | |

STEP 6 EMS Manual

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|--|-----|--------------------|--------------|
| 4 | Ask the EMS Coordinator what process exists to remove obsolete documents promptly from all points of issue and use, in order to prevent the possibility of unintended use. | | | |
| 5 | <p>Review the document control procedure. Does the procedure specify retention periods for the various EMS documents?</p> <p>If the procedure does not specify retention periods, verify the existence of some other mechanism that specifies document retention periods.</p> <p>Ask the EMS Coordinator to describe the process for periodically disposing of EMS documents in accordance with the facility/offices document retention policies and procedures.</p> | | | |

(NAME) – Auditor

Date

(NAME) – Department Manager

Date

STEP 7

EMS Operational Controls

Step 7: Specifying EMS Operational Controls

In this section the key tasks are to assess (1) the process used to determine the need for operational controls, (2) the adequacy of operational controls that have been put in place, (3) the use of operating criteria (where relevant) in establishing operational controls.

The facility/office needs to have a way to monitor its SEAs to determine if operational controls are effective. Therefore, additional key tasks are to determine whether the facility (4) monitors and measures key characteristics related to its environmental performance, (5) documents the results of its monitoring and measuring activities, (6) maintains and follows procedures for calibrating and maintaining any monitoring equipment, and (7) has established and implemented a procedure for periodically evaluating its environmental compliance.

STEP 7

EMS Operational Controls

Department: _____

Auditor(s): _____

C – Conformance N – Nonconformance

Date: _____

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|--|-----|--------------------|--------------|
| 1 | <p>Verify that the facility/office has developed documented operational controls for each of its SEAs.</p> <p>TIP#1: “operational controls” can take the form of a simple work instruction or standard operating procedure (SOP).</p> <p>Example: if the facility identifies boiler stack emissions as an SEA, operational controls for this SEA can take the form of the SOP for boiler operation, including instructions for ensuring boiler is operated at maximum efficiency.</p> <p>TIP#2: If the facility/office has established operational controls for an Environmental Aspect not classified as “significant”, ask the EMS Coordinator why this EA requires controls. Does this suggest that the EA should have been classified as an SEA?</p> | | | |

STEP 7 EMS Operational Controls

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|---|-----|--------------------|--------------|
| 2 | <p>Have these documented operational control procedures been implemented? Are they effective?</p> <p>Sample 3 or 4. Determine whether root cause analysis or comparable tools were used to identify the source of actual or potentially significant environmental impacts intended to be controlled by the procedure.</p> <p>If the employee or operator correctly follows the operational control procedure, will the risk of a potentially significant environmental impact be reduced?</p> | | | |
| 3 | <p>Are operating criteria stipulated in the operational control procedures (where appropriate)?</p> <p>Example: if boiler stack emissions are an SEA, do the operational controls (such as boiler operation SOP) specify boiler operation criteria such as temperature and pressure ranges?</p> | | | |

STEP 7 EMS Operational Controls

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|--|-----|--------------------|--------------|
| 4 | <p>Has the facility/office communicated EMS operational control procedures to its on-site contractors and suppliers?</p> <p>TIP: This applies only for operational controls for SEAs in which on-site contractors and suppliers need to play a role in helping minimize potentially significant environmental impacts.</p> | | | |
| 5 | <p>Has the facility/office established and does it maintain a documented procedure to monitor and measure the “key characteristics” (or measureable parameters) of its operations and activities that can have a significant impact on the environment?</p> <p>TIP: There need not be a separate documented procedure for monitoring and measurement. Each operational control procedure itself can describe the process for monitoring the SEA.</p> | | | |

STEP 7 EMS Operational Controls

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|--|-----|--------------------|--------------|
| 6 | <p>Are records of monitoring/measurement results available to track whether a Significant Environmental Aspect remains under control, or to track the facility/office's performance related to that Significant Environmental Aspect?</p> <p>Are monitoring records legible, easily accessible, and up-to-date?</p> | | | |
| 7 | <p>To the extent that the facility/office uses monitoring equipment for monitoring any of its SEAs, verify whether the monitoring equipment has been</p> <ul style="list-style-type: none"> • calibrated • is being maintained <p>according to the facility/office's procedures.</p> <p>TIP: monitoring equipment maintenance procedures can be the equipment manufacturer's maintenance procedures.</p> | | | |

(NAME) – Auditor

Date

(NAME) – Client Department Manager

Date

STEP 8

EMS Responsibilities

Step 8: Assigning EMS Responsibilities

In this section, key tasks are to determine whether (1) environmental responsibilities are clearly defined, documented, and communicated throughout the organization, (2) sufficient resources are being devoted to EMS operation, and (3) EMS performance is being communicated to top management.

Training is directly linked to Responsibilities, so additional key tasks are to determine whether environmental training requirements are identified and appropriate training is provided to employees and contractors, including (4) general environmental awareness training and (5) job-specific training for positions that relate to SEAs. As part of this section, we review the awareness training program to determine whether it covers appropriate components of the EMS.

STEP 8 EMS Responsibilities

Department: _____

Auditor(s): _____

C – Conformance N – Nonconformance

Date: _____

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|---|-----|--------------------|--------------|
| 1 | <p>Verify whether EMS responsibilities have been assigned and communicated.</p> <p>Interview the facility/office Operations Manager and/or EMS Contact to determine if an EMS organizational structure has been established, including defined roles and responsibilities.</p> <p>Sample several documented roles and responsibilities and verify that the person in that position has the necessary authority to take action commensurate with responsibilities.</p> | | | |

STEP 8 EMS Responsibilities

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|---|-----|--------------------|--------------|
| 2 | <p>Verify that management has provided resources essential for implementing the EMS.</p> <p>Interview the EMR to determine if the annual budget process for the facility/office includes specific provisions for implementing and maintaining the EMS. If there are no specific provisions in the budget, what budget items support implementing and maintaining the EMS?</p> <p>Has the facility/office taken action to provide resources for employees to obtain specialized training to support the EMS (e.g., attend an EMS internal audit course)?</p> | | | |
| 3 | <p>Have responsibilities and authority been defined for the EMR?</p> <p>Are these responsibilities and authority documented and have they been communicated to Area / Department and other managers throughout the facility/office?</p> | | | |

STEP 8

EMS Responsibilities

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|--|-----|--------------------|--------------|
| 4 | <p>Are roles, responsibilities, and authorities being effectively implemented for ensuring that EMS requirements are established, implemented and maintained?</p> <p>Review at least two documented operational control procedures and verify that roles and responsibilities are defined. Interview an employee with assigned responsibilities to verify that the responsibilities are being effectively carried out.</p> <p>Review two EMS procedures and interview employees with defined roles under each procedure to verify that their responsibilities are effectively being carried out.</p> | | | |
| 5 | <p>How does the Management Representative or EMR report on the performance of the EMS to top management for review and as a basis for improvement of the EMS?</p> | | | |

STEP 8 EMS Responsibilities

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|---|-----|--------------------|--------------|
| 6 | <p>Has the facility/office identified the EMS-related training needs of its employees and on-site contractors?</p> <p>TIP: Employees and on-site contractors whose jobs/tasks are related to 1) compliance with regulatory requirements, and/or 2) SEAs need competency-based training on how they can do their jobs/tasks so as to improve compliance assurance and minimize significant environmental impacts.</p> <p>Has EMS-related training been programed in accordance with identified training needs?</p> | | | |
| 7 | <p>Review the last EMS audit report and findings (if any) related to training issues.</p> <p>If there were audit findings related to training, verify that corrective and preventive action has been taken.</p> <p>Interview a sample of employees whose jobs/tasks are related to one or more SEAs.</p> <p>Verify records are available and include evidence of training on the applicable operational control procedure(s).</p> | | | |

STEP 8 EMS Responsibilities

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|---|-----|--------------------|--------------|
| 8 | Verify that the facility/office established and maintained an “awareness training” process or program to make all facility/office's employees and on-site contractors aware of: <ul style="list-style-type: none"> • the local EMS Policy • purpose of the EMS • each employee’s role (e.g. suggesting specific environmental improvement opportunities) | | | |
| 9 | Verify that emergency preparedness and response team members have received periodic training on the emergency response process. Are training records up to date? | | | |

(NAME) – Auditor

Date

(NAME) – Client Department Manager

Date

STEP 9

Identifying EMS Procedures

Step 9: Identifying EMS Procedures

In this section, the key task is to determine whether the facility/office has developed and maintains a set of written procedures to guide development and operation of the EMS.

The list of “highly recommended” procedures includes:

1. Identifying Significant Environmental Aspects
2. Identifying Legal and Other Requirements
3. Determining Objectives and Targets
4. Determining Environmental Management Programs
5. Determining Operational Controls
6. Tracking Environmental Performance
7. Calibrating Monitoring and Measuring Instruments
8. Providing Internal Communications
9. Environmental Training of Employees
10. Emergency Preparedness and Response
11. Records Management
12. Document Control
13. External Communication of Significant Environmental Aspects
14. Responding to External Interested Parties
15. Communicating with Suppliers and Contractors
16. Internal EMS and Compliance Status Audit
17. EMS Non-Conformances, Corrective and Preventative Action
18. Management Review

STEP 9 Identifying EMS Procedures

Department: _____

Auditor(s): _____

C – Conformance N – Nonconformance

Date: _____

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|---|-----|--------------------|--------------|
| 1 | <p>Interview EMS Contact and review EMS Manual and related documentation. Verify that the facility/office has identified all EMS procedures that it will be using to support implementation of its EMS.</p> <p>TIP: Module 3 of the EMS Implementation Training materials provided to all facilities and offices highly recommends 18 different EMS procedures and provides a template for how to develop such procedures.</p> <p>Compare the list of 18 highly recommended EMS procedures with the list of EMS procedures provided by the EMS Contact.</p> <p>If the facility/office has and intends to implement fewer than the 18 recommended EMS procedures, determine if there is appropriate justification.</p> <p>Example of appropriate justification for eliminating the recommended monitoring and measurement procedure: “We have combined the monitoring and measurement procedure with the operational control procedure.”</p> | | | |

STEP 9 Identifying EMS Procedures

(NAME) – Auditor

Date

(NAME) – Client Department Manager

Date

STEP 10

EMS Internal Self-Audit Program

Step 10: Establishing an Internal EMS Self-Audit Program

In this section the key tasks are to determine whether (1) a procedure exists for conducting periodic EMS internal self-audits, including periodic compliance self-assessments or audits, (2) the frequency of audits reflects the level of environmental risk and past environmental performance, and (3) a process exists for ensuring corrective and preventative actions are applied to audit findings.

STEP 10

EMS Internal Self-Audit Program

Department: _____

Auditor(s): _____

C – Conformance N – Nonconformance

Date: _____

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|---|-----|--------------------|--------------|
| 1 | Has the facility/office established and does it maintain a program and procedure(s) for conducting periodic EMS internal audits? | | | |
| 2 | Does the program and/or procedure(s) specify the criteria to be used in conducting EMS internal audits (e.g. audit against the 12 Steps, or audit against the ISO 14001 EMS standard)? Does the program and/or procedure(s) require that audit results be reported to the top facility/office manager? | | | |
| 3 | Does the program and/or procedure specify the frequency of EMS internal audits? Is the frequency of EMS audits based on: <ul style="list-style-type: none"> • the environmental risks of the facility/office's operations and activities? • the results of previous audits? | | | |

STEP 10

EMS Internal Self-Audit Program

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|--|-----|--------------------|--------------|
| 4 | <p>Do the EMS internal audit procedures cover the following:</p> <ul style="list-style-type: none"> • scope • frequency • methods • responsibilities for conducting audits • requirements for conducting audits • reporting results | | | |
| 5 | <p>Has the facility/office established and maintained a documented procedure for periodically evaluating compliance with applicable environmental regulations?</p> <p>TIP: the process for “periodically evaluating compliance” can be a part of the EMS Internal Self- Audit procedure or it can be a separate procedure relating only to compliance verification.</p> | | | |
| 6 | <p>Has the facility/office conducted an evaluation of its compliance within the past 12 months?</p> <p>Verify that the compliance evaluation process looks at how environmental regulatory requirements actually apply to specific operations and activities and determines whether the facility/office is in compliance with respect to those operations and activities.</p> <p>Are the results documented and reported to the top facility/office manager?</p> | | | |

STEP 10

EMS Internal Self-Audit Program

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|--|-----|--------------------|--------------|
| 7 | <p>Has the facility/office established and does it maintain a procedure for identifying EMS “nonconformance”?</p> <p>Does the procedure define the responsibility and authority for investigating (e.g. root cause analysis) and managing actions to correct nonconformances, including taking action to mitigate any environmental impacts related to the nonconformance?</p> <p>Does the procedure define the responsibility and authority for for taking action to prevent recurrence of the nonconformance (e.g., retrain appropriate employees, revise an operational control procedure)?</p> | | | |
| 8 | <p>Has the procedure for identifying and managing nonconformances resulted in the identification of nonconformances during the past 3 months (apart from EMS internal audit findings of nonconformance)?</p> <p>How does the facility/office take corrective action to address the root cause of actual and potential EMS nonconformances?</p> | | | |

STEP 10

EMS Internal Self-Audit Program

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|--|-----|--------------------|--------------|
| 9 | <p>Determine who has authority to declare an EMS nonconformance which then triggers the corrective and preventive action process.</p> <p>Is the authority limited to EMS internal auditors, the EMR and the EMS Coordinator?</p> <p>Is the authority defined more broadly to include any facility/office employee? If so, how is that authority communicated to people who can use it?</p> | | | |
| 10 | <p>How are corrective and preventive actions applied to EMS audit findings of nonconformance (where applicable)?</p> <p>Review records of the last EMS Internal Self-Audit. Verify that corrective and/or preventive actions have been taken for each audit report finding of non conformance.</p> <p>Who (at the facility/office) verifies that the corrective/preventive action has been implemented?</p> <p>Is it the same person who is responsible for implementing the corrective/preventive action?</p> | | | |

STEP 10
EMS Internal Self-Audit Program

(NAME) – Auditor

Date

(NAME) – Client Department Manager

Date

STEP 11

Management Review of the EMS

Step 11: Establishing the Management Review Process

In this section the key tasks are to determine whether (1) a procedure exists for regular management review of the EMS, (2) the procedure specifies the types of information and documents that are to be reviewed, (3) the management review results in recommendations, where appropriate, to make changes in the environmental policy, objectives and targets, or other key EMS elements.

STEP 11

Management Review of the EMS

Department: _____

Auditor(s): _____

C – Conformance N – Nonconformance

Date: _____

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|---|-----|--------------------|--------------|
| 1 | <p>Has the facility/office's director and/or operations manager conducted a management review of the EMS to ensure its continuing suitability, adequacy, and effectiveness?</p> <p>Verify that a management review of the EMS has been conducted during the past 12 months.</p> | | | |
| 2 | <p>Has the facility/office established a procedure for conducting management reviews of its EMS?</p> <p>TIP: A documented procedure is not required but the management review process should be briefly described somewhere in the EMS Manual.</p> | | | |
| 3 | <p>Does the procedure specify the types of information and documents that need to be assembled and made available during the review before the management review occurs?</p> <p>Does the procedure specify the frequency of EMS management reviews?</p> | | | |

STEP 11

Management Review of the EMS

| No. | Requirements | C/N | Relevant Documents | Observations |
|-----|---|-----|--------------------|--------------|
| 4 | <p>Does the management review procedure specify the objectives of the management review, including:</p> <ul style="list-style-type: none"> • the possible need for changes to the Environmental Policy? • evaluating progress toward achieving environmental objectives? • effective implementation of other elements of the EMS? • EMS audit results? • changing circumstances? • commitment to continual improvement? | | | |
| 5 | <p>Are records or minutes of management review meetings kept?</p> <p>Review the minutes of the last management review meeting. Were any “action” items noted? If so, verify the implementation status of these “action” items.</p> | | | |

(NAME) – Auditor

Date

(NAME) – Client Department Manager

Date