Documenting Your Environmental Management Plan

A Workbook for Small Business

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

EPA
Small Business Division

Acknowledgements

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Documenting your Environmental Management Plan—A Workbook for Small Business (Workbook) is for business owners who are committed to improving environmental management within their business operations. Why does your company need an *Environmental Management Plan* (*EMP*)? It helps you to keep track of all of your environmental management activities so you can better streamline and organize them, helping to keep the time and effort employees have to devote to them at a reasonable level. Done well, the *EMP* will make environmental management easier and more natural for everyone who is involved in it at your business. Employees appreciate that the *EMP* spells out exactly what's expected of them. The *EMP* provides a framework to ensure your business is in compliance with environmental regulations. It also allows you to more easily see opportunities for improvement and cost savings that may even take your business beyond compliance. Finally, if you have been thinking about developing an *Environmental Management System* (*EMS*) that would be certified or recognized by an organization outside of your business, developing this *EMP* will put you in a good position to do that. (For more information about *EMS*s, see http://www.epa.gov/ems/.)

As the business owner or leader of this effort, you will probably find it useful to read through this Workbook from beginning to end to get an overall picture of what the *EMP* entails and the issues you can expect to encounter along the way. Each section includes an introduction to explain the tasks to be completed, a worksheet to help you through the steps, and an example from one of two hypothetical small businesses: a furniture refinishing company and a marina. The examples will give you an idea of how that portion of the *EMP* might look once it is completed.

After you have reviewed this Workbook, you can work with others in your business to build your *EMP* one step at a time. You may want to appoint an Environmental Team to help pull it together. The idea is to make steady progress without biting off so much at one time that working on the *EMP* begins to detract from day to day business operations that are obviously your first priority. The important thing is to do a good job of putting the *EMP* in place, working away at it a little at a time, even if it takes a year or more.

Much of what you need in order to put together an *EMP* is likely already in place at your business. This includes records, procedures, and training that your business is doing to comply with environmental laws and regulations. By going through this Workbook, you can apply a management system to these existing elements, much as you apply accounting principles to bring order to your business' financial transactions.

The Workbook is designed to go hand in hand with the *Practical Guide to Environmental Management for Small Business* (*Guide*). The Guide provides more detail about the steps to take to improve your business' environmental management activities. The Workbook gives you a place to keep and organize all of the information you compile while doing it. The table on the following page provides a crosswalk between the Guide and Workbook sections to ease your information transfer. It is not necessary to have the Guide to begin working on your *Environmental Management Plan*, but if you would like to obtain a copy, call the U.S. EPA Small Business Division at 800-368-5888 or download it from www.epa.gov/ems/. U.S. EPA's Small Business Division has also compiled factsheets entitled *Plugging Into Best Environmental Management Practices for Small Business* for certain business sectors. If your business is represented by one of these sectors, this information may be helpful as you put together your *EMP*.

This table provides a crosswalk between the Workbook and the Guide so you can review related background information and the pertinent steps to take as you begin working on a particular worksheet.

Documenting Your Environmental Management Plan – A Workbook for Small Business	*Practical Guide to Environmental Management for Small Business*
Environmental Policy	**IV. Keeping the Program Alive**
Responsibilities	**IV. Keeping the Program Alive**
Getting it Written Down – Environmental Manual	**II. Responsible Environmental Basics** **IV. Keeping the Program Alive**
Making Progress Over Time – Setting Goals	**III. Saving Money Through Sound Environmental Management** **IV. Keeping the Program Alive**
Keeping Track of Information – Recordkeeping	**II. Responsible Environmental Basics**
Keeping Track of Information – Document Control	**II. Responsible Environmental Basics**
Master Schedule of Reports, Notifications, and Permits	**II. Responsible Environmental Basics**
Communication	**V. Taking it Outside Your Facility**
Training	**II. Responsible Environmental Basics**
Keeping the EMP Alive and Well	**III. Saving Money Through Sound Environmental Management** **IV. Keeping the Program Alive**
Summary	**VI. Summary**

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While it is good to avoid unnecessary jargon and acronyms, it helps to have a shared understanding of a few terms so that everyone in your company understands how the *Environmental Management Plan* works and what their role is. Defined words are italicized throughout the document.

Applicable Laws

The laws of Congress, including the rules, regulations, requirements, and policies promulgated under those laws, as well as state and local laws, rules, regulations, requirements, and policies governing protection of the environment and protection of public health and safety.

Best Management Practices (BMPs)

Good practices that apply the most up-to-date knowledge and technology to achieve and maintain a level of environmental performance that goes beyond what is necessary to comply with *applicable laws*.

Corrective Action

A specific way to correct an existing problem or non-conformance when performance deviates from expectations set out in the *EMP*.

Critical

A term we use in this workbook to indicate the responsibility, *goal*, function, or element of the *EMP* necessary to make sure your company handles spills properly, keeps its employees safe, and stays in compliance with environmental regulations.

Environmental Management Plan (EMP)

The actions an organization is taking to determine how it affects the environment, complies with regulations, keeps track of environmental management activities, and meets environmental *goals* and *targets*. It also documents key elements of environmental management including the *environmental policy,* responsibilities, *environmental manual*, applicable *standard operating procedures* and *BMPs*, recordkeeping, document control, reports, communication, training, monitoring, and *corrective action*.

Environmental Management System (EMS)

An organizational approach to environmental management that incorporates quality improvement principles (sometimes referred to as "Plan-Do-Check-Act") to develop, achieve, review, and maintain an *environmental policy*. Broad EMS elements include planning, implementation, checking and *corrective action*, and management review.

Environmental Manual
The collection of information that identifies *applicable laws* and outlines the organization's approach to complying with or exceeding their requirements.

Environmental Policy
A statement of the organization's commitment to the environment. It is at the heart of the *EMS* and the framework for planning and action undertaken through the *EMS*.

Goal
A general statement of a desired outcome to be achieved through the business' *EMP*.

Important
A term used in this workbook to indicate the responsibility, *goal*, function, or element of the *EMP* that helps your company be efficient or proactive, to save money or time, or increase the respect and goodwill of employees and community members.

Preventive Action
A specific way to keep a problem or non-conformance with the *EMP* from recurring in the future.

Process Map
A picture or diagram that shows the flow of materials through the business, including what comes in (inputs) and what goes out (outputs, including wastes).

Standard Operating Procedure (SOP)
A set procedure used to carry out a specific activity or operation. It usually includes a step-by-step breakdown of how and when a task is performed on a day to day basis. SOPs are usually written and filed or posted in an accessible location.

Target
A specific statement that conveys a measurable degree of progress toward a particular *goal*.

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An *environmental policy* shows that managing environmental issues is a high priority for your business. It is like a rudder because it steers all of the additional steps your business will take to put together its *EMP*. Later, when you are dealing with all the details that inevitably come along with environmental management, it will be useful to refer back to the *environmental policy* to distinguish the important issues from distractions and to decide in what order to tackle things.

An *environmental policy* begins with a declaration of your business' commitment to the environment. It usually includes a commitment to prevent pollution and to continuously improve environmental performance. Many businesses also commit to keeping employees and community members safe as part of their *environmental policy*. In addition to a declaration, the *environmental policy* states how the business will live up to its declaration.

The *environmental policy* does not have to be lengthy or wordy. The more to the point, the more effective it will be in communicating your intent. When putting the policy together, consider what your company is trying to achieve with your environmental activities and how you will accomplish your *goals*. It should only include strategies and actions that you are willing to commit your business' resources to. Also think about how the policy will be regarded by employees within your business. Later, once you get it fine tuned, you will find that your *environmental policy* can be helpful to communicate your business' approach to environmental management to local officials, customers, and others outside your company.

A sound *environmental policy* makes a commitment to comply with *applicable laws,* implement pollution prevention ideas, and put in place *Best Management Practices* (*BMPs*) that are reasonable, effective, and appropriate for your business. It should also be specific to your business activities and reflect your business' unique culture.

Use the worksheet on the following page to help you and your team create an *environmental policy* that suits your business. Keep in mind that the policy will be periodically reviewed and improved. The important thing is to get something down on paper that you feel your company can stand behind and live up to.

Before or at the same time your business is developing the environmental policy, consider issuing a memo or statement to all employees officially kicking off the effort to develop an EMP. If employees understand that the goals of the EMP are important to you as a business owner, they are more likely to feel that achieving them is an important part of their jobs.

Environmental Policy Worksheet

Step 1

Think about what your company wants to achieve through your *environmental policy*. Brainstorm a list of action words or very short phrases that reflects your company's environmental commitment to your employees, customers, and the community.

Step 2

Drawing on the list of words and phrases you have brainstormed above, put them together into a one or two sentence statement.

Step 3

List the ways that your company is, or plans to, achieve the commitment(s) expressed in the statements above.

Step 4

Draw on the list you developed in Step 3 to put together a statement of how your company will fulfill its environmental commitment(s).

Step 5

Combine the statements you developed in Steps 2 and 4 and fine tune them to make your complete *environmental policy*.

Environmental Policy Examples

Cove Marina Environmental Policy

The management and staff of Cove Marina are committed to preserving and protecting the beauty of our nation's water so that future generations can also enjoy these precious resources. In support of this commitment, we strive to support clean boating and marina practices at our marina and utilize the opportunity to educate our patrons on sound practices. Our goal is to lead the way by exemplifying responsible use of the "river" resource. Operations at Cove Marina are conducted in a manner aimed at achieving and maintaining compliance with all environmental rules and regulations. We strive to continually improve our environmental performance and encourage and expect the day-to-day activities of employees at all levels of our company to support our environmental goals.

Finley Refinishing Environmental Policy

Finley Furniture preserves your heirlooms while protecting the Earth. To accomplish this, the people of Finley Furniture will produce a high quality product using safe and environmentally sound business practices and work to foster a culture focused on excellent environmental performance. Finley Furniture follows through on this commitment by complying with environmental laws and regulations, wisely investing resources toward managing environmental affairs, and training all employees in the knowledge and skills necessary to carry out their job in a safe and environmentally responsible way.

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Having roles and responsibilities clearly written out helps employees understand what part of environmental management activities they are responsible for and how their role relates to the roles of others. By establishing who is responsible for what, the *EMP* helps to increase accountability within the company and motivates employees to take more personal responsibility for environmental management because the tasks are well defined and not overwhelming. By making sure all tasks are assigned, it is less likely that they will fall between the cracks or that environmental management activities will backslide if a key employee leaves.

Each small business is unique and has to work out environmental roles and responsibilities in a way that fits into its particular organization and culture. When assigning responsibilities, it may be helpful to distinguish between *critical* and *important* ones. It is also beneficial to find a balance of responsibilities among all employees so that environmental management will not take up too much of anyone's time and will truly be a team effort.

After you have defined responsibilities, you need a way to communicate them to each employee. This is best done formally by giving each employee their own copy of their specific environmental responsibilities, signed by the company owner or personnel manager, with a copy also being placed in their personnel file. This way, they can be assured that they are within the scope of their job when doing assigned environmental duties and have the opportunity to ask for clarification if they have questions.

Spread responsibilities among employees. ***For example:***

1- Each manager could be responsible for all environmental requirements within her/his department; or

2- Different individuals could specialize in different environmental responsibilities across the entire company.

Worksheet for Assignment of Environmental Responsibilities

Step 1

In the left hand column of the table on the next page, list the major positions in your company that have environmental responsibilities.

Step 2

In the middle column, identify all of the environmental management responsibilities for each position.

Step 3

In the right hand column, designate each responsibility as either *critical* or *important*. *(see* definitions section)

Step 4

Begin by adding *critical* environmental responsibilities to employee position descriptions. If there is going to be a lot of work involved while getting the *EMP* in place, consider phasing in the *important* environmental responsibilities at a later time.

Assignment of Environmental Responsibilities

Position	Environmental Responsibilities	Designation[1]

[1]Designation = *critical* or *important*.

Examples of Environmental Responsibility Assignments

Environmental Responsibilities at Cove Marina

Position	Environmental Responsibilities
Owner	**Critical** Oversee environmental policy and Environmental Management Plan (EMP). Oversee environmental manual. Serve as primary contact for regulatory inspectors. Commit resources to achieve environmental goals. **Important** Review audit results and progress on achieving goals and revise EMP as needed. Update employees annually on environmental policy and goals. Incorporate environmental procedures into patron contracts.
All Employees	**Critical** Attend training on and understand role in emergency action plan. Attend training on and follow environmental *Standard Operating Procedures* (SOPs) and *Best Management Practices* (BMPs). Participate in annual review of marina environmental policy and goals.
Dockmaster	**Critical** Act as marina's Emergency Coordinator for emergency action plan. Maintain emergency action plan and train employees on it. Track and inform Owner of changes to regulations affecting marinas. Maintain environmental permits and provide quarterly reports. Develop environmental SOPs and train employees on them. **Important** Educate patrons about marina's environmental policy and procedures and monitor their activities for conformance.
Store Manager	**Critical** Educate patrons about environmental concerns related to product use, equipment rental, and maintenance activities. **Important** Work with appropriate marina employees to evaluate effectiveness of environmentally sound products. Stock environmentally sound products that have proven to be effective.

Environmental Responsibilities at Cove Marina *(continued)*

Position	Environmental Responsibilities
Maintenance Manager	**Critical** Oversee management of wastes generated by employee activities and compile quarterly waste data reports. Perform sampling required by wastewater permit and submit reports. **Important** Monitor employees' use of environmental SOPs and BMP's.
Maintenance Technician	**Critical** Conduct weekly hazardous waste container inspections. Perform quarterly visual inspections as required by storm water permit. **Important** Monitor oil/water separator for malfunction daily.
Grounds-keeper	**Critical** Monitor for improper disposal practices while emptying trash. **Important** Utilize water conservation measures, integrated pest management, and other means to reduce use of chemical products on grounds.
Fuel Station Attendant	**Critical** Monitor fueling operations and dock activities for consistency with marina environmental policy and procedures and report any problems to Dockmaster. Watch for leaks or spills from hoisting equipment or vessels and, if any are observed, initiate emergency action plan. **Important** Hand out environmental information to patrons and answer related questions or refer them to Dockmaster.

Environmental Responsibilities at Finley Refinishing

Position	Environmental Responsibilities
Business Owner	**Critical** Oversee and approve environmental policy. Authorize annual budget for environmental program. **Important** Establish and lay out expectations for the Environmental Team. Review the environmental policy and the Environmental Management Plan (EMP) annually to make sure they are in keeping with business strategy.
All Employees	**Critical** Attend training and know their role in the emergency response plan. Attend training in and follow environmental Standard Operating Procedures (SOPs.) Be familiar with the environmental policy. **Important** Understand environmental goals and targets and know role in helping to achieve them.
Environmental Team Members	**Critical** Guide the collection of information needed to gage environmental compliance and performance. Put together the EMP and review and revise it annually. **Important** Set goals and targets annually to improve environmental performance.
Shop Supervisor	**Critical** Act as Emergency Coordinator and maintain emergency response plan. Oversee hazardous waste management program. Oversee environmental SOPs used in each shop. Train employees on environmental SOPs and emergency procedures. **Important** Train employees on their role in achieving goals and targets. Maintain an up to date process map for each shop. Conduct performance checks in course of normal work responsibilities to observe whether employees are following environmental SOPs.

Environmental Responsibilities at Finley Refinishing *(continued)*

Position	Environmental Responsibilities
Production Control Assistant (Environmental Coordinator)	**Critical** Maintain environmental manual. Track and inform Environmental Team of changes in regulations. Identify environmental training requirements for each employee. **Important** Work with Shop Supervisor to follow up on audit findings and make sure corrective and preventive actions are carried out.
Human Resources Manager (Safety Coordinator)	**Critical** Work with Shop Supervisor and the Production Control Assistant to be sure adequate spill control supplies are made available to employees in each shop and that they have training to know how to use them safely and properly. **Important** Evaluate whether proposed environmental performance improvements will also improve employee safety.
Business Manager	**Critical** Develop annual budget for environmental management program. **Important** Keep track of costs associated with environmental management, such as those associated with waste disposal, spill preparedness, and training. Keep track of savings associated with the environmental program, such as lower purchasing, disposal, or energy costs. Assist with cost-benefit analysis of proposals to improve environmental performance.
Shipping and Receiving Specialist	**Critical** Oversee and maintain records for hazardous waste shipments. **Important** Track hazardous chemical raw materials received by business. Maintain MSDS sheets and look for opportunities to substitute less hazardous chemical products.

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One of the greatest benefits of an *EMP* is that everything pertaining to environmental management is written down and can be found in one place. This helps ensure that tasks are done consistently throughout the business. The *environmental manual* outlines the requirements of *applicable laws* and how your business plans to meet them.

Your business most likely already has many written documents about your environmental management activities. Begin by finding them all and arranging them in a logical order. Then, beginning with the activities your business must do to keep in compliance, figure out where your gaps are, what you have and what is missing. This is probably the most time consuming task of putting together the *EMP*, but it will more than repay itself in time saved in the future because your *EMP* will allow you to find information when you need it, even if the responsible person is not around.

Now you need to assemble the underlying information you have gathered into an *environmental manual* that will help your business follow its *EMP*. The *environmental manual* describes how environmental management activities are organized within your business. It is usually easiest to arrange this by the major areas of environmental regulations such as hazardous waste management, air compliance, or spill preparedness. Use the sample outline on the next page in conjunction with the Environmental Manual Planning Worksheets at the back of this section to help make sure you have the basics covered.

Sample Environmental Manual Outline

Environmental Management Overview

- Person(s) in charge.
- Overview of regulations that apply.
- System for monitoring changes in regulatory requirements.

Emergency Preparedness

- Person in charge.
- Compliance status (specific regulations that apply).
- Procedure for updating Emergency Plan.
- Availability of Emergency Plan.
- Description of training program.
- Description of records.

Hazardous Waste Management

- Person in charge.
- System for identifying hazardous waste streams.
- Inventory of hazardous waste streams and how they are managed.
- Compliance status (specific regulations that apply).
- Summary of permit requirements (if applicable).
- Description of training program.
- Description of records.

Air Management

- Person in charge.
- System for identifying air emissions.
- Inventory of air emissions.
- Compliance status (specific regulations that apply).
- Summary of permit requirements (if applicable).
- Description of training program.
- Description of records.

Wastewater

- Person in charge.
- Compliance status (specific regulations that apply).
- Copy of current sanitary sewer ordinance.
- Summary of permit requirements (if applicable).
- Description of training program.
- Description of records.

Storm Water Management

- Person in charge.
- Site drainage map.

- Location of drains and outfalls and their downstream connections.
- Compliance status (specific regulations that apply).
- Summary of permit requirements (if applicable).
- Description of training program.
- Description of records.

Note that this sample outline is not a complete list. For example, it does not include regulations pertaining to very specific substances such as polychlorinated biphenyls (PCBs), pesticides, or chlorofluorocarbons (CFCs). It is very important to develop a complete understanding of the requirements of all the *applicable laws* your business needs to comply with at this stage, or else your *EMP* will be flawed in that it will not help you assure compliance. If you need help with determining what requirements of *applicable laws* apply to your business, contact your state Small Business Assistance Program.

Once you have the general outline developed for each area, you should include these additional details:

Environmental Plans and Permits

These are plans and documents that you are required to have to comply with regulations or that you choose to have to manage your environmental affairs better. Examples include your current emergency plan, any current environmental permits your business holds, and your annual environmental training plan. Your *environmental manual* should list each of these and tell where the most current copy can be found.

Environmental Standard Operating Procedures (SOPs)

Having written environmental *SOPs* helps to make sure that important tasks don't get overlooked and are easy to communicate. They can make cross-training easier, so that someone will be available to perform a critical function even if the regular employee is away. They can make turnover easier because the person hiring will have a better idea of what each job entails. A good *SOP* spells out what it is about, who it applies to, and what needs to be done in a step-by-step manner. You should also include the date the it was first issued and the latest revision date. If your business is ISO 9001 certified, you already have *SOPs* for your major business processes. This will give you a leg up because all you have to do is make sure environmental management aspects are covered within them. You may also have safety *SOPs* for certain tasks to which environmental aspects can easily be added.

An environmental *SOP* can stand alone or consist of steps within a more comprehensive *SOP* for a process within your business. For example, the procedure for turning a chemical waste over to the person responsible for arranging its shipment would be one that can stand alone. A *SOP* for a spray painting operation would include overall instructions on how to apply paint coatings as well as covering environmental aspects such as: keeping air emissions, like volatile organic compounds (VOCs), to a minimum; steps for cleaning the paint gun in order to generate as little waste as possible; and steps to contain and manage the wastes that are generated. At the end of this section there is a worksheet to guide you in developing environmental *SOPs*.

Best Management Practices (BMPs)

After you have developed environmental *SOPs* for your business operations, it is a good idea to look outside your business for *BMPs* that are appropriate to your business. Sources include industry or trade associations for your type of business, university and state pollution prevention assistance programs, state Small Business Assistance Programs, and the U.S. EPA Small Business Division. If you find *BMPs* that apply to your business, take them to your Environmental Team to consider whether they would be desirable and feasible to adopt. Include any *BMPs* that your business uses in the *environmental manual*.

Following are three worksheets to help you pull together your environmental plan. The first worksheet will help you outline the *environmental manual* for your business. The second worksheet is to assign responsibility and target dates for developing sections of the *environmental manual* that aren't complete. The third worksheet will guide you in developing a *standard operating procedure* for a particular process.

Environmental Manual Planning Worksheets

Step 1

Drawing on the knowledge of your Environmental Team, *process maps* for each area of your business, and the Sample Environmental Manual Outline on page 17, fill out the form on the next page, the Environmental Manual Section Guide. Fill out one form for each section of the Environmental Manual corresponding to an area in which your business has environmental management activities. On each form, identify and list all of the regulations that pertain to the activities covered by this section. It is very important that you identify all the requirements of environmental regulations that your business must follow before proceeding any further. If you are not certain what regulations may apply, contact your state Small Business Assistance Program or the U.S. EPA Small Business Division for assistance. Next, referring to the Assignment of Environmental Responsibilities table on page 11, identify the best person to be responsible for developing this section of the Environmental Manual and list their name on the form.

Step 2

Ask the person responsible for each Environmental Manual section to review *applicable laws* to figure out and list on the corresponding Environmental Manual Section Guide what plans and documents are required to be maintained and what SOPs are needed to make sure regulatory requirements are met. If there are any BMPs that your business is already using that apply to this section, identify them on the form as well. Once they are filled out, all of the forms can be organized together to develop a detailed outline for the Environmental Manual.

Step 3

Ask the person responsible for each Environmental Manual section to identify what needs to be done to complete it, such as collecting additional information, developing new procedures, or revising existing ones. Using the Environmental Manual Task List table on page 22, they can list the tasks that need to be taken care of. For each one, they need to decide who should be responsible for pulling together the necessary information and procedures and agree on a target date for completing this task. Use the Environmental Manual Task List table on page 22 to organize your efforts. (An example is given as a guide.)

Step 4

After you have developed your business' Environmental Manual, don't forget to periodically review it to incorporate changes in regulatory requirements, business operations, SOPs, or BMPs. You can use the Environmental Manual Section Guide and the Environmental Manual Task list to guide this process.

Environmental Manual Section Guide

Section Title: _____

Section #: _____

Applicable Regulations:

1. _____
2. _____
3. _____

Person in Charge: _____

Required Plans, Records, and Documents:

1. _____
2. _____
3. _____
4. _____

Associated SOPs:

1. _____
2. _____
3. _____
4. _____

Associated BMPs:

1. _____
2. _____

Environmental Manual Task List

Section # & Title	Applicable Laws	Task(s)	Person Responsible	Target Date
Example **Emergency Preparedness**	29 CFR 1910.120, Wis. Adm. Code NR 615.	1. Revise emergency response plan to meet requirements. 2. Update training requirements and develop schedule.	Micky Smith	9/30/02

Cove Marina Environmental Manual
Section 4 – Air Management

Person in charge
Business Owner.

System for identifying air emissions
Annual survey of activities on site that generate air emissions.

Inventory of air emissions

Inventory of Air Emissions—January 2002		
Boat engine exhaust	Gasoline-fueled	# of boats and hours vary
Car engine exhaust	Gasoline-fueled	# of cars and hours vary
Welding machine	Various metals	Usually less than 8 hours/day, approximately 20 hours/week
Airless spray paint gun	Various paints	Intermittently 8 – 10 hrs/ day on no more than 2 boats at a time
Aerosol spray paints	Cans – assorted manufacturers	Average 10 cans/day
Paint removal	Sanding (produces dust)	Intermittently 8 – 10 hrs/day on 1 – 3 boats at a time

Compliance status
According to staff from the Wisconsin Small Business Assistance Program, Air Quality Regulations are enforced for Cove Marina by the State Department of Natural Resources (DNR). They advised that we submit a list of emission sources to DNR and ask for a determination of compliance status. We submitted the list on 4/12/02. In a follow-up call on 5/12/02, DNR representative stated that these activities would not require a permit because the emission levels are below thresholds that trigger the need for a permit. However, an increase in welding and sanding activities would call for re-evaluation of our status.

See also
4/12/02 letter to DNR from S. Smith, Owner, Cove Marina and 6/1/02 letter from DNR to S. Smith, Owner, Cove Marina.

Summary of permit requirements
Not applicable.

Description of training program

Maintenance Manager trains employees in BMPs for spray paint operations, container management, and bottom sanding operations that reduce air emissions. They are also given training on filling out log books for spray paint, sanding, and welding activities. Training takes place after hire, before they engage in any activities that result in air emissions, with an annual update thereafter.

Descriptions of Records

Log books for spray painting, welding, and sanding activities.

Finley Refinishing Environmental Manual

Section 3 – Hazardous Waste Management

Person in charge

Shop Supervisor.

System for identifying hazardous waste streams

Monthly monitoring of waste containers. Annual comprehensive survey of shop activities.

Inventory of hazardous waste streams and how they are disposed (2001 data):

Type of Waste	Amount Generated (kg)			Disposal Method
	Year	Month	Accumulated	
Solids containing toluene, methyl ethyl ketone (MEK), methylene chloride	1,200	100	600	Off-site hazardous waste incinerator.
Sludge containing methylene chloride, lead	500	41	250	Off-site hazardous waste incinerator.
Sludge containing, MEK, toluene, lead	1,000	83	500	Off-site hazardous waste incinerator.
Spent toluene, MEK, and acetone	900	75	450	Off-site hazardous waste fuel blender.
Wastewater containing methylene chloride	350	29	175	Off-site hazardous waste incinerator.
Excess unused products	275	23	138	Off-site hazardous waste incinerator.
Total	4,225	352	2,113	

Compliance status

EPA ID number – WID 473253456. Finley Refinishing is a small quantity generator that must meet the requirements of Wis. Adm. Code NR 610. These include the following:

- Determine if wastes are hazardous;
- Determine the quantity of hazardous waste generated;
- Notify EPA of hazardous waste activities;
- Ship hazardous waste to a licensed facility using a hazardous waste manifest;
- Submit an annual report to Wisconsin Department of Natural Resources (DNR);
- Comply with packaging, labeling, and marking requirements;
- Meet container management requirements;
- Develop and maintain emergency procedures;
- Meet preparedness and prevention requirements; and
- Train employees.

Summary of permit requirements

Not applicable.

Description of training program

Shop Supervisor trains new employees after hire and before they conduct any activities that generate hazardous waste. Shop Supervisor provides an annual update and refresher training to all employees whose activities generate hazardous waste. Shop Supervisor attends a half-day annual update training given by outside provider. Training includes waste identification, container management *SOPs*, emergency procedures, and updating waste log.

Description of records

- Shipping documents (manifests, land disposal restriction paperwork, packing slips);
- Notification of hazardous waste activity;
- List of satellite accumulation areas;
- Monthly hazardous waste inventory;
- Weekly container inspection logs;
- EPA ID number;
- Employee training records;
- Employee position descriptions and training requirements; and
- Annual hazardous waste activity report.

Standard Operating Procedure (SOP) Worksheet

Step 1

To get organized, review the Environmental Manual Task List table (on page 22) to identify *SOPs* that need to be developed or revised. List them in the left column of the table on the next page. In the second column from the left, document why you are developing the SOP (e.g., to support environmental requirements, OSHA, DOT goals, or *Best Management Practices* and list them in the environmental *SOPs* status). This will assist you in prioritizing SOP development.

Step 2

Review the Assignment of Environmental Responsibilities table (on page 11) to determine who needs to be involved with developing each *SOP* and list them in the third column from the left of the table on the next page. Assign a target date to complete development of the *SOP*.

Step 3

For each *SOP* that needs to be developed:

A. Write a statement of what this *SOP* is about.

B. State who this *SOP* applies to.

C. Meet with the employees who usually perform the part of the task that is being described in this *SOP*. Ask them to help you write down the steps. Keep in mind that if *SOPs* have never been written down before, you may discover that there may be a lot of things going on with what you thought was a simple process. If this begins to develop as you talk with employees, then consider whether there might really be more than one *SOP* needed to adequately cover all the aspects of the process you selected.

D. Combine the information you put together in Steps A – C to develop a draft *SOP*. Then share it with the employees you consulted for their comment and input before finalizing it.

Step 4

Periodically review your *environmental manual* and environmental *SOPs* to be sure they reflect any recent changes to environmental regulations or to processes within your business.

Status of Environmental SOPs

Description of SOPs (new or revised)	Why Written	Who Should Be Involved	Target Date
Example 1 **SOP for annual waste stream inventory (new)**		**Environmental coordinator** **Safety coordinator** **Shop supervisors**	**5/15/02**
Example 2 **SOP to reduce air emissions from methylene chloride stripping (revise chemical stripping SOP)**		**Environmental coordinator** **Safety coordinator** **Stripping shop supervisor**	**6/01/02**

Example SOPs

Note: The following example SOPs focus mainly on the environmental aspects of these tasks. They do not include detailed safety procedures and precautions that may apply to these activities.

Cove Marina

SOP for Bottom Paint Repair

Date Issued	Date Revised
3/31/01	4/24/02

Prepared by
S. Smith, Dockmaster

Scope
This SOP pertains to repair of small areas of hard bottom paint only (less than ten square feet). Larger jobs involving hard bottom paint must be conducted in the spray paint booth under the SOP for Bottom Repainting. Repair of boats with ablative bottom paint is not permitted at Cove Marina, but the Dockmaster can refer boat owners to a nearby boatyard.

Personal Protective Equipment (PPE)
1. Refer to PPE Plan to select PPE for each task below.
2. Retrieve appropriate PPE from the PPE cabinet near the employee lockers in the main repair building.

Remove Paint from Damaged Area
1. Sand boats only in the main repair building or the adjacent covered maintenance bay to prevent sanding dust from blowing away.
2. Place non-absorbent tarp under the area of the boat to be sanded. Tarps are stored in plastic bags on shelf above the sanding equipment.
3. Use vacuum sander only for mechanical sanding.
4. Contain dust from manual sanding within tarped area.
5. When done sanding, vacuum dust from tarp; fold, bag, and put away tarp.
6. Empty dust out of sander and vacuum and place, with used sand paper, into the drum labeled "Hazardous Waste – Sanding Solids," replace the lid tightly when done.

Prepare Surface for New Paint

1. Retrieve acetone container from flammable liquids storage cabinet. Carry it to the work location in the drip pan hanging on the wall beside the cabinet, along with rags from bin labeled "Cleaning Rags." (Do not use paper towels for surface preparation.)
2. Keep acetone container in drip pan throughout the process in case of spills.
3. Position drip pan under area to be cleaned.
4. For cleaning, pour acetone onto rag, wipe surface, and repeat until clean. Replace lid tightly on acetone container.
5. Dispose of used rags in drum labeled "Solvent Contaminated Rags," replacing the lid tightly.
6. If acetone spilled into drip pan, retrieve from the flammable liquids storage cabinet the container labeled "Acetone for Reuse" and carry it to the work location in the second drip pan, along with the funnel. Pour spilled acetone into the "Acetone for Reuse" container using the funnel, while continuing to keep the second drip pan beneath it. Replace the lid tightly when done.
7. Return acetone container(s) to flammable liquids storage cabinet, carrying them in the drip pan. Return drip pan(s), unused rags, and funnel (if used) to storage locations.

Note: If any acetone spills outside of drip pan, follow emergency action plan.

Paint Surface

1. Place absorbent floor covering in an area big enough to capture all overspray. (Absorbent floor covering is stored on the shelf above the spray paint equipment.)
2. Spray surface holding nozzle 12" from surface. Disengage trigger at the end of each pass at edge of sprayed area. Spray at steady speed to keep excessive coating and overspray to a minimum.
3. When finished painting, record quantity and product number of paint used in Paint Log, located on top of the paint storage cabinet.
4. Clean spray gun using the SOP for Solvent Cleaning.
5. Place absorbent floor covering pieces that are dry and not heavily covered with paint in bin labeled "Reusable Floor Covering," located on shelf above spray paint equipment.
6. Place paint-contaminated absorbent floor coverings, stir sticks, or rags in the drum labeled "Paint-Contaminated Solids," taking care to replace the lid tightly.

Finley Refinishing

Hazardous Waste SOP 12 – Stripping Shop – Container Management

Date Issued	Date Revised
December 2001	January 2002

Applies to

Employees in the paint stripping shop.

1. Use only the containers listed in the table on the next page for shop waste streams.
2. Always keep waste container lids tightly closed except when adding waste.
3. Do not combine different wastes into the same container.
4. Keep your waste container in its designated catch tub to prevent spills and leaks onto the floor or work benches. Although your supervisor performs weekly container inspections, if you notice that a waste container has leaks, bulges, or any other abnormal condition, notify your supervisor immediately.
5. If you are using a drip pan or catch tub to collect rinsate or sludge as you work, do not leave your station unattended without transferring waste to the proper container.
6. When any waste container has been filled to its "max fill" line (equal to 90% full), write FULL on the cap and notify your supervisor. (Supervisor will transfer it to the hazardous waste storage area by the end of the day.)
7. Retrieve an empty container from the shop storage room and inspect it to be sure there are no visible leaks or deformations and that the cap fits tightly. If it passes inspection, label it according to the table on the next page before you place any waste in it. If it does not pass inspection, turn it over to your supervisor with a trouble ticket.

Finley Refinishing Container Management:

Waste Type	Container Type	Label
Rags from methylene chloride process.	DOT spec plastic five gal pail with lid.	"Waste rags contaminated with methylene chloride"
Rags from solvent stripping (other than methylene chloride).	UL-approved twenty gal ignitable waste can.	"Waste rags contaminated with toluene, MEK"
Tack cloths from mechanical sanding process.	Five gal plastic or metal pail with lid.	"Non-hazardous waste rags"
Sludge from methylene chloride stripping process.	DOT spec five gal plastic pail with lid.	"Waste sludge, contains methylene chloride, lead"
Sludge from solvent stripping (other than methylene chloride).	DOT spec thirty gal metal drum with lid.	"Waste sludge, contains toluene, MEK, lead"
Solvent waste from furniture rinsing.	DOT spec closed-head thirty gal metal drum.	"Waste solvents, contains toluene, MEK, acetone"
Wastewater from furniture rinsing (methylene chloride stripping process).	DOT spec closed-head five gal pail.	"Wastewater, contains methylene chloride"

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A *goal* is a general statement of a desired outcome to be achieved through the business' *EMP*. Setting *goals* to improve your business' environmental management connects your *EMP* to daily business activities. *Goals* are linked to the *environmental policy* and provide a vision of the direction you want to go in over the long term.

Be sure that *goals* are realistic and fit within the mission and overall business strategy of your company. Setting *goals* with unreasonably high expectations may frustrate and discourage employees. On the other hand, *goals* should inspire action by capturing a clear vision of where you and the Environmental Team want to take environmental performance within the business. It is important to select no more *goals* than your company has the resources to address at any one time. For a small business just getting started, this number is typically five *goals* or fewer. Because the number of *goals* a small business can effectively tackle at once is limited, identify those *goals* that that are *critical* to your business' environmental performance and tackle those first. For example, confirming compliance with environmental regulations and putting systems in palce to maintain compliance may be a critical priority. There may also be waste reduction or water or energy conservation activities that are compelling because of the potential for large cost savings for your business.

Your initial *goals* may be fairly general, such as to reduce the amount of waste generated. After you have fully developed the *EMP* and have done some audits to see where you stand, you will be in a good position to set more focused *goals* for improvement, and to select the *goals* that will add the most value to your business. *Targets* are specific, shorter term steps towards achieving your *goal*, and are often measurable. When coupled with measurable *targets*, meaningful *goals* become the drivers for environmental performance improvement. How to select *targets* is discussed in the section on Keeping the EMP Alive and Well – Monitoring and Corrective Action.

This is a good time to start thinking about targets & measures. Further discussion occurs in the section on Keeping The EMP Alive and Well.

Worksheet for Setting Goals

Step 1

Brainstorm a list of possible *goals* to improve your company's environmental management. They may have to do with compliance or they may be about reducing your business' use of resources, or preventing impacts to the environment. Don't worry about the difficulty of achieving a *goal* or its relative importance during the brainstorming session. List the *goals* you come up with in the left column of the Environmental Goals to Consider table on page 34.

Step 2

Go over the list of *goals* you developed during Step 1. For each *goal*, decide whether it is *critical* (necessary to keep employees safe, prevent and respond to spills, or achieve compliance), or *important* (helps your company manage its environmental affairs more efficiently and proactively, save money, and increase the respect and goodwill of employees and community members). Indicate its significance in the middle column of the table on page 34.

Step 3

For each *goal*, indicate in the right hand column the degree of difficulty involved with achieving the *goal*. Consider the budget, number of staff, degree of effort, and other resources needed to achieve the *goal*.

Step 4

Select at least three *goals* to work on for the next several months to a year. *Critical goals* should be your first priority. If these issues are under control, consider selecting the *goals* that have the biggest return for the invested effort. If you can't come to agreement, then the Environmental Team can vote on them or you, as the business owner, can decide.

1.

2.

3.

Environmental Goals to Consider

Goal	Significance[1]	Difficulty[2]

[1]Significance = *critical* or *important*.

[2]Difficulty = high, average, low.

Example Goals

Cove Marina 2002 Goals

1. **Verify compliance with all environmental regulations.**
2. **Verify the appropriate management of all waste streams.**
3. **Communicate the Environmental Policy to all employees.**

Finley Refinishing 2002 Goals

1. **Update Emergency Response Plan.**
2. **Reduce hazardous waste.**
3. **Reduce energy use.**
4. **Reduce VOC emissions.**

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There are several good reasons to keep good records of your environmental management activities. Because most inspectors start with a close look at your environmental records, having them in good shape helps your business get off on the right foot during an inspection. For this reason, when getting organized, it is best to begin with records that are needed to meet regulatory requirements. After that, you can decide what information has additional value to you such as records that:

- Would be useful during an urgent situation involving your businesses' environmental matters such as a spill or a complaint from the neighbors;
- Are essential to protect your business from legal and financial troubles down the road;
- Substantiate whether your business is performing to the level it committed to in its *EMP*; and
- Give you valuable data on business performance, or would be helpful in demonstrating to your customers that your business is "green."

On the next page is an example master file list that gives you a simple system to organize your environmental management files and records that go along with *EMP* and *environmental manual*. It covers the most common environmental recordkeeping requirements. However, to make sure nothing is missing, be sure to go back to your *environmental manual* and review the required documents and records listed in each section to make sure they are included in your master file list.

Emergency Preparedness

- Emergency call list and decision tree.
- Spill reporting call list.
- Copies of emergency plans such as hazardous waste contingency plan; spill prevention, control, and countermeasure (SPCC) plan; and storm water spill preparedness plan.
- Summary of annual emergency plan exercises.
- Documentation and critique of incidents that triggered emergency plan.
- Reports of spills to regulatory agencies.

Training Records

While many different environmental regulations require training, most companies find it easiest to organize them according to employee. In each employee's file include:

- Position description including environmental responsibilities.
- Training plan (see Section on Training for information on how to develop employee training plans).
- Training certificates and the agendas or topics list for each training session, in chronological order, with the most recent training first.

Waste Management

- Correspondence with regulators (inspection reports, regulatory interpretations, and other correspondence).
- EPA Generator ID number(s).
- Current hazardous waste permit and associated documents and correspondence.
- Records of waste determination.
- Hazardous waste shipment paperwork.
- Special waste shipment paperwork such as universal waste batteries, lamps, and mercury switches, used oil, PCB and non-PCB ballasts.
- Solid waste tipping records.
- Inspection records.

Air Management

- Correspondence with regulators (inspection reports, regulatory interpretations, and other correspondence).
- Current permits for major or minor sources and associated documents and correspondence.
- Emission calculations for potential to emit (PTE).
- Annual air toxics inventory.
- Inspection records and chemical usage records as required by permit conditions (e.g., VOC records, pressure drop inspections, operating hours).

Wastewater Management

- Correspondence with local wastewater treatment plant authority.
- Copy of current sanitary sewer ordinance.
- Pre-treatment permit (if applicable) and associated documents and correspondence.

Storm Water Management

- Inventory of storm water drainage and outfalls from your property (include map).
- Storm water pollution prevention plan.
- Maintenance plan for storm water infrastructure.
- Storm water permit (if applicable) and associated documents and correspondence.
- Storm water annual reports and sampling results (if applicable).

Master File List Worksheet

Step 1

Begin by reviewing Assignment of Responsibilities table and the *environmental manual* to identify what files and records you need to keep track of. On an index card, sticky note, or some other system that allows for manipulation, write the name of the file, what area of the *environmental manual* it relates to, and a brief description of what it contains. Here are a couple of examples:

Hazardous Waste Manifests

Environmental Manual Section 3: Waste Management

Contains hazardous waste manifest, (initial and confirmation copies,) Land Disposal Restriction paperwork, and tracking sheet for hazardous waste shipments, in order by shipment date.

Inventory of VOCs

Environmental Manual Section 4: Air Management

Contains material safety data sheets (MSDSs) for all the raw materials we use that contain volatile organic compounds (VOCs), a list of annual use rates, and calculation for annual VOCs emitted.

Step 2

Once you have all your files documented on index cards or other system, arrange them until you find an order that makes sense. Once you have decided on a logical order for your index cards, develop a master file list, based on the index cards, to place in your *EMP* as well as post near the filing cabinet(s).

Step 3

Compare the master file list with what you already have on file to see if you need to set up any new files, rename, or reorder existing files to be consistent with your master file list.

Step 4

On an annual basis, review the master file list to consider whether any new files need to be set up or old files can be retired. *(Note that some regulations require records to be maintained for a specified period of time.)* Update the master file list and make changes to your filing system as needed.

Example Master File List

Cove Marina Master File List

Date Issued	Date Revised
12/29/00	1/15/02

- Environmental Management Plan
- Written Plans
  - Emergency Action Plan
  - Waste Management Plan
  - Hazard Communication Plan
- Patron Contract Language
- Compliance Records
  - Correspondence with regulators
  - Copies of regulatory inspections (if any)
- Employee Records
  - Job descriptions
  - Training records
  - Certifications (pesticide applicator)
- Chemical inventory and material safety data sheets
- Hazardous Waste
  - Notification of Regulated Waste Activity and ID number
  - Manifests and land bans
  - Bill of lading for recycled goods or non-hazardous waste
  - Certificates of disposal
  - Waste determinations, profiles, lab tests
  - Waste generation data
  - Proof of Insurance disposal companies
- Storm Water
  - Permit
  - Sampling and inspection results
  - Annual report
  - Storm water management pollution prevention plan
- Wastewater
  - Permit
  - Sampling results

Master File List for Finley Refinishing

Wisconsin FID number WI 348592

Date Issued	Date Revised
1/2/00	1/2/02

- Environmental Management Plan
- Spill Preparedness
  - Emergency call list
  - Emergency response plan
  - Employee training records
  - Annual exercises
  - Spill notifications, reports, and response critiques
- Emergency Planning and Community Right to Know
  - Correspondence with regulators
  - Employee training records
  - Chemical inventory
  - Material safety data sheets
  - Annual chemical inventory reports (Tier 2)
- Hazardous Waste
  - Correspondence with regulators
  - Notification of regulated waste activity and ID number
  - Employee job descriptions
  - Employee training records
  - Waste generation records
  - Shipment paperwork (manifests, land ban paperwork, etc.)
  - Hazardous waste services contract
- Air Management
  - Correspondence with regulators
  - Minor source permit
  - Employee training records
  - Emission calculations
  - Inspection and chemical usage records as required by permit

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Once you understand what records your business needs to keep, how can you keep track of it all as time goes on? By tackling it in a systematic yet simple way; a document control system makes sure that each vital file or record has somebody looking after it to make sure it stays up to date and is available to those who need it. Before assigning responsibility, look at each file or record on the master file list you put together in the last section and ask yourself "what is the purpose of collecting this information?" Some good reasons to hold onto a file or document are 1) it is *critical* to make sure your company handles spills properly, keeps its employees safe, and stays in compliance with environmental regulations; 2) it is *important* for helping your company to be efficient or proactive, to save money or time, or increase the respect and goodwill of employees and community members; and, 3) it will help you stay out of financial and legal trouble from future environmental claims.

To keep your document control system simply do three things:

1. As much as possible, keep everything in one place. The exception is when there is a compelling reason for the information to be located elsewhere. For example, each shop should have its own list of spill control supplies and personal protective equipment available in that shop.

2. For information that changes or gets updated periodically, assign the most logical person to be responsible for keeping track of updates and changes. For example, for environmental *SOPs* pertaining to a particular shop, it makes sense for that shop's supervisor to be responsible for maintaining them.

3. Use a document control index that all employees have access to so everyone knows what version is the most up to date and who is responsible for maintaining it.

4. If records are maintained electronically, make sure they are backed up by a hard copy, especially if they are required for compliance purposes. The document control index should identify where both electronic and hard copies are kept, and how often electronic records are backed up by a hard copy.

Use the Document Control Worksheet on the following page to help get your business' environmental documents under control.

Federal and state regulations change frequently. Contact your state small business assistance provider for regular updates.

Document Control Worksheet

Step 1

Review your master file list and *environmental manual* to identify all of the environmental documents your business needs to keep track of. List them in the left column of the table on the next page.

Step 2

Consider the purpose in keeping each document and designate its purpose (*critical*, *important*, history or liability prevention). If you can't determine a good purpose for keeping the document, take it off the list. Indicate the purpose of keeping each document in the second column from the left.

Step 3

Refer back to the Assignment of Environmental Responsibilities table (on page 11) to identify the person or position who will be responsible for updating the document when needed, keeping each version of the document on file, and making sure the revised document gets to those who need to see it. Indicate the name or position of the person responsible for each document in the third column from the left.

Step 4

For each document, determine a date of issue. For each subsequent revision, list both the issue date and the latest revision date. Indicate the appropriate issue date and, if applicable, revision date(s) in the fourth column from the left.

Step 5

Decide how often the document should be reviewed to make sure it is still current and appropriate for business operations. Consider allowing documents to go no longer than one year before being reviewed, revised, and reissued. Indicate the frequency of revision for each document in the fifth column from the left in the table on the next page.

Step 6

Decide who needs to get a copy of the document (or its electronic file) when it is revised. Indicate these individuals in the far right hand column.

Step 7

Consider the most strategic location(s) for each document (either posted or on file). Go back to the first column and indicate in parentheses below the name of the document where it will be kept and/or posted so that employees and others can review it.

- Consider using your birthday or anniversary date as the revision date.
- If you shut down for inventory, that would be an ideal time to update documents.

Document Control Index

Document (location)	Purpose[1]	Person Responsible	Issue Date & Revision Dates	Review Frequency	Distribution

[1]Purpose – C = *Critical* (related to compliance, safety, or spill preparedness)
I = *Important* (related to efficiency, prevention, cost savings, community goodwill)
L = Liability protection
H = History

Example Document Management Index

Document Management Index for Cove Marina

Document (location)	Purpose[1]	Person Responsible	Date(s) Issued	Review Frequency	Distribution
Environmental Management Plan and Environmental Manual (Binder in Main Office, Dockmaster's Office, and Main Repair Building)	C	Business Owner	2/15/00 1/28/01 1/14/02 (issued)	Annual	Dockmaster, Maintenance Manager
Emergency Action Plan (Environmental files, and posted in Dockmaster's office, Main Repair Building, and Fueling Station)	C	Dockmaster	3/15/02 2/16/01 (issued)	Annual or as needed	All employees
Patron Contract Language (Business records, filed by patron name)	I	Business Owner	1/2/02 3/18/01 (issued)	Biannual	Patrons, Dockmaster, Store Manager, Fueling Attendant
Hazardous Waste Inventory (Environmental files)	C	Maintenance Manager	2/12/02 1/3/01 1/17/00 (issued)	Annual	Fueling Attendant
Fueling SOP (Environmental files, and posted at fueling station)	C	Dockmaster	3/6/02 (issued)	Annual	Business Owner
Drydock SOP (Environmental files, Dockmaster's office)	C	Dockmaster	9/12/01 (issued)	Annual	Maintenance Technician
Bottom paint repair SOP (Environmental files, and posted in Main Repair Building)	C	Maintenance Manager	2/21/02 1/13/01 (issued)	Annual	Maintenance Technician
Topsides resurfacing SOP (Environmental files, and posted in Main Repair Building)	C	Maintenance Manager	2/21/02 1/13/01 (issued)	Annual	Maintenance Technician, Fueling Attendant

[1]Purpose – C = Critical (related to compliance, safety, or spill preparedness)
I = Important (related to efficiency, prevention, cost savings, community goodwill)
L = Liability protection
H = History

Document Management Index for Finley Refinishing

Document (location)	Purpose[1]	Person Responsible	Date(s) Issued	Review Frequency	Distribution
Environmental Management Plan (Environmental files, binder in Shop Supervisor's office)	C	Business Owner	3/16/02 2/28/01 2/14/00 (issued)	Annual	Shop Supervisor, Production Control Assistant.
Environmental Manual (Binder in Environmental files, on Shop Supervisor's desk, and Production Control Assistant's desk)	C	Production Control Assistant	3/12/02 3/16/01 (issued)	Annual or as needed	Business Owner, Shop Supervisor, Shop Lead Workers
Emergency Response Plan (Environmental files, on clipboard located by phone in main office, stripping shop, finishing shop, shipping office)	C	Shop Supervisor	4/15/02 3/12/01 3/25/00 3/14/98	Annual or as needed	Business Owner, Production Control Assistant, Stripping Shop Employees, Finishing Shop Employees
Hazardous Waste Inventory (Environmental files, posted on bulletin board in break room)	C	Production Control Assistant	4/2/02 1/3/02 10/4/01 1/16/99 (issued)	Quarterly	Shop Supervisor, Finishing Shop and Stripping Shop Lead Workers.
Chemical Stripping SOP (Environmental files, posted by each chemical stripping workstation)	C	Shop Supervisor	3/16/02 2/23/01 (issued)	Annual	Production Control Assistant, Stripping Shop Workers
Mechanical Stripping SOP (Environmental files, posted by each mechanical stripping work station)	C	Shop Supervisor	3/16/02 2/23/01 (issued)	Annual	Production Control Assistant, Stripping Shop Workers
Finishing SOP (Environmental files, posted by each finishing shop work station)	C	Shop Supervisor	4/11/02 2/17/01 (issued)	Annual	Production Control Assistant, Finishing Shop Workers

[1]Purpose – C = Critical (related to compliance, safety, or spill preparedness)
I = Important (related to efficiency, prevention, cost savings, community goodwill)
L = Liability protection
H = History

Master Schedule of Reports, Notifications, and Permits

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This part of your *EMP* lists what reports your business is required to file with regulatory agencies to comply with environmental regulations. You should also keep track of additional notifications to regulatory agencies that your business has made, such as reports of spills or releases, or filing with EPA as a generator of hazardous waste. The reason you want to get these issues organized is so your business doesn't find itself in a vulnerable position by missing a regulatory deadline or failing to get a permit application in on time, potentially causing a permit lapse that could disrupt operations. Here are examples of some (but not all) of these reports and notifications:

Type of Report	Frequency
Notification of hazardous waste activity.	One-time with updates as needed.
Hazardous waste activity report.	Annual or biannual.
Air emissions permit application.	One-time with periodic renewals.
Annual air emission inventory.	Annual.
Petroleum Storage Tank Registrations.	One-time and change-in-service notifications.
"Tier 1" or "Tier 2" emergency planning report.	Annual.

If any of your activities require an environmental permit, you also need to keep track of when the permit will expire so you can submit an application for renewal or close it out in a timely way. If you are not certain what reports, notifications, and permit applications your business is required to file, this would be an excellent time to bring in your state Small Business Assistance Program to help you get started.

In addition to reports that you must submit to regulatory agencies, there are likely to be reports that you need to prepare internally that provide data and information necessary to fill out the required report. You may also produce internal reports to provide information needed to track progress toward meeting *goals*.

Once you are aware of all the reports and notifications that your business needs to maintain, you need a simple system to manage them. Work through the following worksheet to develop an Environmental Master Schedule to help keep track of what needs to be done when and by whom. Include as part of the annual cycle a review of current regulatory requirements to see if reporting or notification requirements have changed.

Master Schedule Worksheet

Step 1

Review the *environmental manual* and the Master File List to identify all the reports, notifications, and permits your business must file with regulatory agencies. Make an index card (or other system) for each report noting to what agency (or agencies) the report must be submitted, the person responsible for compiling and submitting the report, any supporting internal reports or data necessary to produce the report, and person(s) responsible for providing that information. Put the due date for each report in one of the upper corners of the index card.

March 1st Annually

Hazardous Waste Activity Report

Submit to: Wisconsin DNR

Person Responsible: Production Control Assistant

Supporting Internal Report or Data:

1) Hazardous waste shipment manifests and packing slips – *Shipping & Receiving Clerk*
2) Weekly waste inventory logs rolled up monthly – *Shop Lead Workers*

Step 2

Put the index cards in order by due date. Use them to fill out the Environmental Master Schedule Worksheet on the following page. This will serve as a guide for all who are involved with environmental reports for the coming year. (As an alternative, master schedule information can be recorded on a calendar.)

Step 3

At least annually, review the requirements of regulations to see if reporting or notification requirements have changed and revise the Environmental Master Schedule as needed.

Step 4

Check with the Environmental Team to see if new internal reports are needed to fulfill revised *goals* or if any internal reports previously done are no longer needed. Revise the Environmental Master Schedule accordingly.

Environmental Master Schedule

Report (Agency submitted to)	Due Date	Person Responsible	Supporting Internal Data/ Report (Person Responsible)	Date Submitted and Initials

Cove Marina Environmental Master Schedule

Report (Agency submitted to)	Due Date	Person Responsible	Supporting Internal Data/ Report (Person Responsible)	Date Submitted and Initials
Waste Generation Data (Internal – to document generator status)	Quarterly.	Maintenance Manager	Weekly Waste Inspection Logs (Maintenance Technician)	4/12/02 SLS
Stormwater – visual inspections (Internal – required by permit)	Quarterly.	Maintenance Technician		4/6/02 PDB
Wastewater – sampling reports (City Sewer Authority)	15th of third month of each quarter.	Maintenance Manager		3/15/02 SLS
Wastewater – permit application (City Sewer Authority)	October 17, 2002. (Current three-year permit expires January 17, 2003.)	Dockmaster		
Stormwater – permit application (Wisconsin DNR)	April 1, 2005 (Current five-year permit expires July 1, 2005.)	Dockmaster		
Environmental Reports Organizer for calendar year 2003 (Environmental Team)	12/31/02	Business Owner		

Finley Refinishing Environmental Master Schedule

Report (Agency submitted to)	Due Date	Person Responsible	Supporting Report Person Responsible	Date Submitted and Initials
Annual Chemical Inventory (Internal - OSHA requirement and for spill preparedness planning)	1/15/02	Shop Supervisor	Annual purchasing records (Accounts payable specialist)	1/8/02 BCL
Annual Hazardous Waste Activity Report (Wisconsin DNR)	3/1/02	Production Control Assistant	Waste inventory data rollup (Shop Lead Workers)	2/23/02 JAK
Annual Tier 2 Report (County LEPC, City Fire Dept., Wisconsin DEG)	7/1/02	Shop Supervisor	Annual purchasing records (Accounts payable specialist)	
Review requirements and revise Schedule for calendar year 2003 (Internal)	12/31/02	Production Control Assistant	Annual Inventory of Air Emissions (Shop Lead Workers)	
Minor Source Air Permit (Wisconsin DNR)	5/31/04			

Example Environmental Master Schedule in Calendar Format

FEBRUARY

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
					Hazardous waste shipment data to Production Control Assistant - Shipping and Receiving Specialist - 1	2
3	4	5	Weekly hazard-ous waste data rollup to Production Control Assistant - Shop Lead Workers - 6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	Annual Hazardous Waste Activity Report due to DNR 3/1 - Production Control Assistant - 22	23
24	25	26	27	28		

MARCH

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
					Annual Hazardous Waste Activity Report due to DNR - Production Control Assistant - 1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

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If your business is very small, communication about environmental matters among employees may be accomplished in the natural course of day-to-day interactions. But, for many businesses, making sure everyone who has a need to know stays in the loop requires some dedicated effort. This section explains the part of your *EMP* that will make sure that employees and supervisors stay involved with environmental management, understand your business' *environmental policy*, and can provide a consistent message about your business' commitment to environmental performance. It will also make sure your business is providing information to employees and others as required by regulations. As your *EMP* comes together and your business develops a track record of environmental excellence, you may also wish to more actively promote your business' *EMP* with customers and community officials. This can be added to the Communication Plan when you feel ready to do so.

Communication Plan Worksheet

Step 1

Identify ways to inform all the employees at your business about the *EMP* and its *goals* and list them in the Internal Communication Opportunities table on the next page. To get this information out efficiently, you may want to look for opportunities through existing business meetings or events.

Step 2

Using the External Communication Opportunities table on the next page, identify all the people outside of your company who need to, or would be interested to, know about your business' *EMP*. State at least one reason why it would be strategic or beneficial for your business to inform them of the *EMP*.

Step 3

Referring to the information you developed in Steps 1 and 2, decide who will be included in the Communication Plan for the coming year, how you are going to get the information to them, and who will be responsible. Organize this information using the table on page 57. *(Helpful hint: If you do not feel your business is ready to present its EMP "to the world," you can leave out people listed in Step 2 until next year, when you can consider this question again.)*

Internal Communication Opportunities

When	How
Example **Annual employee performance reviews**	**Handout with environmental policy and this year's goals.**

External Communication Opportunities

Who	Reason to Inform	How
Example **Mayor**	**To demonstrate our business wants to be a good neighbor.**	**Talking points presented at quarterly breakfast meeting.**

Current Communication Plan

Issue Date

__ / __ / __

Who?	What?	How	Person Responsible

Example Communication Plans

Cove Marina Communication Plan

Date Issued
January 2001

Date Revised
January 2002

Who?	What?	How and When?	Person Responsible
Staff	EMP and goals and targets.	Update during annual meeting.	Owner
Patrons	BMPs for pollution prevention. Policy for cancellation of lease for non-compliance with environmental policies. Waste disposal practices. Suggestions for improvement.	Contract Language. Newsletter. Postings – dock area. Posting at dumpster. Bulletin board at picnic area or bathrooms. Invitation to information sessions.	Dockmaster
Community	Environmental commitment. New environmental efforts.	Annual picnic on Marina grounds. Policy posted on docks, at entrance, and in office. Host student field trips.	Owner

Finely Refinishing Communication Plan

Date Issued
January 2001

Date Revised
January 2002

Who	What	How and When?	Person Responsible
All employees	Environmental policy and current goals.	Presentation during annual meeting. Updates in business newsletter.	Business owner. Human resources manager.
Shop employees	Environmental goals and targets.	Chalk talk at weekly production meeting.	Shop supervisor.
Sales staff	Customer education on EMP.	Check in during monthly sales meeting.	Sales manager.
Chemical product suppliers	Preference for less hazardous products.	During annual contract negotiation.	Purchasing manager.
Chamber of Commerce	Environmental policy.	Presentation at annual small business reception.	Business owner.

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Getting employees trained in everything they need to know to carry out their environmental management responsibilities is one of the biggest challenges facing a small business owner. Training is required by many environmental regulations. Employees need to understand how their responsibilities contribute toward meeting the *goals* of your *EMP* if you are going to make progress.

Here are some suggestions for setting up an effective training program. While getting the training program established, set priorities so that you work on getting *critical* training in place first: (1) train those who handle chemicals on what to do if there is a spill or release; (2) make sure you have training programs as required by regulations; and (3) train employees on good practices that improve efficiency, save time or money, or help your business be proactive.

Use your *environmental manual* to determine what training is required by *applicable laws* to develop a comprehensive list of training requirements. Then, refer back to the Assignment of Environmental Responsibilities table to set up training so that each employee gets the training he or she needs, but does not sit through training they don't need.

The Training Plan itself should include what training needs to happen, what type of training it will be, and who is responsible. There should also be a target date and a completion date for each task in your Training Plan. It is usually easiest to set up a Training Plan for the coming year. After that you can review training requirements and revise the plan on an annual basis.

Contact your state small business assistance provider for help in determining training needs.

Training Plan Worksheet

Step 1

Refer to your *environmental manual* to identify training that is required by *applicable laws* and list them in the table on the next page.

Step 2

Refer to the Assignment of Environmental Responsibilities table (on page 11) to understand how many employees need what type of training. This will help you decide whether it is more efficient to devote a class to the training topic or to conduct training one-on-one or on the job (OJT). Use the table on page 62 to help with the analysis.

Step 3

Develop a Training Plan for each employee. Use the top part of the form on page 63 to establish training requirements. Use the bottom part of that form to keep track of each employee's training.

Step 4

Using the information you developed in Steps 1 through 3, fill out the table on page 64 to develop a Annual Training Plan for your business.

Summary of Required Training

Training Topic	Code Citation
Example **Hazardous waste handling and emergency procedures**	**Wisc. Adm. Code NR 610.**

Training Overview

Training Requirement	# of Employees to Train	How Often?

Individual Employee Training Plan

Training Plan	
Employee's Name:	**Training Requirements**
Employment Date: ___ / ___ / ___	*1.*_____
Termination Date: ___ / ___ / ___	*2.*_____
Job Title:	*3.*_____
	*4.*_____
	*5.*_____
	*6.*_____
	*7.*_____

Type of Training	Date of Training			
	Initial	2001	2002	2003

Annual Training Plan

What and Who?	Type[1]	Trainer	Frequency	Completed

[1]Key for type of training:

OJT = on the job training.

Chalk Talk = short updates during weekly production meetings.

Class = classroom.

1 on 1 = one-on-one meeting with talking points on a handout.

Cove Marina Training Plan

Date Issued
January 2000

Date Revised
January 2002

What and Who?	Type[1]	Trainer	Frequency	Completed
Emergency procedures – all employees	Class	Dockmaster	Annual (March)	3/15/02 SLN
Hazardous waste – all employees	Class	Maintenance Manager	Annual (July)	
	1 on 1	Dockmaster, Maintenance Manager	As needed	See log sheet.
Storm water pollution prevention – all employees	Class	Maintenance Manager	Annual (July)	See log sheet.
Wastewater for Maintenance Technician	1 on 1	Maintenance Manager	Annual	3/15/02 SRS

[1]Key for type of training:

OJT = on the job training.

Chalk Talk = short updates during weekly production meetings.

Class = classroom.

1 on 1 = one-on-one meeting with talking points on a handout.

Finley Refinishing Training Plan

Date Issued
January 2000

Date Revised
January 2002

What and Who?	Type[1]	Trainer	Frequency	Completed
Emergency response plan for shop employees.	Class	Shop Supervisor, HR Manager	Annual	1/7/02 JAL LLE
Emergency response awareness training for all other employees.	Class	Business owner, Shop Supervisor	Annual	1/5/02 JAL AEC
Hazardous waste for shop employees.	Class	Production Control Assistant	Annual	1/7/02 JAL
	Chalk talks	Shop Supervisor	Quarterly	1/24/02 BTC 3/15/02 BTC
	OJT	Shop Supervisor	As needed	2/20/02 BTC 3/10/02 BTC
Hazard communication for shop employees.	Class	HR Manager	Within 30 days of hire and annually	
Hazmat Shipping for Environmental coordinator.	Class	Outside contractor (ABC Hazmat Inc)	Every three years	
Air permit requirements for paint booth operators.	Chalk talks	Production Control Assistant		
	OJT	Shop Supervisor	Annually or when permit requirements change	
EMP orientation for new employees.	1 on 1	HR Manager and Shop Supervisor	Within 30 days of hire	Ongoing
EMP goals.	Annual Employee Meeting	Business Owner	Annual	

[1]Key for type of training:

OJT = on the job training.

Chalk Talk = short updates during weekly production meetings.

Class = classroom.

1 on 1 = one-on-one meeting with talking points on a handout.

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This part of the *EMP* helps you verify if you are on the right course and gives you a method for getting back on course if you find you have strayed. There are three components to monitoring: 1) environmental compliance monitoring, 2) environmental performance monitoring, and 3) management review, and corrective action.

Environmental Compliance Monitoring

This function determines whether your business is in compliance with regulations and whether employees are following *SOPs* and *BMPs* that contribute to compliance. Audits are a good way to determine compliance with regulations and to observe whether employees are following *SOPs* and *BMPs*. These can be done internally or by an outside party. You can enlist supervisors to do performance checks in the course of their daily work. It is a good idea to conduct a comprehensive compliance audit every few years to help ensure that you have not overlooked any new activities within your company that may affect the environment or any new or changed regulatory requirements. Your state Small Business Assistance Program may be able to assist with compliance auditing. The Compliance Monitoring Worksheet will help you set priorities and assign responsibility for audits.

Environmental Performance Monitoring

This activity verifies whether or not *goals* stated in the *EMP* are being achieved. To do this, you need some way to measure progress towards your *goals*. Measures are usually expressed in numbers – tons of waste generated, pounds of volatile organic compounds (VOCs) emitted. For example, if your *goal* is to reduce hazardous waste, then your measure might be the pounds of waste generated over a year's time. A *target* tells you by how much you want to achieve your *goal*, as expressed by your chosen measure. For example, if your *goal* is to reduce waste, and your measure is the amount of waste generated per unit of product, then a *target* might be to reduce that amount by 10 % within one year. Now you are getting very specific. This is useful to everyone in your company who has to help achieve your company's environmental *goals* because now they know exactly what they should be shooting for. The Performance Monitoring Worksheet will guide you in identifying meaningful *targets*.

As your *EMP* matures, *goals* and *targets* need to be revisited. You may choose to keep the same *goal* but change the *target* to reflect a higher performance expectation. Or, you may choose to retire certain *goals* and adapt new ones to reflect new environmental management challenges your business is facing. The idea is that the *goals* and *targets* work together to fuel ongoing improvement to the *EMP*.

Don't forget that production-based targets should be measured using some system that takes changes in production into account. For example, reduce the amount of water used by 10% for every 1,000 units produced. This way shifts in production will not misrepresent the progress you have made.

Management Review

As the business owner, you want to make sure that the *EMP* meshes well with your overall business strategy and continues to add value to your business over the long haul. This means that on a regular basis you need to review the *goals* of the *EMP*, consider the system of action and accountability it has established throughout your company, and look at the results of monitoring to see how well the *EMP* is working to achieve compliance and to meet its stated *goals*. Also consider how much value the *EMP* is returning to the business for the effort invested. Are environmental management costs higher or lower than this time last year? Are employees more comfortable with their environmental responsibilities? Is it taking less time overall for your business to meet regulatory requirements? Are you sleeping better at night?

Even if you have been involved in the *EMP* all along, it is a good idea to set aside some time at least once a year to make sure you are "seeing the forest through the trees." You are probably in the best position to determine when certain procedures, *goals*, or *targets* in the *EMP* have outlived their usefulness and need to be updated or eliminated. Whether or not you want to enlist others in performing the management review is your decision. It may make sense to seek out the opinions of your key supervisors and members of your Environmental Team. However you decide to approach it, you can use the Management Review Worksheets as a guide.

Corrective Action

This is where the rubber meets the road. If you have a system to identify problems but then fail to correct them, you may be worse off than when you started, especially if the problem affects whether or not your business is in compliance with *applicable laws*. Once you have a finding that indicates a problem, you need to do four things: 1) investigate the root cause of the problem; 2) create a solution to correct the existing problem as well as preventing the problem from happening again; 3) assign responsibility for *corrective* and *preventive action*; and 4) check back later to see if the problem has indeed been solved. The Corrective Action Worksheet will help you work through this process.

Compliance Monitoring Worksheet

Step 1

Based on their experience, ask members of the Environmental Team to identify what areas of environmental regulations they believe the business should audit to verify compliance.

Step 2

Decide what criteria to use to prioritize auditing efforts for the coming year. Some criteria you may want to consider: 1) likely to have a high degree of non-compliance, 2) likely to be the focus of a regulatory inspection in the near future, 3) poses a high potential risk to employees, the community, or the environment, and 4) poses a high degree of liability if not properly managed.

Step 3

Apply your screening criteria developed in Step 2 to the list of areas to be audited developed in Step 1 to come up with two to three areas to emphasize in audits during the coming year. List them in the table on the next page and indicate for each area whether a full compliance audit is warranted or whether selected areas will be targeted for evaluation.

Step 4

Decide what resources and methods the business can apply to fulfill audit plans identified in Step 3. Some methods to consider: 1) assign the responsibility within the business, 2) seek low cost or no cost resources outside your business such as the state Small Business Assistance Program, or peer exchange with or mentoring from another business that you are not in direct competition with, and 3) hire a consultant. Identify in the table on the next page who will be responsible for each audit.

Step 5

Identify in the table on the next page a target date for completion.

Audit Plan for the Coming Year

Environmental Management Area	Audit Type[1]	By Whom	By When

[1]**Audit Type**

Performance check: Regular observation of selected activities in the course of daily activities during a given time period by supervisor, manager, or other designated person.

Targeted compliance audit: An audit of selected compliance points for a major or minor area of environmental regulations.

Full compliance audit: A thorough audit covering every applicable compliance point for a major area of environmental regulations.

Worksheet for Performance Monitoring

Step 1

For each *goal* you selected in the section on Making Progress Over Time—Setting Goals, decide what is the best way to measure progress toward meeting that *goal*. (Helpful hint: to keep it simple, use data that is already available, such as purchasing records, if it can provide any kind of a meaningful measure. This may be better than having employees take time to collect new data, especially in the early stages of the *EMP*.)

Step 2

For each *goal*, decide by how much you want to improve and set a *target*. Be sure to set realistic *targets*. Achieving *targets* in the first year will help employees feel encouraged about their progress and provide momentum for more challenging *goals* and *targets* in future years.

Step 3

Assign responsibility for gathering the information needed to confirm whether your company has met its *target*.

Step 4

Use the table on the next page to plan environmental performance monitoring for the coming year.

Environmental Performance Monitoring for the Coming Year

Goal	Target	Responsible for Monitoring

Example of Goals and Targets

Goals and Targets for Cove Marina

Goal	Targets
Verify compliance with all environmental regulations.	Identify and list applicable regulations by 6/30/02. Develop a system to stay current with new requirements by 12/31/02.
Verify the appropriate management of all waste streams.	Begin monitoring dumpster weekly for wastes that do not belong by 3/31/02. Update employee training on waste management practices by 6/30/02. Create clearly designated and marked areas for patrons to leave acceptable wastes by 9/01/02. Educate patrons on use of site disposal options and unacceptable materials by 9/30/02.
Communicate Environmental Policy to all employees.	Present Environmental Policy to employees and their families at annual picnic, July 2002.

Goals and Targets for Finley Refinishing

Goal	Targets
Update Emergency Response Plan.	Finalize written plan, train all employees, and put in place coordination agreements with outside responders by 6/30/02.
Reduce hazardous waste.	Reduce pounds of hazardous waste generated per unit produced by 10% by 12/31/03. Analyze hazardous chemical product use in comparison with purchasing for opportunities to reduce disposal of excess products by 6/30/02. Evaluate effectiveness of environmentally preferable stripping solvents by 12/31/02.
Reduce energy use.	Determine payback period to upgrade furniture drying equipment with a more energy efficient model by 9/30/02.
Reduce VOC emissions.	Attain a 30 % reduction by replacing finish spray guns with HVLP equipment by 9/30/02.

Management Review Worksheet - Performance

Step 1

Take time to review the *EMP* as well as results of audits and performance monitoring conducted over the past year or so.

Step 2

Consider these questions:

Are we achieving compliance with environmental regulations? If not, do we know why not?

Is our environmental policy *still appropriate for our business' activities and culture?*

Are we meeting our goals *and* targets*? If not, why not?*

Are our goals *and* targets *still adequate for keeping our business on track with our* environmental policy*?*

Management Review Worksheet - EMP

Step1

Has the EMP *added value to the business by:*

Making environmental compliance more effective? _____ yes _____ no

Making environmental management less time consuming? _____ yes _____ no

Causing changes to processes or procedures that reduced liability? _____ yes _____ no

Causing changes to processes or procedures that saved money? _____ yes _____ no

How does the EMP *detract from the business? What can be done to prevent or reduce this from happening?*

Step 2

Based on your responses to the questions in Step 1, what are the three most *critical* issues that need to be addressed to improve the *EMP*? If you have *critical* issues taken care of, what are the three most *important*?

1. _____

_____

2. _____

_____

3. _____

_____

Step 3

Meet with your Environmental Team and discuss the changes you came up with during Step 2 and why you are suggesting them. Discuss how these changes can best be made, and assign responsibility for following through on making them.

Corrective Action Worksheet

Step 1

Describe in one or two sentences the identified problem.

Step 2

Investigate the problem by asking members of the Environmental Team and any employees, who work in the area where the problem is occurring, what they believe the root cause of the problem to be.

Step 3

Determine possible *corrective* and *preventive actions* that your business can undertake to respond to the problem. You may want to involve members of the Environmental Team in a brainstorming session to develop a list of possible *corrective* and *preventive actions*.

Step 4

From the list of *corrective* and *preventive actions* developed in Step 3, decide which one or two will be most effective and feasible given resources available. Write a memo briefly stating the problem, what *corrective* and *preventive actions* the business will take, and who will be responsible to take them.

Step 5

Distribute the memo to everyone who needs to know about it. Check in on those who have follow up responsibilities to make sure they understand what needs to be done.

Step 6

Decide how much time should pass before checking to see if the *corrective* and *preventive actions* are working. Put a reminder for yourself on your calendar so you don't lose track of this as time goes on.

Step 7

When the time comes, evaluate the results of the *corrective* and *preventive actions* and consider whether the *EMP* needs to be revised to reflect a better approach to this particular issue for the future.

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If you have read through this Workbook from beginning to end, you can see that the process of developing an *Environmental Management Plan* can be tackled in a series of manageable steps that are connected by a flow of information and ideas. Each step illuminates the path ahead, helping your business to make steady progress towards organizing environmental management in a way that adds value to your business and fits with its culture. The process is designed with built in opportunities to review and improve performance so that the *EMP* itself will better serve your business as time goes on. This way you can start out simple and build confidence with early success. By revisiting the *EMP*, it remains a vital tool that grows with your business' capabilities and reflects its strategic direction, rather than being just another dust-covered document.

Some last things to keep in mind: take your time. It is better to develop the *EMP* over a period of several months to a year than to feel that the effort required has detracted from your core business activities. Define the boundaries at the beginning of the process and stay within them. For example, will your *EMP* cover the entire business to start out with or will you focus on key processes? Is your initial focus on assuring compliance with *applicable laws*, or do you have an interest in environmental performance that goes beyond compliance? At what stage do you want to share your *EMP* with people outside of your business? Making these fundamental decisions early on will make the efforts that you and your employees invest more focused and likely to succeed.

Once you have established your *EMP*, you may want to give some thought to whether it would be beneficial to your business to pursue outside certification as a formal *Environmental Management System* (*EMS*) or verification through a recognition program such as U.S. EPA's Performance Track. For example, if one of your major customers is requiring that you have an *EMS*, or will be doing so in the future; this could be a compelling reason to take your *EMP* to the next level. For more information about certification, performance track, and *EMS* principles see www.epa.gov/ems.

Finally, remember that you are not isolated. Your state Small Business Assistance Program as well as the U.S. EPA Small Business Division can assist you with nitty gritty questions about regulatory requirements or broad issues of environmental management. If you are not certain how to get in touch with your state Small Business Assistance Program, consult www.smallbiz-enviroweb.org/, or call the U.S. EPA Small Business Division at 800-368-5888, and they can refer you to the appropriate contacts. When you contact them, you may wish to request the companion publication to this Workbook, *A Practical Guide to Environmental Management for Small Business*, as well as any available summaries of *Plugging into Best Environmental Management Practices for Your Small Business* for your type of business. The U.S. EPA Small Business Division and its state partners are there to open the door to small business owners who need to solve environmental management challenges. All you need to do is knock on the door and come on in.

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