

Iowa Department of Natural Resources December 16, 2020

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IOWA DEPARTMENT OF NATURAL RESOURCES

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#### **Training Agenda**

• Day 2

- EMS Implementation Step-by-Step
- Primary chronological steps to EMS development and implementation
   Walk-through the major EMS components, how to develop, and provide examples
- "Environmental Aspects" Workshop: Identifying Environmental Aspects & Impacts and Defining Significance

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#### Step 2 - Conduct Gap Analysis

- Compare existing environmental systems with the requirements of ISO 14001
- What do we have that can be incorporated in our EMS?Existing environmental programs
- Other management systems, documentation
- What's in practice, not just documented
- Can be formal or informal process
- Provides a baseline
- · Helps to establish implementation plan and level of effort

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#### Step 3 - Determine the Scope & Context

- Is this EMS for a single site or for a greater organization?
- What organizational units and functions are included?
- What are the physical boundaries?
- What activities, products, and services are included?
- Are there any portions of the organization to be excluded?
- What are the relevant external and internal issues?
- Who are the organizations interested parties, and what are their needs/expectations?

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#### Example Internal & External Issues

- Environmental conditions related to climate, air quality, water quality, land use, existing contamination, natural resource availability, and biodiversity, that can either affect the org's purpose or be affected by its environmental aspects.
- External cultural, social, political, legal, regulatory, financial, technological, economic, natural, and competitive circumstances.
- Internal characteristics or conditions of the organization, such as its activities, products, and services, strategic direction, culture, and capabilities (i.e., people, knowledge, processes, systems).

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#### Step 4 - Obtain Commitment from Leadership

- Commitment from top management is essential for a successful EMS
- Top management is required to demonstrate leadership and commitment with respect to the EMS
- · Leadership is ultimately responsible for the EMS
- Present business case based on your specific needs, goals, circumstances
- Gap assessment can help provide information on plan, level of effort, and benefits



#### Step 6 - Set the Environmental Policy

- Establish Environmental Policy demonstrating the organization's intentions related to environmental performance.
- Must be established by top management and include the following commitments:
- · Commitment to protection of the environment, including prevention of pollution
- · Commitment to fulfill compliance obligations
- · Commitment to continual improvement of the EMS to enhance environmental performance.

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#### **Example Environmental Policy**

Sally's Salads is committed to sustainable growth and preserving the quality of the environment by managing our environmental footprint as defined in our Environmental Management System.

- We commit to:
- Protect the environment and prevent pollution through our business

- Protect the Environment and prevent policiton introdyr our dusiness practices and maintaining facility operational controls.
   Compliance with environmental laws and meeting other requirements we subscribe to as part of our business operations.
   Continually improve our environmental performance by setting facility relativity. objectives.

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# Step 7 - Establish Documentation System

- Determine where EMS documents will be stored, how accessed, how controlled, how protected
  - Preferably electronic
     Can be on shared network drive, SharePoint, Intranet
- Establish document control, update, and approval process
- Determine format for manual, procedures, forms, etc.
- Start putting a revision date on EVERYTHING
- If using existing documents, can reference, not recreate

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#### Identify Compliance Obligations

- Compliance Obligations (formally Legal & Other Requirements) include:
- Federal (EPA, OSHA, DOT, ...)
- State (State environmental laws)
- Local (City, County, ...)
- Other (Corporate, Industry, Trade, Customer, etc ...)

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# Compliance Obligations -Documentation Examples • Recurrent Task List / Compliance Calendar • Requirements and when they are due • Excel, Outlook, etc. • Legal Register/ Compliance Table • Listing of regulatory requirements per environmental aspect category and how they apply

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-				_			-		
		List of R	isks and Oppo	rtunities	for Cont	inual Im	proven	nent	
			Requested by: Select One)		Ad	ions to be T			Status of Completio
Fiscal Year	Risk / Opportunity	Description / Comments on Identified Risks and Opportunities for Improvement	Name and Date	JustDo It! With documentation	'No go'	Park and Monitor*	Create CAR or new Objective	Bring Forward to Management Review	Mostrecent date of statue changed
FY20	Rak	Update Laboratory Analysis Plan to reflect recent requirements and methods used for analysis of stormwater	Observation from Internal Audit Findings Summary				×		
F120	Opportunity	Install misters by avers on paint hoses to minimize water usage	Joe 5, 6/21/2020	×					7/15/2020, completed. Wat usage has gone down.
PY20	Rbk	GA EPD visit on 8102220. Identified baghouse not listed on an permit Update permit through administrative change with GA EPD	GAEPD 8/10/2020 Joe. S. (internal)				x		In progress , submitted to 0 EPD 1005/2020
		This purpose of this list is to satisfy the following ISI 6.1 Actions to address risks and opportunities.	014001:2015 sections:						
		10.1 General Improvement							
		10.3 Continual Improvement, and should feed into	Management Review 9.	3 subpart (g) of i	5014001:20	15 Standard.			

#### Determine Environmental Aspects & Impacts

- Identify aspects associated with an organization's products, activities, and services, considering a life cycle perspective.
   Take into account changes, abnormal conditions, and
- emergency situations

  Develop criteria of significance and identify significant
- environmental aspects (SEAs)
- Communicate SEAs in the organization
- Document aspects, impacts, criteria, SEAs

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#### Step 10 - Establish Environmental Objectives

- Establish objectives- take into account the significant environmental aspects, compliance obligations, and risks and opportunities.
- Objectives shall be:
- Consistent with the Environmental Policy
- Measurable and Monitored
- Communicate the Objectives to the organization
- Objectives must be documented and kept up-to-date



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Environ	nental-Objective-#1Landfi	I-Waste-ReductionR The-objective-is-to-reduce-sol Baseline:-Final-FY1870%-of e <sup>2</sup> This-objective-will-be-comple	f-waste-to-landi	ile -				
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°π	WhatR	Resources#	WhoR	When#	îκ	Results#	°π	°a
Action- Number <sup>1</sup>	Description of Activitys	Description of Resources RequiredFinancial, Capital,- Personnel,-Time, etcU	Responsible- Partyil	Date- Initiated#	Expected Completion Date#	Method-to- Evaluate- Effectiveness of- Actions#	Statur-of- Completion8	Commente-o Progress-A
1#	Implement cross department waste management teams	Plant leadership buy-in, Environmental Supervisor, Maintenance-Supervisori	Sally Sospboxn	Jun-18¤	Aug-18¤	Gather information for last years waste total (tonnes), evaluate current waste generation and management practicese	a	First meeting scheduled for August-2018#
2¤	Select recycling vendorn	Environmental Supervisor, Maintenance Supervisor=	Joe-Schmoen	Jun-180	Aug-18x	Vendor is selected that is under budget, containers in place-by completion dates	α	Reviewing 3 local vendors- Waste Management, Recycle-Plus, GreenLeat, etc

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#### Environmental Objectives

- Objectives should be approved by top management.
- Objectives and action plans should be documented and communicated.
- Performance against objectives should be reported regularly.
- Objective goals can be adjusted, as needed, with changing circumstances, but MUST document why.
- Objectives should be SMART.

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#### Step 11 - Develop Procedures & Operational Controls

- The EMS should include documented information necessary for the effectiveness of the EMS
- EMS Manual
  - Not required, but can help show overall framework of EMS and direct to other documents.
- EMS Procedures
- What processes do we want to be documented procedures?
  Documented procedures help promote consistency and continuity
- and can serve as a training tool
- Procedures should be designed in a way to prevent error and ensure consistent results

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#### **Operational Controls**

- · Can include engineering controls and procedures
- Processes to manage environmental aspects and risks and help to ensure compliance
- Processes for management of change
- Processes for procurement and management of contractors, including communication of requirements
- Controls to ensure environmental requirements are
- addressed in design/development (if applicable)
- Provide info regarding impacts associated with transportation, delivery, use, end-of life, or final disposal of products (if applicable)

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Example Procedures & (	Jhe	latio	Idi	COIII	TOIS	>
DOCIMENT Management of Hazardous Wastes DOCIMENTHO. EMG 2017-0 TELL PREVMED Poler Camber EFFCCIPC DATE: December 2017 FMG: 3 of 7		ENVIRONMENTAL ASPI		ION		
PREPARED Prior Commer IPV IPV IPV IPV IPV IPV IPV IPV IPV IPV	White gen     Chemical a	nd bulk improduct use				
Section #2: Hazardous Waste Accumulation, Storage, Labeling	Ar emissio     Every and	rs generation - bisges, flare I water consumption - bisges	risck Noutie			
		ucess Requirements:				
Hazzodous waste must be accountiated and stored at the point of generation until removed by a certified waste handler. The hazzodous waste container must be:	Process	Wastewater Tre				
Compatible with its resternt during excendences, having, and signers.     Expt tight solide encry with an adding value to be consistent.     Labeled with the work - handware water, the excentralizens that during the constraints of the factoring of the constraints are of the grandra stage of the constraints are of the grandra stage of the constraints are of the grandra stage of the constraints are of the grandra stage.     One of the constraints are constraints are of the grandra stage of the constraints are of the grandra stage of the constraints are constraints are of the constraints are of the constraints are of the constraints are of the constraints are of the constraints are of the constraints are constraints are of the constraints are constraints are of the constraints are constraints are of the constraints are of the constraints are of the constraints are c		Management Activity	Monitoring Prequency	Operating Criteria Parameters	Munitoring Bacords	Engineering Control or Operational Procedure: K:Plant SOPVEV - Environmental/Procedur
	Covered Anaerobic Lagron (CAL)	CAL System Operation	Daily	COD, TSS, VSS, F.M, Temp, Flow, pH, etc.	WT data entry	P Environmentat DEP 49 Forms
		CAL Skidge Profiling	Monthly	Skulge Depth	CAL Sludge Inventory	P.EnvironmentalLand Applications
<ul> <li>Clean-up residues of neute hazardous waste encereds 100 km or 220 km each month</li> </ul>		CAL Studge Famoval	Annual	Gal. of Studge Ramoved	CAL Studge Ramoval Bacente	
HAZARDOUS WASTE		Biogas Generation / Flare Stack Operation		Automated Monitoring	Automated process (RSV) PLC. etc.) P.Conversionmental DEP 40 Forms	
THE A FORMAT AND RELEASED AND AND ADDRESS		By Pass Operation	As required	COD, TSS, VSS, F.M., Temp, Filow, pH, etc.	WT data only	P Environmental CEP Forms
Territoria		Slat-Up/Shutdown Operation	As required	NA	NA.	50P
Territoriane Concernente Conce		Troubleshooting (Abnormal Conditions)	As required	NA	NA.	Oddit Manual of Tree System
HANDLE WITH CARE!	Activated Shudge System	Return Activated Studge / Waste Activated Studge / Secondary Clantication Management	Daily	MLSS, MLVSS, DO, F.M. SVI	WT data only	Laboratory procedures
	-	Phosphorous Removal	Daily	Phosphorous	WT data entry	Laboratory procedures
		Start. Up/Shutdown Chevrolice	As required.	NA	NA.	SOP

# Step 12 - Implement EMS Training

- Identify training needs
- Conduct training
   >General awareness of the EMS

>Task specific training

- Ensure employees (and contractors) are competent to perform required tasks.
- General communication of the EMS throughout process is also very important.

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Training	Frequency	Applicable Personnel/ Job Function	Records Maintaine By
EMS Awareness	Initial	All employees	HR
ISO 14001 Internal Auditor Training	Initial	EMS Internal Auditors	EMS Coordinator
Emergency Evacuation Training	Annual	All employees	Safety
Spill Training	Annual	Spill Response Team	Environmental
Storm Water Pollution Prevention Awareness	Annual	Finishing Plant, Dye House	Environmental

# Step 13 - Conduct EMS Audit(s) Develop audit team; use qualified internal or external resources. Develop audit plan, schedule,

- tools.
- Select auditors and conduct audits to ensure objectivity and impartiality in the audit process.
- Document the audit and report results to Leadership

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the substantial sectors and se	Incal:			
S	Relownce	Environmental Management Tystem Procedure Clause 102 Section 10.8 Improvement		
		Nanconformity and corrective action		
Requirement	<ul> <li>b) Evaluate the order that it do 1) reviewing the 2) determining 3) determining</li> </ul>	winity and Consider Addon a need for action to eliminate the sources of the nonconformity, in es for mour of occur elimenters, by: is nonconformity, the causes of the nonconformity, if similar nonconformities exist, or could potentially occur		
Finding	CAN a revene	d had madequale or incomplete root cause analysia.		
Evidence	Some CARs # 05) had no do	eviewed had inadequate root cause analysis, and one CAR (FV17- curvented root cause analysis.		
	Parlament.	Environmental Management Soviem Procedure Classe 6.1.3		
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Finding	Tem on recurr	ent task list not completed as scheduled.		
Evidence		eri task bit (Annual Somi Water Ste Comptance Evaluation) must requirement and due in June was not marked as complete, evidence that it has been done.		







## Step 15 - Management Review

- Top management must review the EMS at planned intervals
   Should be at least annual, but can consist of a series of meetings throughout the year.
- Need to have a process for management review and ensure all required inputs are addressed
- Specific outputs must also be discussed/documented
- Review the EMS, changes, status of performance, trends, resources, communication, and opportunities for improvement

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#### **Environmental Aspects**

- Identify environmental aspects
- Select what the organization can control/influence
- Set significance criteria
- Determine aspects with significant impacts
- Keep up-to-date

Significant aspects must be taken into account in establishing, implementing, and maintaining the EMS.

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#### Environmental Aspects and Impacts – Basic Steps

- Identify environmental aspectsIdentify associated environmental
- impacts
- Undertake "scoring" for each
- Allocate significance threshold/ cut-off point
- Produce register of environmental aspects and significant environmental aspects (SEAs)



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#### Tips · Identify aspects for each major process/activity Combine similar or like processes into one category, if the aspects are Helpful the same Identify aspects under normal, abnormal, and emergency Tips conditions • When in doubt, K.I.S.S. BURNS MEDONNELL

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# Significance Scoring · Choose a significance scoring system to apply to aspects Choose categories/scale for scoring Examples: Frequency, compliance/regulatory, severity, etc. Choose formula for calculating significance

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### Significance Scoring Example

- Impact scored from 1 (least) to 5 (highest) for each criterion
- Criteria categories
  - Frequency (F)
- Severity (S)
  Regulatory (R)
  Community Concern (C)
- Overall significance score (SS) is product of individual criterion scores
- F x S x R x C = SS
- A "5" regulatory is automatically significant







