

US EPA ARCHIVE DOCUMENT

Indiana Environmental Stewardship Program

EMS Independent Assessment

Summary of Criterion

To ensure the quality of environmental management systems (EMS) at Environmental Stewardship Program (ESP) member facilities, IDEM is instituting an independent EMS assessment criterion for applying facilities. Prior to applying to ESP, facilities must have had an assessment of their EMS conducted by an independent party. For purposes of ESP, an independent party is one that is neither directly employed by the applying facility nor has played a substantive role in developing the facility's EMS.

The independent assessment shall be conducted using the ESP Independent Assessment Protocol or another protocol that covers all of the provisions of the ESP Independent Assessment Protocol. The EMS independent assessment also applies to all facilities that are renewing their membership.

Options for an Independent Party Assessment

Facilities applying to ESP can select from a number of options for an independent assessment of their EMS. An applying facility may choose from the following options:

1. An EMS assessment conducted in conjunction with participation in an EPA or State EMS/performance-based program and led by an individual meeting the qualifications of an ESP Site Visit Leader (see Qualifications for ESP Site Visit Leaders);
2. An assessment conducted by one of the following, so long as the lead auditor is not directly employed by the facility and did not play a substantive role in developing the EMS for the facility:
 - (a) an individual certified as an EMS lead auditor by the Registrar Accreditation Board (RAB) or the Board of Environmental, Health & Safety Auditor Certifications (BEAC);
 - (b) an individual who has demonstrated that they meet the qualifications of an ESP Site Visit Leader, except those qualifications related to current employment;
 - (c) a corporate audit team whose audit team leader meets the requirements of (2)(a) or (b) above; or
 - (d) a trade association performance-based EMS audit program whose audit team leader meets the requirements of (2)(a) or (b) above;
3. An assessment of a Federal facility EMS conducted according to the Environmental Management Systems Agency Self-Declaration Protocol for Appropriate Federal Facilities, whose audit team leader meets the requirements of (2)(a) or (b) above; or

4. An assessment conducted by other entities will be considered on a case-by-case basis in consultation with IDEM. IDEM may conduct EMS assessments on a limited basis for facilities that do not otherwise have the opportunity to select from one of the preceding options.

Options for Selecting an Assessment Protocol

Facilities may choose either to use: a) the ESP Independent Assessment Protocol or b) their own protocol so long as it incorporates all elements of the ESP protocol. If possible, facilities should consult with IDEM in advance to discuss the acceptability of their own protocols.

Qualifications for ESP Site Visit Leaders

Individuals wishing to serve as a Site Visit Leader for an ESP site visit must meet the qualifications listed below.

Background Requirements for ESP Site Visit Leaders	
Education	High school diploma
Training	40-hour ANSI-RAB NAP Accredited ISO 14001 (EMS) Lead Auditor Training; course examination must have been passed;
Work and Audit Experience	<p>Work experience: in environmental management, environmental science and technology, environmental regulation, or related field as follows:</p> <ul style="list-style-type: none"> • 4 years experience for Leads with high school degree • 3 years experience for Leads with college degree
	<p>Audit experience: 20 work-day equivalents of environmental auditing¹, which includes a minimum of one EMS audit²</p>
Current Employment	To qualify as a Site Visit Leader, the individual must currently work at IDEM or EPA or be a duly authorized agent of EPA or the State.

¹Audit experience can include regulatory, compliance assistance, pollution prevention, or EMS audits.

²EMS audit experience can include ISO 14001 audits, EPA Performance Track audits, or State EMS-program audits.