

US EPA ARCHIVE DOCUMENT

SECTION II: EMS DOCUMENTATION

TIER I SAMPLE EMS MANUAL

Introduction and Purpose

This Manual defines the scope of the EAF Steel Company's¹ Environmental Management System (EMS) and provides a linkage of system documents to the various elements of the ISO 14001:1996 standard and ISO 14001: DIS 2003.

The control of this Manual is in accordance with the EAF Steel Company environmental Procedure for Document Control (P-007). All copies of this EMS Manual not marked "CONTROLLED DOCUMENT" are uncontrolled and should be used for reference purposes only.

Amendments to this manual will be issued by the Environmental Management Representative (EMR) or designee following approval by the Facility Manager.

The principal elements of the system described in this EMS Manual are:

- Scope, resources, roles, responsibility, and authority
- Environmental policy
- Legal and other environmental requirements
- Environmental aspects
- Objectives, targets, and programs
- Competence, training, and awareness
- Communication
- Documentation and document control
- Operational control
- Emergency preparedness and response
- Monitoring, measurement, and evaluation of compliance
- Nonconformity, corrective, and preventive action
- Records
- Internal audits
- Management review

¹ EAF Steel Company is a fictional company used as an example in the Sample EMS Manual and is not associated with any particular steel facility.

Note on using the Sample EMS Manual: This EMS Guide recommends that facilities establish, at a minimum, the several documented procedures required by the ISO 14001 EMS Standard. An index of sample procedures and accompanying forms, which can be used to document conformance with the procedures, is provided as **Section II, Exhibit 12—Master Document List**. The procedures are meant to serve as templates that can be customized by your facility to define roles, responsibilities, activities, and record keeping for that EMS element. When you create your facility EMS, you will want to adopt a labeling system for identifying procedures, forms, and work instructions. As you can see in **Section II, Tier II**, this EMS Guide uses a hypothetical labeling system wherein environmental procedures (P) that apply facility-wide are labeled P-001 to P-014. The first form associated with P-003 is labeled F-003.01 and the second form associated with P-003 is labeled F-003.02, and so forth. Environmental work instructions (WI) that apply to a subset of the whole facility are labeled WI-001 to WI-003, and are found in Tier III. The first form associated with WI-001 is labeled WI-001.01 and the second form associated with WI-001 is labeled WI-001.02, and so forth.

Also in this EMS Guide are examples of how a facility might document and record its EMS (see Exhibits after Tier III). Usually these are examples of how to complete the recommended forms. Revising these examples should be much easier than starting with a blank page. However, when using these examples, it is crucial to review the requirements of your facility in accordance with company policies and the most recent federal, state, and local requirements.

1.0 Scope, Resources, Roles, Responsibility, and Authority

The EAF Steel Company EMS provides a mechanism for environmental management throughout all areas and departments at the facility in Fictional City, Your State. More specifically, it covers operations beginning at the points of entry of raw materials and energy, to the point of exit of finished manufactured products. In addition to manufacturing processes and activities, all other on-site operations fall within the scope of the EMS, including maintenance, grounds-keeping, and offices. The EMS does take material disposal into account in evaluating the environmental impacts of on-site activities, even though EAF Steel may not be the final disposer of its materials. The EMS is designed to cover environmental aspects that a facility can control and directly manage and those it cannot control or directly manage but can be expected to have an influence. Environmental aspects take into account planned or new developments, or new or modified activities, products, and services.

EMS roles, responsibilities, and authorities are defined at relevant functions and levels within the facility. Top management ensures the availability of resources essential to implement, maintain and improve the EMS, including: training, human resources, specialized skills, financial resources, and technical and informational services. An Environmental Management Representative (EMR) has been appointed who, irrespective of other responsibilities, has primary responsibility for ensuring that the EMS is implemented and maintained in accordance with ISO 14001 and for reporting on the performance of the EMS to top management for review and as the basis for improvement. An EMS Coordinator provides routine EMS support and reports directly to the EMR. Members of the Cross-Functional Team (CFT), which includes members from each major operation within the facility, are responsible for representing their area or department in several facets of the EMS, such as identifying environmental aspects, determining significant environmental aspects (SEAs), setting objectives and targets, implementing action plans, reviewing and tracking EMS internal audits results, and serving as an information resource. See **Section II, Exhibit 1—Facility Organization Chart and EMS Core Team Description**.

Reference Material

ISO 14001 Standard (1.0, 4.4.1)

2.0 Environmental Policy

The EAF Steel Company Environmental Policy (Policy) is endorsed by the Facility Manager. The policy will be implemented and maintained across all activities within the scope of the EMS described above. The Policy, which is appropriate to the nature, scale, and environmental impacts of its activities, products, and services, includes the company's commitment to continuous improvement and prevention of pollution as well as a commitment to comply with applicable legal requirements and other requirements to which EAF Steel subscribes, which relate to environmental aspects. The Policy will be reviewed annually by top management, communicated to all persons working for or on behalf (hereafter workforce) of EAF Steel, and made available to the public in accordance with the Communication with Stakeholders procedure. See **Section II, Exhibit 2—EAF Steel Company's Environmental Policy**.

Reference Material

ISO 14001 Standard (4.2)

Applicable Procedures and Forms (*Procedures and forms are found in **Section II, Tier II***)

Procedure for Communication with Stakeholders (P-006) (*see also 7.0 Communication*)

3.0 Environmental Aspects

EAF Steel Company has established, implemented, and will maintain a procedure for determining, within the defined scope of the EMS, the environmental aspects of its operations and activities that it can control. The procedure also describes how EAF Steel Company identifies aspects that it can influence taking into account planned or new developments, or new or modified operations or activities.

The procedure describes how EAF Steel Company determines which of its environmental aspects will be considered significant. Discussions regarding significance are recorded in CFT meeting minutes. The SEAs are reviewed at least semi-annually by the CFT or when there is a new or changed process or activity at the facility. The EMR maintains CFT minutes and other records. See **Section II, Exhibit 4—Significant Environmental Aspects**.

Reference Material

ISO 14001 Standard (4.3.1)

Applicable Procedures and Forms

Procedure for Environmental Aspects, Objectives and Targets, and Programs (P-003)

Aspects Identification and Significant Determination (F-003.01)

Procedure for Identification of Legal and Other Requirements (P-001) (*see also 4.0 Legal and Other Environmental Requirements*)

4.0 Legal and Other Environmental Requirements

EAF Steel Company has established, implemented, and will maintain a procedure for identifying, accessing, and communicating legal and other environmental requirements to which the facility subscribes. The EMS Coordinator and CFT determine how these requirements apply to EAF Steel's environmental aspects and ensure they are considered in developing, implementing, and maintaining its environmental management system.

The EMS Coordinator identifies, communicates to appropriate parties, and makes available, as necessary, local regulations changes to them. At least annually, the EMS Coordinator reviews the most current national, regional, provincial, state, and local legal and other requirements as applicable to EAF Steel Company. EAF Steel also has established a procedure to secure approval from regulatory agencies for processes and

activities affecting air emissions, material management or water discharges, as well as the method for other environmental approvals. See **Section II, Exhibit 3—List of Legal and Other Environmental Requirements**.

Reference Materials

ISO 14001 Standard (4.3.2)

Applicable Procedures and Forms

Procedure for Identification of Legal and Other Environmental Requirements (P-001)

Legal and Other Environmental Requirements Form (F-001.01)

Procedure for Obtaining Agency Approval (P-002)

5.0 Objectives, Targets, and Programs

The EAF Steel Company CFT has established, implemented, and will maintain documented objectives and targets for each SEA. The objectives and targets are measurable where practicable and consistent with the environmental policy, including the commitments to prevention of pollution, compliance with legal and other environmental requirements and continual improvement. These objectives and targets define:

1. The performance objectives (Investigate/Study, Control/Maintain, or Improve) for each SEA;
2. The specific quantified targets that define those performance objectives; and
3. The planned deadlines for the achievement of those targets.

Objectives and targets are developed taking into account: legal and other environmental requirements; SEAs; technological options and financial, operational, and business plans; and the views of interested parties. See **Section II, Exhibit 6—Example of Linking SEAs, Objectives and Targets, Operational Control Procedures to Measurement Indicators, Job Functions, Responsible Parties, and Applicable Operations**.

The CFT has established, implemented, and will maintain programs as a means to achieve objectives and targets. These programs define the principal actions to be taken, those responsible for undertaking those actions (at relevant functions and levels of the company), and means and timeframes by which they are to be achieved. The programs are developed by the CFT and approved by top management (refer to Section 4.0 Significant Environmental Aspects). See **Section II, Exhibits 7-10** for example programs.

EAF Steel Company also has established, implemented, and will maintain a procedure to ensure that environmental management applies to new developments and new or modified activities, products, or services.

Reference Material

ISO 14001 Standard (4.3.3)

Applicable Procedures and Forms

Procedure for Environmental Aspects, Objectives and Targets, and Programs (P-003)

Linking SEAs, Objectives and Targets, and EMS Operational Control Procedures to Measurement Indicators, Job Functions, Responsible Parties, and Applicable Processes (F-003.02)

Program(s) Forms (F-003.03)

Procedure for Environmental Review of New Processes and Materials (P-004)

Environmental Checklist for New Projects (F-004.01)

6.0 Competence, Training, and Awareness

EAF Steel Company identifies, plans, monitors, and records training needs for personnel whose work may have a significant impact upon the environment. EAF Steel Company has established, implemented, and will maintain a procedure to train employees at each relevant function and level so they are aware of the environmental policy, SEAs, their roles and responsibilities in achieving conformance with the policy and procedures, and with the requirements of the environmental management system. The company procedure ensures that any persons performing tasks on its behalf that have the potential to cause significant environmental impact identified by the organization are competent on the basis of appropriate education, training, or experience.

The training coordinator is responsible for maintaining employee training records. Appropriate records are monitored and reviewed on a scheduled basis. Competency is determined by the employee's supervisor as specified in P-005. See **Section II, Exhibit 11—Training Needs Analysis Matrix**.

Reference Material

ISO 14001 Standard (4.4.2)

Applicable Procedures and Forms

Procedure for Environmental Training and Awareness (P-005)

Training Needs Analysis—Procedures and Work Instructions by Area/Department (F-005.02)

7.0 Communication

EAF Steel Company has established, implemented, and will maintain a procedure for internal communication between levels and functions of the company and external communications (i.e., receiving, documenting and responding to relevant communication

from external interested parties regarding the EMS). EAF Steel Company has considered a process for external communication on its SEAs and has decided to make that information available on request.

Reference Material

ISO 14001 Standard (4.4.3)

Applicable Procedures

Procedure for Communication with Stakeholders (P-006)

External Stakeholder Communication Record (F-006.01)

8.0 Documentation and Document Control

This EMS Manual includes the environmental policy and objectives and targets. It also describes the scope, the main elements of the management system and their interaction, and references to related documentation. EMS procedures and records required by the ISO 14001 EMS standard are provided in this EMS Manual, see **Section II, Tier II—EMS Procedures and Forms**. These are the documents that EAF Steel Company has determined to be necessary to ensure effective planning, operation, and control of processes that related to its significant environmental aspects. These documents define the establishment, implementation, and maintenance of the EMS and ensure that the system is maintained in accordance with the environmental policy, objectives, and targets and is communicated to employees, subcontractors and service providers. These procedures are applied company-wide.

EAF Steel Company has established, implemented, and will maintain an environmental procedure for controlling EMS documents. This procedure describes approving documents for adequacy prior to issue, reviewing and updating documents, where documents can be located and how and when they are reviewed. The procedure ensures that current versions are available and that obsolete documents are promptly removed from use or are suitably identified. A list of controlled documents is provided in this EMS Manual, see **Section II, Exhibit 12—Master Document List**.

Reference Material

ISO 14001 Standard (4.4.4, 4.4.5, 4.5.4)

Applicable Procedures and Forms

Procedure for Environmental Document Control (P-007)

Master Document List (F-007.01)

9.0 Operational Control

The EAF Steel Company CFT is responsible for identifying those operations associated with identified SEAs that require operational controls consistent with its environmental policy, objectives and targets. EAF Steel Company has planned these operations to

ensure that they are carried out under specified conditions by establishing and maintaining documented work instructions to control situations where absence of documented procedures could lead to deviations from the environmental policy and the objectives and targets. The work instructions stipulate operating criteria. (**See Section II, Tier III** for a few example work instructions).

EAF Steel Company has a procedure for identifying and controlling the SEAs of goods and services used by the facility and communicating applicable procedures and requirements to suppliers and contractors.

Reference Material

ISO 14001 Standard (4.4.6)

Applicable Procedures and Forms

Linking SEAs, Objectives and Targets, and EMS Operational Control Procedures to Measurement Indicators, Job Functions, Responsible Parties, and Applicable Operations (F-003.02)

Procedure for Environmental Briefing of Sub-Contractors and Service Providers (P-008)

Environmental Briefing Packet and Method Statement (F-008.1)

10.0 Emergency Preparedness and Response

EAF Steel Company has established, implemented, and will maintain a procedure to identify the potential for and to respond to environmental accidents and emergency situations and for preventing and mitigating the environmental impacts that may be associated with them. Emergency preparedness and response procedures are reviewed by the Cross Functional Team on an annual basis and after the occurrence of accidents or emergency situations and revised as necessary. EAF Steel periodically tests such procedures wherever practical.

Reference Material

ISO 14001 Standard (4.4.7)

Applicable Procedures and Forms

Procedure for Emergency Preparedness and Response (P-009)

Emergency Preparedness and Response Requirements Matrix (F-009.01)

11.0 Monitoring, Measurement, and Evaluation of Compliance

EAF Steel Company has established, implemented, and will maintain a procedure to monitor and measure the key characteristics of its operations and activities that can have a significant impact on the environment. This procedure includes documenting information to monitor performance, applicable operational controls, and conformity with EAF Steel's objectives and targets. EAF Steel ensures that calibrated or verified

monitoring and measurement equipment is used and maintained. EAF Steel retains the associated records.

Consistent with its commitment to compliance, EAF Steel has established, implemented, and will maintain a procedure, in this case combined with Internal Audits for periodically evaluating compliance with applicable environmental legal requirements and other requirements to which EAF Steel subscribes. EAF Steel keeps records of the results of these periodic evaluations.

Reference Material

ISO 14001 Standard (4.5.1, 4.5.2)

Applicable Procedures and Forms

Procedure for Monitoring and Measurement (P-010)

Environmental Measurement Indicators Log (F-010.01)

Calibration Log (F-010.02)

Compliance Tracking Log (F-010.03)

Procedure for Internal and Regulatory Compliance Audits (P-013)

12.0 Nonconformity, Corrective, and Preventive Action

EAF Steel Company has a procedure for defining responsibility and authority for handling and investigating non-conformances, for taking action to mitigate impacts, and for initiating and completing corrective and preventive action. The procedure also describes actions to investigate and eliminate the causes of actual nonconformities, in order to prevent recurrence and actions to eliminate the causes of potential non-conformities to prevent their occurrence. Any changes in procedures resulting from corrective and preventive actions are implemented and documented.

Reference Material

ISO 14001 Standard (4.5.3)

Applicable Procedures and Forms

Procedure for Corrective and Preventive Action (P-011)

Corrective and Preventive Action Request (F-011.01)

Corrective and Preventive Action Tracking Log (F-011.01)

13.0 Records

EAF Steel Company has a procedure to identify, maintain, and dispose of environmental records. These records include training records and the results of audits and reviews.

They are readily retrievable and protected against damage, deterioration, and loss. The Areas and Departments maintain their own environmental records. Record and document retention also is specified in the procedure. See **Section II, Exhibit 13—EMS Records Management Table**.

Reference Material

ISO 14001 Standard (4.5.4)

Applicable Procedures and Forms

Procedure for Environmental Records (P-012)

Index for Environmental Records (F-012.01)

14.0 Internal Audits

EAF Steel Company has established, implemented, and will maintain a procedure for conducting periodic internal audits at planned intervals to ensure the EMS conforms to planned arrangements and has been properly implemented and maintained. A summary of these audits is provided to top management. Audits are performed according to a schedule that is based on the environmental importance of an activity, the results of previous audits, and the audit schedule. Auditors are trained and audit records are kept with the Audit Program Leader. General Facility Population and Top Management Internal Audit Checklists are included as **Section II, Exhibit 14**.

Reference Material

ISO 14001 Standard (4.5.5)

Applicable Procedures and Forms

Procedure for Internal and Regulatory Compliance Audits (P-013)

Internal Audit Checklist (F-013.01)

Internal Audit Schedule Form (F-013.02)

General Company Employee Checklist for Internal Audits (F-013.03)

Questionnaire for General Company Employee in Spanish (F-013.04)

15.0 Management Review

EAF Steel Company has a procedure for EMS review by top management. Top management reviews all elements of the EMS at least annually to ensure its continuing suitability, adequacy, and effectiveness. Reviews include assessing opportunities for improvement and the need for changes to the EMS, including the environmental policy and environmental objectives and targets. Meeting minutes record these reviews and are kept by the EMR or designee.

The input to management review includes, among other information:

- Results of environmental management system audits;
- Communication from external interested parties;
- The performance of the environmental management system;
- The extent to which objectives and targets have been met;
- Status of corrective and preventive actions;
- Follow-up actions from previous management reviews;
- Changing circumstances; and
- Recommendations for improvement.

The outputs from the management review include any decisions and actions related to possible changes to environmental policy, objectives, and other elements of the environmental management system, consistent with the commitment to continual improvement.

Reference Material

ISO 14001 Standard (4.6)

Applicable Procedures and Forms

Procedure for Management Review (P-014)

Management Review Record (F-014.01)

Record of Revisions

Revision Date	Description	Sections Affected

TIER II PROCEDURES AND FORMS

Number	Title	Page	ISO Standard
P-001	Procedure for Identification of Legal and Other Requirements	TII-3	4.3.1 4.3.2
F-001.01	Legal and Other Environmental Requirements	TII-5	4.3.2
P-002	Procedure for Obtaining Agency Approval	TII-6	4.3.2
P-003	Procedure for Environmental Aspects, Objectives and Targets, and Programs	TII-8	4.3.1 4.3.3
F-003.01	Aspects Identification and Significance Determination	TII-14	4.3.1
F-003.01 alternate	Significance Determination for Aspects Based on Environmental and Business Considerations	TII-16	4.3.3 4.4.6
F-003.02	Linking SEAs, Objectives and Targets, and EMS Operational Control Procedures to Measurement Indicators, Job Functions, Responsible Parties, and Applicable Processes	TII-18	4.3.3, 4.4.6
F-003.03	Program(s) Form	TII-19	4.3.3
P-004	Procedure for Environmental Review for New Processes, Materials, and Projects	TII-20	4.3.3
F-004.01	Environmental Checklist for New Processes or Materials	TII-24	4.3.3
F-004.02	Environmental Checklist for New Projects	TII-26	4.3.3
P-005	Procedure for Environmental Training and Awareness	TII-28	4.4.2
F-005.01	Training Needs Analysis – Environmental Courses	TII-30	4.4.2
F-005.02	Training Needs Analysis – Procedures and Work Instructions by Area/Department	TII-31	4.4.2
P-006	Procedure for Communication with Stakeholders	TII-32	4.4.3
F-006.01	External Stakeholder Communication Record	TII-34	4.4.3
P-007	Procedure for Environmental Document Control	TII-35	4.4.4 4.4.5
F-007.01	Master Document List	TII-37	4.4.4 4.4.5
P-008	Procedure for Environmental Briefing of Sub-contractors and Service Providers	TII-38	4.4.6
F-008.01	Environmental Briefing Packet and Method Statement	TII-40	4.4.6
P-009	Procedure for Emergency Preparedness and Response	TII-46	4.4.7
F-009.01	Emergency Preparedness and Response Requirements Matrix	TII-48	4.4.7

Number	Title	Page	ISO Standard
P-010	Procedure for Monitoring and Measurement	TII-49	4.5.1 4.5.2
F-010.01	Environmental Measurement Indicators Log	TII-51	4.5.1 4.5.2
F-010.02	Calibration Log	TII-52	4.5.1 4.5.2
F-010.03	Compliance Tracking Log	TII-52	4.5.1 4.5.2
P-011	Procedure for Corrective and Preventive Action	TII-53	4.5.3
F-011.01	Corrective and Preventive Action Request	TII-55	4.5.3
F-011.02	Corrective and Preventive Action Tracking Log	TII-57	4.5.3
P-012	Procedure for Environmental Records	TII-58	4.5.4
F-012.01	Index of Environmental Records	TII-59	4.5.4
P-013	Procedure for Internal and Regulatory Compliance Audits	TII-60	4.5.1 4.5.2 4.5.5
F-013.01	Internal Audit Checklist	TII-64	4.5.5
F-013.02	Internal Audit Schedule Form	TII-74	4.5.5
F-013.03	General Company Employee Checklist for Internal Audits	TII-75	4.5.5
F-013.04	Questionnaire for General Company Employee in Spanish	TII-78	4.5.5
P-014	Procedure for Environmental Management System Management Review	TII-79	4.6
F-014.01	Management Review Record	TII-81	4.6

Procedure for Identification of Legal and Other Environmental Requirements (P-001)

1.0 Purpose

EAF Steel Company is committed to complying with all applicable environmental legal requirements. It also strives to meet other environmental requirements to which the facility subscribes. This procedure describes how EAF Steel Company identifies and has access to applicable legal and other environmental requirements.

2.0 Activities Affected

All areas and departments

3.0 Forms Used

Legal and Other Environmental Requirements (F-001.01)

4.0 References

- 4.1 Governmental/commercially-available publications
- 4.2 Other requirements to which EAF Steel Company subscribes
- 4.3 ISO 14001: DIS 2003, Element 4.3.2

5.0 Definitions

None

6.0 Exclusion

None

7.0 Procedure

- 7.1 The Environmental Management Representative (EMR) is responsible for tracking applicable environmental legal requirements and evaluating their potential impact on the facility's operations. He or she employs several techniques to track, identify, and evaluate applicable laws and regulations. These techniques include commercial databases, information from the trade association, direct communication with national and state regulatory agencies, and periodic refresher training on environmental laws.
- 7.2 The EMR identifies other environmental requirements to which the facility subscribes and keeps up to date with changes in these.
- 7.3 As necessary, the EMR may call upon off-site resources such as consultants or attorneys.
- 7.4 The EMR compiles and maintains updated copies of applicable environmental laws and regulations.
- 7.5 The EMR, working with the EMS Coordinator and Cross Functional Team (CFT), correlates these regulations to the business activities and the related environmental aspects.

8.0 Frequency

Ongoing

9.0 Records

Form for Legal and Other Environmental Requirements (F-001.01) is maintained by the EMS Coordinator. The EMR maintains copies of the applicable regulations.

Record of Revisions

Revision Date	Description	Sections Affected

Legal and Other Environmental Requirements Form (F-001.01)

Note: This table lists descriptions of legal and other environmental requirements for electric arc furnace facilities and how they are relevant to production process and facility support. See **Section II, Exhibit 3** for an example based on F-001.01.

U.S. Federal Environmental Laws:

U.S. Federal Environmental Regulations--Air:

U.S. Federal Environmental Regulations--Water:

U.S. Federal Environmental Regulations—Solid and Hazardous Waste

U.S. Federal Environmental Regulations—CERCLA/EPCRA:

U.S. Federal Environmental Regulations—Other

State of [Your State] Environmental Statutes:

State of [Your State] Environmental Regulations ([Your State] Administrative Code - YSAC):

Local Regulations– Fictional City Facility:

Local Permits– Fictional City Facility (see table below):

Other Requirements:

PERMIT	AGENCY	ISSUED	EXPIRES	COMMENTS

Record of Revisions

Revision Date	Description	Sections Affected

US EPA ARCHIVE DOCUMENT

Procedure for Obtaining Agency Approval (P-002)

1.0 Purpose/Scope

This procedure describes the method to be implemented to secure approval from regulatory agencies for processes and activities at EAF Steel Company affecting air emissions, materials management or water discharges, as well as the method for other environmental approvals.

2.0 Activities Affected

All areas and departments

3.0 Forms Used

None

4.0 References

- 4.1 Procedure for Identification of Legal and Other Environmental Requirements (P-001)
- 4.2 Procedure for Communication with Stakeholders (P-006)
- 4.3 Procedure for Environmental Records (P-012)
- 4.4 ISO 14001:1996, Elements 4.3.4, 4.4.6, 4.5.1

5.0 Definitions

- 5.1 Regulatory Agency: governmental unit with delegated authority for implementing regulations related to ambient air quality, materials management, and/or water discharge quality.
- 5.2 Process: materials, activities, equipment associated with operations.
- 5.3 Permit: permit, licenses, certifications, or other authorizations issued by a governmental regulatory body.

6.0 Exclusions

None

7.0 Procedure

- 7.1 Where operations are identified as potentially requiring environmental permits, the EMS Coordinator shall coordinate the investigation and permitting process through the use of an informal "permit team" comprised of (at least) the EMS Coordinator and, as appropriate, a representative from the [Facility's Name] function responsible for the operation concerned.
- 7.2 All communications in connection with permits, and specifically those with the relevant regulatory agencies, shall be undertaken in conformance with the Procedure for Communication with Stakeholders (P-006).
- 7.3 The permit team shall develop a strategy to secure permits concurrently with existing operational timing plans. The Environmental Management Representative (EMR) is responsible for timely communication of the issues to the Facility Management Team.
- 7.4 The EMS Coordinator shall coordinate the preparation, submission and negotiation of permit applications, operating through the permit team. Permits obtained shall be reviewed to ensure that they adequately cover the operation(s) concerned.

7.5 The permit team will review the terms and conditions in new permits and modify or establish operational controls necessary to ensure compliance with the permit.

8.0 Frequency
Ongoing

9.0 Records
Records shall be retained consistent with the procedure for Environmental Records (P-012).

Record of Revisions

Revision Date	Description	Sections Affected

Procedure for Environmental Aspects, Objectives and Targets, and Programs (P-003)

1.0 Purpose

This procedure defines *EAF Steel Company's* method for:

- Identifying the environmental aspects of its products and services within the defined scope of its EMS that it can control and those which it can influence taking into account planned or new developments, or new or modified activities, products and services;
- Determining the significance for aspects that have actual or potential significant impacts on the environment;
- Establishing and maintaining documented objectives and targets that are measurable and consistent with the environmental policy, including the commitments to prevention of pollution, compliance with legal and other environmental requirements and continual improvement
- Establishing and maintaining programs for achieving its objectives and targets.

2.0 Activities Affected

All areas and departments

3.0 Forms Used

- 3.1 Aspects Identification and Significance Determination (F-003.01)
- 3.2 Linking SEAs, Objectives and Targets, and EMS Operational Control Procedures to Measurement Indicators, Job Functions, Responsible Parties, and Applicable Operations (F-003.02)
- 3.3 Program Forms (F-003.03)

4.0 References

- 4.1 Procedure for Legal and Other Requirements (P-001)
- 4.2 Procedure for Environmental Review of New Processes, Materials, and Projects (P-004)
- 4.3 Procedure for Environmental Records (P-012)
- 4.4 Procedure for Environmental Management Systems Review (P-014)
- 4.5 ISO 14001 Standard (4.3.1, 4.3.2 and 4.3.3)

5.0 Definitions and Acronyms

- 5.1 Environmental Aspect: element of a company's activities, products, and services that can interact with the environment.
- 5.2 Environmental Objective: overall environmental goal, arising from the environmental policy, which a company sets itself to achieve and which is quantified where practicable.
- 5.3 Environmental Target: detailed performance requirement, quantified where practicable, applicable to the company or parts thereof, which arises from the environmental objectives and which needs to be set and met to achieve those objectives.
- 5.4 Program: the means, time frames, and personnel responsible for achieving an objective and target.

6.0 Exclusions

None.

7.0 Procedure

7.1 Procedure for Aspect Identification

7.1.1 The facility Cross Functional Team (CFT), led by the Environmental Management Representative (EMR) or designee, is responsible for completing the form for Aspects Identification and Significance Determination (F-003.01) for each area or operation of the facility and supporting activity that is within the scope of the EMS. If possible, members of the CFT will conduct a physical inspection when completing the form. The completed form is a process flow diagram of a process or activity and is used to identify environmental aspects.

7.1.2 At a minimum, the CFT will review and revise the completed forms, by means of physical inspection, annually. The CFT will also review and revise the aspects forms at the time of implementation of new or modified operations/activities, if those changes are likely to affect the facilities list of SEAs.

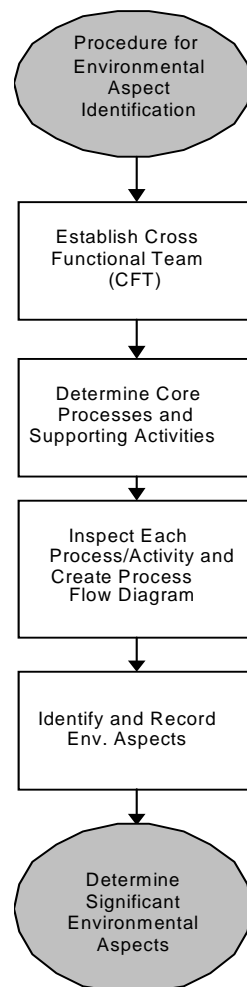
7.1.3 All environmental aspects are evaluated for significance as defined in the section below, Procedure for Determination of Significant Environmental Aspects.

7.1.4 The following procedure is used to fill out the Aspects Identification and Significance Determination (F-003.01). This task consists of identifying all raw materials, chemicals, and utilities used as inputs and all outputs produced as products and by-products. Outputs are all products, non-usable materials produced, recycled materials, water discharges, and air emissions known for the area or operation.

7.1.5 When identifying inputs and outputs, all modes of operation will be considered because startup, shutdown, or emergency operations might introduce additional aspects to the process. When completing the forms, the team will make notes of other potentially useful information such as the quantity or volume used per unit time, where available. To assist with completing these forms, the CFT shall consider the following potential inputs and outputs:

Inputs:

- Product Input.
- Energy: Enter energy type (e.g., electricity, gas, oil, diesel).
- Water: Enter water type (e.g., city, well, storm, process, chilled).
- Materials: Enter Material type (e.g. scrap steel, sand, gases).



- Supplies/Consumables: Enter the major, non-chemical supplies used in the operation.
- Chemicals: Enter any chemical materials used in the operation.
- Other Inputs: Enter inputs that are not covered clearly in other categories.

Outputs:

- Point Source Air Emissions: List all air emissions emitted through a stack.
- Fugitive Air Emissions: List all air emissions that are discharged as fugitive emissions.
- Process Wastewater Discharge: Enter all process wastewater streams that discharge to sanitary sewer systems, ground water, or surface waters. Containerized wastewater should be included in the unused materials section.
- Storm Water Discharges: List all facility storm water discharges.
- Solid Materials: List material intended to be discarded or disposed of that are characterized as hazardous or non-hazardous, including liquids, solids, and gases. Include recycled materials, returnable containers, and chemical by-products under this category.
- Noise/Odor/Radiation/Traffic/Aesthetic/Land Use/Land: Include facility impacts on traffic, aesthetics, land use, land development, or habitat.
- Spillage and Other: Enter all potential spills or other outputs not covered by the categories listed above

7.2 Procedure for Determination of Significant Environmental Aspects (SEAs)

7.2.1 Where appropriate, individual aspects can be grouped. For example, if the consumption of energy is listed as an environmental aspect in several areas, the CFT can group these listings such that consumption of energy appears just once on a company-wide form.

7.2.2 The following criteria will be used to determine significance and are listed on Aspects Identification and Significance Determination (F-003.01):

7.2.2.1 Legal Requirements/Voluntary Commitments/Company Policy:

Subject to specifically relevant legislation, regulation, and/or permit requirements that address significant impacts to the environment. This will likely include aspects associated with operations and activities if (1) environmental regulations specify controls and conditions, (2) information must be provided to the authorities, and/or (3) there are, or may be, periodic inspections or enforcement actions taken by the authorities. Potential aspects that are subject to environmental regulations in the event of incidents will be recognized as significant when such an event occurs. A closely related condition is whether an aspect is the subject to or associated with environmentally-related company

- goals, directives, policies, or subject to or associated with voluntary covenants to which the company has committed.
- 7.2.2.2 Community Concern/Image: Subject to or associated with community concerns, such as those previously expressed in the form of complaints or critical inquiry.
- 7.2.2.3 Pollution Prevention Potential: Based on technical and business conditions, such as cost-effectiveness, has a high potential for pollution prevention or resource-use reduction.
- 7.2.2.4 Potential Impact to the Environment: Associated with potential impact to the environment from high environmental loading due to one or more of the following: toxicity, amounts, frequency, duration, and severity.
- 7.2.3 Using the Significance Determination portion of the form for Aspects Identification and Significance Determination (F-003.01), the CFT, or a subset thereof, shall evaluate, each identified aspect to determine whether it is significant. The environmental aspects will be considered to be “significant” if the aspect meets one or more of the four criteria. If any of the columns are assigned a Yes, indicate “S” for significant in the appropriate column for that aspect. Otherwise, indicate “N” for not significant. Provide the rationale for S or N in the appropriate column. When the Legal Requirements/Voluntary Commitments/Company Policy is assigned a Yes, the rationale column will include notes regarding the how the legislation, regulation, and/or permit requirements apply to the aspect.
- 7.2.4 EAF Steel shall account for the affect of planned or new developments or new or modified activities products or services on its list of SEAs through the implementation and maintenance of its Procedure for Environmental Review of New Processes, Materials, and Projects
- 7.3 Establishing and Maintaining Objectives and Targets
- 7.3.1 Transfer the SEAs that were determined by the Team to the form for Linking SEAs, Objectives and Targets, and EMS Operational Control Procedures to Measurement Indicators, Job Functions, Responsible Parties, and Applicable Operations (F-003.02)
- 7.3.2 Then the CFT shall establish and maintain environmental objectives and targets for all significant aspects and record them on (F-003.02) Objectives and targets shall be consistent with the *EAF Steel Company* environmental policy including commitments to prevention of pollution and compliance with legal and other environmental requirements and continual improvement. Objectives and targets shall be one of three types: control; improve; or study/investigate. (C=Control or Maintain; I=Improve; S=Study or Investigate) Guidance regarding use of these objectives is provided below for use by the CFT:
- 7.3.2.1 Control or Maintain – is an appropriate objective for SEAs that are the subject of environmental regulations because the environmental policy states that we will comply with legal requirements. In these cases, the objective will be to maintain conformance with operational controls, such as work instructions that apply to those significant aspects. The target will be ongoing.
- 7.3.2.2 Improve – is appropriate for SEAs that our company goals commit us to improving upon, i.e., are not required by law but fall within

our commitment to pollution prevention. Improvement objectives also can be used for SEAs that have regulatory drivers and environmental improvement goals.

7.3.2.3 Study or Investigate – is appropriate in cases where the CFT thinks improvement will be feasible and beneficial, but study is needed to determine how much improvement can be achieved and timeframes that are feasible. The objective will be to study the alternatives by a target date in preparation for later setting an improvement objective (or dropping the objective if the study reveals that the changes are not financially, technologically, or logistically feasible).

7.3.3 The CFT is also responsible for developing and recommending potential new environmental objectives to top management.

7.3.4 When developing and recommending objectives, the CFT should consider the number of columns that were marked “Yes” on the form for Aspects Identification and Significance Determination (F-003.01). These columns relate to the significance criteria established by this EMS (legal/company requirements, community concerns, pollution prevention potential, and/or potential impact on the environment). Those SEAs with two or more “Yes” rankings will likely be good candidates for control, improvement, or investigation.

7.3.5 Performance against objectives and targets shall be reviewed at least every six months by the CFT and reported at the management review meeting. (See the *Procedure for Top Management Environmental Review*). The management review shall authorize the EMS objectives and targets.

7.4 Establishing and Maintaining Programs

7.4.1 The CFT shall establish and maintain Programs for achieving the objectives and targets developed for the SEAs identified and review and update these as needed or at least every six months.

7.4.2 Programs shall identify the means, time frames and those responsible for achieving associated objectives and targets. Responsibility will be identified at each relevant function and level of the company. Use the Program Forms (F-003.03) to document your action plan.

8.0 General Rules

8.1 The CFT shall include representation from all appropriate functional areas and departments.

8.2 The environmental aspects and SEAs associated with the operations of on-site subcontractors and service providers are covered by this procedure.

8.3 Interested parties include employees and the community.

9.0 Frequency

This procedure will be repeated at least annually. More frequent updates will be conducted for new projects or processes that affect the list of the company’s SEAs.

10.0 Records

Records are maintained in according to the Procedure for Environmental Records.

Record of Revisions

Revision Date	Description	Sections Affected

Aspects Identification and Significance Determination (F-003.01)

See sample completed form in *Exhibit 4* in *Section II*.

Aspect Identification and Significance Determination for:							
Process:							
Person Completing Form:						Date:	
ASPECT IDENTIFICATION	Condition Type	SIGNIFICANCE DETERMINATION					
Category/Aspect	Normal, Abnormal, Start-up, Shut-down, Upset	Legal Requirements/ Voluntary Commitments, Company Policy ¹	Community Concern/Image	Material Reduction or Pollution Prevention Potential	Potential Impact to the Environment	Significant (S) Not Significant (N)	Rationale for Significance or Non-significance
INPUTS							
Energy:							
Water:							
Materials:							
Other							
Supplies/Consumables:							
Other							
Chemicals (see Material Safety Data Sheet log):							
Other							
OUTPUTS							
Point Sources Air Emissions: (include all items specified in point source permits)							

¹When a yes for a legal requirement, how the requirement applies to the aspect needs to be noted in the rationale column.

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Aspect Identification and Significance Determination for:							
Process:							
Person Completing Form:						Date:	
ASPECT IDENTIFICATION	Condition Type	SIGNIFICANCE DETERMINATION					
Category/Aspect	Normal, Abnormal, Start-up, Shut-down, Upset	Legal Requirements/ Voluntary Commitments, Company Policy ¹	Community Concern/Image	Material Reduction or Pollution Prevention Potential	Potential Impact to the Environment	Significant (S) Not Significant (N)	Rationale for Significance or Non-significance
Fugitive Air Emissions:							
Process Wastewater Discharge:							
Other							
Storm Water Discharge:							
NA							
Other Material Outputs:							
Other							
Noise/Odor/Radiation/Traffic/Aesthetic/Land Use/Land:							
Other							
Spillage and Other:							
Other							

Record of Revisions

Revision Date	Description	Sections Affected

US EPA ARCHIVE DOCUMENT

Significance Determination for Aspects Based on Environmental and Business Considerations (Alternative Form F-003.01)

Person Completing Form:

Area/Process:

Date:

Aspects Not Meeting Regulatory or Facility Policy Criteria	Potential Impacts	Level of Control High, Medium, or Low	Environmental Significance (Scale of 1-5 per Definitions*)					Business Significance (Scale of 1-5 per Definitions*)					
			Scale	Severity	Probability	Duration	Average Score	Difficulty Changing Impact	Effect on Public Image	Outcome of Change on Process	Concerns of Interested Parties	Costs of Changing Impact	Average Score
Supplies:													
Chemicals:													
Energy Use:													
Water Use:													
Air Emissions:													
Noise/Odor/Radiation:													
Water Discharges:													
Solid Materials:													
Storm Water Discharges:													
Spills:													
Other Inputs and Outputs:													

***Definitions to be used in Rating Environmental and Business Considerations**

PARAMETER		RATING CATEGORIES				
		1	2	3	4	5
ENVIRONMENTAL CONSIDERATIONS	SCALE	insignificant volume/quantity	low volume/quantity	medium volume/quantity but sporadic	medium volume/quantity but ongoing	high volume/quantity
	SEVERITY	minimal impact	moderate impact but localized and readily containable	moderate impact over multiple locations	significant impact and/or regional	extreme impact and/or potential for global impact
	PROBABILITY	very unlikely under any operating condition	occurs during abnormal/emergency conditions/probability anticipated and managed	occurs during small-medium new projects or routine maintenance activities	occurs during major new projects or major maintenance activities	occurring during normal operating conditions and artifact of operations
	DURATION	spike situation extremely short-term duration within one day	less than one month	one-six months	less than one year	long-term duration greater than one year or continuous
BUSINESS CONSIDERATIONS	DIFFICULTY OF CHANGING IMPACT	easy to accomplish	minor level of effort required	moderate effort required	major effort required	impact cannot be changed only managed
	EFFECT ON PUBLIC IMAGE/ PERCEPTION	no effect	minor/local scrutiny	moderate public scrutiny manageable	intense local or regional scrutiny requiring more effort	extreme scrutiny : major facility profile impact
	OUTCOME OF CHANGE ON ACT/PROD/SVCS*	no effect	minimal effect	medium effect	large effect	extremely large effect
	CONCERNS OF INTERESTED PARTIES**	no concerns	minor interest at local level limited number of parties	moderate interest/manageable at local/prov. level; limited number of parties	major interest at federal level more widespread, > number of parties	extreme/major impact, e.g., financing/litigation
	COST OF CHANGING IMPACT	extreme: greater than \$5m	major process change: >\$500k but <\$5m	moderate process changes: <\$500k	minor process change: <\$25,000	procedural ~ less than \$1000

*ACT/PROD/SVCS: Activities/Products/Services

**Interested parties could include: employees; community; federal agencies; state agencies; local agencies; shareholders; and special interest groups.

Linking SEAs, Objectives and Targets, Operational Control Procedures to Measurement Indicators, Job Functions, Responsible Parties, and Applicable Operations (F-003.02)

See sample completed form in *Exhibit 6* in *Section II*.

SEA	Objective & Target: C=Control I=Improve S=Study	Measurement Indicators	Associated Job Functions/ Training Needs	Existing Operational Control (Procedure, Work Instruction, BMP, Visual Aid, or EMP)	New Operational Control (Procedure, Work Instruction, BMP, Visual Aid or EMP)	Person Responsible	Production						Facilities and Maintenance				Material Handling and Storage				
							Scrap Yard & Prep	EAF	Ladle Metallurgy Station	Caster	Rolling Mill	Offline Straightening	Finishing	Maintenance	Bag House	Mobile Equipment	General Facility	Scrap Yard and Scale	Shipping	Oil and Fuel Storage	Slag Processing

Program(s) Form (F-003.03)

<p>Significant Environmental Aspect:</p> <p>Objective: Target:</p> <p>Category: Control/Maintain <input type="checkbox"/></p>	<p>Area/Department(s): Process:</p> <p>Study or Investigate <input type="checkbox"/></p> <p>Improve <input type="checkbox"/></p>
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Task/Action Items	Responsible Party	Resources Needed	Project Start Date	Project Completion Date	Comments/Deliverables

Procedure for Environmental Review of New Processes, Materials, and Projects (P-004)

1.0 Purpose

This procedure defines the method for identifying and evaluating the environmental issues of new processes, materials, and projects at *EAF Steel Company* to:

- Ensure that appropriate consideration is given to environmental issues prior to new process, material, or project initiation;
- Ensure that new environmental aspects generated by processes, materials, or projects are identified and their significance evaluated; and
- Provide a mechanism for the amendment of EMS elements, the list of SEAs, and Programs, where relevant, to ensure that the EMS applies to such processes, materials, or projects.

2.0 Activities Affected

All areas and departments

3.0 Forms Used

- 3.1 Environmental Checklist for New Processes and Materials (F-004.01)
- 3.2 Environmental Checklist for New Projects (F-004.02)
- 3.3 Project Evaluation Form
- 3.4 EMS Implementation Form

4.0 References

- 4.1 Procedure for Environmental Aspects, Objectives and Targets, and Programs (P-003)
- 4.2 Procedure for Environmental Records (P-012)

5.0 Definitions and Acronyms

- 5.1 Initiating Activity:

6.0 Exclusions

None

7.0 Procedure

- 7.1 Areas/departments initiate the Environmental Checklist for New Processes and Materials (F-004.01) when a process or material (not project-specific) is introduced.
 - 7.1.1 The “initiating activity” or designee shall identify and evaluate environmental issues associated with the new process/material.
 - 7.1.1.1 A summary of this evaluation shall be documented on the Environmental Checklist for New Processes and Materials (F-004.01).
 - 7.1.1.2 This process may be undertaken in liaison with the EMS Coordinator (or other competent individual) at the discretion of the initiating activity.

- 7.1.1.3 This environmental review shall include an identification of any environmental aspects and requirements for obtaining approvals from environmental regulatory agencies.
- 7.1.1.4 The initiating activity shall submit the completed Environmental Checklist for New Processes and Materials (F-004.01) for review to the Environmental Management Representative.
- 7.1.2 The Environmental Management Representative (EMR), or designee, shall review the proposed process and/or material to ensure that all relevant environmental issues have been identified
 - 7.1.2.1 If incomplete, the EMR shall return the Environmental Checklist for New Processes and Materials (F-004.01) to the initiating activity for correction.
- 7.1.3 Environmental aspects associated with new process and/or material shall be evaluated for significance by the EMR and Cross Functional Team per the Procedure for Environmental Aspects, Objectives and Targets, and Programs (P-003).
- 7.1.3 The EMR will submit changes to the EMS resulting from the significance determination for review and approval by top management.
- 7.1.4 Following appropriate review, the EMR, or designee, may approve the process and/or material by returning the Environmental Checklist for New Processes and Materials (F-004.01) to the initiating activity for further processing.
 - 7.1.4.1 If a new process and/or material is not acceptable, the initiating activity will coordinate any necessary actions to satisfy concerns identified.
- 7.1.5 The initiating activity in conjunction with the Environmental Management Representative, or designee, will coordinate any necessary prevention, mitigation, or control activities associated with the process/material/project.
- 7.2 Project Manager should initiate the Environmental Checklist for New Projects (F-004.02) when a new project is introduced.
 - 7.2.1 The Project Manager shall identify and evaluate environmental issues associated with the new project.
 - 7.2.1.1 A summary of this evaluation shall be documented on the Environmental Checklist for New Projects (F-004.02).
 - 7.2.1.2 This process may be undertaken in liaison with the EMS Coordinator (or other competent individual) at the discretion of the Project Manager.
 - 7.2.1.3 This environmental review shall include an identification of any existing companywide environmental aspects, objectives and targets, Programs, work instructions, best management practices, and requirements for obtaining approvals from environmental regulatory agencies (see Compliance Checklist F1-3) that apply to this project.
 - 7.2.1.4 This environmental review shall include an identification of any new project-specific environmental aspects to be evaluated for significance by the EMR and Cross Functional Team per the Procedure for Environmental Aspects, Objectives and Targets, and Programs (P-003).
 - 7.2.1.5 The Project Manager shall submit the completed Environmental Checklist for New Projects (F-004.02) for review to the EMR.

- 7.2.2 The EMR, or designee, shall review the proposed project to ensure that all relevant environmental issues have been identified.
 - 7.2.2.1 If incomplete, the EMR shall return the Environmental Checklist for New Projects (F-004.02) to the Project Manager for correction.
- 7.2.3 The EMR will submit changes to the EMS resulting from the significance determination for review and approval by top management.
- 7.2.4 Following appropriate review, the EMR, or designee, may approve the new project review by returning the Environmental Checklist for New Projects (F-004.02) to the initiating activity for further processing.
 - 7.2.4.1 If the new project review is not acceptable, the initiating activity will coordinate any necessary actions to satisfy concerns identified.
- 7.2.5 The Project Manager in conjunction with the EMR, or designee, will coordinate any necessary prevention, mitigation, or control activities associated with the new project.
- 7.2.6 The Project Manager in conjunction with the EMS Coordinator will prepare site specific EMS Manual, including the following:
 - 7.2.6.1 Description of EMS
 - 7.2.6.2 Environmental Policy
 - 7.2.6.3 Organizational Chart
 - 7.2.6.4 Compliance Checklist
 - 7.2.6.5 EMS Implementation Form (applicable companywide aspects indicated and project-specific information added to bottom)
 - 7.2.6.6 Copies of applicable procedures, Programs, work instructions, and best management practices, and other applicable forms.
- 7.2.7 The Project Manager shall maintain the project-specific EMS Manual and generated project-specific EMS Records onsite with the associated project files.
- 7.2.8 The Project Manager shall send updated EMS Implementation Form and Project Evaluation Form periodically to company headquarters for inclusion of project information in companywide EMS.
- 7.2.9 At the completion of the project, the Project Manager shall send a final EMS Implementation form and Project Evaluation Form to company headquarters for inclusion of project information in companywide EMS.
- 7.2.10 At the completion of project, project specific EMS manual will be filed with associated project specific files.

8.0 General Rules

None

9.0 Frequency

Ongoing

10.0 Records

Records shall be retained consistent with the Procedure for Environmental Records (P-012).

Record of Revisions

Revision Date	Description	Sections Affected
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Environmental Checklist for New Processes and Materials (F-004.01)

Check one:

- New Process
- New Material (attach copy of Material Safety Data Sheet, if applicable)

Description of new process/material :

New process/material considerations:

INPUTS	OUTPUTS
Energy:	Point Sources Air Emissions:
Water:	Fugitive Air Emissions:
Materials:	Process Wastewater Discharge:
Supplies/Consumables:	Storm Water Discharge:
Chemicals:	Solid Materials
	Noise/Odor/Radiation/Traffic/Aesthetic/Land Use/Land
	Spillage and Other

SIGNIFICANCE DETERMINATION	Yes	No
Legal or other requirements?	<input type="checkbox"/>	<input type="checkbox"/>
Community concern?	<input type="checkbox"/>	<input type="checkbox"/>
Material reduction or pollution prevention potential?	<input type="checkbox"/>	<input type="checkbox"/>
Potential impact to the environment?	<input type="checkbox"/>	<input type="checkbox"/>
Please explain:		
ADDITIONAL CONSIDERATIONS (please explain)		

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Initiating Activity Manager (Signed and Dated)
Environmental Management Representative (Signed and Dated)

Record of Revisions

Revision Date	Description	Sections Affected

Environmental Checklist for New Projects (F-004.02)

Project Site and Location Name/Number: _____

Project Manager: _____

Date: _____

List Applicable Companywide EMS Elements:

- Relevant Companywide Significant Environmental Aspects
- Relevant Objectives and Targets
- Relevant Programs
- Relevant Work Instructions, Best Management Practices, Standard Operating Procedures
- Other relevant companywide forms (e.g., Emergency Preparedness and Response, Training
- Needs Analysis, etc)

List Project-Specific Considerations:

INPUTS	OUTPUTS
Energy:	Point Sources Air Emissions:
Water:	Fugitive Air Emissions:
Materials:	Process Wastewater Discharge:
Supplies/Consumables:	Storm Water Discharge:
Chemicals:	Solid Materials
	Noise/Odor/Radiation/Traffic/Aesthetic/Land Use/Land
	Spillage and Other

SIGNIFICANCE DETERMINATION	Yes	No
Legal or other requirements?		
Community concern?		
Material reduction or pollution prevention potential?		
Potential impact to the environment?		
Please explain:		
ADDITIONAL CONSIDERATIONS (please explain)		

US EPA ARCHIVE DOCUMENT

Ensure Environmental Compliance

- Completed Compliance Checklist
- Obtain Necessary Permits

Initiating Activity Manager (Signed and Dated)

Environmental Management Representative (Signed and Dated)

Record of Revisions

Revision Date	Description	Sections Affected

Procedure for Environmental Training and Awareness (P-005)

1.0 Purpose

This procedure defines the process for identifying and planning environmental training and awareness in order to assist in ensuring ensure the required competence at **[Facility's Name]**.

2.0 Activities Affected

All areas and departments

3.0 Forms Used

3.1 Training Needs Analysis—Environmental Courses (F-005.01)

3.2 Training Needs Analysis—Procedures and Work Instructions by Area/Department (F-005.02)

4.0 References

4.1 Procedure for Identification of Legal and Other Requirements (P-001)

4.2 Procedure for Environmental Aspects, Objectives and Targets, and Action Plans (P-003)

4.3 Procedure for Communication with Stakeholders (P-006)

4.4 ISO 14001 Standard (4.4.2)

5.0 Definitions

None

6.0 Exclusions

None

7.0 Procedure

7.1 Training and Competence

7.1.1 A training needs analysis and training schedule (TNA) shall be completed and maintained by the EMS Coordinator (i.e. the person responsible for environmental regulatory and management system training) to identify the level of instruction needed by personnel whose jobs may create a significant impact on the environment as a part of ensuring required competence. The TNA will consider overall competence (combination of appropriate education, training, or experience) requirements and these personnel. Training while it cannot fully replace requirements for experience, it can at times help to offset lower levels of experience.

7.1.2 The TNA shall be reviewed and updated where necessary, at least annually, and when requested by the EMR or designee in consultation with the EMS Coordinator to ensure its continuing adequacy.

7.1.3 Other knowledgeable individuals with appropriate expertise and experience in environmental legal requirements, facility operations and EMS shall assist the EMS Coordinator develop the TNA at the **[Facility's Name]**.

7.1.4 New, part-time, and transferred employees, as well as permanent on-site contractors, and all persons working for or on the behalf of *EAF Steel Company* shall be included in the environmental training program.

7.1.5 The EMS Coordinator is responsible for implementing the TNA such that persons working for the **[Facility's Name]**.or on its behalf are aware of:

- 7.1.5.1 The importance of conformity with the environmental policy and procedures and with the requirements of the EMS;
- 7.1.5.2 The SEAs, actual or potential, of their work and the environmental benefits of improved personal performance;
- 7.1.5.3 Their roles and responsibilities in achieving conformity with the environmental policy and procedures and with the requirements of the EMS, including emergency preparedness and response requirements; and
- 7.1.5.4 The potential consequences of departure from specified operating procedures.
- 7.1.6 The person(s) responsible for environmental regulatory and management system training shall maintain records of each individual's environmental training.
- 7.2 **Awareness**
Environmental awareness training shall be implemented as stipulated in the current version of the Training Needs Analysis—Environmental Courses (F-005.01). All existing employees and full-time on-site contractors shall receive environmental awareness training during initial EMS implementation. New hires and contractors shall receive the training as part of their orientation.
- 7.3 **Competence**
Employee competence relevant to the EMS is determined through testing on the training material and through observation of performance by the employee's supervisor.

8.0 Frequency
Ongoing

9.0 Records
Records shall be retained consistent with the Procedure for Environmental Records (P-005).

Record of Revisions

Revision Date	Description	Sections Affected

Training Needs Analysis—Environmental Courses Form (F-005.01)

Date:

Course	Employees Requiring Training	Source of Training	Duration (Hours)	Frequency

US EPA ARCHIVE DOCUMENT

Training Needs Analysis—Procedures and Work Instructions by Area/Department Form (F-005.02)

Procedure/ Work Instruction Number	Title	Production							Facilities and Maintenance				Material Handling and Storage			
		Scrap Yard & Prep	EAF	Ladle Metallurgy Station	Caster	Rolling Mill	Offline Straightening	Finishing	Maintenance	Bag House	Mobile Equipment	General Facility	Scrap Yard and Scale	Shipping	Oil and Fuel Storage	Slag Processing

Procedure for Communication with Stakeholders (P-006)

1.0 Purpose

This procedure defines the process by which **[Facility's Name]**:

- Addresses internal environmental communication/awareness between various levels and functions within the facility; and
- Receives, documents, and responds to relevant communication from external parties.

2.0 Activities Affected

All areas and departments.

3.0 Forms Used

External Stakeholder Communication Record (F-006.01)

4.0 References

- 4.1 Environmental Policy
- 4.2 Procedure for Identification of Legal and Other Requirements (P-001)
- 4.3 Procedure for Obtaining Agency Approval (P-002)
- 4.4 Procedure for Environmental Aspects, Objectives and Targets, and Programs (P-003)
- 4.4 Procedure for Environmental Management System Management Review (P-0014)
- 4.5 Procedure for Emergency Preparedness and Response (P-009)
- 4.6 Procedure for Environmental Training and Awareness (P-005)
- 4.7 Procedure for Contractors and Sub-contractors (P-008)
- 4.8 Procedure for Document Control (P-007)
- 4.9 ISO 14001 Standard (4.4.3)

5.0 Definitions

External Communications: written or electronic correspondence, Internet Websites (worldwide web), telephone conversations, and discussions or meetings with parties external to the facility.

6.0 Exclusions

None

7.0 Procedure

- 7.1 *EAF Steel Company* shall implement an internal communications and awareness process to ensure those personnel at each relevant level and function are aware of the importance of conformance with the environmental policy and procedures, individual roles and responsibilities in achieving conformance with procedures, including emergency preparedness and response, and the facility's progress toward achieving its environmental objectives.
 - 7.1.1 Internal environmental communications may be accomplished by the use of notice boards; Internal (intranet) websites or pages; newsletters; electronic notes; team meetings and meeting minutes; management reviews and meeting minutes; and/or Corrective Action Requests.
 - 7.1.2 Communication of environmental issues from employees to top management shall be handled by the Cross Functional Team (CFT)

member representing the affected area, in coordination with the Environmental Management Representative (EMR). These communications shall be documented.

- 7.1.3 Communication of changes to legal and other requirements to employees shall be handled by the Area or Department Manager or designee. These communications shall be documented.
- 7.2 The community liaison person or his designee is responsible for *EAF Steel Company* communicating proactively with external stakeholders by:
 - 7.2.1 Sharing information about its SEAs
 - 7.2.2 Responding to inquiries from interested parties and regulatory; agencies;
 - 7.2.3 Sending current copies of its Environmental Policy to interested parties upon request;
 - 7.2.4 Responding to media communications;
 - 7.2.5 Implementing, when stakeholder concerns relate to an environmental emergency, the Procedure for Emergency Preparedness and Response (P-009);
 - 7.2.6 In consultation with the EMR, determining the need for and preparation of notification to regulatory agencies; and
 - 7.2.7 Maintaining up-to-date records, in this case the External Stakeholder Communications Record (F-006.01).

8.0 Frequency
Ongoing

9.0 Records
Records shall be retained consistent with the Procedure for Environmental Records (P-012).

Record of Revisions

Revision Date	Description	Sections Affected

External Stakeholder Communication Record (F-006.01)

Date:

Contact Name(s):

Time:

Person Completing Form:

Type of Contact:

Meeting

Email/Letter

Telephone

Other (describe):

Environmental Issue/Concern:

Actions to be Taken:

Type of Follow-up Required:

US EPA ARCHIVE DOCUMENT

Procedure for Environmental Document Control (P-007)

1.0 Purpose

This procedure defines the mechanism for controlling EMS documents. The purpose of this procedure is to ensure that those personnel requiring access to EMS documents have the most up-to-date versions and are aware of the document control process.

2.0 Activities Affected

All areas and departments

3.0 Forms Used

3.1 Master Document List (F-007.01)

4.0 References

- 4.1 Procedure for Environmental Records (P-012)
- 4.2 ISO 14001 Standard (4.4.5)

5.0 Definitions and Acronyms

None

6.0 Exclusions

None

7.0 Procedure

- 7.1 The Environmental Management Representative (EMR) or designee shall be responsible for coordinating, developing, issuing, and controlling EMS documents.
- 7.2 Procedures shall be in a format that is consistent with other controlled documents at the company.
- 7.3 The EMR or designee shall maintain a master set of EMS documents.
- 7.4 Each area or department manager or designee should maintain a list of, or have access to, all EMS documents relevant to their area or department, as applicable.
- 7.5 Relevant documents are available at the locations where they are needed.
- 7.6 Personnel ensure current versions are available and used.
- 7.7 The Cross Functional Team shall review and approve changes to EMS documents.
- 7.8 All controlled documents shall be marked with the words "CONTROLLED DOCUMENT."
- 7.9 Controlled versions of system documents may be placed on the computer system for access by area or department personnel.
- 7.10 All controlled documents issued by the EMR or designee shall be recorded on a Master Document List (F-007.01).
- 7.11 The EMR or designee shall:
 - 7.11.1 Provide notice to affected personnel to ensure that they are aware of the new or revised document; and
 - 7.11.2 Issue controlled copies of those documents to appropriate employees.

8.0 General Rules

- 8.1 All documents not marked with the words "Controlled Document" shall be considered uncontrolled.

9.0 Frequency
Ongoing

10.0 10.0 Records

Records shall be retained consistent with the Procedure for Environmental Records (P-012).

Record of Revisions

Revision Date	Description	Sections Affected

Master Document List (F-007.01)

See sample completed form in **Section II, Exhibit 12.**

Date:

Area/Department:

Person Completing Form:

ID	Title	Issue Date	Location	Authorized By

US EPA ARCHIVE DOCUMENT

Procedure for Environmental Briefing of Subcontractors and Service Providers (P-008)

1.0 Purpose

This procedure defines the process for briefing on-site subcontractors and service providers on the environmental aspects at *EAF Steel Company* project sites.

2.0 Activities Affected

All areas and departments authorizing subcontractors and service providers to work on-site.

3.0 Forms Used

3.1 Environmental Briefing Packet and Method Statement (xxxx)

4.0 References

- 4.1 Procedure for Environmental Communication with Stakeholders (P-006)
- 4.2 Procedure for Environmental Aspects, Objectives and Targets, and Programs (P-003)
- 4.3 ISO 14001:1996, Element 4.4.6

5.0 Definitions and Acronyms

5.1 Method Statement: a written statement prepared by a subcontractor or service provider that outlines the work to be undertaken and the method(s) for minimizing and managing environmental impacts. The method statement includes an assessment of the environmental issues associated with specified work activities and measures necessary to minimize environmental impacts.

6.0 Exclusions

- 6.1 Subcontractor and service provider activities and services that are not performed at *EAF Steel Company* project sites.
- 6.2 Subcontractors and service providers performing emergency services.
- 6.3 Subcontractors and service providers providing clerical, accounting, or other similar administrative services.

7.0 Procedure

- 7.1 A Cross Functional Team led by the Environmental Management Representative or designee develops a process to obtain and review method statements.
- 7.2 The need for subcontractor and service provider services is identified and a request for a Environmental Briefing Packet and Method Statement (F-008.1) is prepared by the initiating activity.
- 7.3 Information related to subcontractor and service provider on-site activities shall be documented by the subcontractor and service provider using a Environmental Briefing Packet and Method Statement (F-008.1).
- 7.4 Completed Environmental Briefing Packet and Method Statement (F-008.1) forms will be submitted to the initiating activity. The Environmental Management Representative or designee will evaluate Environmental Briefing Packet and Method Statement (F-008.1) to identify potential environmental issues and concerns.
- 7.5 Prior to on-site work subcontractors and service providers shall:
 - 7.5.1 Be provided with information and documents to ensure their awareness of the *EAF Steel Company* EMS and their conformance to it.

- 7.5.2 Submit a completed Environmental Briefing Packet and Method Statement (F-008.1) to the initiating activity.
- 7.6 While on site, subcontractors and service providers shall conform to the EAF Steel Company EMS and to all applicable legal and other requirements.
 - 7.6.1 Subcontractors and service providers shall maintain records as specified by the EMS and by contract requirements.

8.0 General Rules

- 8.1 Subcontractors and service providers shall ensure their on-site employees are aware of *EAF Steel Company* EMS requirements.

9.0 Frequency

Ongoing

10.0 Records

Records shall be retained consistent with the Procedure for Environmental Records (P-012).

Record of Revisions

Revision Date	Description	Sections Affected

US EPA ARCHIVE DOCUMENT

Environmental Briefing Packet and Method Statement (F-008.1)

SUBCONTRACTOR/ SERVICE PROVIDER INFORMATION

(CHECK ALL THAT APPLY)

- Current subcontractor or service provider to EAF Steel Company
- New subcontractor or service provider to EAF Steel Company
- Currently involved in other EAF Steel Company project(s)
- List project(s): _____

Name:	
Address:	
City:	
State:	
Phone Number:	
Fax Number:	
President/General Manager:	
Company Site Coordinator:	
Email Address:	
Phone Number:	
Mobile Number/ Pager:	
Fax Number:	
24-Hour Emergency Number:	

ENVIRONMENTAL MANAGEMENT SYSTEM BASICS

The *EAF Steel Company* Environmental Management System (EMS) is designed to meet the requirements of the ISO 14001 Standard. The principle elements of the EMS and environmental policy are:

1. To establish and operate effective procedures aimed at controlling environmental performance to comply with all applicable environmental legislation and regulations;
2. To set objectives and targets aimed at achieving continual improvement in environmental performance; and
3. To introduce improvements that contribute to the prevention of the pollution at the source, where possible.

An important part of the EMS relates to the control of subcontractors and service providers, who are required to comply with *EAF Steel Company's* environmental policies and procedures.

The nature of the subcontractor and service provider activities is such that subcontractor and service provider personnel have significant potential to affect the environmental performance and regulatory compliance of *EAF Steel Company*. Subcontractors and service providers and *EAF Steel Company* must therefore work together to achieve *EAF Steel Company's* environmental policy, the environmental objectives and targets, and the protection of the environment.

Subcontractors and service providers must be aware of the importance of compliance with relevant environmental legislation and regulations, and the consequences of non-compliance.

Subcontractors and service providers are responsible for completing a Method Statement and returning it to the *EAF Steel Company* Environmental Management Representative or designee.

Subcontractors and service providers are responsible for communicating to all their employees the information in the Method Statement as well as information from the Environmental Briefing Package.

All subcontractors and service providers working at *EAF Steel Company* facilities are required to comply with the requirements of the EMS and the environmental policy.

Subcontractors and service providers are financially responsible for on-site environmental remediation actions resulting from incidents involving their employees.

To minimize the risk of environmental accidents please review and initial the items contained in the Environmental Management Basics table below:

Environmental Management System Basics	Subcontractor/Service Provider Initials
Subcontractor/Service provider understands the importance of compliance with relevant environmental legislation and regulations and the consequences of non-compliance.	
Subcontractor/Service provider working at the <i>EAF Steel Company</i> facility are required to comply with and ensure that their employees and any Suppliers/Sub-Contractors or agents comply with <i>EAF Steel Company's</i> Environmental Management System (EMS) and environmental policy.	
Subcontractor/Service provider acknowledges receiving or were made aware of the <i>EAF Steel Company's</i> environmental policy as well as applicable system procedures and work practices.	
Subcontractor/Service provider shall not discharge anything to drains and/or sewers without prior approval from the <i>EAF Steel Company's</i> EMS Coordinator. Spills and other releases to the environment must be immediately reported to the EMS Coordinator and Project Manager.	
Subcontractor/Service provider shall provide adequate spill release prevention, as approved by the <i>EAF Steel Company</i> EMS Coordinator.	
Subcontractor/Service provider shall immediately notify the <i>EAF Steel Company</i> EMS Coordinator and the Project Manager of any abnormal conditions found during excavation activities at the <i>EAF Steel Company</i> facility.	
Subcontractor/Service provider shall properly label, store, and dispose of all of their non-usable materials used on-site in accordance with <i>EAF Steel Company</i> procedures and all legal requirements.	

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Environmental Management System Basics	Subcontractor/Service Provider Initials
If <i>EAF Steel Company</i> personnel are required to work with potentially hazardous materials brought on-site by a subcontractor or service provider, prior approval of the material by the EMS Coordinator is required.	
Subcontractor/Service provider shall minimize the effects of noise, odor, light, fugitive dust emissions, and traffic movement on and/or adjacent to the <i>EAF Steel Company</i> facility.	
Subcontractor/Service provider shall obtain, prior to commencing work, all necessary environmental approvals or permits and present copies of such permits to the <i>EAF Steel Company</i> EMS Coordinator.	
Subcontractor/Service provider employees were informed of actions to be taken during an actual emergency situation.	
Subcontractor/Service provider understands that <i>EAF Steel Company</i> may interrupt subcontractor or service provider activities that violate <i>EAF Steel Company</i> policies and/or all legal requirements.	

METHOD STATEMENT

Respond to the following questions (use additional space where required):

This method statement must be completed, signed, and returned to *EAF Steel Company's* Environmental Management Representative before contracted work commences.

Work Description

Briefly describe the work to be performed while on-site.

Air Emissions

Will the work you perform produce or cause the release of any air emissions? YES NO

IF YES, list air emissions and method for preventing impact to the environment.

US EPA ARCHIVE DOCUMENT

Water Discharges

Will the work you perform produce or cause the release of any wastewater? YES NO

IF YES, how will the wastewater be handled?

Materials

What materials (chemicals, oils, etc.) and/or equipment will you be handling or bringing on-site to perform the contracted work?

Training

Your employees should be trained on the proper handling of materials and equipment, and the proper response to incidents involving these materials. Describe the training your employees receive.

Excess Material Generation

Will the work you perform result in any materials that can not be reused or recycled? YES NO

IF YES, list the disposal location as well as amounts and types of materials expected and the proposed disposal method.

Will any materials generated be recyclable? YES NO

IF YES, list the recyclable and where and how they will be recycled.

Energy

Will the work you perform consume energy (electricity, compressed air, natural gas, steam, etc.)? YES NO

IF YES, explain what type of energy will be consumed, and how you will minimize consumption.

Other

Are there any other ways in which your work will be affecting and/or protecting the environment?

YES NO

IF YES, please describe below.

Other

Describe methods for minimizing material usage, emissions, and energy usage from on-site.

Other

Describe any environmental monitoring to be performed including sampling methods, frequency, analytical requirements, and laboratory to be used.

Other

Identify environmental legal requirements applicable to the work that was not already addressed by the Company.

Supplier/Contractor Certification (review and sign):

I have reviewed and understand the information contained in this document. I also understand that

EAF Steel Company Personnel have the right to inspect our on-site activities. I further understand that activities pertaining to service and/or maintenance contracts may only require submission of this form on an annual basis. The *EAF Steel Company's* Environmental Management Representative should be contacted to make this determination.

Name _____

Title _____

Signature _____

Date _____

Procedure for Emergency Preparedness and Response (P-009)

1.0 Purpose/Scope

This procedure defines the framework for identifying, preparing for, and responding to emergencies involving potential impact to the environment at **[Facility's Name]**.

2.0 Activities Affected

All areas and departments

3.0 Forms Used

Emergency Preparedness and Response Requirements Matrix (F-009.01)

4.0 References

4.1 Procedure for Environmental Aspects, Objectives and Targets, and Action Plans (P-003)

4.2 Procedure for Corrective and Preventive Action (P-011)

4.3 Procedure for Communication with Stakeholders (P-006)

4.4 ISO 14001 Standard (4.4.7)

4.5 **[Facility's Name]** Emergency Preparedness and Response Plan

4.5.1 Procedure for internal and external notifications (i.e., contact, organization name, and phone number of facility emergency response coordinator, facility response team personnel, federal, state, and local officials)

4.5.2 Procedure for establishment of a response management system

4.5.3 Procedure for preliminary assessment of the situation, including and identification of incident type, hazards involved, magnitude of the problem, and resources threatened

4.5.4 Procedure for establishment of objectives and priorities for response to the specific incident, including immediate goals/tactical planning (e.g., protection of workers and public as priorities), mitigating actions (e.g., discharge/release control, containment, and recovery, as appropriate) and identification of resources required for response

4.5.5 Procedure for implementation of tactical plan and mobilization of resources

4.5.6 Procedure for termination and follow-up actions

4.5.7 Procedure for incident documentation

4.5.8 Procedure for training and exercises/drills

4.5.9 Procedure for response critique and plan review and modification process

5.0 Definitions

Environmental Incident or Emergency Situation: environmental releases that require an Emergency response

Emergency Response: actions taken by personnel outside of the immediate work area to address an environmental incident.

6.0 Exclusions

None

7.0 Procedure

7.1 Potential environmental incidents and emergencies likely to occur at the facility shall be identified semi-annually by the Cross Functional Team and documented

in on the Emergency Preparedness and Response Requirements Matrix (F-009.01).

- 7.2 Methods to respond to, mitigate, and prevent environmental emergencies shall be established and maintained at the facility in the Security Office by the Emergency Response Coordinator.
- 7.3 Roles and responsibilities for communications within the facility and for obtaining outside support services shall be established and maintained at the facility via the emergency plans.
- 7.4 Mock drills or table-top exercises will be conducted at least annually. The EH&S Department shall maintain records of these tests. Methods to respond to, mitigate, and prevent environmental emergencies shall be amended as required based on the results of these tests.
- 7.5 Following an environmental emergency, the cause of the emergency and corresponding emergency methods shall be reviewed. Corrective/preventive actions will be identified and undertaken by implementing P-011. Methods to respond to, mitigate, and prevent releases that arise as a consequence of an environmental emergency shall be amended as required and the Environmental Management Representative or EMS Coordinator notified. Changes shall be documented.
- 7.6 Where applicable, regulatory agencies shall be notified by the EMS Coordinator of environmental incidents consistent with P-006.

8.0 General Rules

- 8.1 All emergency response activities are to be conducted within boundaries of training levels, appropriate procedures, and governmental regulations.
- 8.2 The Facility Manager shall designate an Emergency Response Coordinator.

9.0 Frequency
Ongoing

10.0 Records
Records shall be retained consistent with the Procedure for Environmental Records (P-012).

Record of Revisions

Revision Date	Description	Sections Affected

US EPA ARCHIVE DOCUMENT

Emergency Preparedness and Response Requirements Matrix (F-009.01)

Potential Emergency Scenario	Potential Environmental Impact(s)	Action Required/Person Responsible	Procedures Needed	Training Needed
Contact Person:			Date Completed:	

US EPA ARCHIVE DOCUMENT

Procedure for Monitoring and Measurement (P-010)

1.0 Purpose/Scope

This procedure defines the mechanism for the monitoring and measurement of significant environmental aspects associated with **[Facility's Name]** operations and activities, the calibration and maintenance of monitoring equipment, and the evaluation of compliance with relevant environmental legal and policy requirements.

2.0 Activities Affected

All areas and departments

3.0 Forms Used

- 3.1 Environmental Measurement Indicators Log (F-010.01)
- 3.2 Calibration Log (F-010.02)
- 3.3 Compliance Tracking Log (F-010.03)

4.0 References

- 4.1 Procedure for Identification of Legal and Other Requirements (P-001)
- 4.2 Procedure for Environmental Aspects, Objectives and Targets, and Action Plans (P-003)
- 4.3 Procedure for Communication with Stakeholders (P-006)
- 4.4 Procedure for Environmental Management System Management Review (P-014)
- 4.5 Procedure for Emergency Preparedness and Response (P-009)
- 4.6 Procedure for Environmental Training and Awareness (P-005)
- 4.7 Procedure for Environmental Review for New Purchases, Processes, and Products (P-004)
- 4.8 Procedure for Contractors and Sub-contractors (P-008)
- 4.9 Procedure for Corrective and Preventive Action (P-011)
- 4.10 Procedure for EMS and Regulatory Compliance Audits (P-013)
- 4.11 ISO 14001:1996, Element 4.5.1
- 4.12 SOP's Air and Wastewater Pollution Control Systems
- 4.13 O&M Procedures for Equipment and Pollution Control Systems
- 4.14 Title V Air, NPDES, and POTW Permits

5.0 Definitions

None

6.0 Exclusions

None

7.0 Procedure

- 7.1 Monitoring and Measurement of Significant Aspects, Objectives and Targets, and Operational Controls
 - 7.1.1 The monitoring and measurement of key characteristics and environmental performance associated with significant aspects will be specified in action plans and documented using Environmental Measurement Indicators Log (F-010.01).
 - 7.1.2 The monitoring and measurement of conformance to specified environmental objectives and targets will be accomplished through the

internal system audit process and through the creation of Corrective Action Requests.

- 7.1.3 Operational controls will be monitored and measured as indicated in applicable action plans, procedures, work practices, or visual aids. The methods, frequencies and responsible parties for completing the monitoring and measuring activities will be specified in these documents, e.g., SOP's for Air and Wastewater Pollution Control Systems, O&M Procedures for Equipment and Pollution Control Systems, Title V Air, NPDES, and POTW Permits.
- 7.2 Calibration and Maintenance of Environmental Monitoring Equipment
 - 7.2.1 Relevant areas and departments shall ensure that environmental monitoring equipment is calibrated and maintained at a frequency consistent with manufacturers' recommendations, or at least every year if those recommendations are unknown. Relevant areas and departments shall maintain calibration and maintenance records as necessary to prove conformance with this procedure.
 - 7.2.2 Calibration and maintenance of environmental monitoring equipment shall be addressed in area and department preventative maintenance programs, where applicable, or in local work practices, if desired.
 - 7.2.3 Each applicable area and department will maintain a list of EMS equipment requiring calibration and the corresponding calibration frequency using Calibration Log (F-010.02).
- 7.3 Evaluation of Compliance
 - 7.3.1 The evaluation of compliance with relevant environmental legal requirements shall be accomplished through the implementation of Procedures for Internal and Regulatory Compliance Audits (P-013). Document compliance monitoring activities using the Compliance Tracking Log (F-009.03).

8.0 Frequency

Ongoing

9.0 Records

Records shall be retained consistent with the Procedure for Environmental Records (P-012).

Record of Revisions

Revision Date	Description	Sections Affected

Environmental Measurement Indicators Log (F-010.01)

Aspect	Objective	Indicator	Date Checked	Who Checked	Result	Corrective Action
Contact Person				Date Completed:		

US EPA ARCHIVE DOCUMENT

Calibration Log (F-010.02)

Indicator	Measurement Method	Equipment Used	Equipment Calibrated: Date/Method
Contact Person:		Date Completed:	

Compliance Tracking Log (F-010.03)

Person Responsible	Regulations	Root Cause	Compliance Check Date	Results	Corrective Action/Date	Compliance Verified/Date
Contact Person:				Date Completed:		

US EPA ARCHIVE DOCUMENT

Procedure for Corrective and Preventive Action (P-011)

1.0 Purpose

The purpose of this procedure is to establish and outline the process for identifying, documenting, analyzing, and implementing preventive and corrective actions. Preventive or corrective actions may be initiated using this procedure for any environmental problem affecting the organization.

2.0 Activities Affected

All areas and departments

3.0 Forms Used

- 3.1 Corrective and Preventive Action Request (CAR) (F-011.01)
- 3.2 Corrective and Preventive Action Tracking Log (F-011.02)

4.0 References

- 4.1 Procedure for Internal and Regulatory Compliance Audits (P-013)
- 4.1 Procedure for Emergency Preparedness and Response (P-009)
- 4.2 Procedure for Communication with Stakeholders (P-006)
- 4.3 Procedure for Document Control (P-007)
- 4.4 Procedure for Monitoring and Measurement (P-010)
- 4.5 ISO 14001:1996, Element 4.5.2

5.0 Definitions

None

6.0 Exclusions

None

7.0 Procedure

- 7.1 Where non-conformances or non-compliances are identified through the environmental audit process, the responsible and accountable area or department representative, affected area or department manager, audit team member or Environmental Management Representative (EMR), is responsible for:
 - 7.1.1 Identifying the root cause(s) of non-conformances or non-compliances;
 - 7.1.2 Identifying appropriate corrective and preventive actions (including modifying or creating environmental procedures and work practices);
 - 7.1.3 Planning and implementing corrective and preventive actions; and
 - 7.1.4 Verifying the close-out and effectiveness of corrective and preventive actions.
- 7.2 Where non-conformances are identified outside the EMS audit process, the Quality Manager or designee will generate a CAR, as appropriate. The affected area or department manager, or designee, is responsible for:
 - 7.2.1 Identifying the root cause(s) of these non-conformances;
 - 7.2.2 Identifying appropriate corrective and preventive actions (including modifying or creating environmental procedures and work practices);
 - 7.2.3 Planning and implementing corrective and preventive actions; and
 - 7.2.4 Verifying the close-out and effectiveness of corrective and preventive actions.

The Quality Manager or designee will verify proper implementation of corrective and preventive actions.

- 7.3 Where non-compliances are identified outside the Regulatory Compliance Audit process, the EMR or designee will generate a Non-Compliance Report, as appropriate to be handled in accordance with P-013, Sect. 7.2.4-7.2.8.

8.0 Frequency

As needed following reviews

9.0 Records

Records shall be retained consistent with the Procedure for Environmental Records (P-012).

Record of Revisions

Revision Date	Description	Sections Affected

Corrective and Preventive Action Request (F-011.01)

Corrective and Preventative Action Request	
A. Audited Area/Department:	
<i>Audit Date:</i>	<i>Auditor(s):</i>
<i>Auditee(s):</i>	<i>Date:</i>
B. Description of Non-Conformance or Non-Compliance:	C. Root Cause Analysis:
Audit Criteria: Applicable ISO 14001 Element:	
D. Corrective Action:	
Date of Implementation:	

US EPA ARCHIVE DOCUMENT

Corrective and Preventative Action Request

E. Preventive Action:

Date of Implementation:

F. Verification:

Date of Verification:

Auditor (signed):

Date:

US EPA ARCHIVE DOCUMENT

Corrective and Preventive Action Tracking Log (F-011.02)

CAR #	Issue Date	Area/ Department	Problem Description	Corrective Action Completion Date	Preventive Action Completion Date	Closure Date

US EPA ARCHIVE DOCUMENT

Procedure for Environmental Records (P-012)

1.0 Purpose/Scope

EAF Steel Company has established this procedure to identify, maintain, and dispose of environmental records. These records include training records and the results of audits and reviews. They are readily retrievable and protected against damage, deterioration, and loss. The Areas and Departments maintain their own environmental records. Record and document retention is also specified in the procedure.

2.0 Activities Affected

The areas and departments specified in the Index of Environmental Records.

3.0 Forms Used

3.1 Index of Environmental Records (F-012.01)

4.0 References

4.1 ISO 14001:1996, Element 5.5.3

5.0 Definitions

Records: documented information that: (a) is evidence of an environmental activity or event that has been or is being performed; or (b) is required to be retained for future reference. It is information on environmental performance.

6.0 Exclusions

None

7.0 Procedure

7.1 Records shall be maintained and retained as specified in the Index of Environmental Records (F-012.01).

7.2 Record retention will be consistent with applicable legal and other requirements.

7.3 Each area or department manager or designee shall have access to a master list of all EMS records relevant to their area or department, as applicable.

7.4 Each activity responsible for maintaining a record has the responsibility for establishing the method for filing and indexing records to ensure accessibility.

8.0 General Rules

Records shall be legible, readily retrievable, and stored and maintained so as to prevent damage, deterioration, or loss as appropriate to the importance of the record.

9.0 Records

Records shall be retained as specified in this procedure, P-012.

Record of Revisions

Revision Date	Description	Sections Affected

Index of Environmental Records (F-012.01)

Document	Record	Retention (yrs)	Controlled By	Location
P-001	Legal and Other Environmental Requirements (F-001.01)			
P-003	Aspects Identification and Significance Determination (F-003.01)			
	Linking SEAs, Objectives and Targets, and Operational Control Procedures to Measurement Indicators, Job Functions, Responsible Parties, and Applicable Processes (F-003.02)			
	Program (s) (F-003.03)			
P-004	Environmental Checklist for New Processes and Materials (F-004.01)			
	Environmental Checklist for New Projects (F-004.02)			
P-005	Training Needs Analysis—Environmental Courses (F-005.01)			
	Training Needs Analysis—Procedures and Work Instructions by Area/Department (F-005.02)			
P-006	External Stakeholder Communication Record (F-006.01)			
P-007	Master Document List (F-007.01)			
P-008	Environmental Briefing Packet and Contractor Method Statement Template (F-008.01)			
P-009	Emergency Preparedness and Response Requirements Matrix (F-009.01)			
P-010	Environmental Measurement Indicators Log (F-010.01)			
	Calibration Log (F-010.02)			
	Compliance Tracking Log (F-010.03)			
P-011	Corrective and Preventive Action Request (F-011.01)			
	Corrective and Preventive Action Tracking Log (F-011.02)			
P-012	Index of Environmental Records (F-012.01)			
P-013	Internal Audit Checklist (F-013.01)			
	Internal Audit Schedule Form (F-013.02)			
P-014	Management Review Record (F-014.01)			

Procedure for Internal and Regulatory Compliance Audits (P-013)

1.0 Purpose/Scope

This procedure defines the mechanism for the planning and implementation of internal EMS and regulatory compliance audits at [Facility's Name]. Regulatory Compliance Audits shall be handled with special consideration as outlined in Sect. 7.2

2.0 Activities Affected

All areas and departments

3.0 Forms Used

- 3.1 Internal Audit Checklist (F-013.01)
- 3.2 Corrective and Preventive Action Request (CAR) (F-011.01)
- 3.3 Corrective and Preventive Action Tracking Log (F-011.02)
- 3.4 Internal Audit Schedule Form (F-013.02)
- 3.5 General Company Employee Checklist for Internal Audits (F-013.03)
- 3.6 Questionnaire for General Company Employee in Spanish (F-013.04)

4.0 References

- 4.1 Procedure for Corrective and Preventive Action (P-011)
- 4.2 Procedure for Management Review (P-014)
- 4.3 ISO 14001: Standard (4.5.2, 4.5.5)
- 4.4 Compliance Assurance Program Guidelines

5.0 Definitions

- 5.1 Auditee: individual audited.
- 5.2 Auditor: audit team member performing the audit.
- 5.3 Audit Criteria: policies, practices, procedures, or other requirements against which the auditor compares objective evidence about the subject matter.
- 5.4 Audit Program Leader: individual responsible for maintaining the Environmental Audit Program.
- 5.5 CAR: corrective and preventive action request that identifies observed non-conformances.
- 5.6 Finding: an existing condition supported by objective evidence.
- 5.7 Non-conformance: the non-fulfillment of specified system requirements.
- 5.8 Objective Evidence: qualitative or quantitative information, records, or statements of fact pertaining to the existence and implementation of an EMS element that is based on measurement or test and which can be verified.

6.0 Exclusions

None

7.0 Procedure

- 7.1 Conducting the Internal Audit
 - 7.1.1 The Quality Manager, or designee, shall plan, schedule, and implement internal audits. The audit schedule, developed on the Internal Audit Schedule Form (F-013.02), will be used to identify the frequency and location of internal environmental management system audits and will be revised as necessary. Revisions to the audit schedule may be based on the results of prior audits.

- 7.1.2 Audit frequency will be established on a priority basis, taking into account previous audit results and the relative importance of the area or department, and will not be less than once per year. Each area or department will be audited at least once every three years. Audits will occur at planned intervals.
- 7.1.3 For each area or department within the facility, an audit team will be formed whose membership has no responsibility within the area or department to be audited. This independence will be documented by indicating on the audit report or other audit record the organization to which the auditors belong.
- 7.1.4 Competent audit teams shall perform internal environmental audits.
 - 7.1.4.1 At least one member of the team shall be competent in the environmental auditing process through either training and/or experience.
 - 7.1.4.2 All members of the audit team shall have an awareness and understanding of the **[Facility's Name]** environmental management system by virtue of formal and informal training.
- 7.1.5 Audit scope and criteria will be established for each area or department prior to each audit. Audit criteria may be documented by the audit team on Internal Audit Checklist (F-013.01) and the checklist used during the audits.
- 7.1.6 During the audit, the audit team will record audit information, such as: items checked; individuals interviewed; any concerns identified; and any corrective or preventive actions completed during the audit. The audit team shall promptly notify the Environmental Management Representative (EMR), or designee, of any possible regulatory non-compliance. Upon verification of non-compliance, the EMR shall notify facility management.
- 7.1.7 Upon completion of the internal audit, the audit team will review their findings with the auditee and responsible and accountable area or department representative. The team will then initiate a CAR for each finding of non-conformity (Note: a non-compliance is a non-conformance) using the Corrective Action Request form. (Note: a non-compliance is handled a special case of non-conformity.)
- 7.1.8 The Quality Manager or designee will track the status of all outstanding CAR's using the Corrective and Preventive Action Tracking Log (F-011.02).
- 7.1.9 The responsible and accountable area or department representative will identify the root cause of the non-conformity (where applicable), corrective and preventive actions to be undertaken, and the dates by which these actions will be completed. This information will be documented on the original CAR and the CAR sent to the applicable area or department manager. A copy of the CAR will also be provided to the Quality Manager, or designee, within the time frame established during the audit review meeting.
- 7.1.10 Upon completion of the corrective and preventive actions, the area or department manager will acknowledge completion of these actions by signing the original CAR and returning it to the Quality Manager or designee.

- 7.1.11 Corrective and preventive actions will be verified during the next internal audit or the area or department manager may contact the Quality Manager to schedule verification of actions prior to the next audit.
- 7.1.12 When full conformity is determined or corrective and preventive actions accepted, the audit team leader will sign the original CAR and return it to the Quality Manager, or designee, for closure and filing.
- 7.1.13 At least annually, the EMR, or designee, will summarize system audit results with facility management as specified in the Procedure for Environmental Management System Management Review (P-014).
- 7.2 Conducting the Regulatory Compliance Audit
 - 7.2.1 In some cases regulatory compliance audits will be preformed in addition to internal audits. The EMR, or designee, is responsible for planning, scheduling, and implementing these internal environmental regulatory compliance audits, including the identification of required resources.
 - 7.2.2 The EMR, or designee, develops and maintains the environmental compliance assurance program and issues program support documents, based on facility environmental compliance assurance guidelines, where available.
 - 7.2.3 During a regulatory compliance audit, audit team members will record information, such as: items checked; individuals interviewed; and any possible regulatory non-compliance issues. The compliance audit team shall promptly notify the EMR, or designee, of any possible regulatory non-compliance. Upon verification of non-compliance, the EMR shall notify facility management.
 - 7.2.4 The regulatory compliance audit team reviews possible regulatory non-compliance issues with the responsible and accountable area or department representative. The team also prepares a CAR identifying the issues, corrective and preventive actions required, and the individuals responsible for completing the actions. The EMR, or designee, and area or department manager will concur with the CAR before its issuance.
 - 7.2.5 Upon completion of the corrective and preventive actions, the area or department manager will acknowledge completion of these actions by signing the original CAR and returning it to the EMR, or designee. Corrective and preventive actions will be verified in a timely manner by a member of the regulatory compliance audit team. When full compliance is determined or corrective and preventive actions accepted, the assessment team member will sign the original CAR and return it to the EMR or designee for closure and filing.
 - 7.2.6 At least *annually*, the EMR or designee will present a summary of open CAR's that are based on regulatory non-compliance to facility management for review.
 - 7.2.7 Regulatory Compliance Auditors must be competent environmental professionals by virtue of a combination of education, training, and experience. The EMR and/or EHS Coordinator is responsible for establishing regulatory compliance auditor competency requirements for [Facility Name]. A certified or competent EMS auditor is not automatically qualified to function as a competent regulatory compliance auditor.
 - 7.2.8 If there is a legal or attorney-client privilege component to the regulatory compliance audit, it needs to be included in this section 7.2.
 - 7.2.9 Corrective and preventive actions will be verified in a timely manner by a member of the assessment team. When full compliance is determined or

corrective and preventive actions accepted, the assessment team member will sign the original CAR and return it to the EMR or designee for closure and filing.

7.2.10 Each annually, the EMR or designee will present a summary of open CAR's that are based on regulatory non-compliance to facility management for review.

8.0 Frequency

At least annually

9.0 Records

Records shall be retained consistent with the Procedure for Environmental Records (P-012).

Record of Revisions

Revision Date	Description	Sections Affected

Internal Audit Checklist (F-013.01)

Date:

EMS Requirement	Yes	No	Findings/Remarks	Responsible Party/Parties	Date Completed
Structure and Responsibility					
Company has defined the roles, responsibilities, and authorities to facilitate an effective EMS.					
The company ensures the availability of resources essential for the implementation, maintenance and improvement of the EMS.					
Company management has appointed an EMR with defined roles and responsibilities to implement the EMS.					
Company EMR reports on the performance of the EMS to top management for review and continuous improvement.					
Environmental Policy					
Top management has defined the company's environmental policy.					
The company has defined the scope of the EMS.					
Policy is specific to company and is appropriate to the nature, scale and environmental impacts of its activities, products or services.					
Policy includes a commitment to continuous improvement in environmental performance and the prevention of pollution.					
Policy includes a commitment to sharing information on EMS performance with the community.					
Policy includes a commitment to comply with applicable environmental legislation and regulations.					
Policy includes a commitment to meeting other requirements to which the company subscribes.					

EMS Requirement	Yes	No	Findings/Remarks	Responsible Party/Parties	Date Completed
Policy provides the framework for setting and reviewing environmental objectives and targets.					
Policy is implemented and maintained.					
Policy is communicated to all employees.					
Policy is made available to the public.					
Environmental Aspects					
Company has established and maintains a procedure to identify the environmental aspects that it can control or over which it can be expected to have an influence within the scope of its EMS, in order to determine those that have or can have significant impacts. It takes into account, modified, planned or new, activities, products or services in this process.					
Company has considered in its SEA determination, the aspects associated with on-site contractor activities.					
SEAs are considered in developing, implementing and maintaining the EMS including forming the basis for establishing process and management controls, environmental improvement programs, and SEAs for further investigation and study.					
Legal and Other Requirements					
Company has a procedure to identify and have access to legal and other requirements and to determine how these requirements apply to its environmental aspects.					
Company maintains access to all current federal, state, and local regulations and ordinances by either contacting the appropriate authorities or subscribing to a regulatory update service.					
Company has documented procedures for periodically evaluating compliance with relevant environmental legislation and regulations.					

EMS Requirement	Yes	No	Findings/Remarks	Responsible Party/Parties	Date Completed
EMR is responsible for planning, scheduling and implementing internal environmental regulatory compliance assessments, including the identification of required resources.					
A procedure is in place for these assessments and they evaluate compliance with applicable environmental legal and other requirements to which the Company subscribes.					
These assessments are documented and are part of the EMS.					
Company considers that environmental legal and other requirements to which it subscribes are considered in developing and maintaining its EMS.					
Objectives and Targets					
Company has considered technological options, financial, operational, and business requirements in establishing its objectives and targets.					
Company has considering legal and other requirements in establishing objectives and targets.					
Company has considered the views of interested parties in establishing objectives and targets.					
Company objectives and targets are, documented, are at relevant functions and levels within the organization, measurable where practicable, and are consistent with environmental policy and its commitment to prevention of pollution, and compliance with environmental legal and other requirements..					

EMS Requirement	Yes	No	Findings/Remarks	Responsible Party/Parties	Date Completed
Environmental Programs					
Company has established and maintained programs for achieving its objectives and targets.					
These programs designate responsibility for achieving objectives and targets at relevant functions and levels of the organization and the means and time frame for their achievement.					
New activities, products or services are reviewed for potential environmental impacts and aspects.					
Company has defined roles and responsibilities for environmental review of new projects.					
Project originator reviews and characterizes the environmental and energy aspects of a new project.					
Company has identified operations associated with SEAs.					
Company has planned maintenance activities in order to ensure that they are carried out under specified conditions.					
Operations associated with SEAs have documented procedures to cover situations where their absence could lead to deviations from the policy, objectives and/or targets.					
Procedures stipulate operating conditions.					
Company has a procedure related to the identifiable SEAs of goods and services provided by contractors and vendors and communicates procedures and requirements to suppliers and contractors.					
Company or initiating activity communicates relevant company-specific environmental procedures, work practices, and requirements to affected contractors prior to the commencement of requested work.					
Company has a procedure for the prevention of pollution and material usage minimization.					

EMS Requirement	Yes	No	Findings/Remarks	Responsible Party/Parties	Date Completed
Company has documented procedures for monitoring and measuring key characteristics of operations associated with SEAs.					
Company has established metrics to track performance, relevant operational controls, and conformance with objectives and targets.					
Training and Awareness					
The company has performed a comprehensive environmental training needs analysis.					
Individuals working for the company or on its behalf whose work may create a significant impact, or is associated with a SEA, have received appropriate training.					
Company has a procedure to make individuals working for it or on its behalf aware of the importance of conformance with policy and procedures, the significant impacts associated with their work, and their roles and responsibilities as they pertain to the environmental policy.					
Company has a procedure to make individuals working for it or on its behalf aware of: requirements of the EMS, the potential consequences of departure from operating procedures, and emergency preparedness and response.					
Company individuals working for it or on its behalf performing tasks that can cause significant environmental impact are competent on the basis of education, training and/or experience.					
Communication					
Company has a procedure for internal communication between the various levels and functions of the company.					
Internal communications procedures are used to facilitate implementation of regulatory, company policy and other requirements.					

EMS Requirement	Yes	No	Findings/Remarks	Responsible Party/Parties	Date Completed
Company has a procedure to log external communications and record the responses to external communications that concern environmental issues.					
EMR or designee responds to inquiries from the community and regulatory agencies.					
A designated person, in consultation with the EMR, is responsible for responding to media communications.					
Company has documented whether it will externally communicate about its SEAs an if so, has established a procedure for this.					
Where the external communication relates to an environmental incident, appropriate emergency response procedures are identified and followed.					
Emergency Preparedness & Response (EP&R)					
Potential environmental incidents and emergencies likely to occur at the company have been identified by the cross functional team.					
Methods for preventing, mitigating associated impacts and responding to potential and actual releases that require emergency response have been established and maintained at the company and involve the appropriate response personnel.					
Roles and responsibilities for communications within the company and for obtaining outside support services (e.g., police, fire) have been established and are maintained at the company.					
The EP&R procedures at the company are reviewed and revised on an annual basis or as necessary by the CFT.					
EP&R methods and communications are tested on an annual basis or as necessary.					

EMS Requirement	Yes	No	Findings/Remarks	Responsible Party/Parties	Date Completed
The company emergency response leader records information necessary to determine corrective and preventive actions and any improvements to existing procedures that may be needed.					
Documentation and Control of Documents and Records					
Company has information in paper or electronic form to describe the core elements of the EMS and their interactions.					
Company has information in paper or electronic form to provide direction to related documentation.					
Company has a procedure for controlling all documents required by the EMS.					
Authorized personnel review documents and forms for adequacy before use or release.					
The EMR or designee maintains a master list of documents and records.					
Relevant documents are available at the locations where they are needed.					
Obsolete documents are promptly removed from all points of use or otherwise assured against unintended use.					
Obsolete documents retained for legal or preservation purposes are properly identified.					
Company has a procedure for defining responsibility concerning the creation and modification of documents					
Documentation is approved, legible, dated and readily identifiable, maintained in an orderly manner, periodically reviewed, and retained for a specified period.					

EMS Requirement	Yes	No	Findings/Remarks	Responsible Party/Parties	Date Completed
Company has a procedure to identify, maintain, and dispose of environmental records as necessary to demonstrate conformity to the requirements of its EMS and of the ISO 14001 standard. These records include training records, results of audits, and results of evaluations of compliance with environmental legal requirements.					
Each activity responsible for maintaining a record has the responsibility for establishing the method for filing and indexing the records for accessibility.					
The responsible activity is the generator of the record.					
Company records procedure is consistent with corporate record retention procedures.					
Nonconformity and Corrective Actions					
Company has a procedure for nonconformities and corrective and preventive actions defining responsibility and authority for investigating and mitigating environmental impacts.					
Each activity within the company is responsible for identifying specific techniques to: identify the root cause(s); take appropriate corrective or preventive action; and verify effectiveness and prevent recurrence where possible.					
Company reviews the actions taken and implements and documents changes resulting from corrective and preventive action.					
Internal Audits					
Company has a program and procedure for periodic EMS audits.					
The EMR or designee is responsible for planning, scheduling and implementing internal EMS audits.					
An EMS audit team will be formed whose membership has no responsibility within the activity to be audited.					

EMS Requirement	Yes	No	Findings/Remarks	Responsible Party/Parties	Date Completed
An EMS audit schedule will be developed for each activity to be audited. Audit frequency is determined on priority basis that accounts for previous audit results and the relative importance of the activity, and is not be less than once per year for each activity.					
The EMS audit team has established a checklist of questions relating to the EMS. These questions are reviewed and amended as necessary based on audit findings and other factors.					
During the audit, the EMS audit team records audit observations, indicating items checked, individuals interviewed, any concerns identified and any corrective or preventive actions completed during the audit.					
The audit team documents its findings using an audit findings form.					
The area representatives address the corrective and preventive action sections within the specified time limit and return the information to audit team and EMR.					
The EMR notifies company management of potential regulatory non-compliance.					
The audit team reviews corrective actions and confirms proper implementation either by a subsequent check or during the next audit.					
The EMR or designee submits audit summaries for management review.					
Management Review					
Management reviews are conducted by the EMR and the management committee.					
The EMR schedules these reviews at least once each year and outputs are documented including required actions and changes to the EMS.					

EMS Requirement	Yes	No	Findings/Remarks	Responsible Party/Parties	Date Completed
The review addresses all applicable components of the <i>EAF Steel Company</i> EMS, including among other information: <ul style="list-style-type: none"> • Results of environmental management system audits, • Communication from external interested parties, • The performance of the environmental management system, • The extent to which objectives and targets have been met, • Status of corrective and preventive actions, • Follow-up actions from previous management reviews, • Changing circumstances, and • Recommendations for improvement. 					

Audit Team Leader Signature: _____

Date:

F-013.03: General Company Employee Checklist for Internal Audits

Look for documentation of planning/evidence of implementation.

General Facility Population Checklist for EMS Internal Audits	
Questions	Findings/Observations
Environmental Policy	
1. Do you know the facility's Environmental Policy?	
2. What are the keywords of the Policy?	
3. How does the Policy relate to your job?	
4. What is your understanding of the facility's EMS and your role?	
ADDITIONAL QUESTIONS:	
Environmental Aspects	
1. Are you aware of the aspects and the significant environmental aspect in your department?	
2. What are they?	
3. Where can they be found?	
ADDITIONAL QUESTIONS:	
Objectives and Targets	
1. Do you know what the objectives and targets for the significant environmental aspects are?	
2. Where can these be found?	
3. What is the status or progress on the objectives with which your department is involved?	
ADDITIONAL QUESTIONS:	
Training, Awareness, and Competence	
1. Have you received awareness training on the facility's environmental management system and the significant environmental aspects in your department?	
2. Have you received training on your role and responsibility to conform with the facility's: a. Environmental Management System b. Emergency preparedness and response	
3. Are you aware of the potential consequences of departure from your environmental work practices (environmental impact)?	
ADDITIONAL QUESTIONS:	

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General Facility Population Checklist for EMS Internal Audits	
Questions	Findings/Observations
Communication	
1. Have you received information on the facility's Environmental Management System and significant environmental aspects?	
2. How (e.g., facility newsletter, department meetings, training, posters, pocket cards)?	
3. Do you have an example?	
4. If you had a concern about the EMS or any environmental concern, what would you do?	
ADDITIONAL QUESTIONS:	
Documentation and Control of Documents	
1. Do you have access to current versions of your department's action plans, procedures, and/or environmental work instructions?	
2. Where are they kept?	
3. If there are any postings in the department check to see if they are current.	
ADDITIONAL QUESTIONS:	
Operational Control	
1. Roles/instructions are clearly understood by querying against documentation that applies to your area(s). Record any findings/observations.	
2. What are the ramifications if instructions are not followed?	
List documentation reviewed:	
Emergency Preparedness and Response	
1. Do you know the difference between an incidental release/spill versus one that requires an emergency response?	
2. What types of spills/releases are you allowed to clean up?	
3. What do you do if there is a spill/release that requires the services of personnel outside of your immediate work area (i.e., an emergency response)?	
ADDITIONAL QUESTIONS:	
Monitoring and Measurement	
1. Do you have any monitoring equipment in your area?	
2. What is monitored or measured?	
3. Are there any calibration requirements? What is the frequency? Who performs them?	
ADDITIONAL QUESTIONS:	

General Facility Population Checklist for EMS Internal Audits	
Questions	Findings/Observations
Nonconformity and Corrective and Preventative Action	
1. Do you know what to do if you get a CAR?	
ADDITIONAL QUESTIONS:	
Records	
1. Does your area maintain any environmentally-related records (e.g., training records, monitoring equipment calibration records, completed forms)?	
2. Do you have an index of those records with storage location and retention period? What is the retention period?	
3. Show me those records (consistency with index and retention periods, readily retrievable and legible, stored to protect from damage, deterioration or loss).	
ADDITIONAL QUESTIONS:	

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Questionnaire for General Company Employee in Spanish (F-013.04)

PREGUNTAS CLAVE PARA ENTREVISTADOS

NOMBRE:

DEPARTAMENTO:

CARGO/FUNCION:

FECHA:

- 1) Describa en sus propias palabras la Política Ambiental de la organizacion
- 2) Cuales son sus funciones habituales
- 3) Que entrenamiento ha recibido a la fecha en materia ambiental o del sistema ambiental
- 4) Cuales son sus roles y responsabilidades en el sistema ambiental
- 5) Mencione los aspectos ambientales más importantes de su area de trabajo
- 6) Que procedimientos del sistema ambiental están relacionados con su trabajo
- 7) Que registros ambientales son generados o controlados por su departamento
- 8) Cual es su responsabilidad en caso de emergencia / si Ud. es el primero en detectarla
- 9) Que hace Ud. en caso de detectar alguna actividad a hecho que le parezca anormal o incorrecto dentro del funcionamiento del sistema ambiental
- 10) Cuales son los principales Objetivos y Metas ambientales de su departamento y que programas están relacionados al cumplimiento de los mismos

COMENTARIOS GENERALES Y/O OBSERVACIONES DEL AUDITADO:

Procedure for Management Review (P-014)

1.0 Purpose

This procedure defines the process for the periodic review and evaluation of the EAF Steel Company's environmental management system by top management to ensure its continuing suitability, adequacy, and effectiveness.

2.0 Activities Affected

All areas and departments

3.0 Forms Used

3.1 Management Review Record (F-014.01)

4.0 References

- 4.1 Procedure for Environmental Aspects, Objectives and Targets, and Action Plans (P-003)
- 4.2 Procedure for Environmental Audits (P-013)
- 4.3 Procedure for Corrective and Preventative Action (P-011)
- 4.4 Procedure for Legal and Other Requirements (P-001)
- 4.5 ISO 14001 Standard (4.6)

5.0 Definitions and Acronyms

None

6.0 Exclusions

None

7.0 Procedure

- 7.1 The Environmental Management Representative and top management shall conduct a review of the EMS at least once each year.
- 7.2 Management review meetings shall be scheduled in advance by the Environmental Management Representative (EMR) and an agenda issued to ensure appropriate preparation and attendance.
- 7.2 The meeting shall review all applicable components of the EAF Steel Company EMS. including among other information:
 - Results of environmental management system audits,
 - Communication from external interested parties,
 - The performance of the environmental management system,
 - The extent to which objectives and targets have been met,
 - Status of corrective and preventive actions,
 - Follow-up actions from previous management reviews,
 - Changing circumstances, and
 - Recommendations for improvement.
- 7.4 The EMR and top management shall review and confirm their approval and the continual suitability, adequacy and effectiveness of the environmental policy, environmental objectives and targets, action plans, and other elements of the system as well as confirm that regulatory compliance requirements are met.
- 7.5 The EMR, or designee, will publish and maintain meeting minutes identifying issues discussed, possible changes to environmental policy, and corrective and preventive actions to be taken consistent with the commitment to continual

improvement. Required actions will be assigned to the responsibility of process, area, and functional management.

7.6 Timely decisions will be made.

8.0 General Rules

None

9.0 Frequency

At least once each year

10.0 Records

Records shall be retained consistent with the Procedure for Environmental Records (P-012).

Record of Revisions

Revision Date	Description	Sections Affected

Management Review Record (F-014.01)

EMS Management Review Record	
Date of review meeting:	
People present at meeting:	
Name:	Position:
Conclusions:	
Actions to be taken:	Person(s) responsible:

Signed: _____
 Environmental Management Representative Company Manager

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TIER III WORK INSTRUCTIONS

Number	Title	Page	ISO Standard
WI-001	Operational Control for Container Labeling	TIII-1	4.4.6
WI-002	Operational Control for Hazardous Waste Satellite Accumulation Areas	TIII-2	4.4.6
WI-002.01	Weekly Hazardous Waste Satellite Storage Inspection Checklist	TIII-5	4.4.6

Operational Control for Container Labeling (WI-001)

1.0 Purpose

To maintain safety on-site and ensure that, in the event of a spill of a hazardous or non-hazardous substance, the Emergency Coordinator follows the correct procedure.

2.0 References

2.1 RCRA Subtitle C (40 CFR 262)

3.0 Responsibility

3.1 The Environmental Engineer or designee shall assure that *EAF Steel Company* makes available labels for container labeling and ensures that employees who handle and dispose of hazardous and non-hazardous wastes understand the labeling procedures outlined here.

3.2 Managers of each department are responsible for providing the Environmental Engineer with a list of employees who handle or may potentially handle hazardous and non-hazardous wastes.

4.0 Procedure for Labeling Containers:

4.1 All containers of hazardous and non-hazardous substances should have a label. The label should include, at a minimum:

4.1.1 Chemical name

4.1.2 Hazard warning

4.1.3 Date

4.1.4 User department

4.2 All labels must be legible and written with a permanent marker.

4.3 Labels that have been damaged or removed must be replaced.

4.4 If a chemical is transferred to a portable or temporary container, then that container must also have a label.

4.5 If a chemical is flammable, an additional "DANGER/FLAMMABLE" label is required.

Approved by:

Environmental Management Representative

Operational Control for Hazardous Waste Satellite Accumulation Areas (WI-002)

1.0 Purpose

Maintain compliance with federal and state regulations for accumulating hazardous waste temporarily in various work areas at *EAF Steel Company*.

2.0 References

- 2.1 40 Code of Federal Regulations 261
- 2.2 40 Code of Federal Regulations 262
- 2.3 State Hazardous Waste Regulations (to be completed by each facility)

3.0 Definitions

- 3.1 Satellite Accumulation Area (SAA): an area within the facility at the point of generation that can have a maximum of 55-gallons of each type of hazardous waste generated at that location. Only one container of each type of hazardous waste may be used for accumulation in each designated SAA.
- 3.2 Accumulation Start Date: the date when a container stored in a SAA becomes full. The container must be moved from that location to the waste storage area within 2 days.
- 3.3 Full: for the purposes of this instruction, a container shall be considered to be full when hazardous waste has reached within 4-inches from the top of the container.

4.0 Responsibility

- 4.1 The EMS Coordinator is responsible for overall implementation and checking for implementation of this operational control procedure. The designated Production Supervisor for each production process is responsible for implementation of this procedure in his or her work area.
- 4.2 The Hazardous Waste Managers are responsible for implementation of steps defined below for their respective SAAs.
- 4.3 Employees that add hazardous waste to SAAs are responsible for the items described below for employees.

5.0 Procedure

- 5.1 SAAs shall be designated and tracked by the EMS Coordinator. The EMS Coordinator will maintain a map showing each SAA. The EMS Coordinator will maintain a list of all Hazardous Waste Managers.
- 5.2 Supervisors of areas that generate hazardous waste on a regular basis will have a Hazardous Waste Manager in their area. The Supervisor must notify the EMS Coordinator of any changes to Hazardous Waste Managers within his or her production area. The Supervisor also must notify the EMS Coordinator of the number of hazardous waste types and containers to be used in his or her SAA and of any requests for new SAAs or requests to modify an SAA.
- 5.3 Supervisors for areas that may generate hazardous waste on a one-time basis will coordinate with the EMS Coordinator to have the hazardous waste picked up in a timely manner. Hazardous waste should not be accumulated in these areas on a regular basis.
- 5.4 Each area that is designated as an SAA must comply with the following procedure.
 - 5.4.1 Only one container for each defined type of hazardous waste is allowed in the SAA at any given time. The containers will be obtained from the EMS

Coordinator and will be compatible with the hazardous waste they are to contain.

- 5.4.2 The container must have labels with the words “Hazardous Waste” on it before any hazardous waste can be added to the container. Labels are available from the EMS Coordinator. As an alternate, a marker or other means should be used to put these words on the accumulation container.
- 5.4.3 The label also must include a description of the type of hazardous waste in the container. The Environmental Manager will conduct any hazardous waste analysis and provide hazardous waste labels or hazardous waste labeling instructions for each waste.
- 5.4.4 The container will not be dated until the container is full (defined as having hazardous waste to within 4-inches from the top of the container). When the container is full it will be dated. The Supervisor for each SAA is responsible for having the container moved to the hazardous waste storage area within 48 hours of it being filled and dated.
- 5.4.5 If a new container is needed when the existing container is full, the full one must be moved immediately to the storage area.
- 5.4.6 Hazardous Waste Managers should inspect their SAA area daily. These inspection records will be maintained by the SAA area in case of an inspection or internal audit. The Supervisor is responsible for making sure the inspection records are up-to-date for his or her SAA.
- 5.4.7 Each employee that adds hazardous waste to a container in an SAA should read the sign above the SAA area and make sure that the instructions are followed each time the container is accessed. For example, the waste is placed in the correct container, the container is closed after the addition of hazardous waste, etc. These checks do not need to be documented. The Supervisor is responsible for making sure that each employee knows to do this check and does them.
- 5.4.8 The EMS Coordinator will conduct a weekly inspection of all SAAs at this facility.

6.0 Records

- 6.1 The Hazardous Waste Managers will use the Weekly Hazardous Waste Satellite Storage Inspection Checklist (WI-002.01) to note that they have checked their area for the day. This form will be maintained at the SAA for which they are responsible.
- 6.2 The signs posted above each SAA document that employees conduct “each use” checks.
- 6.3 The EMS Coordinator will complete the Weekly Hazardous Waste Satellite Storage Inspection Checklist (WI-002.01) and maintain this checklist in the Environmental Office.
- 6.4 Training requirements for personnel supporting hazardous waste accumulation are documented under Training Operational Controls.

7.0 Revision

Date: March 2005, WI 002 (REV 1)

Approved by:

Environmental Management Representative

US EPA ARCHIVE DOCUMENT

Weekly Hazardous Waste Satellite Storage Inspection Checklist (WI-002.01)

Date: _____ **Inspection Completed by:** _____

Note: Inspect each of the following hazardous waste satellite storage areas on a weekly basis. Note any problem and record the corrective action taken to resolve the problem. Inspect each area for the following:

- (a) Condition of drums (leaking, bulging, rusting);
- (b) Cleanliness of area;
- (c) Drums or containers properly closed;
- (d) Drums or containers properly labeled;
- (e) Drums or containers dated when full; and
- (f) Full drums or containers moved to the 90-day hazardous waste storage area within 48 hours.

Satellite Accumulation Sites:	Good Condition	Needs Improvement
1.		
2.		
3.		
4.		
5.		
6.		

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