Roles and Responsibilities

November 3, 2017
Identify Roles and Responsibilities—Iowa
Definition

“Responsibility for implementation of the elements of the EMS program need to be identified, documented and communicated to relevant staff.”
Key Resources – Other Considerations

- How Do Staff Members Know They Have Assigned Tasks in the EMS?
  - Responsible for an Objective and Target?
  - Responsible for an Action Plan Item?
  - Responsible for Delivering a Training Class?
  - Responsible for Conducting a Storm Water Inspection?

- Develop a Roles and Responsibilities Table for the EMS
  - Identify Job Titles and/or Staff Member Names with Associated Responsibilities in the EMS
<table>
<thead>
<tr>
<th>EMS Activity</th>
<th>Job Title/Role</th>
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<tbody>
<tr>
<td>Identify and Track Environmental Aspects</td>
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<td>and Impacts</td>
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<td>Tracking/Analyzing New Regulations</td>
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<td>Permit Management</td>
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<td>Comply with Regulatory Requirements</td>
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<td>Track Environmental Objectives, Targets</td>
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<td>and Action Plan</td>
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<td>Integrate EMS Practices into Hiring &amp; Performance</td>
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<td>Assessment Practices</td>
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<td>Develop Budget for EMS</td>
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<td>Train Employees</td>
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<td>Communicating with External Interested Parties</td>
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<td>Communicate Environmental</td>
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<td>Expectations with Contractors</td>
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<td>Maintain EMS Procedures</td>
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<td>EMS Awareness Activities</td>
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<td>Maintain Operational Controls</td>
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<td>Coordinate Emergency Preparedness and Response</td>
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<td>Efforts</td>
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<td>Monitoring and Measurement</td>
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<td>Compliance Assessments/Inspections</td>
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<td>Manage Nonconformances</td>
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<tr>
<td>Maintain EMS Records</td>
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<td>EMS Assessment</td>
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<tr>
<td>Coordinate EMS Management Review</td>
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</tbody>
</table>

Note: L=Lead  S=Support
Best Practices

- Distribute the Roles and Responsibilities Table and Explain to Staff
- Provide Training and/or Information to Facilitate Understanding of the EMS and Associated Requirements
- Be Open to Conversations About Limited Staff Time and Availability
- Match Roles and Responsibilities Table to EMS Procedures
ROLES AND RESPONSIBILITIES
EXERCISE
Documentation

November 3, 2017
Documents

- **Written Procedures/Instructions on:**
  - Environmental Compliance
  - How the EMS was Developed
  - How the EMS Will Continue to be Implemented

- **Example Documents**
  - Environmental Policy Statement
  - Communication Procedure
  - Spill Response Plan
  - Compliance Manual
  - Permit
  - Tank Operational Manual
Documents

- **Purpose of a Document is to:**
  - Explain and Require Practices and Procedures to Promote Consistency
  - Identify Responsible Personnel
  - Identify Places Where Lack of Consistency in Performing a Task Would Lead to an Environmental Problem or Deviation of the EMS
Document “Control”

- Documents Need to be “Controlled” to:
  - Ensure Staff are Working From the Most Recent Version of the Document
  - Ensure the Use of Approved Procedures and Processes
  - Ensure the Staff that Need the Document Actually Receive (and are Aware of) the Document

- Controlled Documents Need to Have a Review and Approval Process for Finalizing Documents

- Document Control May Include:
  - Document Numbering Systems
  - Signature of Authorized Staff for Approval
  - Effective Date and/or Revision Number
DOCUMENT CONTROL
EXAMPLES
EMS Procedure Legal & Other – DMASWA

Effective Date: February 24, 2011
Revision Number: 1
Signature: [Signature]

Reviewed By: Bev Wagner
Approved By: EMS Core Team

The Intelex Software on-line version and secured hardcopy are the controlled documents. Refer to the DMASWA's Intelex Software System for latest version.

1.0 PURPOSE
To establish a procedure tracking compliance and changes to all laws and regulations applicable to DMASWA.

2.0 SCOPE
This procedure provides instructions and assigns responsibilities for the review, execution and documentation of all laws, regulations, and other requirements established at the federal, state and local levels as applicable to DMASWA.

3.0 RESPONSIBILITY
3.1 Agency Administrator Responsibilities:
Environmental Management System Procedure
Legal and Other Requirements

The Intelex Software on-line version and secured hardcopy are the controlled documents. The secured hardcopy will be identified by an “Official Document” stamp giving date of distribution. Any and all other documents are uncontrolled. Contact the Document Control Manager or refer to the Metro Waste Authority’s Intelex Software System for the latest version.

ISO 14001 REQUIREMENTS

ISO 14001, section 4.3.2, Legal and Other Requirements, requires the following:

The organization shall establish, implement and maintain a procedure(s)

a) to identify and have access to the applicable legal requirements and other requirements to which the organization subscribes related to its environmental aspects, and

b) to determine how these requirements apply to its environmental aspects.

CONTENTS

1.0 PURPOSE
2.0 SCOPE
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6.0 REVIEW
7.0 REFERENCES/RELATED DOCUMENTS

1.0 PURPOSE
RATHBUN AREA
SOLID WASTE COMMISSION

Iowa EMS Pilot Project
Environmental Management System
Internal Audit/Assessment Procedure
Doc ID# 010-01EMS-10
Issue Date: October 8, 2010
Reviewed By: EMS Core Team
Approved By: Ralph Alshouse, Chairman

Signature: /s/ Ralph Alshouse 12/14/10

1.0 Purpose

To establish minimum requirements for planning, performing, and documenting annual internal audits of the Environmental Management System established at Rathbun Area Solid Waste Commission.

2.0 Scope

This procedure applies to all internal audits of RASWC’s EMS within its determined EMS fenceline.

3.0 Responsibilities

3.1 EMR Responsibilities:
   3.1.1 Establish audit schedule among internal auditor, Director and RASWC staff.
   3.1.2 Designation of internal auditor (must be independent of day-to-day management of
Documentation: Many Styles

- Documentation Can be Simple to Very Complicated
  - Text
  - Flow Charts
  - Photographs with Explanations
- EMS Documentation Usually Contains Similar Sections
  - Scope
  - Responsibilities
  - Procedure
  - Training
  - Records
Document Formatting

- Personalize the Document Format
  - Identify the Document Style, Layout and Control Procedure that Best Works for Your Organization
  - Keep the Format Consistent
- Review and Update the Format As Needed
- Communicate the Necessary Information
List of Required Documents for Iowa EMS

- Fenceline Statement
- Environmental Policy
- List of Significant Aspects/Impacts
- List of Legal and Other Requirements
- Objectives and Targets and Action Plan
- Key Resources and Responsibilities

*Don’t Forget Required Compliance Documents*
List of Required Documents for Iowa EMS (cont.)

- Procedures
  - Environmental Impacts
  - Legal and Other Requirements
  - Objectives and Targets [Strongly Recommended]
  - Communication, Training and Awareness [May be broken into 2]
  - Monitoring and Measurement
  - Assessment
  - Reevaluation and Modification [Strongly Recommended]
Consider the Use of an EMS Manual

- An EMS Manual is Used to Tell “Our EMS Story” and May Also be Used to Keep All EMS Documentation in One Place

- Describes and Defines the Entire EMS Process in One Location and Answers the “W” questions - Who, Where, When, What, Why
Record - Definition

- A Record is Written Proof or Evidence that:
  - The EMS or Compliance Program is in Place
  - The EMS or Compliance Program is Functioning

- Most Records Cannot or Should Not Be Changed

- Examples of Records
  - Completed Training Log
  - Completed Inspection Checklist
  - Manifests
  - Lab Results Related to an Objective and Target
  - EMS Annual Report
Records

Purpose of a Record:
- Demonstrate Conformity to the EMS
- Demonstrate Compliance with the Law

Control of Records – Identify Where the Record is to Be Stored, For How Long, and When It Can or Will be Destroyed

Most Organizations Have a Records Retention or Retrieval Process Already in Place
Records – Things to Consider

- **Identification of Records**
  - What Records Am I Supposed to Keep?

- **Storage of Records**
  - Where Are They Stored?

- **Retrieval of Records**
  - How Can I Access the Records When I Need Them?

- **Retention of Records**
  - How Long Do I Need to Keep Them?

- **Disposal of Records**
  - When Can I Recycle Them?
Example List of Required Records for Iowa EMS

- Legal and Other Requirements List
- Activities and Impacts List
- Roles and Responsibilities Table
- Monitoring and Measurement Data
- Log of Information Requests from the Public with Corresponding Responses
- Reevaluation Results
- Management Review Record
- Training Logs

Don’t Forget Records Required by Law!
Best Practices

- Ask, “What is the Value in Generating this Document or Record?”
  - Is it Required by Law?
  - Is it Required by the EMS?
  - Would it Eliminate Deviations that Could Cause Environmental Harm?

- Determine Whether There is an Existing Document Management/Control/Records Retention Process Already in Place
  - Use it!
Best Practices

 Be Clear and Concise
 Consider Paper or Electronic Versions
 Designated Responsibility and Authority for Creating/Revising Documents
 Retrieval of Old Documents
 Consider Log of Documents and Records
Warning: “Over-Documentation” Problems

- Remember You Have to Keep Up With It!
- If I Say I’m Going to Do Something in a Written Procedure, Then I Better Be Doing It
- If the EMS Becomes About Generating Paperwork, Then We Missed the Point
QUESTIONS?

Leslie Goldsmith
(515-725-8319 or Leslie.Goldsmith@dnr.iowa.gov)
Cory Sander
(614-917-3074 or cmsander@psara.com)
Tom Dietrich
(937-408-1775 or tom_dietrich@gspnet.com)