

# Environmental Stewardship Program

## Environmental Management System Checklist

### *Environmental Policy*

- Does your EMS include a written environmental policy that has been defined by senior facility management and communicated internally to all employees?
- Does your policy commit your facility to compliance with your legal requirements and attainment of your voluntary commitments? **OR** Do you have programs and procedures in place that achieve compliance with your legal requirements and attainment of your voluntary commitments?
- Does your policy commit your facility to preventing pollution at its source?
- Does your policy commit your facility to continuously improve your environmental performance, even in areas where you do not have regulatory requirements?
- Does your policy commit your facility to sharing information with your community and responding to community concerns? **OR** Do you have programs and procedures in place that implement your commitment to share information with your community and respond to community concerns?

If you can answer “Yes” to all of the questions in this section, then your EMS meets the *Environmental Policy* requirements of ESP.

### *Planning*

- Have you conducted an analysis of all your facility’s aspects, both regulated and unregulated?
- Have you determined which aspects are significant?
- Does your EMS include an inventory of all your legal requirements at the Federal, State, tribal, and local level?
- Does your EMS include procedures for integrating changes due to management, budget, staffing, regulatory or voluntary commitments, product design, and equipment into the EMS?
- Does your EMS include measurable objectives and targets, and procedures to meet your policy commitments?

If you can answer “Yes” to all of the questions in this section, then your EMS meets the *Planning* requirements of ESP.

### *Implementing and Operation*

- Is there senior management commitment to your EMS (e.g. a top manager with responsibility and authority for implementing your EMS)?

- Does your EMS establish roles and responsibilities for meeting the objectives and targets of the EMS, including compliance with legal requirements?
- Does your EMS establish procedures for achieving and maintaining compliance with legal requirements and meeting performance objectives?
- Does your EMS establish procedures for communicating EMS information throughout your organization, including information about your facility's environmental performance?
- Does your EMS establish procedures for controlling EMS documents and records that include who will maintain the documents and records, and where they will be stored?
- Does your EMS include a general environmental training program for all employees?
- Does your EMS include specific training for those who have direct responsibility for achieving and maintaining legal compliance or the objectives and targets in the EMS?
- Does your EMS document all of the following:
  - Your environmental policy?
  - Your significant environmental impacts?
  - Your objectives and targets?
  - Roles, responsibilities, and authorities for the EMS?
  - Your compliance audit program?
  - Your EMS audit program?
  - Overall authority for the EMS?
- Does your EMS include operation and maintenance programs for equipment related to legal compliance, significant environmental aspects, and achieving the objectives and targets in the EMS?
- Does your EMS include an emergency-preparedness program?

If you can answer “Yes” to all of the questions in this section, then your EMS meets the *Implementation and Operation* requirements of ESP.

### ***Checking and Corrective Action***

- Does your EMS include an ongoing program for assessing facility performance and for detecting and preventing nonconformance with your EMS?
- Do you have an EMS audit program?
- Does your EMS include an ongoing program for preventing and detecting noncompliance with legal requirements?
- Does your EMS include a compliance audit program?
- Does your EMS include an active program for prompt corrective action of noncompliance with legal requirements and of nonconformance with EMS requirements?

- Does your EMS include a procedure to confirm that there are no ongoing citizen suits related to environmental issues against your facility?

If you can answer “Yes” to all of the questions in this section, then your EMS meets the *Checking and Corrective Action* requirements of ESP.

### ***Management Review***

- Does your facility’s senior management review the effectiveness of the EMS and evaluate its performance against established objectives and targets at defined intervals?

If you can answer “Yes” to the question in this section, then your EMS meets the *Management Review* requirements of ESP.

### ***Public Outreach***

- Does your EMS include a procedure to identify and respond to community concerns?
- Does your EMS include a procedure to inform community members of important matters that affect them?
- Does your EMS include a procedure to make the ESP Annual Performance Report available to the public?

If you can answer “Yes” to all of the questions in this section, then your EMS meets the *Public Outreach* requirements of ESP.