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***Title: Environmental Management System
Performance Checklist***

U. S. ENVIRONMENTAL PROTECTION AGENCY
ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)

EMS Performance Checklist

Each of the Agency's official EMS reporting locations will be measured based upon their completion of the following steps toward full EMS implementation by December 31, 2005. At least quarterly, an Agency-wide status report will be distributed to senior managers that will identify progress toward full implementation. All due dates listed are maximums and reporting locations are encouraged and expected to move more quickly in achieving full implementation. All requested information in the steps below should be submitted to the OARM EMS Coordinator, Dr. Jerry Oakley.

Step 1: Identifying a primary EMS Contact and backup personnel.

Each location must select and provide the contact information (name, address, phone, fax, e-mail) for a primary EMS Contact and for at least one backup contact. (Due: July 1, 2001)

Step 2: Performing an EMS self-assessment.

Each reporting location must complete a self-assessment of its existing EMS activities to provide a baseline. The Greenware software Self-assessment module has been distributed to all locations to facilitate this process. (Due: October 18, 2001)

Step 3: Putting a local EMS policy or commitment letter in place.

The Administrator has issued the Agency-wide EMS policy statement (May 17, 2002). Each reporting location is now required to create and issue a local EMS policy document or a letter of commitment stating its commitment to achieving EMS implementation and signed by a senior manager. (Due: August 1, 2002)

Step 4: Identifying significant environmental aspects.

Each reporting location must review the activities performed at the location to identify all of its environmental aspects and their potential adverse impact upon the environment. Once all aspects have been identified, those having the greatest significance will be the focus of corrective actions. Submissions will follow the format identified in Appendix 3C of the EPA EMS Implementation Training Series - Module 1 Workbook. (Due: February 4, 2003)

Step 5: Identifying EMS objectives and targets.

Based upon the significant aspects identified, each reporting location will establish objectives and specific targets designed to eliminate and/or minimize the adverse impacts associated with these aspects. Each location will submit a draft list of objectives and targets following the format provided in Appendix 3D of the EPA EMS Implementation Training Series - Module 1 Workbook. (Due: April 15, 2003)

Step 6: Establishing the EMS manual

- Part 1, Introductory materials.

Each reporting location will establish and maintain an EMS manual. The manual will contain the EMS program documentation and related EMS materials. A basic manual format, subdivisions, etc. and the guidelines for maintaining the manual has been provided to each location as part of the EPA EMS Implementation Training Series - Module 2. The introductory section provides general EMS information such as scope, organizational characteristics, EMS policy, etc.

- Part 2, Completing the environmental management program (EMPs) forms.

The second part of the EMS manual provides the detailed documentation and records associated with environmental management programs designed for each of the significant aspects.

Each reporting location will establish an EMS manual and complete (based on the template provided in the EPA EMS Implementation Training Series - Module 2 Workbook) and maintain the EMP forms. These forms must be available for review during compliance and EMS audits. Further, each location will submit a statement verifying that the EMS manual and EMPs are in place. (Due: June 2, 2003)

Step 7: Specifying EMS operational controls.

Operational controls (technological, operational, procedural) need to be developed for all sources (activity or activity groups) of each significant aspect. Operational controls are designed to reduce the risk of an aspect's adverse impact from occurring. Each reporting location will complete the operational control portions of the template provided in the EPA EMS Implementation Training Series - Module 2 Workbook and maintain the forms for review during compliance and EMS audits. Further, each location will submit a statement verifying that all necessary operational controls have been identified and appropriate information regarding same has been included in the EMS manual. (Due: July 15, 2003)

Step 8: Assigning EMS responsibilities.

A central activity in implementing an EMS is identifying the responsible parties associated with each of the operational control activities and providing competency training as necessary to assure their ability to perform assigned duties. Each reporting location will record specific responsibilities and the person(s) assigned on the OC form provided in the EPA EMS Implementation Training Series - Module 2 Workbook and maintain the information as personnel or assignments change. Completed OC forms are to be available for review during compliance and EMS audits. Further, each location will submit a statement verifying that all necessary designations have been identified and appropriate information regarding same has been included in the EMS manual. (Due: August 5, 2003)

Step 9: Identifying EMS procedures.

Each reporting location will develop and implement required EMS procedures and record and/or reference same in the EMS manual. Refer to the EPA EMS Implementation Training Series - Module 3 Workbook template and guidance. Each location will maintain its EMS procedures for review during compliance and EMS audits. Further, each location will submit a statement verifying that all necessary procedures have been established and appropriate information regarding same has been included or referenced in the EMS manual. (Due: December 2, 2003)

Step 10: Establishing an internal EMS self-audit program.

Each location will develop a plan for auditing its own EMS to determine compliance status and areas requiring additional effort or emphasis to ensure full implementation. Local EMS Contacts and the implementation team must conduct at least one such internal audit by the due date. Refer to the EPA EMS Implementation Training Series - Module 4 Workbook for guidance on planning an audit program. Each location will submit a findings report subsequent to its internal audit and include what plans it has for additional or corrective actions to achieve full implementation. (Due: June 15, 2004)

Step 11: Establish the management review process.

Each reporting location will develop a procedure for integrating EMS into the normal management review process. Refer to the EPA EMS Implementation Training Series - Module 4 Workbook for guidance on the major components of the management review process. Each location will submit a copy of its management review process plan. In addition, a statement verifying that all local managers are aware of the plan and are including EMS in all strategic and operational planning activities will be submitted. (Due: August 18, 2004)

Step 12: Complete the EPA Self-declaration process (or external ISO 14001 registration).

When a reporting location believes that it has fully implemented an EMS, they must notify the OARM EMS Coordinator of the method of authenticating its EMS (EPA self-declaration or ISO registration). If EPA self-declaration is chosen, OARM will provide a list of Agency personnel who have completed Lead Auditor training. The location may select any two of these individuals and arrange a final EMS audit (a location may not select an individual(s) located at its own site). In the alternative, locations may seek ISO 14001 official registration.

Upon completion of the final audit and any necessary corrective actions identified by the audit, OARM will issue an Agency certificate which declares the location has a fully implemented EMS and that it is in full compliance with Executive Order 13148. (Due: December 31, 2005)