

US EPA ARCHIVE DOCUMENT

STRUCTURE AND RESPONSIBILITY

Background and Exhibits

One of the first tasks of EMS planning is to establish the roles and responsibilities associated with EMS leadership and technical support. *Module 1* provided guidance for establishing these roles and responsibilities during the EMS implementation planning and budgeting process. This module addresses the closely related task of creating an ongoing structure that ensures the facility is equipped with sufficient personnel and other resources to meet its objectives and targets and to ensure compliance with legal requirements. The facility should also provide appropriate incentives for personnel to meet the EMS requirements.

Assigning Responsible People

It is important to designate, as soon as possible, the **Environmental Management Representative** (EMR), the **EMS Coordinator**, and the **Cross Functional Team** (CFT), all of whom will play a role in developing and promoting your EMS. If you have a very small facility, these may all be the same person. However, it is still important to designate who will be responsible for various activities.

- The EMR is the member of the facility's top management who is responsible for the functioning of the EMS. The EMR ensures that all tasks relating to the EMS are identified and completed in a timely manner. The EMR is responsible for reporting periodically to top management on the progress and results of the EMS. It is not necessary for the EMR role to be served by the environmental, health, and safety manager or vice-president. In many facilities, the manufacturing or engineering and maintenance manager performs the EMR function.
- The EMS Coordinator is responsible for identifying, assigning, scheduling, providing the necessary support for, and ensuring completion of all tasks relating to the EMS. The EMS Coordinator usually has job responsibilities in addition to coordinating the EMS. The EMS Coordinator works closely with the EMR and the CFT. The EMS Coordinator is also responsible for maintaining the EMS manual, under the leadership of the EMR. It is possible for the functions of EMS Coordinator and EMR to be performed by the same person.
- The CFT includes members of the facility who are responsible for representing their area or department in several facets of the EMS, such as identifying environmental aspects, determining significant environmental aspects, setting objectives and targets, implementing environmental management programs, reviewing and tracking EMS internal audits results, and serving as an information resource. The CFT meets to discuss the EMS on a regular basis. A sample presentation for training the CFT about EMS, in preparation for planning and implementation, is provided in Appendix E—Additional Tools.

It is important to designate, as soon as possible, the EMR. In assigning EMS responsibilities and creating your EMS team, it is crucial that you explore the range of job functions and skills that make up your facility, and select from that broad spectrum of people who will dedicate themselves to the EMS tasks. To do that, consider your facility's structure. Then, you can create

a list of job functions and skills that make up your facility to support your EMS planning and implementation efforts.

Depending on the maturity of environmental management at your facility, initial planning and implementation of an EMS may require a significant level of effort. However, a fully functional EMS should quickly repay, through its increased efficiency, the initial effort within approximately one or two years.

To achieve EMS success it will be important to have a person at your facility who champions and mentors the EMS. This person who has a “big-picture” perspective and can drive the process forward, often serves as the EMR or EMS Coordinator.

EMS Implementation Training

The efforts of the EMS Team (the EMR, the EMS Coordinator, and the CFT) will be crucial to effective EMS implementation and the long-term success of the facility’s EMS. In-depth training on how to plan and implement an EMS and integrate it with existing facility operations is required so that the EMS Team conducts itself effectively and efficiently. Appendix E—Additional Tools provides a training presentation that your facility can customize and use to train your EMS Team. Usually this implementation training precedes other activities, such as the drafting of an environmental policy, the review of environmental compliance requirements, the identification of environmental aspects, and other planning and implementation tasks.

Exhibit 2-1: EMS Expertise and Roles Across Facility Functions presents a sample list of facility functions and suggests the likely contribution of each to the EMS. Refer to ***Exhibit 2-2: Summary Checklist*** for a set of steps that can help you determine your facility’s EMS roles and responsibilities. ***Exhibit 2-3: EMS Responsibilities Descriptions*** and ***Exhibit 2-4: EMS Responsibilities Form*** can be used to develop and track responsibilities for your EMS Team.

Exhibit 2-1: EMS Expertise and Roles Across Facility Functions

Facility Function	Expertise Brought to Project Team	How They Can Help (Possible Roles)
Top Management	<ul style="list-style-type: none"> • Capability for ensuring continual improvement 	Communicate importance of EMS throughout the facility; provide necessary resources; track, and review EMS performance.
Environmental	<ul style="list-style-type: none"> • System for complying with environmental regulations • Management of environmental records 	Provide an organizational and functional role in establishing and maintaining the EMS.
Production	<ul style="list-style-type: none"> • Management of environmental aspects of production 	Help identify significant environmental aspects; provide input to objectives and targets; participate in environmental management programs; serve as trainers and internal auditors; help implement corrective and preventive action.
Maintenance	<ul style="list-style-type: none"> • Management of environmental aspects of equipment maintenance 	Implement preventive maintenance programs for key equipment; support identification of environmental aspects.
Facilities Engineering	<ul style="list-style-type: none"> • Management of environmental aspects of new construction and installation/modification of equipment 	Consider environmental impacts of new or modified products and processes; identify pollution prevention opportunities.
Human Resources	<ul style="list-style-type: none"> • Knowledge of training programs (including environmental) • Experience with the inclusion of employee incentives in performance measurement system 	Define competency requirements and job descriptions for various EMS roles; train temporary workers and contractors; maintain training records; integrate environmental management into reward, discipline, and appraisal systems.
Purchasing	<ul style="list-style-type: none"> • Knowledge of procurement system (including screening of suppliers, material composition of components) • Knowledge of supply chain efforts 	Develop and implement controls for chemical/other material purchases and for communicating requirements to contractors and suppliers.
Accounting/Finance	<ul style="list-style-type: none"> • Systems for tracking costs of operations and evaluating cost/benefits of new projects 	Track data on environmental-related costs (such as resource, material, and energy costs, waste disposal costs, etc.); prepare budgets for environmental management programs (EMPs); evaluate economic feasibility of environmental projects.

Facility Function	Expertise Brought to Project Team	How They Can Help (Possible Roles)
Operations Personnel/All Employees	<ul style="list-style-type: none"> Thorough knowledge of processes and operations 	Provide first-hand knowledge of environmental aspects of their operations; support training for new employees.
Quality	<ul style="list-style-type: none"> Quality management system, including document control procedures 	Support document control, records management, and employee training efforts; support integration of environmental and quality management systems.
Shipping, Receiving, Transportation, Logistics	<ul style="list-style-type: none"> Management of environmental aspects of shipping, receiving, and transportation 	Help identify aspects; provide input to objectives and targets; participate in EMPs; serve as trainers and internal auditors; help implement corrective and preventive action.
Sales/Marketing	<ul style="list-style-type: none"> Knowledge of environment-related commitments to customers 	Assist with communications with external stakeholders.
Public Relations	<ul style="list-style-type: none"> System for communicating with public on environmental issues 	Assist with communications with external stakeholders.
Product/Process Design	<ul style="list-style-type: none"> System for examining environmental aspects of new designs 	Participate in product-related objectives, targets, and EMPs.
Storage/Inventory	<ul style="list-style-type: none"> Management of environmental aspects of raw material and product storage and in-facility transportation 	Help identify aspects; provide input to objectives and targets; participate in EMPs; serve as trainers and internal auditors; help implement corrective and preventive action.

Exhibit 2-2: Summary Checklist

STRUCTURE AND RESPONSIBILITY

- Step 1: Using *Exhibit 2-1: EMS Expertise and Roles Across Facility Functions* for guidance, develop an EMS Responsibilities Matrix (see *Example 2-1: Responsibility Matrix*) as a worksheet.
- Step 2: Describe responsibilities for key EMS Team members using *Exhibit 2-3: EMS Responsibilities Descriptions* and designate people for these roles using *Exhibit 2-4: EMS Responsibilities Form*. Include these descriptions and designations in your EMS manual (see *Exhibit 10-3: EMS Manual*).
- Step 3: Using the information organized in Steps 1 and 2, develop an organizational chart for your facility (see *Example 2-2: Sample Organization Chart*). Include this chart in your EMS manual (see *Exhibit 10-3: EMS Manual*).

Exhibit 2-3: EMS Responsibilities Descriptions

[Facility's Name] needs to establish an Environmental Management System (EMS) Team made up of the following members: an Environmental Management Representative (EMR), an EMS Coordinator, and a Cross Functional Team (CFT). Responsibilities of each are as follows:

- Environmental Management Representative. The EMR is the member of [Facility's Name] top management responsible for the functioning of the EMS. It is his or her job to ensure that all tasks relating to the EMS are identified and completed in a timely manner. He or she is also responsible for reporting periodically to top management on the progress and results of the EMS.
- EMS Coordinator. The EMS Coordinator's responsibility is to identify, assign, schedule, provide the necessary support for, and ensure completion of all tasks relating to the EMS. The EMS Coordinator works closely with the EMR and the CFT. The EMS Coordinator is also responsible for maintaining this EMS manual, under the leadership of the EMR. The same person may fill the functions of EMS Coordinator and EMR.
- Cross Functional Team. The CFT is made up of members of the facility who are responsible for representing their area or department in several facets of the EMS, such as establishing environmental aspects, determining significant environmental aspects, setting objectives and targets, implementing environmental management programs, reviewing and tracking EMS internal audits results, and serving as an information resource. The CFT meets to discuss the EMS on a regular basis.

Other management personnel also play a crucial role in the structure and function of the EMS at [Facility's Name].

Records

The EMS Coordinator maintains an updated list of the EMR, the EMS Coordinator, and CFT members. A letter issued by top management that assigns the current EMR and his or her responsibilities is maintained as part of this facility's EMS manual and is attached to the EMS Responsibilities Form.

Exhibit 2-4: EMS Responsibilities Form

The following table lists the [Facility's Name] EMR, EMS Coordinator, and CFT.

EMS Function	Name	Regular Position
Environmental Management Representative (EMR)		
EMS Coordinator		
Cross Functional Team (CFT)		

Examples

Example 2-1: Responsibility Matrix lists EMS activities and how they might apply to the various facility personnel that perform these and other facility functions. An organization chart that presents the staffing of your EMS should be included in your EMS manual. If you do not have such an organization chart already in place for your facility, **Example 2-2: Sample Organization Chart**, presents an example that you can modify to fit your own organization. As an example, it is not meant to prescribe which management function must be merged with EMR duties or to imply that EMS duties should become full-time responsibilities for any one particular job function.

Example 2-1: Responsibility Matrix

Legend: L = Lead Role
S = Supporting Role

Responsibility	Top Managers (Plant Mgr./ President)	Environmental Manager (EMR and EMS Coord.)	Production Supervisors	Maintenance Staff	Facility Engineers	Human Resource Manager	Purchasing Staff	Accounting/ Finance Staff	Operations Personnel
Communicate importance of environmental management	L	S	S			S			
Coordinate auditing efforts		L	S	S					
Track/analyze new regulations and maintain library		L							
Obtain permits and develop compliance plans		L			S				
Prepare reports required by regulations		L							
Coordinate communications with interested parties		L				S			
Train employees		S	L			S			
Integrate environmental into recruiting practices	S					L			
Integrate environmental into performance appraisal process			S			L			
Communicate with contractors on environmental expectations					L		L		
Comply with applicable regulatory requirements	L	L	L	L	L	L	L	L	L
Conform with facility's EMS requirements	L	L	L	L	L	L	L	L	L
Maintain equipment/tools to control environmental impact				L					S
Monitor key processes		S	L						S
Coordinate emergency response efforts	L	S							

SPECIALTY-BATCH CHEMICAL MANUFACTURING INDUSTRY — EMS IMPLEMENTATION GUIDE

Responsibility	Top Managers (Plant Mgr./ President)	Environmental Manager (EMR and EMS Coord.)	Production Supervisors	Maintenance Staff	Facility Engineers	Human Resource Manager	Purchasing Staff	Accounting/ Finance Staff	Operations Personnel
Identify environmental aspects of products, activities, or services	S	L	S	S	S	S	S	S	
Establish environmental objectives and targets	L	S	S						
Develop budget for environmental management		S						L	
Maintain training records						L			
Maintain EMS records (non-training)		L							
Coordinate EMS document control efforts		L*					S		

While it is the Environmental Manager's responsibility to coordinate EMS document control efforts, the day-to-day management of these effort is often time consuming and may more effectively be completed by someone other than the Environmental Manager.

Example 2-2: Sample Organization Chart

