

US EPA ARCHIVE DOCUMENT



# INDEPENDENT ASSESSMENT PROTOCOL

VERSION 1.0

August 30, 2006

## ESP INDEPENDENT ASSESSMENT PROTOCOL, VERSION 1.0

### GUIDE TO ESP INDEPENDENT ASSESSMENT PROTOCOL

This Independent Assessment Protocol provides guidance to independent parties conducting EMS assessments at facilities wishing to apply to the Indiana Environmental Stewardship Program (ESP). This Protocol can be used as a stand-alone document, or it can be incorporated into existing audit protocols. The auditor(s) conducting the assessment must meet the qualifications set out in the ESP Independent Assessment criterion available at [www.in.gov/ide/ide/prevention/esp/assessmentcriteria.doc](http://www.in.gov/ide/ide/prevention/esp/assessmentcriteria.doc). In addition, the auditor(s) should have a good working knowledge of all of the ESP EMS provisions and be familiar with the other ESP entry criteria.

The assessment must cover all of the activities, products, and services within the scope of the “facility” wishing to seek entry into ESP. Note that, for purposes of ESP, a facility may actually comprise buildings, properties, activities, and services that are not co-located on a contiguous parcel of land. The auditor(s) should ascertain the boundaries of the facility and applicability of the EMS – both physical and functional – prior to conducting the assessment. Any questions regarding the acceptability of a particular facility in this sense should be directed to IDEM at [esp@idem.in.gov](mailto:esp@idem.in.gov) or 800-988-7901.

This Protocol is organized into the following major evaluation areas:

#### Section I: EMS Evaluation

- Overall EMS
- Policy
- Planning
- Implementation and Operation
- Checking and Corrective Action
- Management Review
- Public Outreach

#### Section II: Senior Facility Management Commitment

Following the evaluation sections is a Summary Form that can be used to summarize the auditor(s) findings. Each evaluation topic area contains one or more assessment criteria that must be assessed. Criteria can be assessed as either:

<b>Yes</b>	Conformance. The facility has fully addressed the criterion.
<b>No – Minor</b>	Minor non-conformance. The facility has addressed or marginally addressed the criterion, but still has some discrepancies that could be corrected with minimal organizational, operational, or technical change and within a reasonable time frame.
<b>No – Major</b>	Major non-conformance. The facility has not addressed or adequately addressed the criterion.

Facilities with minor non-conformances may be accepted into ESP if: a) IDEM determines that the non-conformances taken as a whole do not compromise the effectiveness of the facility’s overall EMS, and b) there is an acceptable corrective action schedule in place to address the deficiencies. Facilities with major non-conformances generally will not be eligible for entry into ESP until those deficiencies are corrected. Contact IDEM for any questions on this topic.

## OVERALL EMS

### 1. SCOPE

✓ Does the EMS cover the entire physical area of the facility and all activities including any ancillary operations such as warehouses, power generation facilities, waste management facilities, offices, R&D facilities, other company divisions or product lines onsite, and contractors operating onsite?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
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Objective Evidence:

Comments:

### 2. CHANGE MANAGEMENT

✓ Does the facility consider the impacts of changes (e.g., management, budget, staffing, regulatory, product design, and equipment) on the effectiveness of its EMS and revise it as necessary?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
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Objective Evidence:

Comments:

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<b>3. EMS IMPLEMENTATION</b>			
<b>✓ Has the facility's EMS been fully implemented (Plan, Do)?</b>	<b>YES</b> <input type="checkbox"/>	<b>NO - MINOR</b> <input type="checkbox"/>	<b>NO - MAJOR</b> <input type="checkbox"/>
<b>Objective Evidence:</b>			
<b>Comments:</b>			

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# POLICY

## 4. ENVIRONMENTAL POLICY

✓ Does the environmental policy contain a commitment to compliance with legal and other requirements?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Does the environmental policy contain a commitment to pollution prevention?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Does the environmental policy contain a commitment to continuous improvement?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Does the environmental policy contain a commitment to sharing environmental performance information with the community and responding to community concerns? <i>NOTE: if not in policy, facility may have a separate public outreach procedure or functional program in-place.</i>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Is the environmental policy communicated internally? [Auditor should interview appropriate/representative employees to determine whether the policy has been adequately communicated.]	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>

**Objective Evidence:**

**Comments:**

# PLANNING

## 5. LEGAL AND OTHER REQUIREMENTS

✓ Does the facility effectively identify and assess its legal and other requirements?

YES

NO - MINOR

NO - MAJOR

Objective Evidence:

Comments:

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<b>6. ENVIRONMENTAL ASPECTS</b>			
✓ Are regular environmental aspects analyses conducted?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Is the facility's entire environmental footprint considered, including any ancillary operations (e.g., warehouses, power generation facilities, offices, R&D facilities), sister divisions onsite, and contractors operating onsite?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Does the facility have a system for ranking aspects to determine their significance?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Are the aspects kept up to date as changes occur at the facility, in the community, and as legal requirements change?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
<b>Objective Evidence:</b>       			
<b>Comments:</b>       			



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<b>7. OBJECTIVES AND TARGETS</b>			
✓ <b>Are meaningful and measurable objectives and targets set?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ <b>Are procedures in place to accurately measure progress towards attaining environmental objectives and targets?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
<b>Objective Evidence:</b>			
<b>Comments:</b>			

<b>8. ENVIRONMENTAL MANAGEMENT PROGRAMS</b>			
✓ <b>Are the facility's environmental management programs actively and effectively meeting their objectives and targets?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ <b>Are objectives and targets supported by the means to achieve them?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
<b>Objective Evidence:</b>			
<b>Comments:</b>			

# IMPLEMENTATION AND OPERATION

<b>9. STRUCTURE AND RESPONSIBILITY</b>			
✓ Have responsibilities and authorities for <u>managing and improving</u> environmental performance been well defined?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Have responsibilities and authorities for <u>ensuring compliance</u> with legal and other requirements been well defined?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Have responsibilities and authorities for <u>public outreach and communication</u> of environmental performance been well defined?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
<p><b>Objective Evidence:</b></p>    <p><b>Comments:</b></p>			

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<b>10. TRAINING, AWARENESS, AND COMPETENCE</b>			
✓ <b>Has the organization identified training needs and have all appropriate personnel received the necessary training?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ <b>Are the facility's employees aware of their roles and responsibilities within the EMS and maintaining compliance with applicable legal and other requirements, and capable of carrying them out?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
<b>Objective Evidence:</b>  			
<b>Comments:</b>  			

<b>11. COMMUNICATION</b>			
✓ <b>Does the facility effectively communicate its environmental and EMS information internally?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
<b>Objective Evidence:</b>  			
<b>Comments:</b>  			

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**12. EMS DOCUMENTATION**

✓ <b>Is the environmental policy adequately documented?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ <b>Are the significant environmental aspects adequately documented?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ <b>Are objectives and targets adequately documented?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ <b>Are roles, responsibilities, and authorities adequately documented?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ <b>Is the compliance audit program adequately documented?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ <b>Are the emergency preparedness and response procedures adequately documented?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ <b>Is the EMS audit program adequately documented?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ <b>Are procedures for maintaining compliance with all applicable environmental requirements adequately documented?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>

**Objective Evidence:**

**Comments:**

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<b>13. DOCUMENT CONTROL AND RECORDS</b>			
✓ <b>Does the facility have adequate document control and records retention systems to define and control its EMS?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
<b>Objective Evidence:</b>  			
<b>Comments:</b>  			

<b>14. OPERATIONAL CONTROL</b>			
✓ <b>Does the facility have adequate operational procedures to ensure that equipment and other operations comply with legal requirements and address the facility's significant environmental aspects?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ <b>Does the facility define and communicate its procedures to affected employees to ensure that activities are carried out under specified conditions that address significant environmental aspects and legal compliance?</b>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
<b>Objective Evidence:</b>  			
<b>Comments:</b>  			

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**15. EMERGENCY PREPAREDNESS AND RESPONSE**

✓ **Does the facility have emergency procedures that identify and prevent the potential for accidents and that mitigate the impacts of accidents?**

YES

NO - MINOR

NO - MAJOR

✓ **Does the facility review and revise, as necessary, its emergency preparedness and response procedures and periodically test such procedures where practicable?**

YES

NO - MINOR

NO - MAJOR

**Objective Evidence:**

**Comments:**

## CHECKING AND CORRECTIVE ACTION

<b>16. MONITORING AND MEASUREMENT</b>			
<p>✓ <b>Does the facility regularly monitor and measure its operations that can have a significant impact on the environment and record this information?</b></p>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
<p>✓ <b>Does the facility have effective procedures in place for monitoring and measuring, on a regular basis, its key environmental performance indicators (e.g., solid waste generation, water and energy usage, water and air emissions, material use)?</b></p>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
<p><b>Objective Evidence:</b></p>        <p><b>Comments:</b></p>			

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<b>17. EMS AND COMPLIANCE AUDITS</b>			
✓ Does the facility adequately audit its conformance with its EMS (e.g., are facility personnel trained and/or competent in EMS auditing; are internal audits conducted on at least an annual basis; are all procedures, activities, products, and services covered in an audit cycle)?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Does the facility adequately audit its compliance with applicable legal requirements (e.g., are facility personnel competent in compliance auditing; are internal audits conducted on at least an annual basis; are all regulated activities, procedures, products, and services covered in an audit cycle)?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
<p><b>Objective Evidence:</b></p>          <p><b>Comments:</b></p>			



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**18. CORRECTIVE AND PREVENTATIVE ACTION**

✓ Does the facility have adequate procedures for investigating, correcting, and preventing nonconformance?

YES

NO - MINOR

NO - MAJOR

Objective Evidence:

Comments:

**MANAGEMENT REVIEW**

**19. MANAGEMENT REVIEW**

✓ Does the facility's senior management review, at defined intervals, the effectiveness of its EMSs and are the findings of the review documented and addressed?

YES

NO - MINOR

NO - MAJOR

Objective Evidence:

Comments:

**PUBLIC OUTREACH & PERFORMANCE REPORTING**

**20. IDENTIFYING AND RESPONDING TO COMMUNITY CONCERNS**

✓ <b>Is the facility taking appropriate steps to identify and respond to community concerns?</b>	YES <input type="checkbox"/>	NO – MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ <b>Does the facility adequately inform the community of important environmental matters that affect it?</b>	YES <input type="checkbox"/>	NO – MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ <b>Is the facility’s approach to reporting performance information to the community appropriate to its scale of operations and setting?</b>	YES <input type="checkbox"/>	NO – MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>

**Objective Evidence:**

**Comments:**

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## INTERVIEW WITH SENIOR MANAGEMENT

Intent of interview with senior management is to ascertain whether or not senior management is fully committed to implementing and maintaining the facility's EMS as needed for recognition in ESP.

### 1. MANAGEMENT INVOLVEMENT IN ENVIRONMENTAL POLICY

Describe your involvement in the development and communication of your facility's environmental policy. How do you use the policy to guide decision-making at your facility?

Objective Evidence:

Comments:

### 2. MANAGEMENT ROLE IN EMS

Discuss your role in managing environmental issues and discuss how you use the facility's EMS to improve environmental performance.

Objective Evidence:

Comments:

**3. MANAGEMENT ATTENTION TO EMS EFFECTIVENESS**

How do you as a senior facility manager determine the effectiveness of your facility's EMS?

Objective Evidence:

Comments:

**4. MANAGEMENT EXPECTATIONS FOR ESP PARTICIPATION**

What do you see as the primary benefits of participating in ESP? What can EPA or the State do to improve the value of your participation in the program?

Objective Evidence:

Comments:

End of Document