

ENVIRONMENTAL MANAGEMENT SYSTEM

MANUAL

U.S ARMY GARRISON –REDSTONE



October 6, 2004

INTRODUCTION

An Environmental Management System (EMS) represents a systematic approach to ensuring that environmental aspects and impacts are well managed in the organization. The EMS at U.S. Army Garrison- Redstone follows the ISO 14001 organizing structure and the requirements identified at the Garrison level, AR-200-1, Environmental Sustainability and Stewardship, Executive Order 13148, and other Army and DOD laws and regulations. With a focus on best management practices, this Manual covers:

- Section 1, EMS Planning
- Section 2, EMS Implementation
- Section 3, EMS Monitoring
- Section 4, EMS Management Review

Within each Section the requirements are identified and each provides information and guidance for:

- Purpose
- Roles and Responsibilities
- Procedures
- References and Related Documents

A means of monitoring the development and maintenance of each requirement is established through an “Action Taken” Log.

The intent of this Manual is not to create a new parallel program for the organization. Its emphasis is on continual improvement – improvements that will be realized through a management process that drives best practices. These include:

- Build EMS awareness
- Identify and unify current and functioning environmental management practices
- Taking Action for continual improvements

Actions taken should reference current practices and drive the full implementation and on-going maintenance of each EMS element.

Using the information provided in the Manual, the organization will focus on the development and maintenance of an EMS that reinforces the U.S. Army Garrison-Redstone Environmental Policy and helps to continuously identify and reduce risk to the environment. The system will identify appropriate EMS operations based on risk and regulatory issues and installation requirements.

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This Manual is an inherent component of the organization's EMS and is maintained as a Level 1 document by the Directorate of Public Works, Environmental Management Division. This Manual is reviewed annually and whenever changes are required to ensure the installation's EMS is effective, efficient, and drives continual improvements. This Manual is maintained by the EMS Representative or Designated individual.

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Revision	Date	Description and Distribution	Responsibility
Initial Release	041006	EMS Manual Development	Marc Subido EMS Coordinator

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EMS MANUAL CONTENTS

Environmental Management System Definitions: This area provides definitions for terms used in the EMS Manual.

Definitions:

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Section 1 – Planning: The organization must conduct a review of its operations and processes, identify legal and other requirements, establish objectives, set targets and devise plans for meeting those targets.

This Section covers:

Page: **4.2 thru 4.3.4**

- Environmental Policy
- Environmental impacts evaluation
- Legal and other requirements
- Objectives, targets, environmental management programs and EMS planning

Section 2 – Implementation: The organization follows through with the planning by establishing responsibilities, training, communication, documentation, operating procedures and an emergency response plan to ensure that impacts are managed and that environmental targets are met.

This Section covers:

Page: **4.4 thru 4.4.7**

- Structure and responsibility
- Training, awareness and competence
- Communication
- Environmental management system document control and environmental records
- Operational Control
- Emergency preparedness and response

Section 3 – Monitoring: Monitoring evaluates the full implementation of the EMS. Environmental performance is assessed and corrective and preventive actions are taken to maintain best practices.

This Section covers:

Page: **4.5 thru 4.5.4**

- Monitoring and measurement
- Environmental management system and compliance audit
- Nonconformance and corrective and preventive action

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Section 4 – Management Review: modifies the EMS to optimize its effectiveness. The review stage creates a loop of continuous improvement for the location.

This Section covers:

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- Management Review

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DEFINITIONS

Division, operations

Represent the organization structure for the facility duties or functions. In the context of this EMS Manual, “operations” is used as a collective term for the structure.

EMS effectiveness and efficiency

Meeting the operation’s mission while conforming to commitments to compliance with applicable environmental regulations, other requirements and the principles described in the Environmental Policy. Sound use of resources to reduce risk.

Emergency condition

An unplanned abnormal, accidental or unexpected condition (upset). It is a specific combination of events or circumstances that leads to an undersirable consequence.

Environment:

Sensitive environment receptors (air, water, land, natural, cultural or historical resources, flora, and fauna and human and community interrelation, within the ecosystem or beyond.

Environmental Aspect

Operations or elements of an operation shall be considered an environmental aspect if both of the following conditions are met: 1) The service, operation and/or element thereof can interact with the environment; and 2) The organization can be expected to have control and/or an influence over the service, operation and/or practice.

Environmental Management System (EMS)

That part of the overall management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental program and achieving environmental goals.

EMS Representative

The individual responsible for implementation, maintenance and reporting of environmental programs, including the EMS for an installation and its area of responsibility.

Installation

The term used to reference the location or scope of the Environmental Management System.

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Maintenance

Actions taken to protect assets, usually performed by the operator to maintain satisfactory condition of the operations and/or process. Maintenance may also be considered those operations performed from outside the area, such as preventive maintenance.

Normal conditions

Day-to-day actions (man and machine) that constitute the typical conditions under which an operation/process is performed.

Operational Controls

Means used to ensure that the environmental impacts on the environment and resources are effectively prevented or minimized (include but not limited to standard procedures, etc.).

Organization

Used in the context of this EMS Manual refers to the installation.

Resources

Assets that may be impacted by the conduct of practices, such as personnel health and safety, real property, financial resources, public relations status and mission capability.

Risk Analysis

Risk analysis refers to a qualitative and quantitative assessment of the nature and magnitude or risk. The purpose of a risk analysis is to estimate the severity and likelihood of harm to the environment and resources. Risk management is assessed against best management practices. The significance of risk is weighted in terms of the expressed risk and the management directed to the risk.

Supervisor

The Individual responsible for the day-to-day activities within a branch, division, or operation.

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SECTION 1
EMS PLANNING

EMS 001 Environmental Policy

Purpose: Identify the process to develop and maintain the organization's Environmental Policy.

1.0 Roles and Responsibilities

The **Garrison Commander** shall be responsible for ensuring the U.S. Army Garrison – Redstone Environmental Policy is developed, maintained and adhered to. The **Environmental Management Representative** shall review this procedure annually for its effectiveness in meeting EMS commitments.

2.0 Procedures

- 2.1 The policy must commit the facility to, at a minimum:
 - continual improvement;
 - compliance to applicable environmental legislation, regulation and policy; and
 - prevention of pollution.
- 2.2 The Environmental Policy must focus the EMS effort on minimizing risks to mission and to the environment.
- 2.3 The Policy must be posted, published and/or distributed in a manner that will ensure all personnel are aware of and understand the Policy.
- 2.4 The Policy must be made available to the public.
- 2.5 The Policy must be signed and dated by the highest-ranking official in the Garrison.
- 2.5 The Environmental Policy must be reviewed at least annually.
- 3.0 Reference, Related Documents.
 - Executive Order 13148

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EMS 001 Actions Taken Log

Action Taken	Supporting Documents	Comments
Initial Release of Procedure	EMS 001	
Environmental Policy Signed	EMS.001.01	Draft signed on 03/01/16 by the Garrison Commander
Policy available thru Garrison Webpage	EMS.001.02	Policy posting in the installation intranet
		Identify means to ensure contractors are aware of Policy.
		Identify means whereby Policy can be made available to the public.
		Ensure Policy is integrated into EMS Awareness training

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**SECTION 1
EMS PLANNING**

EMS 002 Environmental Impact Evaluation

Purpose: Identify the organization’s process for the identification of operations and environmental impacts, assessment of significance and means to consider information in the development of objectives and targets.

Establish a Management of Change process to ensure system information is maintained and kept-up-to-date.

1.0 Roles and Responsibilities

The **Environmental Media Program Managers** shall identify the organization’s process, identify environmental impacts of operations, and consider appropriate objectives and targets. The **Environmental Management Representative** shall review this procedure annually for its effectiveness in meeting EMS commitments.

2.0 Procedures

2.1 All operations under the control and/or influence of the organization which constitute the full scope of EMS must be identified. Existing practice inventories and organizational charts should be considered.

2.2 Operations or elements thereof shall be considered an environmental aspect if both of the following conditions are met:

- The service, operation and/or practice can interact with the environment; and
- The organization can be expected to have control and/or an influence over the service, operation and/or practice.

2.3 Operations under normal conditions must be assessed for environmental impacts. Maintenance and emergency conditions must be assessed or identified as not applicable. Impacts shall be identified and organized under the following environmental program heading: Air emissions created, waste water discharged, waste produced (solid, hazardous and non-hazardous), natural resource use (energy, water and raw materials), cultural or historical resources affected (include community issues), and local issues (including noise).

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2.4 The significance of environmental aspects/impacts shall be based on the following:

- Control
- Influence
- Regulated
- Funding
- Potential for Notice of Violation
- Community interactions

*Rating of aspects/impacts shall follow these ranking guidelines:

Control			
Rating			
	3	2	1
	Employee has full control of aspect/impact from beginning to ending the assigned task	Employee control of the aspect/impact and may be lessened due to higher job requirements or priorities	Employee has less control of the aspect/impact and low job priority.
Influence			
	Employee has full influence of aspect/impact from beginning to ending the assigned task	Employee influence of the aspect/impact and may be lessened due to time constraints and third party responsibility for job completion	Employee has less influence of the aspect/impact and no time restrictions.
Regulated			
	Specific regulations apply to the environmental aspect/impact and monitoring and measurements and/or reporting apply.	Specific regulations apply to the environmental aspect/impact is being closely watched for applicability to the installation.	No specific regulations apply.
Funding			
	Full funding or no funds required of the aspect/impact to become operational and destined for project completion.	Projected funding allocation of the aspect/impact is reduced and pending approval by higher authority.	Funds are not available or not included in the budget forecasting.

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Potential for Notice of Violation			
	Rating		
	3	2	1
	The aspect/impact is marginal and under the watchful eye of regulators and the employee needs to improve its current state.	The aspect/impact is affected by its present condition and may be liability to the organization.	The aspect/impact has no immediate issues concerning federal/state regulators.
Community Interactions			
	The aspect/impact needs the input/output from interested parties, employees, contractors, tenants, etc.	The aspect/impact may have limited input/output from interested parties and may not affect job requirements.	Aspect/impact has no affect to interested parties.

*Aspects/impacts rated 3(high), 2(moderate), 1(low) probability.
Significance shall be rated on total score High (18-15 points) Significant, Medium (14-11 points) considered significant, Low (10 points and below), not significant.

The rating and ranking process shall be further determined through organization activities ranking and are listed below:

- Mission
- Community issues
- Cost
- Severity/NEPA
- Occurrence
- Priority

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Rating shall follow these ranking guidelines:

Mission		
Rating		
	Yes	No
	Significant aspect has impact on sustainability and readiness	Significant aspect has no impact.
Community Issues		
	Significant aspect has impact on pending issues	Significant aspect has no impact on community issues.
Cost		
	Significant aspect has impact on expenses and must be met for continued operations	Significant aspect has no impact on expenses.
Severity/NEPA		
	Significant aspect has impact on pending legal issues, such as notices and permits or lawsuits.	Significant aspect has no impact on legal issues.
Occurrence		
	Significant aspect has impact on risk for program failure	Significant aspect has no impact on program risk.
Priority		
	Significant aspect is major concern and needs all available resources.	Significant aspect is not a concern and available resources are not needed.

2.5 A worksheet in paper or in electronic format shall be used to collect and maintain environmental impact evaluation information.

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- 2.6 Significant aspects/impacts shall be managed within the context of the installation EMS and the risk assessment and ranking applied to the organizational operations shall provide input for the process used to identify of objectives and targets.
- 2.7 Scoring should be reviewed and updated annually. Actions which can trigger a reassessment include:
- Completion of environmental management programs
 - Significant changes in operations
 - New operations
 - Modification or new applicable legal or other requirements.
- 2.8 Refer to Attachment A for guidance in Management of Change
- 3.0 References and Related Documents**
- Environmental Aspects Worksheet
 - Environmental Impacts Worksheet

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4.0 EMS 002 Actions Taken Log

Action Taken	Supporting Documents	Comments
Initial release of Procedure	EMS 002	

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Attachment A
EMS Management of Change Guidance

Change Identification

Any time a change is made to any operation that could affect the environmental impacts identified in the environmental impact evaluation process or new services are introduced which may reflect new impacts that change should go through a review and approval process prior to making the change.

Changes in the organization may be associated with:

- Facility modifications
- Operational changes
- Procedural changes
- Transfer of technology (whenever a transfer of technology occurs)

Changes may also have their origin in administrative functions that may affect environmental impacts, these include for example:

- System modifications due to continual improvement programs
- Findings from audits resulting in Corrective and Preventive Actions
- Management Review resulting in modifications to system elements

Management of Change

Changes within the facility should be reviewed for effects or environmental impacts prior to the change.

All changes to operations process parameters or new process or practices introduced should be reviewed prior to implementation by the supervisor/manager of the operating process or practice and the **Environmental media program managers**.

Where applicable, an Environmental Assessment, Environmental Impact Statement or Environmental Record of Consideration Journal can be used to determine if there is a “change.” Persons knowledgeable in the proposed modification should conduct reviews.

Whenever a transfer of technology occurs between processes or facilities, or is considered from outside, the receiving entity i.e. tenants, contractors, etc. must identify who is responsible for each phase of the transfer and the environmental impacts which may be associated with each phase. Environmental Assessment or Environmental Impact Statement should note any concerns/issues due to technology transfer with members of the supplier/contractor and/or the receiver/end-user of the technology.

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A Management of Change Form should be utilized whenever a change is identified in your aspect. The initiator should summarize the change in a brief statement. If a complete summary cannot be provided on the form, the initiator should indicate where additional information could be obtained. The initiator identifies and copies persons responsible for the change and anyone required for change approval.

Proposed changes should be authorized and documented.

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**SECTION 1
EMS PLANNING**

EMS 003 Legal and Other Requirements

Purpose: Identify the process by which the organization identifies applicable legal and other requirements. Ensure legal requirements are integrated into operational controls.

1.0 Roles and Responsibilities

The **Environmental Management Division, Directorate of Public Works** shall develop and maintain the process by which applicable legal and other requirements are addressed and ensure that legal requirements are integrated into operational controls. The **Environmental Management Representative** shall review this procedure annually for its effectiveness in meeting EMS commitments.

2.0 Procedures

2.1 The Code of Federal Regulations, DOD, Army, and EPA in association with Alabama Department of Environmental Management(ADEM) and local agencies including U.S. Army Garrison- Redstone Regulation, AR-200-1 thru AR 200-6, and Executive Order 13148 shall be used as the primary means for the identification applicable environmental requirements for the installation. Additional resources may include:

- Regulatory Compliance Newsletters
- Membership on Regulatory Agency Committee
- Communications with Legal staff.

2.2 The identification and assessment of applicable regulatory requirements and resulting compliance programs should reflect the spirit as well as the letter of the law.

2.3 Environmental personnel must assess legal and other requirements and determine applicable compliance actions. This includes, as applicable, requirements associated with:

- permit, license or registration;
- compliance reporting;
- monitoring;
- record keeping; and
- management and training requirements.

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A central repository for environmental documents (i.e. reports, permits, regulatory correspondences, training records, local, and federal and state environmental regulations) and comprehensive listing of requirements must be established.

- 2.4 Other environmental requirements which include, for example Executive Orders shall be identified and the applicable requirements recorded.
- 2.5 Legal and other requirements shall be integrated within workplace operational controls. The conformance to legal and other requirements shall be assessed in conformance with the installation's EMS and Compliance Audit practices.
- 2.6 The **Environmental Personnel** are responsible for record keeping requirements associated with all legal documents, records and supporting plans, procedures and technical manuals.

3.0 References, Related Documents

- Legal and Other Requirements Listing
- Memorandum of Understanding
- EMD Contracts

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4.0 EMS 003 Actions Taken Log

Action Taken	Supporting Documents	Comments
Initial release of Procedure	EMS 003	

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**SECTION 1
EMS PLANNING**

**EMS 004 Objectives, Targets, Environmental Management Programs and
EMS Planning**

Purpose: Identify the process by which the organization establishes environmental objectives, targets and the means by which objectives are accomplished. To establish guidance for EMS Planning and on-going implementation efforts.

1.0 Roles and Responsibilities

The **Environmental Program Media Manager** is responsible for the initial determination of objectives and targets. The **Garrison Commander** must approve and endorse the identified objectives and targets.

The **Environmental Management Coordinator** shall identify the means by which objectives and targets are achieved and develop an annual EMS Plan.

The **Environmental Management Representative** shall review this procedure annually for its effectiveness in meeting EMS commitments.

2.0 Procedures

2.1 Environmental Objectives and Targets

2.1.1 Environmental objectives and targets shall be identified and reinforce these guidance requirements:

- Full implementation of the environmental management system through the identification of appropriate EMS operations.
- Emphasize prevention or mitigation of high-risk or significant aspects of installations' operations.
- Reinforce DOD and Army environmental programs associated with compliance, Pollution prevention, natural and cultural resource management and remediation or restoration, Executive Orders; and Environmental Performance metrics identified by the Department of Defense.

2.1.2 Objectives and targets should have the following characteristics:

- Broad based and reflect the applicable level and function within the installation.
- Compatible with the Environmental Policy
- Compatible with installation Policy and Directives
- Targets derived from objectives should be quantified and measurable

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- Can be short term or also project managed over one or a number of months or years.

2.1.3 A list of Environmental Objectives and Targets must be developed and maintained.

2.1.4 Objectives and targets must be reviewed at a minimum annually. Reviews should consider the following:

- means by which objectives and targets are being accomplished, and
- the continued applicability of the objective and target in light of changes or modifications to the EMS or mission priorities.

2.1.4 When an objective and target has not been met or cannot be achieved in the specific time scale, the objective must be changed to reflect the conditions. This change must be documented and the record of objectives changed.

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2.2 Environmental Management Programs

- 2.2.1 An Environmental Management Program must be developed for each objective and target identified.
- 2.2.2 Each program must be documented and specify the following information:
- Person(s) responsible for achieving objective and target
 - The actions by which the objective and target are achieved
 - Effective date/timetable by which actions are to be achieved
 - Means to monitor and assess current status of objective and target
- 2.2.3 Current Army planning, programming, and budgeting system, such as the Environmental Program Requirements, PPBES, etc. should be utilized to fulfill objectives and implement formal projects. The submission of a project for funding or other support should be identified as an action item in the program. Program timetables should align with the installations' EPR funding cycle.
- 2.2.4 Program actions in excess of \$10,000 should include a cost-benefit analysis and evaluation of feasible alternatives. To evaluate the benefits of alternatives, the evaluation or narrative statement in the EPR should, at a minimum, look at:
- investment;
 - operating benefits; and
 - expected time period or life of the investment.
- When the action is principally driven by an occurrence assessment in the organizational activities section, developed in EMS 002 Environmental Impact Evaluation the cost-benefit assessment and evaluation should also reflect the degree of risk reduction and risk management benefit expected.
- 2.2.5 Results and findings of analysis should direct the remaining actions identified in the overall program.
- 2.2.6 Programs must be reviewed annually and where appropriate updated every six months or as required in the EPR review by the person assigned responsibility for achieving the objective and target.
- 2.2.7 When objectives and actions have not been met, consideration for bringing additional resources to bear to achieve the objective and accomplish the associated actions should be considered, such as, reallocating funds from dormant and/or cancelled projects. This review should be integrated within the Management Review process.

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2.3 EMS Planning

- 2.3.1 EMS Implementation planning shall reflect the timetables associated with the installation EMS guidance to address DOD and Army requirements and EMS Implementation Criteria and Metrics.
- 2.3.2 Additional consideration should be given to:
- installation resources including budget, technology and operations
 - What personnel, in what positions, are necessary to implement and maintain EMS
 - What support systems are necessary and means to maximize installation-wide EMS cooperation
- 2.3.3 An EMS Plan shall be developed annually. The Plan should address objectives, targets and management programs. As the EMS evolves the planning process should be integrated within the Management Review process.
- 3.0 References and Related Documents
- List of Environmental Objectives and Targets
 - Environmental Management Programs
 - EMS Annual Plan

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4.0 EMS 004 Action Taken Log

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Initial release of Procedure	EMS 004	

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Section 2 EMS Implementation

EMS 005 Structure and Responsibility

Purpose: To describe the process used to identify, document and communicate EMS roles, responsibilities and authority.

1.0 Roles and Responsibility

The **Public Works Director** shall identify and maintain the means to define, document and communicate EMS roles, responsibility and authority. The **Environmental Management Representative** shall review this procedure annually for its effectiveness in meeting EMS commitments.

2.0 Procedures

2.1 EMS Roles and responsibilities must be documented and identify, at a minimum, the following:

- Title and name of personnel
- Key areas of EMS responsibility

The means to specify roles, responsibilities and authority may include the use of job descriptions, organizational diagrams and flowcharts.

2.2 An **EMS Representative** must be appointed to manage the day-to-day requirements of the EMS. Responsibilities must be documented and include:

- establishing and ensuring maintenance of the EMS Manual and procedures;
- controlling, releasing and updating key EMS supporting documents;
- ensuring EMS requirements are established, implemented and maintained in accordance with all EMS procedures; and reporting on the performance of the EMS.

2.3 The EMS Representative may designate additional personnel to support their responsibilities. Delegated responsibilities of the EMS Representative must be documented.

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- 2.4 In addition to the EMS Representative, these key roles and responsibilities must be identified:
- Environmental personnel
 - EMS Auditors
 - EMS Management Review Team
 - Management level installations' operational staff responsible for environmental aspects/impacts associated with their operations.
- 2.5 Personnel must be aware of their assigned position within the EMS structure. Personnel must possess the required skills to adequately carry out their assigned roles and responsibilities. Such skills may be associated with experience, education and/or training. Authority must be established and/or verified through assignment responsibilities.
- 2.6 EMS supplementary roles and responsibilities are not required to be documented in conformance with this procedure. Such roles may be identified within specific instructions or other associated EMS documentation.

3.0 References and Related Documents

- Installation Organizational Chart including mission functions
- Directorate of Public Works Organizational Chart
- Environmental Management Division Organizational Chart
- EMS architecture
- Environmental Personnel Job Descriptions and Qualifications summary
- Appointment Letters

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4.0 EMS 005 Action Taken Log

Action Taken	Supporting Documents	Comments
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Section 2
EMS Implementation

EMS 006 Training, Awareness and Competence

Purpose: To identify the process by which Environmental and EMS education and Training is identified, training provided and competency assessed.

1.0 Roles and Responsibility

The **Environmental Management Coordinator** shall develop a process to identify and provide Environmental and EMS training to all staff and contractors whose work is associated with significant environmental aspects/impacts.

The **Environmental Management Representative** shall review this procedure annually for its effectiveness in meeting EMS commitments.

2.0 Procedures

2.1 Environmental personnel must perform a training needs assessment to determine the following:

- identification of personnel who can potentially impact the environment through job assignments and responsibilities, and
- appropriate competencies to perform job assignments and responsibilities.

Results of the assessment must be documented.

2.2 EMS training must provide personnel and where applicable contractors the necessary skills and knowledge to perform their work in an environmentally sound manner. As applicable to all staff and contractors, training must cover, at a minimum:

EMS Awareness:

- Environmental Policy
- Environmental impact awareness
- Objectives and targets and Environmental Management Programs
- Environmental Operational Controls, based on their job title and function, and the Potential consequences of departure from specified operating

Level-to-Level Training is specific to job function and is designed to meet specialized needs. This training covers:

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- Roles and Responsibilities
- Environmental Impacts and Improvement Activities
- Environmental Operational Controls covering normal, abnormal or emergency and maintenance conditions.

Regulatory required training, operator and mechanical skill training. This training covers:

- Legal requirements as applicable to the operations
- Certification training associated with statute or by skill

2.3 Training records must be maintained and include the following:

- Name or description of the training program or topic
- Reference to supporting documents used during the training
- Training handouts or other appropriate materials
- Means of competency assessment (i.e. copy of completed examination)
- Record of attendance and completion (i.e. certificate, license, etc.)

2.4 Competency may be assessed through one or more of the following:

- Written tests
- Verbal question and answer
- Supervisor oversight
- Job performance/personnel assessments

3.0 References and Related Documents

- Training Needs Assessment (Training Matrix)
- Training Programs and related records

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4.0 EMS 006 Action Taken Log

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Section 2 EMS Implementation

EMS 007 Communication

Purpose: To identify the process and means of internal and external communication.

1.0 Roles and Responsibility

The **Environmental Media Program Managers** shall develop the process and means for internal and external communications associated with significant environmental aspects/impacts. The **Environmental Management Representative** shall review this procedure annually for its effectiveness in meeting EMS commitments.

2.0 Procedures

2.1 Internal Communications

2.1.1 The **Environmental Management Systems Coordinator** is designated as the EMS point-of -contact for the organization.

2.1.2 To establish and maintain awareness of the EMS, the **Environmental Management Systems Coordinator** may use any of the following:

- Bulletins
- Handouts
- Meetings
- Training sessions

2.1.3 The **Environmental Management Representative** must establish a communications structure to receive and respond to critical comments, inquiries and suggestions on environmental matters. This should include a means of communication associated with:

- Environmental and EMS related questions
- Environmental compliance concerns
- Environmental Program Management, roles and responsibilities
- Pollution prevention

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A Tracking Log must be maintained for critical communications associated with, for example, compliance and critical risk conditions.

2.1.4 To communicate EMS issues and changes in the EMS resulting from the Management Review or other actions, the **Public Works Director** will ensure the following:

- System changes are routed to appropriate personnel whereby system up-dates can be implemented.
- Supervisors communicate system information to relevant personnel.
- Contractors and suppliers while on-site are aware of the Environmental Policy and the environmental impacts of their services.

2.1.5 A formal method of Emergency Notification must be established. The notification must be disseminated throughout the installation and provide, at a minimum, the following:

- What constitutes an emergency
- Appropriate Environmental Contacts
- Specific emergency actions and reporting requirements.

A Tracking Log must be maintained for emergency communications.

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2.2 External Communications

- 2.2.1 An External Communications Tracking Log must be used to record receipt, reply and/or decision on reply.
- 2.2.2 External Communication – Communications primarily between the interested parties should be directed by this guidance.
- The Environmental Policy is freely available to any member of the general public or external interested parties upon request.
 - Significant environmental impact information may be available upon specific request subject to the confidentiality of the information concerned. Specific requests must be recorded and routed through the **Garrison Commander's Office** and follow the chain-of-command structure through the Public Affairs Office.
- 2.2.3 External Communication – Communications primarily between other Federal or State agencies inclusive of regulatory agency communications should be directed by this guidance:
- Communications for general requests for information should be directed to environmental media program managers or topic of concern. Personnel without direct knowledge of the media or topic should not respond to requests for information.
 - Specific communications associated with permit notification or requirements, verification of compliance forms, non-compliance notices, permit application and supporting data should be directed to an environmental media program manager or topic of concern. Support from the Public Affairs and Legal Offices should be considered.
- 2.2.4 External Communication – Emergency Communications associated with emergency conditions should be directed by the requirements and guidance identified in the following:
- Emergency Preparedness and Response Plan
 - Emergency Operations Center Plan
- ### 3.0 References and Related Documents
- Internal Communications (EMD Journal entry)
 - External Communications (EMD Documents Library Log)
 - Internal /External Communications Flowcharts

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4.0 EMS 007 Action Taken Log

Action Taken	Supporting Documents	Comments
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Section 2 EMS Implementation

EMS 008 Environmental Management System Document Control and Environmental Records

Purpose: To identify document control requirements and the process for the identification and maintenance of environmental records

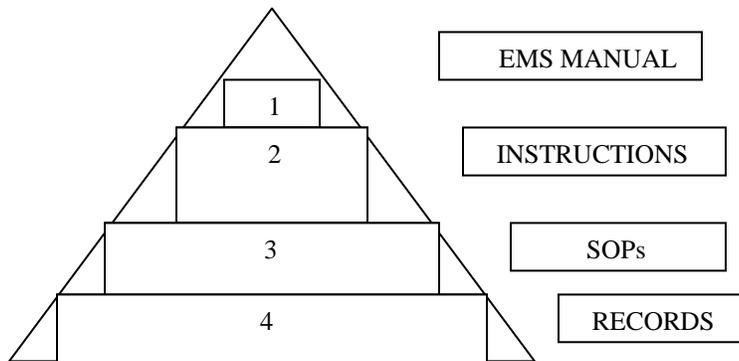
1.0 Roles and Responsibilities

The **Environmental Media Program Managers** shall develop document control requirements and define the process for identifying and maintaining environmental records and documents. The **Environmental Management Representative** shall review this procedure annually for its effectiveness in meeting EMS commitments.

2.0 Procedures

2.1 EMS Document Structure

2.1.1 The primary EMS documentation structure is divided into four sections that are describe as Levels 1, 2, 3, and 4. The EMS Document structure is:



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- 2.1.2 Level 1 contains the EMS Manual. These procedures describe the system's core elements and how system elements relate to each other.
- 2.1.3 Level 2 contains Instructions. These procedures describe how roles and responsibilities drives each element from Level 1.
- 2.1.4 Level 3 contains Standard Operating Procedures (SOPs). These procedures and supporting documents developed are used to implement key elements in Level 2.
- 2.1.5 Level 4 contains records. EMS related support documents would exist as Level 4 documents within the organization.

2.2 Document Control

- 2.2.1 Documentation must be managed to ensure that:
 - they can be located;
 - use the appropriate format which contains: unique number which can be used track associated documents and records.
 - documents created are periodically reviewed, revised as necessary and approved for adequacy by authorized personnel;
 - appropriate documents are available to personnel where they are needed;
 - documents are legible;
 - current versions are available;
 - obsolete documents are removed for point of use;
 - documents removed from use follow retention requirements; and
 - documents are reviewed annually by the person(s) designated as accountable.
- 2.2.2 Documents should be maintained in electronic form unless deemed inaccessible by the users of the information.
- 2.2.3 An EMS Document Tracking Log must be maintained. The following information should be referenced:
 - Document identification
 - Title (Subject)
 - Destination (Mailing Address)
 - Issue Date
 - Location (Web linked)
 - Accountability (Point of Contact)
 - Access

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The log must reflect an up-to-date listing of all active documents and records contained within the EMS. Documents referenced within the EMS should also be identified to ensure they are maintained.

- 2.2.4 EMS documents critical to the daily operation of the EMS must be accessible to all personnel who rely on such documents. Where relevant, password or other security overrides shall be issued to accomplish access requirements. Uncontrolled hardcopies may be printed and maintained to meet the provisions of this requirement.

2.3 EMS Document Relationship, Titles, Numbering and Controls

- 2.3.1 Document management practices should reflect the following:
- All EMS documents should be numbered in such a manner to track their status within the context of the EMS.
 - Other miscellaneous documents created to fulfill a specific role in the EMS should have a reference in the document title or heading that identifies it as an EMS Record.
- 2.3.2 The first time an EMS document is released; it should be marked as “Initial Release”. Following the revision of an EMS document, all uncontrolled hard copies should be replaced or updated within a reasonable time frame.

2.4 Document Review and Retention

- 2.4.1 Procedures and EMS documents should be reviewed at a minimum annually. All reviews should be documented and where applicable the reissue date of the documents identified.
- 2.4.2 Modifications to documents should be made within a reasonable time frame.
- 2.4.3 Unless otherwise identified by legal requirement or specific retention requirements referenced within the EMS procedures, records retention may follow this general guide. EMS records must be retained for at least two (2) years. Documents, unless identified by legal requirements or specific retention requirements referenced within EMS procedures, should be retained for one (1) year.

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2.5 EMS Document Change

2.5.1 A centralized process should be established to manage EMS document changes and change requests. The process should consider the use of a Change History record which includes the revision number, originator, reason for the change and date.

2.6 EMS Documents at Point of Operational Use

2.6.1 All EMS documents prepared for distribution throughout the organization should:

- Have appropriate document identification (Subject and number reference)
- Effective date and date of reissue as applicable
- Directorate/Division responsibility and authority associated with issue
- Point of Contact
- Be clear, concise and provide reference to supporting documents and references

2.6.2 A log and distribution list should be retained for all documents.

2.6.3 The issuing entity must have a means to recall documents and verify that documents have been received and are maintained at point of use.

2.7 Environmental Records

2.7.1 Environmental records shall include, at a minimum, all records identified or referenced within the EMS Manual.

2.7.2 Records must state who is responsible for keeping the records, what form they will be in and how long they will be kept.

3.0 References and Related Documents

- Environmental Records Log and Distribution List

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4.0 EMS 008 Action Taken Log

Action Taken	Supporting Documents	Comments
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Section 2
EMS Implementation

EMS 009 Operational Controls

Purpose: To identify the process for the identification, development and maintenance of environmental operational controls.

1.0 Roles and Responsibilities

The **Environmental Management Personnel** shall ensure environmental operational controls are developed and maintained. The **Environmental Management Representative** shall review this procedure annually for its effectiveness in meeting EMS commitments.

2.0 Procedures

2.1 Operational Controls at the Installation

- 2.1.1 Operational controls document and provide operating instructions for the management of significant environmental impacts.
- 2.1.2 Operational controls must reflect the environmental practices directed toward best management practices of significant environmental aspects/impacts. operational controls must reflect risk minimization, regulatory or other operating requirements and where applicable pollution prevention.
- 2.1.3 Operational controls associated with services, operations, and practices under the direct control of **Environmental Media Program Managers** must specify the respective Directorate or operations supervisory personnel roles and responsibilities.
- 2.1.4 Operational controls must consider the full scope of significant environmental impacts (as applicable) and cover normal, maintenance and emergency conditions.
- 2.1.5 Operational controls may be integrated within Army Technical Manuals, Army Environmental Program Management Plans and/or be supported by Standard Operating Procedures (SOPs), work instructions or other appropriate worksheets or forms.

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2.2 Operational Controls Directed to Contractors and Suppliers

2.2.1 For contractors working on-site the primary Army Contracting Officer, i.e. Corps of Engineers, Mobile District, etc. shall ensure that practices are established for the management and/or mitigation of the environmental impacts associated with their activities.

Suppliers shall be notified of the significant environmental impacts associated with their products and the impact mitigation requirements of the organization.

2.2.2 Operational control identification, development and maintenance should be referenced in Contract and/or Scope of Work (or other means by which services are provided) requirements. Contractors should be held responsible and accountable through one or more of the following environmental management system checking process:

- Environmental Performance Monitoring
- Environmental Management System and Compliance Audits
- Corrective and Preventive Actions

2.3 Operational Controls Review

2.3.1 Operational controls should be evaluated for their appropriateness and effectiveness on a regular schedule. If it is determined that current operational controls are inadequate, existing controls should be modified on new controls established within a reasonable time frame. Additional reviews may be required whenever:

- new services, operations or practices are identified;
- performance monitoring and/or audits indicate deficiencies in operational controls; or
- EMS changes as a result of objectives, targets and environmental programs.

3.0 References and Related Documents

- Operational Controls and related documents and records

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4.0 EMS 009 Action Taken Log

Action Taken	Supporting Documents	Comments
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Section 2
EMS Implementation

EMS 010 Emergency Preparedness and Response

Purpose: To identify the process for the identification, preparedness and response to accidents and emergency situations to ensure the significant environmental impacts associated with an emergency situation are mitigated.

1.0 Roles and Responsibilities

The **Environmental Management Branch Chiefs** including the **Installation-On-Scene Coordinator** shall identify the emergency preparedness response process to ensure environmental impacts resulting from emergency situations are mitigated. The **Environmental Management Representative** shall review this procedure annually for its effectiveness in meeting EMS commitments.

2.0 Procedures

- 2.1 The process to identify potential emergency conditions is implemented in EMS 002 Environmental Impact Evaluation (Occurrence).
- 2.2 Emergency preparedness and response practices must include:
 - Measures to prevent or avoid situations. Measures may reference, for example, pollution prevention efforts, process or practice operational or engineering changes and administrative changes.
 - Response Plans to deal with situations. These plans are necessary should the the prevention or avoidance measures fail. Plans outline the steps to be taken in the event of an emergency situation. Drills and the organization and/or community emergency response support practices must be identified.
- 2.3 Emergency contacts and emergency instructions must be prominently displayed and known throughout the installation.
- 2.4 Organizational elements associated with emergency situations must install and test warning and alarm systems.

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2.5 All drills and testing must be documented and critiqued by senior emergency response personnel to identify the need for process and practice improvements due to observed non conformance or inadequate or partial response to practices. Changes to EMS procedures and operational controls should be considered. Changes should be made and appropriate training scheduled within a reasonable time period.

3.0 References and Related Documents

- Emergency Response Plans and Records of Drills
- After Action Reports for Hazardous Waste Response

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4.0 EMS 010 Action Taken Log

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Section 3 EMS Monitoring

EMS 011 Monitoring and Measurement

Purpose: To identify the process by which environmental performance monitoring requirements are identified and monitoring performed.

1.0 Roles and Responsibilities

The **Environmental Media Program Manager** shall define environmental performance monitoring requirements and ensure that performance monitoring is conducted. The **Environmental Management Representative** shall review this procedure annually for its effectiveness in meeting EMS commitments.

2.0 Environmental Performance Monitoring Requirements

- 2.1 Persons responsible for the environmental performance monitoring and metrics information should have direct knowledge of the related operations and direct data accessibility.
- 2.2 Where sampling is performed, all sampling, monitoring or measurement should be carried out in accordance with recognized standards or procedures.
- 2.3 Monitoring and measurements for environmental performance must be Maintained for DOD and Army performance metrics. The following is a list of media that requires monitoring and performance measuring at scheduled intervals.
- Air
 - Storm Water
 - Noise
 - Drinking Water
 - Hazardous Waste
 - Wastewater
- 2.4 In addition to or in support of the required metrics, monitoring and measurements for environmental performance must be maintained for the following areas:
- Regulatory and other requirements.
 - Track environmental performance in relation to objectives, targets and environmental management action plans.
 - Suspected negative impact on the environment and/or risk assessment confirmation or nuisance.

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- 2.5 A list of Environmental Monitoring requirements must be developed and maintained.
- 2.6 Where monitoring is required, monitoring and measurement records should provide the following information:
 - Date of measurement
 - Projected performance: actual measurement captured
 - Verification of person performing monitoring
 - Comments on monitoring activity, and
 - Monitoring equipment
- 2.7 Monitoring and measurement results, as well as documents relating to quantity assurance and calibration must be retained as records. If a third party is involved, documents describing the organization's quality control methods, calibration records and procedures and applicable certifications must be retained as records.
- 2.8 The results of monitoring associated with compliance parameters or other data considered critical to protection of the environment must be reviewed in a timely manner and results must be compared against requirements.

All monitoring, measurement and analysis, as required by regulatory agencies, must be reported to the appropriate authority within the specific reporting timetables and following authority instructions.

- 2.9 Monitoring, measurement or analysis results that are out of limits or outside recommended guidance limits should be addressed immediately following the procedures outlined in Conformance Corrective and Preventive Actions.
- 2.10 Equipment calibration must be maintained following manufacturer's recommendations. A Calibration Log must be maintained covering, at a minimum, the following information:
 - Equipment ID/name
 - Calibration schedule
 - Responsibility
 - Records

3.0 References and Related Documents

- List of Environmental Monitoring
- Calibration Records (In-house and Contractor domain)

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4.0 EMS 011 Action Taken Log

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**Section 3
EMS Monitoring**

EMS 012 Environmental Management Systems and Compliance Audits

Purpose: To identify the process by which EMS and Compliance audits are performed.

1.0 Roles and Responsibilities

The **Public Works Director** shall define the process for conducting EMS and Compliance audits. The **Environmental Management Representative** is responsible for the implementation of this procedure and reporting results to the **Garrison Commander**. The **Garrison Commander** shall identify a Lead Auditor(s) who shall identify an Audit Team whose responsibilities include conducting the audit in an unbiased and objective manner and performing audit duties as directed by the Lead Auditor.

The **Garrison Commander** is responsible for declaring Self Declaration of Conformance to these standards or requirements; EO 13148 and ISO 14001.

The **Environmental Management Representative** shall review this procedure annually for its effectiveness in meeting EMS commitments.

2.0 Procedures

2.1 EMS First Party Audits

- 2.1.1 First party audits are internal evaluations conducted by the installation to evaluate its own performance.
- 2.1.2 Only qualified auditors may perform first party audits. Auditor qualifications and competency must be established through
 - the successful completion of an internal auditor course by a recognized third party, or
 - internal auditor training provided by personnel who have successfully completed an internal auditor training course and are familiar with training practices and competency assessments, or
 - Registration Accreditation Board (RAB) Certification
- 2.1.3 Training must include, at a minimum, the following topics and practices:
 - An assessment and determination of conformance standards of the relevant standard and requirements to which the system must conform.

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- Audit planning covering development of Audit Plans, working documents and checklists.
- Initiating the audit covering and gathering audit evidence, interviewing techniques and examination and assessment of records.
- Audit reporting which covers non-conformances and observations and formal reports.

2.1.4 Auditors must be familiar with EMS Manual

2.1.5 Staff performing audits must be independent from the audited mission, process or activity, familiar with pertinent technical issues and regulations of the installations' processes and services.

2.1.6 Contractors must prove competency and use this procedure as well as the Non-Conformances, Corrective and Preventive Actions when performing first party audit activities.

2.1.7 An annual Internal Audit Schedule must be prepared and maintained. The Schedule is initially based on the status of management system procedures development and implementation of requirements identified in the procedure. The ongoing schedule will reflect the initial audit results and the following:

- Significant Aspects risks and hazards
- Concerns raised by interested parties
- Results of third party audits
- Concerns raised by the employees
- Concerns rose during Management Reviews
- At a minimum each procedure will be audited annually

2.1.8 Audit methodology must consider the following:

- The full implementation of each management system procedure as described in the Management System Manual to determine if the management system conforms to planned arrangements for environmental, safety, and health management including the standards by which the system was developed, ISO 14001 and EO 13148 and
- if the system has been properly implemented and maintained.

2.1.9 A Lead Auditor must be assigned to each audit. The designated Lead Auditor is responsible for audit planning requirements, ensuring the audit activity follows this procedure, presenting the audit during opening and closing meetings, and for preparing and distributing the audit report.

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- 2.1.10 Audit planning and preparation must include the following:
- Identification of Audit Team, confirming qualifications and assigning responsibilities;
 - Collection of information to be used during the audit
 - preparation of checklists as approved by the Environmental Management Representative; and
 - Preparing an Audit Plan which identifies, at a minimum:
 - Scope and objective of the audit
 - Area(s) to be audited;
 - Schedule (date and time); and
 - Assignment of auditors

A management system audit may include regulatory compliance.

2.1.11 The Audit Plan must be approved by the **Commander, Director, or Office Chief**, and sent to the audited area at least two weeks before the audit.

2.1.12 An opening meeting may be used to introduce the audit activity. When performing an audit, auditors observe conditions, ask questions, review records and verify if procedures and practices conform to documented and non-documented arrangements. The interviews should be conducted in the work area, if possible or appropriate, so that actual processes can be observed and any records or related data will be available for review. Information obtained from the interview, who was interviewed as well as the records review and site inspection shall be documented. The records review will most typically be conducted before conducting interviews and physical inspections with follow-up reviews conducted following the findings of previous steps. Auditors must gather as much information and objective evidence as necessary to adequately assess the area or condition observed.

2.1.13 An exit briefing may be held and the Lead Auditor may provide verbal feedback on findings and/or observations.

- 2.1.14 An Audit Report must be prepared and distributed by the Lead Auditor. This report, at a minimum, must include or reference:
- Audit Plan;
 - audit materials used;
 - copy of non-conformances
 - copy of observations; and
 - verification that the Audit Plan was followed.

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The report shall be provided to the **Environmental Management Representative** who must present the results to the **Garrison Commander** and the **Public Works Director** during Management Review. The report may also be provided to the **Auditee** (organization being audited), **Environmental Management Systems Coordinator**, and **Environmental Media Program Manager** who oversees the specific media being audited.

2.2 EMS Second Party Audits

- 2.2.1 Second party audits are those independent evaluations of the installation’s management system conducted by auditors outside the scope of the installation’s management system.
- 2.2.2 Second party audit practices must be approved by the **Garrison Commander** and provide for at a minimum:
 - accredited and experienced auditors; and
 - written audit protocols at least equal to those used for first party audits.

2.3 EMS Third Party Audits

- 2.3.1 Third Party audits are those independent reviews conducted by Registration Accreditation Board (RAB) Accredited Registrar.
- 2.3.2 Third party audits must follow RAB Accreditation requirements.

2.4 EMS Self-Declaration

- 2.4.1 Self Declaration must be verified by Second or Third Party Audits.

2.5 Compliance Audits

- 2.5.1 Compliance audits are performed to assess compliance to applicable legal and other requirements.
- 2.5.2 Audits may be performed by internal staff or by external parties, all auditors must be independent of the area where the compliance status is being audited. second party audit practices must be approved by the **Garrison Commander** and provide for at a minimum:
 - experienced auditor(s); and
 - written audit protocols at least equal to those used for first party audits.

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2.5.3 Regulatory compliance assessment shall consider: permit, license or registration compliance reporting, monitoring, record keeping; and management and training requirements as applicable to: air emissions created, waste water discharged, waste produced (solid, hazardous and non-hazardous), natural resource use (energy, water and raw materials), cultural or historical resources affected (include community issues), and local issues (including noise).

3.0 References and Related Documents

- Audit Schedule
- Audit Plan
- Audit Reports

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4.0 EMS 012 Action Taken Log

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Section 3
EMS Monitoring

EMS 013 Non-Conformance, Corrective and Preventive Actions

Purpose: To identify the process by which non-conformances are handled, corrective and preventive actions are developed and managed.

1.0 Roles and Responsibilities

The **Environmental Media Program Manager** shall develop procedures on preparing and managing non-conformances, corrective and preventive actions. The **Environmental Management Representative** shall review this procedure annually for its effectiveness in meeting EMS commitments.

2.0 Procedures

2.1 Non-Conformances, Corrective and Preventive Actions

- 2.1.1 Non-Conformances are identified during audits. Non-conformances may also result from monitoring and measurement and as a result of previous corrective actions that have failed to address deficiencies.
- 2.1.2 Non-conformances must be addressed through formal Plan of Actions or through a more informal corrective and preventive action process (improvement actions).
- 2.1.3 When completing a non-conformance Plan of Action or general Improvement Action nonconformance, the following information must be identified on the document.
 - Identification of the non-conformance, including a brief description of the non-conformance.
 - Date, location and associated operation or organizational area of responsibility.
 - Legal and non-regulatory requirements associated with the non-conformance will be identified, where applicable.
 - Identification and listing of corrective and preventive actions, including a list of any associated procedures, documents or records. Persons who are responsible for the corrective and preventive action should be consulted and assist in the identification of applicable actions.
 - Document must be signed with routing to appropriate personnel identified.
- 2.1.4 A ranking process should be established for non-conformances. The ranking should reflect the use and applicability of the Plan of Action or Improvement Action process. Ranking should reflect degree of risk and can be organized as follows:

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High Risk	Non-conformance is associated with a major impact and/or a major release to environment, non-compliance to regulatory or other requirements. A Corrective and Preventive Action Request (CAR) form is developed and the non-conformance is investigated and corrected following a formal Root Cause Analysis.
Medium Risk	Non-conformance is associated with a minor impact: a CAR form is developed and the non-conformance is addressed through appropriate actions.
Low Risk	Incident does not demonstrate best practices but is not seen as a root cause of a further problem. Incident is <u>not</u> required to be addressed through a written CAR

2.1.5 Corrective and preventive action responsibilities must be assigned.

- 2.1.6 Prior to the closure of a corrective and preventive action, the responsible person
- All relevant sections of the Corrective and Preventive Action Form are completed and that information is adequate and accurate.
 - All assigned tasks have been completed.
 - All assigned tasks and corrective and preventive actions are considered adequate in mitigation of risk and environmental impacts, and
 - Legal and non-regulatory obligations where adequately addressed and resolved.

- 2.1.7 If a corrective and preventive action cannot be closed the responsible person must identify additional actions that may include:
- Additional root cause assessment,
 - Modification of corrective and preventive actions.
 - Establishing of additional corrective and preventive actions, and
 - Additional review of legal or other obligations.

2.2 Observations on EMS conformance identified outside the audit process.

2.2.1 Observations on EMS may be made outside the formal audit process.

2.2.2 Observations should be directed to the **Auditee** (organization being audited). The **Environmental Media Program Manager** will determine if an issue will be managed through the formal CAR process.

2.3 Changes in EMS

2.3.1 Any change in documented procedure resulting from corrective or preventive actions shall be identified and implemented.

3.0 References and Related Documents

- Corrective and Preventive Action (CAR) Form

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4.0 EMS 013 Action Taken Log

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Section 4 EMS Management Review

EMS 014 Environmental Management System Management Review

Purpose: To identify the process by which Management Reviews are performed and the EMS is assessed for its effectiveness and efficiency in meeting the Environmental Policy and improving environmental performance

1.0 Roles and responsibilities

The **Garrison Commander** shall identify the process and means by which EMS is assessed for its effectiveness and efficiency in meeting the EMS procedures, Environmental Policy and improving environmental performance. The **Environmental Management Representative** shall review this procedure annually for its effectiveness in meeting EMS commitments.

2.0 Procedures

- 2.1 An EMS Management Review Team representing senior leadership must be identified. The highest ranking officer at the Garrison or designated representative will chair the meetings.
- 2.2 A Management Review of the EMS must be performed at a minimum once per year. All team members should attend this meeting.
- 2.3 The **Environmental Management Representative** should establish the agenda and organize the information presented.
- 2.4 The review process must consider the continuing suitability, adequacy and effectiveness of the Environmental Policy and the Environment Management System and whether revisions are required in light of:
 - Emerging/growing environmental concerns in specific areas
 - Ongoing and developing understanding of environmental issues
 - Potential regulatory or other requirements developments
 - Concerns of interested parties
 - EMS and environmental complaints
 - Mission and changes in operations
- 2.5 In addition the meeting must review the following:
 - EMS and Compliance audits
 - Non-conformances and corrective and preventive actions

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- Environmental objectives, targets and status of Environmental Management Programs and the EMS Plan
 - Environmental accidents and emergencies
 - Environmental Performance monitoring and improvements in environmental performance
 - Resource allocation.
- 2.6 Findings, conclusions and recommendations reached because of the review must be documented. Records of the meeting must specifically include:
- Date
 - Attendance (signature)
 - Minutes of the meeting shall include:
 - Items discussed
 - Decisions
 - Changes to management system
- 3.0 References and Related Documents**
- Management Review Records
 - Management Review Flowchart

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4.0 EMS 014 Action Taken Log

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