



Green Zia Environmental Leadership Program

Demonstrating Environmental Achievement

program

HANDBOOK

August 2011

Pollution Prevention Program
New Mexico Environment Department

THE GREEN ZIA LEADERSHIP PROGRAM

The Green Zia Environmental Leadership Program (GZELP) is a statewide environmental leadership program, administered by the New Mexico Environment Department's Pollution Prevention Program. GZELP is designed for all types of businesses and organizations in New Mexico.

We offer three levels of partnership. – Gold, Bronze and Silver. The overall goal of the program is to produce real environmental improvements, such as the reduction of air emissions, hazardous materials, water and energy use, and pollution prevention.

GZELP builds on the concept that waste is the result of inefficiency and poor planning. By reducing waste, an organization can increase both its productivity and its profits. New Mexico is working hard to preserve our natural resources and remain the “Land of Enchantment”. We need businesses in our state to be a part of this preservation by setting an example for sustainability.

GZELP recognizes businesses and organizations for their environmental stewardship.

Green Zia Environment Leadership Program is a voluntary program that:

- ◆ Supports and assists all New Mexico businesses to achieve environmental responsibility through continuous improvement and environmental management
- ◆ Encourages integration of environmental stewardship into businesses operations and management practices through the establishment of a prevention-based system
- ◆ Emphasizes the establishment of a system to provide a framework for continuous environmental improvement that will assure compliance and reduce or eliminate pollution

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HANDBOOK

The purpose of this document is to provide a central reference for policies and procedures associated with New Mexico’s Green Zia Environmental Leadership Program. The handbook summarizes information on current aspects of program implementation, including eligibility requirements and member incentives. This Handbook is a “working document” that will be updated annually and available in electronic format on our program website.

www.nmenv.state.nm.us/GreenZia

Who should participate in this Program?

- ◆ Large and small businesses – any business that creates waste, regardless of size can apply to the program. Any operation that generates waste or uses resources such as electricity or water can strive for continuous environmental improvement.
- ◆ Communities can use the GZELP to work with local businesses to meet community environmental and economic sustainability goals.
- ◆ Local governments can apply the GZELP to operations such as fleet maintenance, waste handling and other operations to reduce waste and save money
- ◆ Other types of organizations, such as economic development organizations and environmental groups can also benefit from using the tools associated with the GZELP.

Green Zia Tools for incorporating pollution prevention and sustainability concepts into your organization are available at: www.nmenv.state.nm.us/GreenZia

ELIGIBILITY REQUIREMENTS

Requirements for Program Tier Status

Those entities that operate in New Mexico and voluntarily seeks or agrees to designation in one of the program tiers must meet the compliance and beyond-compliance eligibility requirements below.

*This is not a compliance awards program.

COMPLIANCE

Requirement	Bronze	Silver	Gold
No serious violations (as evidenced by a notice of violation, compliance order, or other enforcement instruments) of applicable local, state, tribal, or federal environmental laws, regulations or permits, for the specified period of time prior to the application submittal	1 year	1 year	3 years
No serious violations between the time the application is submitted and recognition is granted	X	X	X
No criminal convictions, or out-of-court settlements of criminal charges, under any local, state, tribal, or federal environmental laws for the specified period of time prior to application submittal	2 years	2 years	5 years
An applicant may also be denied recognition if the Department determines the applicant has shown a pattern of regulatory or permit violations, criminal convictions, or recalcitrance in addressing compliance issues that indicates a lack of commitment to environmental stewardship			

BEYOND COMPLIANCE

LEADERSHIP LEVEL REQUIREMENTS



Bronze Leader

1) Compliance Requirements + the following:

An entity is nominated to the Bronze level for making a significant achievement(s) in improving the environment of New Mexico. **The areas of achievement, which must be beyond compliance, may include one or more of the following:**

- ◆ Improvement of air quality
- ◆ Improvement in water quality
- ◆ Reducing water usage
- ◆ Reducing energy use (e.g. an Energy Star achievement)
- ◆ Solid and/or hazardous waste reductions
- ◆ Implementing pollution prevention actions
- ◆ Land use improvements or protection
- ◆ Environmental education, outreach or mentoring; and/or
- ◆ Other innovative measures which benefit the environment

Please attach a demonstration of how your company is addressing the above items . Graphs, charts, and summaries can be attached.

An entity can nominate itself and attach the appropriate paperwork that is required for the Bronze Level partnership. If a third party makes the nomination the entity will be contacted by the NMED GZELP staff. Should the party be interested in following through with the nomination, at that time GZELP staff will request additional information required for the Bronze Level application. (See application for details of required documentation).



Silver Leader

1) Compliance Requirements + 2) Bronze Level Requirements + the following:

An entity applying to the Silver Level must commit to developing and implementing an environmental management system (EMS) within an agreed upon timeframe, not to exceed three years, in addition to meeting the compliance requirements for “beyond-compliance” activities and programs. Please demonstrate in your application, base-line data of areas you are addressing and how your organization is tracking reductions. (Example: chart demonstrating past energy or water use v.s. use after implementing savings strategies)

Certain milestones (at a minimum) must be met to remain in the program, however, an entity has the opportunity to apply to the Gold Level sooner if they meet the following requirements: (NOTE: Not all requirements may apply and will be determined on a case-by-case basis).



Gold Leader

- 1) Compliance Requirements +
- 2) Bronze Level Requirements + the following:

To qualify for designation as a Gold Leader, an entity MUST:

- ◆ Have in place a fully operational, facility-specific EMS.
- ◆ Have completed at least one full cycle of an EMS that conforms to the criteria set forth in Appendix A (a full cycle includes planning, implementation and operation, checking and management review).
- ◆ Have completed both an EMS and internal compliance audit
- ◆ Have completed a third-party assessment of the EMS. (Third-party assessments may be performed by a lead auditor in your parent company or by an independent auditor, but not by individuals who played a substantive role in developing the EMS for the facility).
- ◆ Provide a summary, on-site review or some other documentation of an entity's EMS that demonstrates achievement of the criteria set forth in Appendix A.
- ◆ Demonstrate "Past Achievements" in order to show commitment to improving environmental performance. In general, small entities (50 employees or less) will be asked demonstrate one Past Achievement and large entities will be asked to demonstrate at least four Past Achievements.
- ◆ Set continual environmental improvement goals "Future Commitments" as the means to achieve environmental excellence. Future Commitments should be based on a sound systematic approach to environmental decision-making and goal setting, supported by measurable results. The number of Future Commitments an entity must set depends on the size of the entity as determined by the department. In general, small entities will be asked to set two continual improvement goals and large entities will be asked to set four goals.

Guidance:

Continual environmental improvement goals should promote the following:

- (1) Elimination or reduction of waste at the source of generation;
- (2) Redirection of waste streams for reuse or for substitution of commercial products;
- (3) Environmentally sound on-site and off-site recycling programs; and,
- (4) Beyond compliance activities and programs.

CONTINUED ON NEXT PAGE...

Gold Level Guidelines Continued...

Other goals may include attending or sponsoring environmental workshops, developing case studies, establishing pollution prevention networks with suppliers or providing the department with pollution prevention information for possible publication or dissemination. Aspects are chosen by the facility. Commitment for improvement should relate to the significant environmental aspects identified in the EMS and should take into account local environmental priorities and pollution prevention opportunities.

Optional activities or programs that qualify for continual environmental improvement may include participating in mentoring opportunities with other companies or organizations such as providing technical assistance and exchanging innovative technologies, attending or sponsoring workshops and developing case studies.

LEADERSHIP PARTNER RECOGNITION

The Green Zia Environmental Leadership Program participants are recognized as entities that inspire and challenge other organizations to higher levels of environmental performance. The substantial voluntary commitments Partners make with respect to environmental protection are highly valuable to the state of New Mexico. In recognition of our Bronze, Silver, and Gold level partners we offer:

- ◆ Use of the Green Zia logo and slogan in all advertising and marketing materials for the duration of recognition
- ◆ Organization name and website posted on the NMED Green Zia website
- ◆ NMED press release announcing all partner recognitions
- ◆ Window sticker
- ◆ Recognition letter from NMED

GZELP NOMINATION &/OR APPLICATION

There are currently three levels of the GZELP for which entities may apply: Bronze, Silver or Gold. To determine which of the existing levels best fit your entity, see “Eligibility Requirements”

Applicants are encouraged to submit forms electronically. Hard copies will also be accepted, but **MUST** be double-sided.

Applications and nomination forms should be sent to the following address:

E-Mail: michelle.vattano@state.nm.us

Address: New Mexico Environment Department
Pollution Prevention Program
P.O. Box 5469; Santa Fe, New Mexico 87502

BRONZE Level Leadership Application Process

Nominations or Applications may be submitted at any time during the year. **Applications will only be reviewed once a year and should be submitted not later than August 31** to receive recognition in the current year.

NMED will contact the nominee to acknowledge receipt and to provide a timeline for processing. At that time additional a Bronze level application must be completed by the nominee.

During the processing period, the department shall:

- ◆ Review the nomination / application for completeness and request additional information as needed
- ◆ Conduct a compliance review of the nominee:
- ◆ Consult with the GZELP Task Force on any nomination as necessary;
- ◆ If required, request that the internal/external Task Force panel provide a recommendation for approval or denial of the nomination to the Cabinet Secretary of the department

The Task Force will make a determination of acceptance or denial:

- ◆ If the Task Force approves a nomination, a letter of acceptance will be sent to the nominator and nominee.
- ◆ If however, the nomination is denied, at a minimum, the nominator will be notified of the decision.

Bronze Achiever awards are honored for a one-year period from receipt of notification of award from the department.

Bronze Achiever awards are **NOT** automatically renewed. A nomination form documenting further achievements may be submitted to the department for consideration of a subsequent Bronze Level award.

SILVER Level Leadership Application Process

Applications may be submitted at any time during the year. **Applications will only be reviewed once a year and should be submitted not later than August 31** to receive recognition in the current year.

The department will contact the applicant after receiving an application to acknowledge receipt and to provide a timeline for processing the application.

The department will complete an initial review of the application to ensure completeness of the application. We will contact the applicant to request additional information if necessary.

The department will conduct an environmental compliance review after the August 31st deadline once all applications have been received. The compliance review will include consulting available databases and enforcement sources within the New Mexico Environment Department. Prior to applying to the GZELP program, applicants are encouraged to assess their own compliance record.

The department will schedule a site visit, (if necessary), upon receipt of complete application.

Once the compliance review is complete, the Administrator will provide a recommendation for approval or denial of the application to the NMED Cabinet Secretary. There is no formal appeal of the Cabinet Secretary's final eligibility decision.

Within 90 days of the August 31st deadline and review of a complete application, the department will notify the applicants, in writing, of the approval or denial of the applicant into the GZELP Program.

Silver Partners are recognized for a maximum of three years unless Gold Level Status is achieved sooner. Silver status shall not exceed three years. To retain status as a Silver Partner over the 3 year period, an entity must:

- ◆ Continue to progress towards implementation of an EMS as required by the Eligibility Requirements of this Handbook. Non-participation and/or meeting the required milestones may lead to probation or termination of a member's designation.
- ◆ Complete the Silver Partner Annual Reports to Green Zia Environmental Leadership Program by August 31st of each year, in order to track progress towards timeline and goals and explain any unmet requirements.

Once all requirements are met within the three-year period (or sooner), Silver Partners may submit a Gold Level Application to the department to achieve Gold Level Status. The application will be treated as a Gold Leader Application.

In the event a Silver Leader Company may need an extension of the three year maximum status, formal request must be made to the GZELP Coordinator. Determinations of each request will be handled on a case-by-case basis. Possible requests for extension may include Regulatory/Compliance "three year clean compliance record concerns", and Economic/Resources issues for implementing an EMS.

GOLD Level Leadership Application Process

Applications may be submitted at any time during the year. **Applications will only be reviewed once a year and should be submitted not later than August 31** to receive recognition in the current year.

The department will contact the applicant of receiving an application to acknowledge receipt and to provide a timeline for processing the application.

The department will complete an initial review of the application to ensure completeness of application. We will contact the applicant to request additional information if necessary.

GZELP application examiners will review and discuss one application. Examiners are volunteers who are either current or retired professionals in the environmental field or NMED staff with no conflicting interest with an applying entity. Applications are reviewed based on narrative of environmental efforts, demonstration of tracking aspects, completion / work towards reduction goals.

The department will conduct an environmental compliance review after the August 31st deadline once all applications have been received. The compliance review will include consulting available databases and enforcement sources including the EPA and local health departments, as information is available, to obtain compliance information. Prior to applying to the GZELP program, applicants are encouraged to assess their own compliance record.

The department will schedule a site visit upon receipt of complete application.

Once the compliance review is complete, the Administrator will provide a recommendation for approval or denial of the application to the NMED Cabinet Secretary. There is no formal appeal of the Cabinet Secretary's final eligibility decision.

Within 90 days of the August 31st deadline and review of a complete application, the department will notify the applicants, in writing, of the approval or denial of the applicant into the GZELP Program.

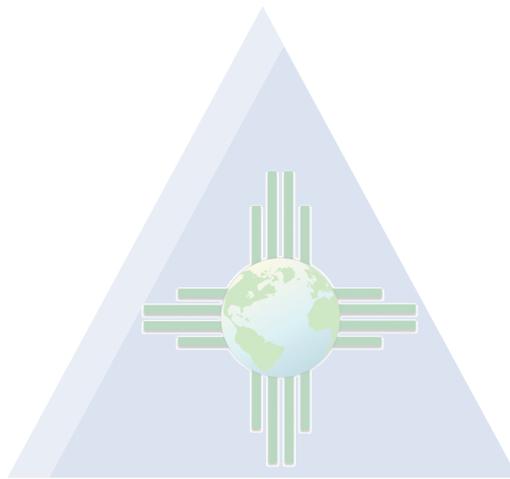
Gold Leaders are recognized for a maximum of three years and may renew their partnership. To retain status as a Gold Leader, an entity must continue to meet all partnership eligibility requirements as outlined in this handbook and:

- ◆ Continue to maintain and implement an EMS in compliance with the EMS Guidelines (Appendix A).
- ◆ Complete the Gold Member Annual Reports to Green Zia Environmental Leadership Program by August 31st of each year, in order to track progress towards timeline and goals and explain any unmet requirements.
- ◆ Failure to meet the required milestones may lead to probation or termination of a member's designation.

LEADERSHIP PROGRAM COMPLIANCE

In addition to Environmental Compliance, entities must meet deadline dates for retention and renewal requirements. NMED may place a member on probation or terminate Leadership Program designation for any of the following GZELP Program compliance issues:

- ◆ Failure to submit Annual Progress Reports as required by Silver & Gold partner levels
- ◆ Failure to submit a Renewal Request as required by Silver & Gold partner levels
- ◆ Failure to complete goal requirements for partnership



ENVIRONMENTAL MANAGEMENT SYSTEM (EMS) REQUIREMENTS

(Note: This section closely reflects the ISO 14001 (2004) requirements.)

Guidance:

There are many models of EMS. The department considers an EMS to be a flexible system designed to continually manage and reduce an entity's environmental impact. The complexity of an EMS can range from simpler and more streamlined for smaller, less complex organizations and businesses to very comprehensive for larger, more complex entities. Regardless of complexity, all EMSs must identify and rank the full spectrum of an entity's environmental impacts and all applicable environmental legal and regulatory obligations. The EMS must be fully supported by and incorporated into the existing management structure of a company or entity and must be appropriate to the nature, scale, and potential environmental impacts of an operation or entity. The department's EMS framework is similar to ISO 14001, but certification to the international standard is not required by the department.

1. Environmental Policy

An environmental policy statement should demonstrate a high tier of commitment to environmental management through the establishment of guiding principles. The environmental policy should be available to the public and be communicated to all employees who work for or on behalf of the entity. The environmental policy should be appropriate to the nature and scale of the entity or business and should include all of the following:

- A commitment to environmental excellence and continual environmental improvement;
- A commitment to pollution prevention;
- Commitment to comply with applicable environmental regulations and other requirements; and,
- A statement acknowledging the importance of communication with employees and the public

Guidance:

The policy statement should be kept brief, appropriate to the scope of the EMS and meaningful to management, employees and to the entity as a whole. A brief description of the business or entity may be included in the policy statement. Procedures that convey how frequently a policy will be reviewed, who is responsible for reviewing the policy, how the policy is communicated to employees and how the policy will be made available to the public should also be developed.

2. Planning

2.1 Environmental Aspects - Identification and prioritization of activities and the corresponding aspects that have or can have an impact on the environment.

Guidance:

Identifying environmental aspects and impacts can be one of the most challenging elements of an EMS. Begin by identifying activities at the facility and the corresponding environmental aspect resulting from these activities. Include day-to-day operations, infrequent operations and activities related to potential accidents or emergencies. From this analysis the expected or likely environmental impact can then be identified. The impacts should be ranked to identify the most significant impacts. The EMS should include procedures to help identify both positive and negative actual or potential environmental impacts and to ensure that the impacts and opportunities for environmental improvement are considered to determine significance and set environmental objectives.

From the comprehensive list of environmental impacts, the next step is to develop the criteria that will be used to determine the significance of each impact. This step identifies the aspects of an entity's operations that have or can have significant impacts on the environment.

Guidance:

The significant impacts will be used to develop other elements of the EMS including: setting environmental objectives and targets; developing operational procedures; training employees; and, establishing monitoring and measuring programs. A consistent methodology that includes criteria such as any related legal requirements, the likelihood of occurrence, the frequency, intensity, duration and offensiveness, or concerns of interested parties or the community of potential or real environmental impacts, should be considered. Once criteria are selected, a procedure to rank or score the criteria should be developed. The ranking can be numerical or based on a rating of high, medium or low. Regardless of the ranking or scoring system selected, it is important that each environmental impact is analyzed in a consistent way to develop a sound evaluation process.

2.2 Legal and other Requirements - A list of legal and other requirements should include all applicable environmental federal, state and local requirements related to its environmental aspects, including all applicable environmental permits and the terms and conditions contained therein. Company-specific requirements or other external requirements (e.g., community, customer, shareholders, etc.) should also be included with this list. An entity must also determine how these requirements apply to its environmental aspects.

Guidance:

Identifying and keeping up-to-date with legal and other requirements is important to the implementation and continued improvement of the EMS. A procedure should be developed to describe how to identify any environmental requirements that are applicable to the scope of the EMS. Consider federal, state and local requirements as well as all environmental permits, industrial codes of practice, agreements and non regulatory guidelines. Tables that list regulatory and other requirements, including recordkeeping requirements and external regulatory inspections are helpful in tracking and keeping up-to-date with legal and other requirements.

2.3 Objectives and Targets - The EMS should include objectives and targets to help address environmental impacts in a definitive, systematic way. The target is a detailed performance requirement that supports a specific objective. Objectives and targets are often combined together into one procedure in the environmental management program. Each objective should be realistic, quantitative and measurable.

Guidance:

When establishing objectives, consider the following: significant aspects; the environmental policy; legal and other requirements; technological options; pollution prevention opportunities; financial, operational and business requirements; and views of interested parties and/or the surrounding community.

2.4 Environmental Management Program(s) - An environmental management program is a systematic way of managing environmental objectives and targets. The program should focus on continual improvement and address significant impacts of an entity's activities. The program should include a list of roles and responsibilities for implementation, maintenance and control of the EMS.

Guidance:

An action plan should be developed for achieving compliance and meeting objectives and targets. The action plan should define the steps that will be taken to achieve each stated objective and target, include who is responsible for meeting the target, the timeline for achieving milestones and the target date for completion.

3. Implementation and Operation

3.1 Structure and Responsibility - An EMS must define structure and responsibility. This element defines and documents roles and responsibilities for your entity. These roles and responsibilities must be clearly communicated to appropriate personnel.

Guidance:

Identify all personnel responsible for activities that could have an impact on the environment. The EMS should document roles, titles and responsibilities. The personnel responsible for serving as management for purposes of reviewing the EMS should also be included in this list.

3.2 Training, Awareness and Competence - Successful implementation of an EMS is dependent on a program that includes employee and supply chain training and awareness. Training is needed when the EMS is first implemented; new employees are hired; employee responsibilities change; procedures change; new processes or equipment is installed; suppliers are brought on-site, or new regulations are put in place. The EMS should include procedures that establish and maintain environmental training needs for all employees and subcontractors who have responsibility or authority over activities that have significant environmental impact or the potential for significant environmental impact.

Guidance:

Employees (and suppliers) should be trained on relevant elements of an EMS. Training should include information on the environmental policy, the significant environmental aspects of their activities and related work instructions, objectives and targets, their EMS roles and responsibilities, the emergency action plan and other pertinent information related to the EMS. The EMS should identify and track the training needs of each employee (within the scope of the EMS). If questioned in the field, employees should be able to demonstrate competency about the EMS and their environmental responsibilities.

3.3 Communication - The EMS must include a communication plan for internal communication and external community outreach and communication. Both a process and procedures for communicating information on environmental issues and the EMS to employees and with the public, including the local community and interested groups, should be developed.

Guidance:

Environmental leaders should maintain a community outreach and communications plan to effectively communicate the environmental impact, objectives and targets of your business or entity and to address the community's perceptions and reactions to this information. Public communication and outreach activities can vary across facilities depending on the size, setting, type of operation or other sensitivities.

At a minimum, public communication and outreach plans should include procedures for: (1) identifying and responding to community concerns; (2) informing the community of important matters that might or do effect it; and, (3) reporting on the facility's environmental policy, EMS and performance commitments. Other communication efforts might include raising environmental awareness in the community, providing or assisting with training, education or incentive methods that focus on environmental improvement and excellence in the community. Active communication with employees and the community help to convey: what an EMS is; what management's commitments are with respect to environmental issues; the benefit(s) an EMS brings to the business or entity; and progress in meeting objectives and targets. Communication plans and techniques will vary for each company or entity.

3.4 Environmental Management System Documentation – The EMS documentation element is designed to ensure that entities create and maintain documents in a manner sufficient to implement the EMS. Documentation can be maintained in paper or electronic form.

Guidance:

The EMS documentation requirement can be met by development of an EMS manual. The manual

should detail the overall structure of the EMS and ensure that the EMS is understood and operating as designed. EMS procedures should be either referenced, but not included in the manual, or incorporated consistently into the manual. Written procedures are not required for all elements of the EMS. A separate procedures document from the manual is a cleaner and clearer approach. The following depicts a common document hierarchy.

Policy ⇔ EMS Manual ⇔ Procedures ⇔ Work Instructions ⇔ Records

3.5 Document Control – Controlling documents is another important element of an EMS. An established document control process helps to track progress and improvements. A procedure that describes how documents will be controlled and identifies personnel responsible for controlling EMS documentations should be included in the EMS.

Guidance:

Keep the document control process simple and within easy access. Creating a master EMS document list may be helpful. Documents should be periodically reviewed and revised as necessary. Original documents should be dated and identified as the most recent version. Current versions of essential documents should be available at all locations as appropriate. One way to track documents is to use headers with pertinent tracking information. Obsolete documents should be removed from the working files, but retained when necessary for legal and or historical recordkeeping purposes. Reasonable precautions should be taken to protect original documents from damage, loss or other accidental events, such as fire or flood. Controlled documents include: the environmental policy; related procedures; and, records and forms used to implement and track the EMS.

3.6 Operational Control – Operation and maintenance programs for equipment and other activities that are related to legal compliance and achieving the objectives and targets in the EMS should be included as part of the EMS.

3.7 Emergency Preparedness and Response – It is important to identify the potential for and how to respond to accidents and emergency situation of environmental aspects.

Guidance:

The outcome should result in having documented procedures/instructions in place for emergency type situations. They should be easy to reference and use, and all effected personnel understand how to react in emergency situations. It is important to include prevention and mitigation of environmental aspects of potential accidents and emergencies. Should an emergency situation arise, it is important to review and revise procedures as applicable after the situation is controlled to ensure they are complete and accurate.

4. Checking and Corrective Action

4.1 Monitoring and Measurement - Establish and maintain specific measurable metrics and/or goals to monitor progress toward achieving and obtaining goals. This data will be used to validate and support EMS efforts within the department and for other Environmental Stewardship Program needs (i.e., publications, presentations and information dissemination).

Guidance:

The outcomes must be measurable and should be linked to the environmental policy, objectives and targets of a company or entity. Measurable goals might include: quantity of air pollution reduced or mitigated; quantity of water pollution reduced or mitigated; quantity of hazardous and solid waste reduced or mitigated; quantity of water and energy use reductions; and, reduction in risk to employees and the community. For example, environmental performance might be reported in solid waste reduction in tons per year; hazardous pollutants (air, water, or waste) in pounds per year; water use reduction in gallons per year; energy use reduction in kWh per year; and, air pollutant reductions (CO₂, PM, and VOCs) in tons or pounds per year. Other measures might include pollution prevention performance

information and community involvement measures such as increased reporting to the community through public reports (i.e., sustainability or environmental reports), and community involvement in identifying goals of facility.

4.1.2 A program should also be in place for ensuring equipment used for monitoring and measuring environmental conditions is calibrated according to the manufacturer's recommendations.

4.2 Nonconformance and corrective and preventive action – Establish and maintain procedures for investigating and correcting nonconformance.

Guidance:

Identify the cause of the nonconformance. Implement the necessary corrective action. Implement and/or modify controls necessary to avoid repetition of the nonconformance. Record any changes in written procedures resulting from the corrective action

4.3 *Records* – Establish and maintain procedures to provide and require records to be kept.

Guidance:

Records should be identified, maintained and show disposition by determining retention times. Records should be easily retrievable, legible and traceable.

4.4 *Environmental Management System Audit* - Procedures to provide for regular self-initiated regulatory compliance and EMS (systems) audits must be included in the EMS. Both internal and external or third party audits should be conducted on a regular basis. Effective mechanisms (procedures) should be in place to assess compliance with environmental laws; assess conformance with the procedures and systems of the EMS; assure that effective mechanisms are in place to promptly and adequately respond to and address violations of applicable environmental requirements or nonconformance of the EMS.

Guidance:

The entire EMS needs to be audited periodically to identify any inconsistencies between your EMS requirements and actual practices and measurements. An audit is an important tool to determine if your EMS is being properly maintained and implemented. Audits will help to identify and resolve EMS deficiencies and can be used to assess regulatory compliance and to update environmental and legal requirements in the EMS. As a rule of thumb, all parts of the EMS and compliance related issues should be audited at least once each year. To be effective, the EMS should include:

- Audit procedures and protocols that are specific to your company and operations;
- A schedule of appropriate audit frequencies;
- Auditor training; and,
- Appropriate audit records. The internal and external EMS auditors should be trained in auditing techniques and management system concepts. Auditors should also be objective, knowledgeable of the applicable environmental regulations and of the facility operations.

4.5 *Management Review* – Establish and maintain a procedure for management review of the EMS.

Guidance:

Reviews may include: (1) results from audits; (2) the extent to which objectives have been met; (3) the continuing suitability of the environmental management system in relation to changing conditions and information; (4) concerns amongst relevant interested parties. The reviews should be documented/recorded.

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End of Appendix A