

Reclamation Manual
Directives and Standards

TEMPORARY RELEASE
(Expires 09/30/2012)

Bureau of Reclamation Environmental Management System (EMS) Conformance Audit Criteria Checklist					
EMS Required Elements	Description	Evidence of Conformance	Yes/No - Description of Non-Conformance	Actions Necessary to Achieve Conformance	Appropriate Organization Corrective and Preventative Action Plan
Environmental Policy	As part of the EMS, the appropriate organization shall formally adopt Reclamation Manual Policy, <i>Commitment to Environmental Stewardship</i> (ENV P05), and include additional commitments to reflect the needs of the appropriate organization, as necessary. The manager of the appropriate organization shall communicate the commitment statement to ENV P05 to all employees of the appropriate organization and to external stakeholders as he/she deems appropriate.	<ul style="list-style-type: none"> The appropriate organization has formally adopted ENV P05 through Regional Director (RD) memorandum distributed to all employees. ENV P05 is included or referenced in the EMS manual. If referenced, a link to the Reclamation Manual website to view the full policy is provided. The appropriate organization's commitment to ENV P05 is documented and maintained. Management understands and supports the goals established by ENV P05. 			
Environmental Aspects	Appropriate organizations shall identify and list the environmental aspects associated with the appropriate organization and its sub-organization's operations, activities, or functions and document them in the EMS. Appropriate organizations shall also include in the EMS the sustainability goals in Section 2 of Executive Order (EO) 13423, <i>Strengthening Federal Environmental, Energy, and Transportation Management</i> (EO 13423) as supplemented and amended by EO 13514, <i>Federal Leadership in Environmental, Energy and Economic Performance</i> (EO 13514) based upon their applicability and relevance to the appropriate organization's mission, operation, and ability to influence the activity.	<ul style="list-style-type: none"> The appropriate organization has established procedures in the EMS manual to identify and evaluate environmental aspects within the scope of the EMS. Environmental aspects have been identified for core mission activities, products and services. If core activities have been omitted, rationale is provided. There is a documented list or report of environmental aspects and impacts. Environmental aspects are reviewed and updated (added/deleted/modified) annually. The EMS manual identifies EO 13413 and EO 13514 sustainability goals as Federal requirements, establishes EMS objectives and targets for some of the sustainability goals, and describes a plan or strategy for including each of the sustainability goals into the EMS over time. 			
Identification of Significant Aspects	Appropriate organizations shall develop, document, and apply criteria for determining significant environmental aspects. Appropriate organizations shall include in the EMS all significant environmental aspects from operations under its control or responsibility, including the operations of its sub-offices and facilities.	<ul style="list-style-type: none"> The appropriate organization establishes procedures in the EMS manual for ranking significance and clearly describing the significance ranking criteria applied. The criteria for significance must consider one or more of the following factors: natural resources/environmental impact; human health impacts; toxicity; probability of occurrence; frequency; cost; within the control or influence of the organization; regulated by local, state and/or Federal law; or required by EO or other Federal, agency or bureau requirement. If a numerical rating system is applied, there must be a clear description of the values, what they mean, and how they were applied to determine and rank significance. Those aspects determined to be significant must be clearly identified. 			

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Legal and other Requirements	Appropriate organizations shall establish, implement, and maintain procedures within the EMS for identifying the Federal, state, and local environmental regulations and other requirements and commitments applicable to their organization's environmental aspects. The procedures shall include a periodic review of legal and other requirements and the process for documenting and communicating changes.	<ul style="list-style-type: none"> • The appropriate organization establishes procedures in the EMS manual for identifying applicable environmental legal requirements, corporate policies, and other environmental requirements. • The EMS manual or other reference source identifies the Federal, state, and local legal and other environmental requirements relevant to the appropriate organization's activities and operations (i.e., hazardous materials management, environmental, health and safety, transportation, and energy laws and regulations) and the corresponding environmental aspects have been identified. • The appropriate organization assigns responsibility for monitoring, updating, and communicating changes to applicable legal and other environmental requirements. The latest legal and other environmental requirements are included in the EMS manual or other source (e.g., website, environmental compliance handbook, on-line environmental regulation tracking service) and are communicated to applicable staff. 			
Objectives and Targets	The appropriate organization shall establish, implement, and document in the EMS measurable, realistic, and time-specific objectives and targets for all significant environmental aspects. The environmental objectives and targets shall support ENV P05 to promote regulatory compliance, prevent pollution, reduce environmental impacts through sustainable practices, and improve environmental performance.	<ul style="list-style-type: none"> • The appropriate organization establishes in the EMS manual a systematic process to determine objectives and targets. • Management considers significant environmental aspects and impacts, legal and other requirements, EO 13423 and EO 13514 sustainability goals, ENV P05, and relevant business considerations when identifying objectives. • The rationale for selecting current objectives and targets is documented and easily understood. • Objectives are clearly stated, understandable, and realistic. Targets are quantifiable and time specific. • Significant aspects for which objectives and targets are not set in the current EMS cycle must be identified and an explanation be provided. 			
Roles and Responsibilities	Appropriate organizations shall define, document, and communicate the roles and responsibilities for achieving the environmental objectives and targets.	<ul style="list-style-type: none"> • There is a clear identification and delineation of roles, responsibilities, and authorities for implementing the EMS in an organizational chart or other document. • The appropriate organization has identified in each EMP the positions responsible for achieving objectives and targets to address significant environmental aspects. • There is evidence via memorandums, emails, meeting notes, and interviews that the roles and responsibilities have been communicated to the appropriate personnel, personnel understand their responsibilities, and their roles and responsibilities are being carried out. 			

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Training and Awareness	Employees working in activities or operations tied to significant environmental aspects shall be trained to perform their job functions in an environmentally sound manner. The appropriate organization shall identify training needs associated with its significant environmental aspects, shall provide training or other means to meet the needs, and retain associated records.	<ul style="list-style-type: none"> • The appropriate organization establishes procedures in the EMS manual for identifying positions requiring training to reduce potential environmental impacts. • The necessary training, experience and education has been identified for those positions (e.g., environmental regulatory training, hazardous communications training, green purchasing training, sustainable building design, etc.). • The appropriate organization requests and supports completion of required training of identified personnel. Records of completed training are maintained and available and indicate that training is current for appropriate individuals. • The appropriate organization facilitates the completion of initial EMS awareness training for all current and new employees to ensure awareness of Reclamation's environmental policy, Federal EMS and sustainability requirements, and strategy for implementing EMS. • Contractors and temporary employees are made aware of ENV P05. 			
Internal and External Communication	Appropriate organizations shall communicate to all employees and appropriate external stakeholders ENV P05. The organization shall establish and maintain procedures for communication on the EMS between organizational functions and levels. Procedures shall also be developed for receiving, documenting, and responding to relevant communication from external interested parties.	<ul style="list-style-type: none"> • ENV P05 has been distributed to all employees and is readily available for review either via hard copy or electronically. • ENV P05 is made available to the public via a link on the Reclamation Manual website or other means deemed appropriate. • Communication procedures are established, maintained, and implemented for internal communication on EMS between various functions and levels of the organization. • Communication procedures are established to manage incoming communication from external parties related to the EMS. • Management has made a decision whether or not to communicate the EMS manual to the public, and this decision is documented. 			

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Documentation	Appropriate organizations shall maintain and control documents so that they are up-to-date, legible, consistent, and available. There are clearly defined processes for controlling documents to ensure that the most update-to-date documents are available.	<ul style="list-style-type: none"> • The EMS identifies the written information that supports the EMS. At a minimum, there is documentation of the following specific EMS information/records: <ul style="list-style-type: none"> o ENV P05 o Environmental aspects and impacts o Criteria for determining significant environmental aspects o Significant environmental aspects o Environmental objectives and targets o Roles and responsibilities o Positions requiring training, training requirements, and records of training received o EMS management reviews o EMS internal and external audits • The EMS includes procedures for the management of EMS and related documentation in accordance with Reclamation and regional records management requirements. 			
Operational Controls	Appropriate organizations shall identify, implement, maintain, and document or reference procedures, practices, and operational controls related to their significant environmental aspects. This may include reference to current standard operating procedures, policies, directives and standards (D&S), plans, and programs. Appropriate organizations shall ensure that these controls are carried out in order to avoid deviation and potential environmental impacts and to achieve environmental objectives.	<ul style="list-style-type: none"> • The appropriate organization establishes in the EMS manual a process to identify, develop, implement, and update operational controls appropriate to the organization's significant environmental aspects. • The EMS manual documents or references operational controls related to the significant environmental aspects. References may include documentation developed and managed outside of the EMS such as policies, D&S, operating procedures, technical guidance documents, and emergency action plans. The reference will provide the location of the document. • Operational controls ensure that significant aspects are appropriately managed, thus reducing the potential for adverse environmental impacts. • The appropriate organization communicates operational controls to appropriate staff. 			
Emergency Preparedness and Response	Appropriate organizations shall establish, implement, and maintain emergency response procedures for potential occurrences that can have an environmental impact. The appropriate organization shall refer to existing emergency action plans in the EMS, as appropriate.	<ul style="list-style-type: none"> • The EMS manual references internal Reclamation emergency action plans and procedures. • Emergency plans include procedures to prevent and/or mitigate the environmental effects associated with accidents and emergencies, respond to actual emergency situations and accidents, perform periodic testing (where practicable), and require review and revision following an emergency or a change in organizational responsibility, process, chemicals, or facilities. 			

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Monitoring and Measurement	Appropriate organizations shall establish and document procedures to monitor and measure the key operations that can have a significant environmental impact on the environment. Monitoring and measurement activities shall also include internal audits or reviews that assess compliance with legal requirements, performance in achieving the environmental objectives and targets, effectiveness of operational controls, and implementation of quality assurance and control procedures for collecting data related to the EMS. The appropriate organization shall identify and document any noncompliance issues and deficiencies and put corrective action plans in place.	<ul style="list-style-type: none"> • The appropriate organization establishes procedures in the EMS manual to monitor and measure achievement of EMS objectives and targets. Data related to objectives and targets is gathered and analyzed on a reoccurring basis. EMS management reviews and reports demonstrate that accomplishment of objective and target based on sound data is assessed. • Additional procedures are established for monitoring the effectiveness of operational controls to ensure that strategies are in place to reduce current and future environmental impacts of significant aspects. There must be evidence that good quality assurance practices are in place. Procedures for monitoring operational controls may occur at the field level and may be referenced. • The EMS manual contains procedures for conducting internal reviews of the EMS and establishes a frequency for such reviews. Internal review procedures ensure that the EMS functions properly and conforms to the requirements in Reclamation Manual D&S, <i>Environmental Management System (EMS) Implementation</i> (ENV 05-01). • EMS procedures include how the results of internal reviews and external audits will be communicated and how non-conformities will be addressed. This includes procedures for reviewing previous audit findings, the status of corrective and preventative actions, and confirmation of closure on audit findings. 			
Evaluation of Compliance	The appropriate organization shall reference and adopt the environmental review procedures in Reclamation Manual D&S, <i>Hazardous Materials and Hazardous Waste Auditing and Review Program Implementation</i> (ENV 02-08).	<ul style="list-style-type: none"> • The appropriate organization has an environmental compliance program with an environmental audit component that meets the requirements of ENV 02-08. • Reports document facility-level audits to determine compliance to environmental regulatory requirements and identify audit findings and recommendations. 			
Management Review	The senior manager of the appropriate organization shall conduct management reviews of its EMS at planned intervals to ensure continued suitability, adequacy, and effectiveness. The management reviews shall focus on conformance with the EMS elements, deficiencies, and opportunities for improvement. Management reviews shall be documented, maintained, and include: (a) any EMS-related communication from external interested parties; (b) the extent to which EMS objectives and targets have been met, including compliance with environmental regulations and other legal requirements; (c) the status of the EMS implementation and conformance declarations; (d) the results of previous EMS conformance audits, if any, and (e) the status of any follow-up actions from previous conformance audits.	<ul style="list-style-type: none"> • Top management reviews the EMS, at least annually, to ensure its continuing suitability and effectiveness. • Meeting minutes or notes demonstrate that the management review includes review of the EMS manual, progress and status of current objectives and targets, changes in significant environmental aspects, the results of internal or external audits, the status of major audit findings and corrective and preventative actions, open items from previous management reviews, and opportunities for improving or changing the EMS. • Attendee lists demonstrate that senior level management of the appropriate organization participated in the management review. • Records of management review actions and decisions are maintained and available. • Adequate data in the form of briefing papers or reports are provided to management to ensure that they perform a thorough and effective review. 			