

**EMS Implementation Guide for the Meat Processing Industry
Appendix A, Module 8: Workshop Activities**

Activity 1: Assessment Planning

Purpose: To give participants experience in defining and organizing an EMS assessment program.

- How would you begin to organize an EMS assessment? Items to consider are:
 - Team members?
 - Parts of the EMS to be assessed (the entire EMS at one time or break it down into discrete elements for more frequent assessments)?
 - Timeline for completing the assessment?
 - Frequency of assessments?
- Using the activity sheets provided, brainstorm how you would begin planning your EMS assessment.
- Start by considering how you would answer some of the previous questions.

Planning for an Assessment

Step 1

Step 2

Step 3

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Step 4

Step 5

Team Members _____

Parts of the EMS to be Assessed _____

Timeline for Completion of the Assessment _____

Frequency of the Assessment _____

Other Considerations _____

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Activity 2: Checklist

Purpose: To give participants experience defining what the EMS you aspire to (against which an assessment will be based) requires and to learn a process by which to plan and conduct an assessment.

- Element – **Legal and Other Requirements**

Step 1: Clarify what you have defined as required in your EMS for legal and other requirements :

- The EMS Checklist given in Module 1, Attachment 1-A is a starting point. Add to or expand on the list given in the checklist.
- Also review the Environmental Requirements Checklist given in Attachment 1-B.

Step 2: Outline how you will determine conformance with your EMS.

- Must **collect** and **verify evidence** to support an opinion on the status of the plant's progress in meeting the requirements of your EMS.

Legal and Other Requirements (the details of your EMS)

(1) _____

(2) _____

(3) _____

(4) _____

(5) _____

(6) _____

(7) _____

(8) _____

(9) _____

(10) _____

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Gathering Assessment Evidence

Develop A Work Plan

- In the case of legal and other requirements, consider which types of evidence you would want to focus on for the assessment.

Testimonial _____

Physical _____

Documentary _____

Circumstantial _____

Gather Data

What methods for collecting evidence would you consider using when looking at legal and other requirements?

Interviews _____

Document Review _____

Observation of Activities and Conditions _____

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Compare Practices Against the Requirements of Your EMS

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ATTACHMENT 1-A: EMS CHECKLIST

These questions are designed to allow you to identify specific gaps between where your current system is and a fully implemented EMS. The questions in the checklist include statements that, if satisfied, meet the requirements for a functional EMS. The checklist also includes questions that indicate a well developed and sustainable EMS. An EMS that satisfies the requirements of standards such as ISO 14001 will typically satisfy most if not all of the requirements of this checklist. However, this checklist is not designed to determine if an EMS meets the requirements of any one particular standard, but rather provide a comprehensive list of EMS criteria against which to gauge your plant's EMS as implementation progresses. In order to satisfy all the criteria in this checklist a plant will need to have a robust, fully developed, implemented and continuously improved (has gone through at least one full "Plan, Do, Check, Act" cycle) EMS in place. Think of the content of this checklist as the high bar against which you can gauge your plant's EMS.

This checklist satisfies the standard EMS requirements of EPA's National Environmental Performance Track Program (PT). It does not examine performance and other related reporting requirements of PT. For more information on PT go to: <http://www.epa.gov/performancetrack>. There are two suggested evaluation approaches to use with this checklist.

Method A: Simplified

A checkmark ✓ in a box signifies that the evidence of conformance with the associated requirement has been observed and verified. An X in a box signifies that the associated requirement does not appear to be satisfied or that evidence of the requirement having been satisfied was not present or available.

Method B: Scored Level of Completeness

A numerical score is placed in each box to signify the degree to which the EMS is completed. Suggested scoring is as follows:

- 0 - not initiated
- 1 - under development
- 2 - developed/documented
- 3 - deployed
- 4 - assessed/verified/improved

Only a score of 4 signifies that that requirement of the EMS is complete and that evidence of the requirement having been satisfied is present or available. You may find that placing these questions in an electronic spreadsheet program allows for greater ease in adding up scores and tracking of progress over time.

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It is the responsibility of the user of this checklist to utilize due care and good judgement as an auditor to ensure that each requirement has been met or not met and where prudent retain evidence.

Environmental Management System (EMS) Requirements

(a) Policy

The plant has a written environmental policy, defined by top management, and committing to:

Compliance with both:

- 9 legal requirements and
- 9 voluntary commitments.

- 9 Pollution prevention (based on a pollution prevention hierarchy where source reduction is the first choice).

- 9 Continuous improvement in environmental performance, including areas not subject to regulations.

- 9 Sharing information on performance of the EMS with the community.

(b) Planning

- 9 The plant has a process for identifying its aspects and determining their significance.
- 9 The plant has identified its significant aspects.
- 9 The plant has identified all EPA permits and ID numbers.
- 9 The plant has a process for identifying its legal requirements.
- 9 The plant has identified its legal requirements, i.e., the plant has identified its environmental requirements in accordance with the attached application checklist (see Attachment 1-B).
- 9 The plant has procedures for integrating anticipated changes to the plant's requirements or commitments into the EMS.

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The plant has established measurable objectives and targets:

- To meet:
- 9 policy commitments and
 - 9 legal requirements,
- 9 To reduce its impacts associated with its significant environmental aspects,
- and
- 9 To meet performance commitments made by the plant.

The plant has active, documented programs to achieve the objectives, targets and commitments in the EMS, including the following to ensure completion:

- 9 The means, and
- 9 The timeframes.

(c) Implementation and Operation

- 9 The plant has identified a top management representative with authority and responsibility for the EMS.
- 9 The plant has established roles, responsibilities, and dedicated the required resources for meeting its objectives and targets of the overall EMS.
- 9 The plant has established roles and responsibilities for compliance with legal requirements.

The plant has defined procedures for:

- 9 Achieving and maintaining compliance,
 - 9 Meeting performance objectives,
 - 9 Communicating relevant information regarding the EMS, including the plant's environmental performance, throughout the organization,
 - 9 Providing appropriate incentives for personnel to meet the EMS requirements, and
 - 9 Document control, including where documents related to the EMS will be located and who will maintain them.
- 9 The plant has established a public outreach program.
 - 9 The plant has a designated point of contact with direct access to plant management.

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The plant has described its activities / plans / procedures in the following areas:

- 9 Identifying and responding to questions or concerns of local residents.
- 9 Informing community members of important matters that affect them.

The plant is able to:

- 9 List any current or ongoing citizen concerns with the plant.

The plant has defined its training needs and has environmental training programs for:

- 9 All employees,
- 9 Specific training for those whose jobs and responsibilities involve activities directly related to achieving objectives and targets, and
- 9 Specific training for those whose jobs and responsibilities involve activities directly related to compliance with legal requirements.

The plant has documented key EMS elements including:

- 9 The environmental policy,
 - 9 Significant environmental aspects,
 - 9 Objectives and targets,
 - 9 Identification of a top management representative,
 - 9 An EMS audit program, and
 - 9 Overall EMS authority.
-
- 9 The plant retains EMS documentation.
 - 9 The plant has operation and maintenance programs for equipment and for other operations that are related to legal compliance.
 - 9 The plant has operation and maintenance programs for equipment and for other operations that are related to other significant environmental aspects.
 - 9 The plant has an emergency preparedness program.

(d) Checking and Corrective Action

The plant has active program(s) for:

- 9 Assessing performance,

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- 9 Detecting non-conformance with legal and other requirements of the EMS,
- 9 Preventing non-conformance with legal and other requirements of the EMS,
- 9 Prompt corrective action of any non-conformance with legal and other requirements of the EMS, and
- 9 Conducting EMS audits.

(e) Management Review

The plant has a process for, conducts, and documents management reviews covering:

- 9 Performance with regard to the objectives and targets,
- 9 The effectiveness of the EMS in meeting policy commitments.

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ATTACHMENT 1-B: ENVIRONMENTAL REQUIREMENTS CHECKLIST

The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual plant.

Air Pollution Regulations

Check All
That Apply

- | | |
|---|---|
| 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) | 9 |
| 2. Permits and Registration of Air Pollution Sources | 9 |
| 3. General Emission Standards, Prohibitions and Restrictions | 9 |
| 4. Control of Incinerators | 9 |
| 5. Process Industry Emission Standards | 9 |
| 6. Control of Fuel Burning Equipment | 9 |
| 7. Control of VOCs | 9 |
| 8. Sampling, Testing and Reporting | 9 |
| 9. Visible Emissions Standards | 9 |
| 10. Control of Fugitive Dust | 9 |
| 11. Toxic Air Pollutants Control | 9 |
| 12. Vehicle Emissions Inspections and Testing | 9 |

**Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above
(identify)**

- | | |
|-----------|---|
| 13. _____ | 9 |
| 14. _____ | 9 |

Hazardous Waste Management Regulations

- | | |
|---|---|
| 1. Identification and Listing of Hazardous Waste (40 CFR 261) | |
| - Characteristic Waste | 9 |
| - Listed Waste | 9 |
| 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262) | |
| - Generator status identification | 9 |
| - Manifesting | 9 |
| - Pre-transport requirements | 9 |
| - Record keeping/reporting | 9 |
| 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263) | |
| - Transfer plant requirements | 9 |

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- Manifest system and record-keeping	9
- Hazardous waste discharges	9
4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)	
- General facility standards	9
- Preparedness and prevention	9
- Contingency plan and emergency procedures	9
- Manifest system, record keeping and reporting	9
- Groundwater protection	9
- Financial requirements	9
- Use and management of containers	9
- Tanks	9
- Waste piles	9
- Land treatment	9
- Incinerators	9
5. Interim Status Standards for TSD Owners and Operators (40 CFR 265)	9
6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)	9
7. Administered Permit Program (Part B) (40 CFR 270)	9

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

8. _____	9
9. _____	9

Hazardous Materials Management

1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153)	9
2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)	9
3. Hazardous Materials Transportation Regulations (49 CFR 172-173)	9
4. Worker Right-to-Know Regulations (29 CFR 1910.1200)	9
5. Community Right-to-Know Regulations (40 CFR 350-372)	9

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

6. _____	9
7. _____	9

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Solid Waste Management

1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) 9
2. Permit Requirements for Solid Waste Disposal Facilities 9
3. Installation of Systems of Refuse Disposal 9
4. Solid Waste Storage and Removal Requirements 9
5. Disposal Requirements for Special Wastes 9

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

6. _____ 9
7. _____ 9

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) 9
2. Designation of Hazardous Substances (40 CFR 116) 9
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) 9
4. NPDES Permit Requirements (40 CFR 122) 9
5. Toxic Pollutant Effluent Standards (40 CFR 129) 9
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) 9
7. Meat Products Point Source Category Effluent Guidelines and Standards (40 CFR 432) 9
8. Water Quality Standards 9
9. Effluent Limitations for Direct Dischargers 9
10. Permit Monitoring/Reporting Requirements 9
11. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants 9
12. Collection, Handling, Processing of Sewage Sludge 9
13. Oil Discharge Containment, Control and Cleanup 9
14. Standards Applicable to Indirect Discharges (Pretreatment) 9

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

15. _____ 9
16. _____ 9

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Drinking Water Regulations

- | | |
|--|---|
| 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) | 9 |
| 2. National Primary Drinking Water Standards (40 CFR 141) | 9 |
| 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) | 9 |
| 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources | 9 |
| 5. Underground Injection Control Requirements | 9 |
| 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems | 9 |

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above (identify)

- | | |
|----------|---|
| 7. _____ | 9 |
| 8. _____ | 9 |

Toxic Substances

- | | |
|--|---|
| 1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) | 9 |
| 2. Import and Export of Chemicals (40 CFR 707) | 9 |
| 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) | 9 |
| 4. Chemical Information Rules (40 CFR 712) | 9 |
| 5. Health and Safety Data Reporting (40 CFR 716) | 9 |
| 6. Pre-Manufacture Notifications (40 CFR 720) | 9 |
| 7. PCB Distribution Use, Storage and Disposal (40 CFR 761) | 9 |
| 8. Asbestos (40 CFR 61 and 29 CFR 1910) | 9 |
| 9. Lead (40 CFR 141 and 29 CFR 1910) | 9 |
| 10. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) | 9 |
| 11. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) | 9 |

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

- | | |
|-----------|---|
| 12. _____ | 9 |
| 13. _____ | 9 |

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Pesticide Regulations

- | | | |
|----|---|---|
| 1. | FIFRA Pesticide Use Classification (40 CFR 162) | 9 |
| 2. | Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) | 9 |
| 3. | Certification of Pesticide Applications (40 CFR 171) | 9 |
| 4. | Pesticide Licensing Requirements | 9 |
| 5. | Labeling of Pesticides (40 CFR 156) | 9 |
| 6. | Pesticide Sales, Permits, Records, Application and Disposal Requirements | 9 |
| 7. | Disposal of Pesticide Containers | 9 |
| 8. | Restricted Use and Prohibited Pesticides | 9 |

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

- | | | |
|-----|-------|---|
| 9. | _____ | 9 |
| 10. | _____ | 9 |

Environmental Clean-Up, Restoration, Corrective Action

- | | | |
|----|---|---|
| 1. | Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify section) | |
| | _____ | 9 |
| | _____ | 9 |
| 2. | RCRA Corrective Action (identify section) | 9 |
| | _____ | 9 |
| | _____ | 9 |

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (identify)

- | | | |
|----|-------|---|
| 3. | _____ | 9 |
| 4. | _____ | 9 |

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Activity 3: The Interview

Select someone you do not normally work with and conduct a short interview. Ask them to explain how EPA, State and local legal requirements are tracked and then communicated to both management and staff in general at the plant.

Hints: You are trying to verify that they track information, that there is a means by which the information gets “distilled” and that the right people get the right information.

At the end of the interview, you should now understand:

- How the information is identified;
- Determined to be relevant;
- How staff are trained (where necessary); and
- The checks and balances that ensure it actually works.

Can you also say that this process reflects the commitments of their EMS?

This means you are looking not only to see if the steps occur but also, to see if the person being interviewed is aware of their part(s) in the process.

Note: Ideally you would be confirming the process with others at the plant as a part of other interviews.

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Sample Interview Record

Organization _____ Date _____

Interviewee _____

Assessment Team Member _____

Document Reference	Assessment Criteria/ Question	Claim: C = conformance N1 = minor nonconformance N2 = major nonconformance	Comments/Source of Backup Evidence