

Environmental Management System Handbook



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INTRODUCTION

Western Area Power Administration

The Western Area Power Administration (Western) is a power marketing agency of the U.S. Department of Energy (DOE). Western markets and transmits approximately 10,000 megawatts of power annually from 55 hydropower plants and one thermal power plant to 688 wholesale customers. Western's service area covers 1.3 million square miles in 15 states. Western operates and maintains 17,474 miles of transmission lines and rights-of-way, 266 substations, and various other facilities (offices, maintenance service centers, warehouses, communication facilities, and metering sites) in its service area.

The operation and maintenance of facilities generate hazardous and non-hazardous waste. These facilities house circuit breakers, transformers, batteries, and other equipment that may contain regulated materials. Western's facilities are located in areas near a variety of ecosystems such as rivers, forests, wetlands, grasslands and deserts. Many of Western's electrical substations were constructed near hydroelectric dams, bodies of water, and irrigation projects as part of Federal irrigation and flood control projects by the Bureau of Reclamation or the U.S. Army Corps of Engineers. Operation and maintenance of these facilities, as well as the construction of new facilities, has the potential to affect sensitive environmental resources. Water releases from hydroelectric dams may affect sensitive environmental resources downstream.

Power sales, transmission operations and maintenance and engineering services are accomplished by employees at 52 duty stations located throughout the service area. Major duty stations include the Corporate Services Office (CSO) in Lakewood, Colorado, four regional Customer Service Offices located in Billings, Montana (Upper Great Plains Region, UGP); Phoenix, Arizona (Desert Southwest Region, DSW); Loveland, Colorado (Rocky Mountain Region, RMR); Folsom, California (Sierra Nevada Region, SNR); and the Colorado River Storage Project Management Center (CRSP-MC), located in Salt Lake City, Utah.

Additional information about Western's operations and customers, including Western's Annual Report, can be found on Western's internet website at <http://www.wapa.gov>.

Environmental Management System

This Environmental Management System (EMS) Handbook outlines a systematic process that guides Western's activities to ensure implementation of environmental requirements and to encourage the achievement of continuous improvement. The rate and extent of improvement is dictated by available resources and other guiding circumstances. Western's EMS conforms to

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the International Standards for Environmental Management Systems described by ISO 14001:1996(E). It also meets the criteria of Executive Order 13148, *Greening the Government Through Leadership in Environmental Management*, and DOE Order 450.1, *Environmental Protection Program*, that require Federal facilities to implement EMS's, as well as the Code of Environmental Management Principles for Federal Facilities (CEMP).

The International Standard methodology is based on Plan-Do-Check-Act and is described as follows:

- Plan: Establish the objectives and processes necessary to deliver results in accordance with the organization's environmental policy.
- Do: Implement the processes.
- Check: Monitor and measure processes against environmental policy, objectives, and targets, legal and other requirements and report the results.
- Act: Take actions to continually improve the performance of the environmental management system.

All information required to conform to the above standards is in this handbook, either directly or by reference. Referenced documents include EMS processes (EMSP), procedures (EMPR), and environmental program plans.

This EMS is applicable to all functions within Western.

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1.0 ENVIRONMENTAL POLICY

The purpose of the EMS is to ensure systematic approaches to managing environmental issues and full implementation of the Environmental Policy. The Environmental Policy is the foundation of commitments made by Western's senior managers to implement and improve Western's environmental program. Western recognizes that this Policy augments the Declaration of National Environmental Policy stated in Title I; Sec. 101 of the National Environmental Policy Act (NEPA) of 1969. The Environmental Policy is located in EMSP-1.0, *Environmental Policy Statement*. All employees are expected to be aware of and to comply with the spirit as well as the letter of this Policy. The policy development process may be found in EMPR-1.0, *Update and Approval of Western's Environmental Policy Statement* and ISO 14001.

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2.0 EMS PLANNING

This section outlines the process for identifying environmental aspects, legal and other requirements, establishing objectives and targets, and establishing environmental management programs. Systematic planning, integrated execution, and evaluation of programs for the public health and environmental protection, and pollution prevention are requirements of DOE Order 450.1, *Environmental Protection Program* and ISO14001.

2.1 *Environmental Aspects*

Environmental aspects are the elements of Western's activities, products and services that can interact with or have an impact upon the environment, such as the use, storage and transportation of chemicals, or vegetation management on rights-of-way. EMS procedure EMPR-2.1, *Environmental Aspect Identification and Evaluation*, describes the process involved in identifying and evaluating the environmental aspects associated with Western's operations. The identified aspects associated with operations and activities at Western are in EMSP-2.1, *Aspects and Impacts Matrix*. This matrix also identifies Western's significant environmental aspects.

As an ongoing element of the EMS, Western's environmental managers, in coordination with other functional managers, are responsible for reviewing the environmental aspects following the procedure EMPR-2.1. This review is conducted on an annual basis (or more frequently depending on the need) or for increased continuous improvement efforts.

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2.2 Legal and Other Environmental Requirements

A list of requirements (EMSP-2.2, *List of Legal Requirements*) has been developed and identifies:

- Federal laws, regulations, and implementing requirements/regulations promulgated by DOE and other Federal agencies.
- Executive Orders issued by the President of the United States.
- DOE requirements, including policies, notices, orders, manuals, guides, technical standards and other guidance.
- Western directives.
- State and local requirements by reference.

This list is kept up to date in accordance with procedure EMPR-2.2, *Update of Legal Requirements List*. Western's contractors are also required to comply with these requirements.

Information sources for legal and other requirements to be used by environmental management, staff, and other employees include:

- Federal Register
- Code of Federal Regulations
- Regulatory information and updating sources
- State regulatory agencies
- Regulatory training seminars and workshops
- EPA and other agency newsletters
- DOE's Office of Environment, Safety and Health (DOE-EH)
- Environmental regulation clearinghouses
- Trade and business publications

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2.3 *Objectives, Targets and Environmental Management Programs*

One of the major functions of the EMS planning process is to monitor and improve environmental performance. This is accomplished by developing written objectives and targets that are to be achieved by the EMS and establishing programs that specify the actions that will be taken to achieve the objectives and targets. ISO 14001 defines the following terms:

- **Environmental objective:** an overall environmental goal, arising from the environmental policy, than an organization sets itself to achieve.
- **Environmental target:** a detailed performance requirement that arises from the environmental objectives that needs to be set and met in order to achieve the objective.
- **Environmental management programs:** address how the organization will achieve its environmental objectives. The programs should include schedules, resources and responsibilities for attaining the objectives and targets.

Objectives, targets and environmental management programs are documented in EMSP-2.3, *Environmental Objectives, Targets and Environmental Management Programs*. Development, review and update of the objectives, targets, and associated environmental management programs are conducted in accordance with EMPR-2.3, *Objectives, Targets and Environmental Management Programs Development*, as part of the environmental program planning that occurs at quarterly meetings of the environmental managers.

At their first quarterly meeting of the year, the environmental managers evaluate the previous year's environmental management programs for completion and determine if the desired objective was achieved. New objectives, targets and environmental management programs are set based on meeting the commitments in the Environmental Policy, audit findings and trends, maintenance and construction reviews, legal and other requirements, significant aspects, technological options, views of interested parties, Western's strategic and annual performance plans, and Western's financial, operational, and business requirements. Progress towards accomplishment of the goals is monitored at the quarterly meetings.

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3.0 IMPLEMENTATION AND OPERATION

This section outlines how Western's Environmental Policy is implemented and operated.

3.1 *Resources, Roles, Responsibility and Authority*

Western Order 450.1A, *Environmental Considerations in the Planning, Design, Construction, and Maintenance of Power Facilities and Activities* (WAPA 450.1A) establishes policy, assigns responsibilities, and delegates authority to ensure that agency activities comply with the letter and spirit of environmental requirements. The EMS covers implementation of this directive, which includes Western's Environmental Policy.

Western's Administrator is the senior management official charged with directing resources and has the overall responsibility for environmental compliance. The senior managers (managers who report directly to the Administrator and/or who have been designated senior management status) are charged with agency oversight and management. The senior managers confer at least monthly. The Regional Managers and the CRSP-MC Manager have responsibility for assigning resources and ensuring environmental compliance at each regional office. Each Western office is responsible for environmental compliance with applicable state and local regulations, rules, and other requirements within their boundaries, and for implementing its environmental program in accordance with WAPA 450.1A, Western's Environmental Policy, and the EMS.

The regional environmental managers are responsible for developing, managing and supporting environmental programs within their respective offices. Regional functional managers are responsible for assuring compliance with environmental program requirements. The CSO Natural Resources Office is responsible for supporting specific regional environmental projects and programs, providing policy and program support, and providing liaison and quality control services. Western's organization charts are kept by the Human Resource Office.

The environmental managers are charged with ensuring EMS requirements are established, implemented, and maintained in accordance with recognized standards. They periodically analyze the performance of the EMS and make progress reports and recommendations for improvement to senior management. They also set policies to support environmental programs within Western.

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Western's environmental activities are primarily implemented through environmental program plans. These plans follow a similar outline as the EMS and describe roles, responsibilities and requirements for implementing the many disciplines of environmental compliance. Requirements include legal and other environmental requirements, performance commitments, documentation, training, and records. Where necessary, it also includes standard operating procedures and guidelines and recommendations for regional implementation. Environmental program plans have been completed or are scheduled for completion in the following areas:

1. Pollution Prevention
2. Auditing, Assessment and Corrective Action
3. Materials Management
 - Spill Control and Response
 - Water Pollution Prevention
 - Groundwater Protection
 - Air Pollution Control
 - Hazardous Materials and Transportation Management
 - Hazardous Waste Management
 - Polychlorinated Biphenyls (PCB) Management
 - Non-Hazardous Waste Management
 - Storage Tank Management
 - Pesticide Management
 - Integrated Vegetation Management
 - Emergency Planning and Community Right-to-Know Act Implementation
 - Emergency Response Procedures
 - Comprehensive Response, Compensation and Liability Act Implementation
 - Other management programs
4. Environmental Impacts
 - National Environmental Policy Act Implementation
 - Cultural and Historic Resources Protection
 - Native American Relations
 - Endangered Species Act Implementation
 - Migratory Bird Treaty Act Implementation
 - Other requirements
5. Records Management
6. Program Management
 - Contract Management
 - Public Involvement
 - Project Management for Environmental Projects
7. Resource Protection

Environmental compliance is considered part of the cost of conducting work and, with the exception of a limited number of special mandates, funding is not provided through a separate environmental budget. Western receives annual appropriations to finance most operations for 15 separate power projects and sets power and transmission rates to recover all costs, including interest, associated with those activities. In some cases, specific expenses are funded directly from power sales receipts. Routine environmental program-related funding is obtained directly from individual project budgets. Any significant or major environmental funding need would be obtained through the annual planning, programming and budget appropriation process.

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3.2 Competence, Training and Awareness

Environmental training requirements are outlined in Federal, state and DOE regulations, and environmental program plans. Each office (regional, CSO, CRSP-MC), is responsible for developing, implementing, documenting and keeping records of their training programs. Functional managers, in consultation with their respective environmental manager, identify personnel/positions which require environmental training. Assuring staff complete required environmental training is the responsibility of the functional manager. Training is provided by environmental offices or by off-site vendors. EMSP-3.2, *Matrix of Required Environmental Training* outlines the required training for each functional group within Western. At the minimum, employees receive training that includes the following:

- Awareness of the EMS and the importance of conformance with the Environmental Policy, legal and other requirements.
- The significant environmental impacts of individual work activities, and the environmental benefits of improved personal performance.
- Individual roles and responsibilities in achieving conformance with compliance requirements, and with the requirements of the EMS.
- The potential consequences of not meeting compliance and EMS requirements.

For training routinely provided by the environmental offices, the environmental managers work to define and coordinate training that is common throughout Western. Regional environmental managers define and develop training that is unique to their region, including state and local requirements.

All new employees receive training on EMS and compliance requirements. Environmental staff receives training as defined in their individual development plans (IDP) and as required by regulation or policy.

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3.3 Communication

Regional environmental managers, the CSO environmental team lead and the CSO Natural Resources Manager are the primary authority for communicating information on environmental matters to interested parties, within and outside of Western.

Communication from regulatory agencies is also directed to each manager, who may choose to relay it to the responsible functional manager or environmental staff. NEPA projects may have environmental staff assigned as project managers who interact with the public and other interested parties. Certain communication will be handled by, or coordinated with the Office of Corporate Communication. Western Policy 140.1, *Media Interactions* supplies specific guidance on communicating with external parties.

The environmental managers may communicate information relative to the EMS to senior management, other functional managers, employees, external stakeholders and customers.

The Annual Site Environmental Report outlines the accomplishments and issues of Western's environmental program for the calendar year. The report is available to all employees and the public and is distributed to managers, external stakeholders, and state and Federal agencies. Other methods of communicating environmental information include:

- Western's Strategic Plan
- Annual Performance Plan
- Western's Annual Report
- DOE and Western directives
- Western's publication *Closed Circuit*
- Regional and CSO office periodic newsletters
- Senior manager meeting notes
- Environment manager meeting notes
- Ad hoc teams formed for specific projects
- Email notices and correspondence
- Meetings with regulatory agency personnel
- Western's internal and external internet
- Telephone conversations

Western communicates occurrences (unusual occurrences, spills, etc.) to DOE and state and local agencies using procedural methods established in WAPA 450.1A, DOE Order 231.1A, *Environment, Safety, and Health Reporting*, and DOE Manual 231.1-2, *Occurrence Reporting and Processing Operations Information*.

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3.4 EMS Documentation

The EMS Handbook describes the various pieces of Western's EMS. It also describes the relationships between the documents and where the documentation can be found. Western's EMS documentation includes:

- Environmental Policy
- EMS Handbook (this document)
- EMS Processes and Procedures (listed in Appendix A)
- Western Order 450.1A
- Environmental Program Plans and tiered documents and procedures
- Environmental Records

A full list of EMS documentation is kept by the CSO Natural Resources Manager in EMSP-3.4, *EMS Documentation*. The maintenance and management of the EMS Handbook is the responsibility of the environmental managers. It is reviewed periodically and updated as needed. The current EMS Handbook is on Western's internal intranet. Issued paper copies are controlled and are under the control of the CSO Natural Resources Manager.

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3.5 Document Control

The primary method of distribution and control of EMS documentation (except records) is electronic media. The management and control of environmental records follows the protocols in the Records Management Program Plan.

The most recent versions of the Environmental Policy, the EMS Handbook, EMS processes and procedures, directives, environmental program plans, operating manuals, and other documentation are housed on Western's intranet. Notification of the availability of new or revised documents is accomplished through Western's internal electronic mail system. Paper copies of the EMS Handbook are limited to each regional/CSO environmental office and are controlled documents. They are kept only for official backup. Copies furnished to external entities are not controlled. The CSO Natural Resources Manager distributes revisions for all controlled documents. EMS documents include a heading indicating the document title, document number, page number, effective date, and the preceding document number/date.

A form is available on the intranet for all users of EMS documents to note any needed revisions or improvements. The CSO Natural Resources Manager is responsible for upkeep of the EMS website.

Detailed procedures and responsibilities concerning the creation and modification of EMS-related documents are in EMPR-3.5, *Document Control Procedure*. This procedure assures documents are adequately reviewed, revised, controlled and kept current as well as outlining the approval process. The CSO Natural Resources Manager keeps a list of all EMS documentation (except records) in EMSP-3.4, *EMS Documentation*.

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3.6 Operational Control

Western conducts numerous operations that, without established documented procedures and controls, could lead to deviations from the Environmental Policy, significant environmental impacts or regulatory violation. Operational control documents are established and managed by Western as summarized below:

Operational Control Document	Management Method
Directives in the form of policy, notice, and order	Prepare new or update existing as needed from aspect analysis, audit findings, incident investigation results, and employee suggestion. Any functional organization may initiate.
Operating manuals in the form of the Power System Maintenance Manual, Power System Safety Manual, and the Engineering Manual	Environmental staff conducts periodic reviews and updates of operating manuals to ensure environmental procedures are addressed and up to date.
Written spill control procedures (SPCC Plans)	Environmental staff prepares and updates plans in accordance with current regulations.
Environmental Program Plans	Environmental staff prepares and updates plans in coordination with affected functional groups.
Construction and other procurement specifications	Environmental staff and management review standard and individual specifications routinely to ensure contractors conduct environmental activities as required.
Regional environmental guidance documents	Regional environmental offices prepare guidance documents for topics that are unique to their situations, based on regulations, risk exposure, audit feedback, state requirements, etc.
Memoranda from management	Environment offices initiate memorandums guiding specific operations or operational corrections in special, near term or emergency cases.
Job Hazard Analysis (JHA) documents	Routine maintenance operations may require special operational guidelines based on non-routine work, or to reinforce existing operational controls. Maintenance supervisors initiate the JHA.
Facility audit (inspection) reports	Environmental staff conducts facility audits (inspections) to assess if applicable regulations and requirements are met.

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3.7 Emergency Preparedness and Response

Situations at Western that may require emergency preparedness and response procedures include mineral oil and PCB releases, regulated materials releases, cultural resources damages, taking of endangered species, and wildlife interactions with facilities.

The following procedures are in place to respond to emergency situations and to prevent or mitigate associated environmental impacts:

- DOE Order 5500.11, *Power Marketing Emergency Preparedness Program* describes procedures and responsibilities for handling emergency situations.
- Procedures prescribed in each of Western's spill prevention, control and countermeasures (SPCC) plans in place at facilities where oil spills could potentially harm the environment.
- Western's implementation of DOE Order 231.1, *Environment, Safety and Health Reporting* guides reporting procedures and evaluations to determine causes and preventive measures.
- Western Order 450.1A, Chapter 1, directs procedures for incident investigations and evaluations to determine causes and preventive measures.
- Environmental program plans describe specific roles, responsibilities and procedures for emergency preparedness and response.

Procedures are in place to regularly review and revise orders, SPCC plans, and environmental program plans, as outlined in the environmental program plans.

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4.0 CHECKING AND CORRECTIVE ACTION

This section outlines the operational controls and implementation programs that are used to measure and monitor Western's environmental program for effectiveness.

4.1 *Monitoring and Measurement*

Permits and environmental program plans outline monitoring and measurement of activities that have environmental impacts. Methods of monitoring and measurement employed at Western include some of the following:

- Laboratory analysis of suspected contamination (contaminated soil from an oil or PCB spill, and other);
- Monitoring mitigation commitments (i.e. endangered species, cultural resources, etc.);
- Reports and tracking of regulated materials purchases and use;
- Tracking and reporting of sanitary and hazardous waste disposals;
- Tracking and reporting of pollution prevention data;
- Tracking and reporting of affirmative procurement data;
- NEPA documents tracking and reporting;
- Auditing proposed disposal facilities;
- Tracking wildlife transmission system interactions;

Procedures in place for the above are in program plans, and in Western and DOE directives and guidance documents. Procedures are also in place to periodically evaluate compliance with relevant environmental requirements, based on facility audits and other requirements (Section 4.2).

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4.2 *Evaluation of Compliance*

Audits and inspections are conducted at Western facilities to evaluate compliance with established standards. The Auditing, Assessment, and Corrective Action Program Plan outlines the processes and procedures followed for conducting assessments. Types of evaluations included in the program plan are:

- Self-Assessments – assessments of Western’s environmental program conducted by an environmental team on a 3-5 year cycle.
- Facility evaluations, audits or assessments – field audits conducted by each regional environmental staff according to an auditing schedule.
- Vendor Audits – conducted as need on vendors who handle, transport, process or dispose of regulated material are subject to audits to determine their ability to comply with regulatory requirements to minimize the risk of future cleanup costs. These are conducted either by Western’s environmental staff, or by another Federal agency.
- External Audits – conducted ad hoc by external agencies such as the Environmental Protection Agency and Federal, state and local regulatory agencies.

Each regional environmental manager is responsible for conducting regional assessments according to an assessment schedule. The results of these assessments are forwarded to the appropriate functional manager for assignment of corrective actions. Self-assessments of Western-wide programs are initiated by the environmental managers. These are conducted internally by cross-regional teams appointed by the environmental managers. Findings from these assessments are evaluated and corrective actions are assigned and prioritized by the environmental managers.

DOE Policy 450.5, *Line Environment, Safety and Health Oversight*, establishes “the Department’s expectations for DOE line management environment, safety and health oversight.” The policy is broader than just audits and assessments, and places these tools in the context of performance measures and performance indicators; data collection and analysis and corrective actions; and continuous feedback and performance improvement. Western’s facility audits, vendor audits, self assessments, pollution prevention data collection, and other sources of performance measurement are regularly analyzed to meet the DOE requirement.

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The Annual Site Environmental Report submitted to DOE summarizes the status of environmental issues at Western, including projects, permits, audits, reviews, self assessments, EMS implementation and more. External enforcement actions are reported to DOE in accordance with the procedures of DOE Order 231.1A, *Environment, Safety, and Health Reporting*.

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4.3 *Non-Conformance and Corrective and Preventive Action*

The Auditing, Assessment, and Corrective Action Program Plan outlines the processes and procedures followed for evaluating and responding to findings, preparing corrective actions, and tracking and trending findings and corrective actions. Non-conformances follow the procedures for assessment findings and are forwarded to the appropriate functional or environmental office for assignment of a corrective action.

Regional managers are responsible for tracking and trending findings and corrective actions within their regions. Functional managers are responsible for responding to findings and implementing corrective actions in accordance with the processes and procedures of the Auditing, Assessment, and Corrective Action Program Plan. The environmental managers have responsibility for determining appropriate corrective actions for findings that have Western-wide impacts such as self-assessments, EMS audits and some external audits. The CSO Natural Resources Manager has responsibility for tracking Western-wide findings and corrective actions.

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4.4 Records

Records are kept to meet and demonstrate regulatory compliance, and to show conformance with Western's EMS.

Western follows the policies and procedures specified in the Environmental Records Management Program Plan for maintenance of records related to the EMS and environmental programs. This plan follows DOE Order 1324.5B, *Records Management*. Procedures in the Plan include directions regarding retention periods and disposition of records. Some records are maintained indefinitely due to possible future regulatory or legal situations. Records are maintained within the regional environmental office that generates the record and/or within the official project file.

Other records are maintained in the offices of other functional managers. Examples of such records include audit and inspection reports, training records, pollution prevention/affirmative procurement records, etc. Those records are maintained in accordance with DOE, Western, and functional office policy.

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4.5 Environmental Management System Audit

Four times a year, the environmental managers evaluate comments and inputs received regarding the EMS. They conduct an EMS audit using EMPR 4.5, *EMS Auditing*, which lists the audit criteria, scope, methods, reporting format, and contains a schedule for auditing each section of the EMS. The EMS review evaluates the level of implementation and operational effectiveness of procedures, programs, and controls, and evaluates progress made on objectives and targets. The CSO Natural Resources Manager coordinates the report distribution and any changes and updates as directed by the managers.

Every five years, an external team composed of Western personnel from offices outside of environment, DOE, another Federal agency, or an EMS-certified auditing consultant, conducts an assessment of Western's EMS using ISO 14001 as the review standard. The evaluation includes measures of how effectively Western is implementing EMS procedures, programs, controls and progress made on objectives and targets. The report is submitted to Western's environmental managers.

The environmental managers evaluate the audit results, summarize deficiencies, and prepare plans and strategies for remedying deficiencies. The audit report, summary of deficiencies, and the plans and strategies are presented to the senior managers through the Chief Operating Officer. Changes and updates to the EMS will be directed by the environmental managers and incorporated into the EMS by the CSO Natural Resources Manager.

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5.0 MANAGEMENT REVIEW

The senior managers review the EMS annually to ensure its continuing suitability, adequacy, and effectiveness. The environmental managers facilitate the continuous improvement process by preparing a summary progress report.

The summary progress report describes how performance has met the criteria of the environmental policy statement, overall improvement of environmental performance, successful and unsuccessful programs, and the level of achievement toward meeting objectives and targets. Sources of information include: the Annual Site Environmental Report, status of environmental management programs, status of environmental commitments in Western's Annual Performance Plan, results of prior EMS audits, communication from internal and external sources, status of corrective actions, follow-up actions from previous management reviews, changing circumstances, and recommendations for improvement. The summary progress report is submitted to the Chief Operating Officer and includes plans and timelines for correcting any items that are not in conformance or are not on schedule.

The Chief Operating Officer evaluates the summary progress report to ensure the EMS continues its:

- Suitability to Western's mission, culture and strategic plan.
- Adequacy in fulfilling requirements of ISO 14001.
- Effectiveness in managing and improving environmental performance.

Each review considers the need for updating the Environmental Policy, environmental objectives and targets, and other elements of the EMS.

The review is documented and presented to the senior managers by the Chief Operating Officer. The results of the review are incorporated within the Annual Site Environmental Report.

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Western Area Power Administration EMS		Doc. No. EMS Handbook
Subject: Environmental Management System Handbook		Page: 23 of 23
Prepared by: Environmental Managers	Date: February 19, 2004	Effective Date: April 20, 2004
Approved by: Senior Managers	Date: April 20, 2004	Supersedes New

Appendix A – List of EMS Processes and Procedures

Processes

EMSP-1.0	<i>Environmental Policy Statement</i>
EMSP-2.1	<i>Aspects and Impacts Matrix</i>
EMSP-2.2	<i>List of Legal Requirements</i>
EMSP-2.3	<i>Environmental Objectives, Targets and Environmental Management Programs</i>
EMPR-3.2	<i>Matrix of Required Environmental Training</i>
EMSP-3.4	<i>EMS Documentation</i>

Procedures

EMPR-1.0	<i>Update and Approval of Western's Environmental Policy Statement</i>
EMPR-2.1	<i>Environmental Aspects Identification and Evaluation</i>
EMPR-2.2	<i>Update of Legal Requirements List</i>
EMPR-2.3	<i>Objectives, Targets and Environmental Management Programs Development</i>
EMPR-3.5	<i>Document Control Procedure</i>
EMPR-4.5	<i>EMS Auditing</i>

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