CENTER FOR RETAIL COMPLIANCE

ENVIRONMENTAL MANAGEMENT SYSTEMS FOR THE RETAIL SECTOR

Do

Guide Three in a Series of Five. These guides may be used sequentially if your company is at the initial stages of implementing an EMS or in a modular approach for those looking to improve elements of their existing EMS.

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6. Resources, Roles & Responsibilities

An important task in environmental management system (EMS) implementation is establishing the roles and responsibilities associated with EMS leadership, implementation, and technical support. This chapter covers how to create a structure to ensure that the organization has sufficient personnel, resources, and processes to meet its environmental objectives, targets, and compliance obligations. The organization should also provide incentives (financial and/or non-financial) for staff to meet the EMS requirements and achieve the objectives.

Assigning Responsibilities


CLM Section 1.5

These roles are touched upon across these guidance documents, but here we discuss EMS specific roles, which are often added to provide guidance and support to line staff.

The EMS Manager, EMS Coordinator, and Environmental Compliance Team all play important roles in developing and promoting the EMS and should be designated at the beginning of the EMS planning process. In a small business or facility, the EMS Manager and EMS Coordinator may be combined. While these roles are not explicitly specified by International Organization for Standardization's (ISO) 14001, they are critical for implementation. Your organization should build its Environmental Compliance Team and roles based on what is most suitable, given its size, structure, resources, etc.

The EMS Manager is the leader of the Environmental Compliance Team and is responsible for overall EMS implementation and management. The EMS Manager must be in a position, or report to a position, that is sufficiently senior to effectively communicate and engage with the facility's senior management team and the many stakeholders and "owners" of operations and activities related to significant environmental aspects.

In a retail company, the EMS Manager role may be filled by a corporate compliance manager or similar position with environmental compliance responsibility. In smaller companies, the EMS Manager may be a member of the senior management team or an executive reporting to a senior manager.

The EMS Coordinator maintains the EMS documentation and is responsible for tasks such as scheduling and tracking EMS development, as well as providing support for EMS planning and implementation.

The Environmental Compliance Team can be broadly defined, but needs to include enough functions – both from internal positions, as well as external resources – to ensure that the organization has sufficient understanding of compliance requirements and actions necessary to ensure compliance. Traditionally, this team includes a designated environmental compliance manager, EMS manager or coordinator if these are not the same people, representatives of the legal team and/or outside legal counsel, and representatives from retail and other facility operations. The Environmental Compliance Team provides critical input regarding the feasibility of compliance requirements within current standard operating procedures and can work with the EMS Manager and/or Coordinator to determine ways to make smart changes that comply, but also work well in their operations.

A fundamental concept of an EMS is that the most important responsibilities are given to those people throughout the organization who are implementing operational controls, driving progress towards

environmental objectives, and providing leadership around prioritizing environmental management. In many, if not most cases, these people are line managers, facility personnel, and other key staff who are not necessarily identified as "environmental" people.

You can use *Tool 8-1: Structure and Responsibility Questionnaire* to capture information about how responsibilities are currently managed in your organization. *Tool 8-2: EMS Expertise and Roles across Functions* has examples of EMS roles in a retail setting. *Tool 8-3: Responsibility Matrix Example* can help you define who will have which roles under your EMS. You can tailor these tools to document EMS roles and responsibilities for your organization.

THE GOOD GROCER COMPANY'S EMS SCOPE EXAMPLE

Consider the following sample descriptions of EMS responsibilities for a hypothetical regional grocery chain, The Good Grocer Company. Their hypothetical EMS scope was introduced in Module 1: *Planning – Scope and Policy*.

The Good Grocer Company is a regional grocery chain with 320 stores under three brands/formats: 40 Best Gourmet Foods, which are boutique specialty stores; 100 Good Grocer SuperMarkets, which are full-service grocery stores; and 180 Good Bargains, which are economy warehouse format stores. Each brand operates as a separate business unit. Other business units include its Logistics, Dairy and Bakery divisions. All business units are supported by Corporate Support Services (CSS), which provides Accounting, Human Resources, IT support, Compliance and other support and management functions.

The Good Grocer Company decided to implement their EMS in a phased approach by division, beginning with its core store brands (Good Grocer SuperMarkets and Good Bargains). The primary focus of the EMS is to manage environmental compliance.

The Good Grocer Company convened an EMS Team to be responsible for developing the EMS and integrating it into the company's business processes. The EMS team consists of the following members with the following responsibilities.

- ***EMS Team*: With members from each business unit and support team, the EMS Team is a permanent cross-functional team with primary responsibility for developing and monitoring the EMS. The EMS Team meets to discuss the EMS on a regular basis.**
- ***EMS Manager*: The EMS Manager leads the EMS Team and has primary responsibility for EMS development and implementation. The EMS Manager must:**
  - **Report regularly to senior management and communicate/integrate management directives into the EMS process;**
  - **Ensure the EMS Team meets regularly to review the progress of EMS development.**
  - **Ensure all EMS tasks are clearly identified, assigned and completed in a timely manner; and**
  - **Communicate the purpose, function and progress of the EMS to business unit and support team managers.**
- ***EMS Coordinator*: The EMS Coordinator supports the EMS Manager and the EMS Team. Specifically, the EMS Coordinator:**
  - **Schedules regular EMS Team meetings;**
  - **Maintains the EMS documentation;**
  - **Tracks EMS development and implementation tasks; and**
  - **Provides administrative support to the EMS Team.**
- ***EMS Team Members*: The EMS Team includes representatives from all departments, including Store Operations, Logistics, Transportation, Bakery, Dairy, Energy Management, Facilities Maintenance, Engineering, Training, Finance and Community Relations. The EMS Manager (Corporate Compliance) represents the Legal Department and will consult General Counsel as needed. EMS Team members represent their department to:**
  - **Identify environmental aspects and determine significance;**
  - **Set objectives and targets;**
  - **Implement environmental programs;**
  - **Review and track EMS internal audit results; and**
  - **Serve as an information resource to their teams.**

Roles and Responsibility Documentation

The EMS Coordinator typically maintains a current list of Environmental Compliance Team members. A letter or memo from senior management that assigns the current EMS Manager and their responsibilities should be maintained as part of the EMS documentation.

Tools 8-2 and *8-3* can be used to document the responsibilities for your Environmental Compliance Team. *Tool 8-4: EMS Roles and Responsibilities Documentation* can be used to record individuals with EMS responsibilities. Your EMS documentation should include an organizational chart showing how the staffing of your Environmental Compliance Team fits into the organization.

EMS Implementation Training

 *CLM Section 4.1, 4.2*

The Environmental Compliance Team's effectiveness is crucial to the EMS implementation and long-term success. Good training for Environmental Compliance Team members on how to plan and implement an EMS and integrate it with existing facility operations helps create a more effective team. Usually, this training is conducted before the team starts EMS activities such as drafting the environmental policy, reviewing environmental compliance requirements, identifying environmental aspects, and other planning and implementation tasks.

There are a number of training sources. The EPA and some state environmental agencies provide EMS training. Consultants hired to help develop an EMS often provide formal training and ongoing guidance and feedback to the Environmental Compliance Team. Environmental training and EMS auditing and certifying firms all offer EMS training courses. However, training that is adapted to your company will always be more effective.

Next

Like the other elements of your EMS, the roles and responsibilities need to be updated over time to reflect changes in staff and operations. It is particularly important to keep your EMS Team updated as staff move to other positions.

Helpful Tips

As you assemble your Environmental Compliance Team and assign roles and responsibilities:

- Review existing roles within the various levels of your company to compare skills, abilities, and current responsibilities to determine how some of these existing roles may be expanded or integrated to support your EMS Team.
- Use samples provided under Tools & Procedures "as is" or as a starting point to developing your own.
- Refer to the Compliance Leadership Program (CLP) matrix to fine-tune your Environmental Compliance Team selection and assignment of roles and responsibilities.
- Refer to your environmental policy to ensure these activities and their intended outcomes are aligned with the goals of this policy.

Tools & Procedures

Tool 8-1: Structure and Responsibility Questionnaire

Tool 8-2: EMS Expertise and Roles across Functions

Tool 8-3: Responsibility Matrix Example

Tool 8-4: EMS Roles and Responsibilities Documentation

7. Competence, Awareness & Training

 *CLM Section 4.1, 4.2*

Every effective management system is dependent on competent people who are aware of their required tasks and responsibilities. Competence can be achieved in many ways; however, a good training program is almost always a key for the success of your EMS, as well as for regulatory compliance. Training employees about environmental management in general and the EMS specifically is important because:

- All employees have impacts – negative or positive – on the environment and compliance requirements.
- Any employee can have good ideas about how to improve environmental management.
- Support from employees helps ensure a successful EMS.

As every person in the organization can play a role in environmental management, your training program should cast a wide net. At a minimum, every employee and manager should be aware of your organization's environmental policy, the significant environmental aspects (SEAs), environmental programs that apply to their work, and the overall importance of EMS requirements. Employees should also understand the potential consequences of not following EMS requirements, such as spills, fines, or penalties.

More specific training for staff responsible for environmental management should also be identified as part of the EMS training program. Training for some jobs may also be required by the regulations. Training is only one element of establishing competence; other elements include outside education, certifications, and experience. For certain jobs, particularly those involving tasks related to SEAs, you should establish criteria to measure the competence of individuals performing those jobs.

AWARENESS GUIDELINES

All employees need to be aware of the overall EMS. They also may need specific training on environmental areas that they might impact.

For example, all employees should have a general understanding of a company's hazardous waste program so that they know what constitutes hazardous waste and how best to handle it.

Individuals responsible for managing hazardous waste or waste storage areas, maintaining records, and signing manifests will need more detailed, task-specific training in order to perform their responsibilities and also to meet legal training requirements.

Identify, Plan and Track

To start, you should understand the current training situation at your organization. Use the questionnaire in *Tool 9-1: Training, Awareness and Competence Questionnaire* to capture this information. Then review the action steps below to plan your training program. You can identify general training needs now, but as you proceed with the EMS, you will need to add specific technical training needs. For example, you will have specific training requirements associated with operational controls for SEAs, such as training required for individuals who handle the shipping of hazardous materials.

Action Steps

1. Identify job functions that relate to the EMS and SEAs.
2. Identify current training related to environmental, health, and safety and determine if EMS information could be integrated with existing training or if there should be separate EMS training.
3. Identify other training materials or programs available outside your company. Places to check include:
    - Trade associations;
    - Small Business Administration;
    - U.S. Environmental Protection Agency;
    - State and local environmental agencies;
    - Suppliers; and
    - Contractors and consultants.
4. Develop your training program. You can use the *Tool 9-2: Sample Training Needs Analysis Form* to document specific training and *Procedure 9-1: Sample Procedure for Environmental Training* to document program development.
5. Routinely review the effectiveness of your training program and update it regularly to reflect changes.

Don't overlook new employees. Incorporate EMS into orientation training or provide training on the EMS soon after they arrive.

Some regulations have required training, as well as specific requirements for documentation and records retention. Training documentation may include information about the content and delivery of the training, as well as documentation of who took the training (names, titles, dates, etc.). The table below shows examples of training requirements for a retailer.

TRAINING NEEDS EXAMPLE

A retail chain rolled out a hazardous waste management program for its stores along with a training presentation. However, state agency inspectors continued to find two kinds violations at the stores:

1) Hazardous waste in the store's regular trash dumpster; and
2) Hazardous waste improperly stored in the hazardous waste storage area (HWSA).

The first violation suggests a need for improving or reinforcing the Hazardous Waste awareness training for all store employees.

The second suggests a need for improving or reinforcing the task-specific training for the positions responsible for managing the HWSA as well as creating new aids such as signs.

Company Training Requirements					
Course Name and Description	Required for	Legal req.	Source of Training	Duration (Hours)	Frequency
HAZWOPER: First Responder Operations Level	HazMat Team at DCs with ammonia refrigeration	Y	Logistics EHS Team	8	Annual
Stormwater Pollution Prevention Plan (SWPPP)	DC Facility Maintenance Mangers	Y	Logistics EHS Team	8 (initial) 2 (refresher)	Initial and 3-year refresher
Environmental & EMS Awareness Training: Waste Management (*"When in doubt, DON'T throw it out")* – State and RCRA Hazardous Waste; Universal Waste; Recycling; Spill Prevention, Control, and Countermeasure (SPCC); SWPPP; Integrated Emergency Response Plan	Facility-wide – all employees	N	Learning Management System	1	New hires and annually
Waste Management (function-specific): more detailed function-specific training requirements for waste management, including State and RCRA Hazardous Waste, Universal Waste, Organic Wastes Mgt. Plan, Recycling	Contract Janitorial Service Managers, Store & DC Managers, DC Facility Maintenance Managers, Inventory Control Coordinators (stores), Returns and Service Desk Clerks	Y	Learning Management System	4 (initial) 1 (refresher)	Initially, new hires, if changes, and annual refresher
SPCC, SWPPP, Integrated Emergency Response Plan	DC LP Managers, DC Facility Maintenance Managers, Regional EHS Managers, Grocery DC HazMat Teams	Y	Learning Management System	½ to 1½	Initially, new hires

Next

As you continue to implement your EMS and develop operations controls, make sure to update your training program with specific technical training, including training required by regulations. In addition, you will need to update your training program over time to reflect changes in the organization and new legal requirements.

Helpful Tips

As you assess competence and awareness on environmental compliance among your staff:

- Use your company's existing systems, programs, tools, or other resources to assess staff, to build internal capacity and awareness.
- Use samples provided under Tools & Procedures "as is" or as a starting point to developing your own.
- Refer to the Compliance Leadership Program (CLP) matrix to fine-tune your assessment activities and EMS and environmental compliance training procedures.
- Refer to your Environmental Policy to ensure the process for these activities and their intended outcomes are aligned with the goals of this policy.

Tools & Procedures

Tool 9-1: Training, Awareness and Competence Questionnaire

Tool 9-2: Sample Training Needs Analysis Form

Procedure 9-1: Sample Procedure for Environmental Training

8. Communication

Communication is a central pillar of EMS implementation. It allows your organization to provide and obtain information relevant to its EMS, including information related to significant environmental aspects (SEAs), environmental performance, compliance obligations, and recommendations for continual improvement.

Communication is a two-way process and your EMS should include a plan for internal and external communication about your organization's environmental commitments and processes.

The first step in developing a good communications approach is to clearly define your audience. This chapter will help you identify stakeholders who have an interest in your environmental performance or EMS or who can help make your EMS implementation a success. Knowing your audience helps you decide what you want to communicate and the results that you want from your communications, including actions you want people to take; and, develop a plan or procedure to document how and when to communicate.

Internal Communication

 *CLM Section 4.3*

When establishing your company's internal communication process, it is important to think about the various levels and functions to determine the most effective format and depth of information to be communicated. Depending on the size and complexity of your company, a single approach (i.e. same format and level of detail communicated to everyone) may be adequate or perhaps multiple approaches (i.e. different formats and varying levels of detail) may be necessary. Internal communication should explain environmental requirements and voluntary commitments to all employees, on-site service providers, and relevant contractors.

External Communication

 *CLM Section 4.5*

For your company's external communication process, it is important to think about the stakeholder groups across your value chain (i.e. customers, suppliers, regulators, NGOs, trade associations, etc.) to determine the most effective format and depth of information to be communicated. Your external communications may be a combination of a single approach (e.g. a general message to stakeholders on your corporate website or annual environmental or sustainability reporting) or a multiple approach (i.e. specific and more detailed or tailored communications to certain stakeholders). External communication should provide outside stakeholders with information on your environmental programs and accomplishments and can also be a way to get input from external parties.

Stakeholders

 *CLM Section 1.4*

Stakeholders include anyone who has a stake or interest in your company's environmental performance. Clearly employees have a strong stakeholder interest in your company and their support (or lack thereof) plays a large role in determining the success of your EMS. If your facility is part of a larger organization, other operations or divisions of the company are also important stakeholders. In your communications plan, include company representatives and teams beyond those covered by your facility's EMS. What you do may affect them or their participation may be critical to EMS implementation. In addition, they may have already developed processes and procedures you can borrow or piggyback on.

Outside stakeholders are also important to consider. Customers, suppliers, and consultants can provide useful inputs from a different perspective, establishing partnerships with or seeking input from trade associations (e.g. Retail Industry Leaders Association [RILA] and state retail trade associations), professional associations (e.g. Alliance of Hazardous Materials Professionals [AHMP] and National Association of Environmental Managers [NAEM]), may be useful in developing your EMS. In addition, non-governmental organizations with related environmental objectives – and even those that may be adversarial – can provide important insights; reaching out to them may even help improve relations with your company.

Being an environmental leader can enhance customer recognition and loyalty, and involving customers in your EMS helps them recognize your leadership.

Identifying and Understanding Stakeholders

Almost every organization has a wide array of interested stakeholders. Each of these groups has their own priorities and perspectives and each has something different to contribute in support of your EMS and environmental performance. Part of developing an effective communication strategy is identifying and understanding these parties. Examples of internal and external stakeholders are listed below.

INTERNAL STAKEHOLDERS
Employees
Other facilities or divisions
Shareholders
Customers
Suppliers
Consultants
Investors and insurers
Trading partners

EXTERNAL STAKEHOLDERS
Trade and professional associations
Non-governmental organizations (including environmental groups)
Regulatory agencies
Community organizations
Other companies
The media
The general public

Stakeholder Roles

You may want to start by identifying stakeholders who have already expressed interest in your operations. To identify additional stakeholders, ask employees, including operations, store, distribution center and transportation managers, and public relations personnel.

Before engaging stakeholders, be clear on your expectations, what you want from them, and what you want them to take away from your engagement. Consider the following possibilities:

- Internal stakeholder participation can facilitate implementation of environmental projects. Specifically, employees should be encouraged to “take ownership” of the EMS.

- External stakeholders bring useful perspectives to environmental issues, often identifying issues that might otherwise have been overlooked or by helping to prioritize issues.
- Participation by all types of stakeholders can add credibility, transparency, and value to your EMS.
- Involving external stakeholders can help them understand your company's operating constraints and recognize your commitment to operating with an environmental ethic.
- Being an environmental leader can enhance customer recognition and loyalty and involving customers in your EMS helps them recognize your leadership.
- Forming partnerships with customers can help identify shared concerns and establish ways of cooperating to resolve them. For retailers with business-to-business services, your company may be able to help your customers (e.g. building trades contractors and other small businesses) meet their own sustainability and environmental goals.
- Forming partnerships with suppliers may help you get important information needed for meeting EMS goals and requirements.

Getting Started

Create a list of all parties and individual contacts you can think of who would be interested in your environmental activities. You can use *Tool 10-2: Stakeholder Communications Matrix* to record this information. Consider how you could reach each stakeholder and whether you already have established ways of communicating with a certain group. You can then decide where to begin. For example, you could start with the most relevant staff and later add other stakeholders. It is helpful to make your initial communication list as complete as possible and then prioritize your communication efforts. In other words, begin communication efforts with a smaller group of key stakeholders and use the list to expand your efforts when appropriate.

Remember, stakeholder concerns may be very different from what you expect and may be less difficult to resolve or implement than you may think. The only way to find out is to talk with them.

Effective Communication

When working with either internal or external stakeholders, including your Environmental Compliance Team, effective communication will facilitate your EMS implementation. Use the following key guidelines for effective communication:

1. **Communicate early**. For internal stakeholders, begin communication efforts early in the EMS implementation process. Let people know what you are doing. You will undoubtedly need their cooperation to gather information and implement your EMS. In all organizations, small and large, early communication gives stakeholders more time to get used to the new system and will pay off with increased buy-in and a greater feeling of ownership for the EMS.
2. **Set clear communication objectives and procedures**. Decide what you want to achieve through your communication efforts. Setting goals ahead of time will help you get the right message across without overwhelming people with too much information and without spending too much time developing and redeveloping the communication. Create an EMS communication procedure that outlines clear principles for communicating with your internal and external stakeholders. The

procedure should outline what kinds of information will be communicated to which groups, effective methods and best practices for communicating with each group, and how the company will document and respond to responses to communications. You can modify *Procedure 9-1: Sample Procedure for Communication with Stakeholders about the EMS* to document your approach.

3. **Communicate regularly with internal stakeholders**. Communicate regularly and integrate EMS communication with other efforts. Regular communication can be accomplished without straining resources. For example, bulletin board postings, email messages, company intranet, or articles in the organization newsletter can all be effective. Don't forget the value of direct word-of-mouth communication, particularly in smaller organizations. Prepare talking points and 30-second and one-minute "elevator speeches" for Environmental Compliance Team members and update the talking points as the status of EMS implementation changes. Talking directly with key individuals and discussing the EMS at company meetings are effective ways to communicate.
4. **Communicate regularly with external stakeholders**. Consider the following opportunities for communicating your environmental performance to external stakeholders:
   - Update the company website and include EMS updates in your annual report or corporate social responsibility report;
   - Produce a fact sheet about the EMS that explains why and how your company wants to include external stakeholders;
   - Establish a phone line and online methods (e.g. an email address) for the general public to ask questions and voice concerns; and
   - Hold public meetings when appropriate.
5. **Foster dialogue with stakeholders**. Ensure that stakeholder dialogue is a two-way process. Stakeholders will want to know that their comments and concerns are being considered. You need to convey that the organization is genuinely interested in their input and explain how you will incorporate their suggestions.
6. **Track communication**. You should develop a procedure for documenting and responding to stakeholder communication and identify who is responsible for carrying out communication procedures.

You can use *Tool 10-1: Communications Questionnaire* to document your organization's current communication efforts. *Tool 10-3: Example Environmental Compliance Communication Matrix* is an example of a one-year plan for communicating with internal stakeholders about specific environmental topics. Depending on the complexity of your EMS and operations, a more detailed communications plan may be needed.

Checklist!

How is your communication on environmental issues? Is it:

- ☑ Transparent – your company is open in what it reports
- ☑ Appropriate – information meets the needs of relevant interested parties, enabling them to participate
- ☑ Truthful – not misleading to those who rely on the information reported
- ☑ Factual – accurate and able to be trusted
- ☑ Relevant – includes relevant information
- ☑ Understandable – easily understood by your company's key stakeholders

Next

Like the rest of your EMS, the communication plan and approach should be flexible and updated in response to changing conditions and needs. An effective communication plan can make all the difference for your EMS. A well-implemented plan can help achieve the staff and management support required to meet your environmental goals, while a poorly-implemented plan can cause road blocks to improved environmental performance. Knowing this, keep communications in mind as you plan and implement all aspects of your EMS.

Helpful Tips

As you plan communications on environmental compliance:

- Use your company's existing systems, programs, tools, or other resources to communicate with internal and external stakeholders.
- Use samples provided under Tools & Procedures "as is" or as a starting point to developing your own.
- Refer to the Compliance Leadership Program (CLP) matrix to fine-tune your communication protocols and messaging.
- Refer to your Environmental Policy to ensure the process for these activities and intended outcomes are aligned with the goals of this policy.

Tools & Procedures

Tool 10-1: Communications Questionnaire

Tool 10-2: Stakeholder Communications Matrix

Tool 10-3: Example Environmental Compliance Communication Matrix

Procedure 10-1: Sample Procedure for Communication with Stakeholders about the EMS

9. Documentation & Records

This chapter provides guidance on your EMS documentation, which is the information that explains the EMS. Someone from the outside should be able to look at your documentation and quickly understand your systems and approach to environmental management. EMS documentation may be limited to an EMS manual, which describes the core elements of the EMS and the documentation that directly supports it (e.g. listing of specific environmental compliance obligations and the person within your organization with responsibility for managing these. This may also include competence levels and training required to be effective in role). However, documentation can be broader than the EMS manual and include or reference more detailed material such as activity-level procedures, work instructions, or emergency plans. Whether to include additional documentation depends on the scope of your EMS, complexity of your organization, and whether other documentation is adequately managed elsewhere.

WHAT CONSTITUTES EMS DOCUMENTATION?

- **Your environmental policy;**
- **Your organizational chart or list of key staff and responsibilities;**
- **A description or summary of how your organization satisfies EMS requirements (e.g., how environmental aspects are identified, how your organization identifies and complies with legal requirements and how documents are controlled);**
- **EMS procedures (e.g., the procedure for corrective and preventive action);**
- **Environmental programs; and**
- **Other EMS-related documents (e.g., emergency preparedness and response plans, training plans).**

The extent of documented information on your EMS could vary based on:

- The size of the organization and type of activities, processes, products, and services;
- The need to demonstrate fulfilment of compliance obligations;
- The complexity of processes and the interactions between them;
- The competence (i.e. level of training or experience) of the people working under the organization's control.

EMS documentation includes records of what has happened within the system. The term "records" has been de-emphasized in the ISO standards, but is still an important concept. EMS documentation describes your system (e.g. what you do and how you do it), while EMS records demonstrate that you are doing what the documentation says you will do. In other words, records capture information on the implementation of your EMS.

Records management is straightforward. You need to identify what records to keep, how and where to keep them, how long to keep them, and how to dispose of them. ISO 14001 does not specify the duration of record retention. Retention times will ultimately vary by record. Your organization may determine a retention threshold or protocol that is wide enough to cover all of your organization's regulatory compliance obligations. Some organizations may elect to keep all historical records by creating digital archives. If your organization has an ISO 9001 or other management system or a records retention policy, then you should already have a process in place for managing records and this can be adapted

for the EMS. It is important to obtain concurrence from your legal team on your records policy, because some EMS records may be subject to regulatory requirements and could have liability implications.

Good documentation is important to the ongoing success of your EMS for several reasons:

- **Consistency** – Documentation is vital to maintaining consistency in an EMS over time and from department to department. Change is inevitable as new projects are undertaken, the company grows, and employees change positions or leave the company. Accurate documentation makes it easier to maintain a consistent and effective EMS over time.
- **Assessment of Progress** – Documentation helps you assess the progress of your EMS implementation. Some inconsistencies show up only as you commit your ideas to paper and documentation allows you to check on progress, evaluate results, and make improvements.
- **Demonstration** – Documentation of the EMS, its processes and procedures, and how it relates to other business policies provides an understanding of how the EMS is intended to work and how decisions are made. This can help demonstrate to government agencies and non-governmental organizations the company's commitment to complying with regulatory requirements and keeping its promises.

If you want to certify your EMS, for example, to ISO 14001 standard or enter a recognition or voluntary disclosure program such as Wisconsin's Green Tier Program, you must demonstrate that your EMS is complete and actively functioning. In this case, your EMS documentation may be audited or reviewed; therefore, it is important to keep all documentation and records in an organized filing system that is easy to access.

The EMS Manual

The EMS manual is a repository of basic EMS documentation and is not required. However, it is usually created as it makes explaining and managing the EMS easier. The tools and sample procedures in this guidance form the basis of an EMS manual.

A manual can be virtual and not necessarily a formal book. However, it should at a minimum:

- Describe the EMS's core elements and how the elements relate to each other (i.e. the sections of these guidance documents); and
- Reference related documentation such as company policies, procedures, and systems (for example, the company's learning/training management system, procurement system or facilities maintenance management system).

Keep your EMS manual simple so it will be easy to understand even for people unfamiliar with EMS concepts. Your manual does not need to describe every detail of your EMS. Instead, it can provide references to other documents or procedures.

Creating and Updating

Step 1: Create an Outline for your EMS Manual

As a first step, create an outline for what you want, or should be referenced, in your EMS manual. Use the following steps to update your outline. Keep in mind that the more detailed your EMS manual, the more frequently you will need to update it.

Step 2: Evaluate Existing Documents

Explore what documentation already exists and can be used or enhanced to include EMS activities. Examples of existing documentation include a quality plan or tracking reports. You can use the questionnaire in *Tool 11-1: EMS Documentation Questionnaire* to capture information on existing documentation.

Step 3: Determine a Standard Format for All Documents

Before developing your EMS documentation, plan the format (document and page appearance). Use a company standard if one exists. Documents should look like part of an organized, integrated system.

Step 4: Outline Each Document

Before starting, create an outline of what you need in the document. This may have already been done for many of the documents as part of the other guides. The example procedures in this guide are a good place to start and there are additional links on the CRC website Retail EMS guidance page.

The best people to provide early input on a particular EMS document are the people who will use it. Involving them in the process will help ensure the documents are user-friendly.

Step 5: Create a Procedure for Development of your EMS Manual

Like other areas of your EMS, it is important to create a written guide for how your EMS documentation will be developed and maintained. You can use *Procedure 10-1: Sample Procedure for EMS Documentation* as a starting point.

Step 6: Identify Other EMS Documentation

Documentation, in addition to the EMS manual, includes information on the processes used to meet EMS criteria – for example, documentation on "how we identify environmental aspects." This documentation typically includes EMS procedures, which are step-by-step descriptions of what is done, how decisions are made, who is involved, their roles and responsibilities, and how this fits into the company's overall business processes. This guide includes sample procedures for many EMS processes. In addition, you might maintain or refer to area- or activity-specific documentation (such as job aids and work instructions) that directs employees on how to carry out certain operations or activities.

Control of Documented Information

For a successful EMS and good environmental performance, you need to have an effective way to manage your EMS documents to ensure employees always have current information. Your organization should develop a procedure to ensure that EMS documents:

- Can be located (e.g. on a widely accessible computer server);
- Are checked periodically to make sure they are still valid;

- Are current versions and that the right people have access to them; and
- Are removed when obsolete, so that people don't use the wrong documents by mistake.

Your organization may already have a document control process. *Tool 11-2 Document Control Questionnaire* can be used to gather information on your company's current approach.

Hints for Document Control

 *CLM Section 4.9*

- Don't make your document control procedure more complicated than necessary. While larger organizations often have complex processes, smaller organizations can use simpler approaches.
- Limit distribution of the documents, especially in hardcopy format, to make the job easier. Consider preparing a list of who has hardcopies, showing who is responsible for each copy and where it is located.
- Where possible, provide documents electronically to facilitate control. There are commercial software packages that can simplify document control.
- To avoid unauthorized edits, distribute or post documents in a read-only format. Better yet, provide links to documents rather than attaching files, so staff will go to current versions instead of keeping local copies.
- Include a list of documents (*Tool 11-3: Sample Document Control Form*) and an index to track revisions (see *Tool 11-4: Sample Document Index Form*) in your EMS manual.
- Highlight changes (e.g. by using a different font color) to make it easy for readers to see the updates.

Your document control procedure should make it clear who has the responsibility and authority for preparing documents, making changes, and keeping them up to date. *Procedure 11-2: Sample Procedure for Document Control* is a document control procedure that you can modify.

Next

Maintaining your EMS manual and documentation is an ongoing process. Documentation needs to be revised over time and new material distributed. Keeping up with the documentation is valuable, as it can help avoid questions and problems in the future.

Helpful tips

- Use your company's existing systems, programs, tools, or other resources to support EMS documentation.
- Use samples provided under Tools & Procedures "as is" or as a starting point to developing your own.
- Refer to the Compliance Leadership Program (CLP) matrix to fine-tune your documentation activities and protocols.
- Refer to your Environmental Policy to ensure the process for EMS documentation and related activities are aligned with the goals of this policy.

Tools & Procedures

Tool 11-1: EMS Documentation Questionnaire

Tool 11-2: Document Control Questionnaire

Tool 11-3: Sample Document Control Form

Tool 11-4: Sample Document Index Form

Procedure 11-1: Sample Procedure for EMS Documentation

Procedure 11-2: Sample Procedure for Document Control

10. Operational Planning and Controls

Operational controls are the specific procedures (e.g. on-site reminders, facility-level protocols and training) used to manage environmental impacts to comply with laws and regulations. Operational controls are necessary where activities are complex and/or potential environmental impacts are significant. In retail, operational controls may also be necessary for basic activities that must be managed across the entire organization. The large number of facilities, diversity of employees, employee turnover, and lack of specialized EHS expertise and technical training at the store level make seemingly simple activities much more complex and create the need for company-wide management.

Operational controls are the specific procedures used to manage environmental impacts in order to comply with laws and regulations.

Environmental programs are the overall programs to manage environmental impacts and lay out what needs to be done and who should do it.

Both operational controls and environmental programs help achieve the EMS goals and objectives.

In addition to written procedures, operational controls can consist of material and actions such as specific training and on-site job aids. These may be sufficient so that separate written procedures are not needed; however, you may still need to provide records to show that these non-written procedures have taken place, such as by keeping a log of training completed by employees. For example, proper management of hazardous waste in stores may be controlled by all of the following:

- Written training materials that include step-by-step procedures;
- SKU-specific instructions from the RF scanner;
- Program posters;
- Signage and labels at the designated hazardous waste storage areas; and
- Signage outlining prohibited items at janitorial sinks, on compactors, and even on garbage cans.

Establishing Criteria for Operational Controls

 *CLM Section 3*

Determining which activities should be covered by operational controls is important for an effective EMS. Operational controls are usually needed for SEAs, especially if there are regulatory requirements. To avoid getting overwhelmed, focus on activities related to SEAs and do not try to control every activity and process.

In determining which activities need to be controlled, review routine activities, but also look beyond the routine. Intermittent activities such as store openings and closures, equipment maintenance, start-up and shutdown, management of on-site contractors, and activities related to services provided by suppliers or vendors can affect your organization's environmental performance.

The following is a list of typical retail activities where operational controls could improve environmental and compliance performance:

- Waste Management (disposal and recycling);
- Reviews/approvals for on-boarding and set-up of new merchandise and in-house supplies;
- Engagement* of outside service providers** including:
  - Waste and recycling haulers,
  - Janitorial services,
  - Re-lamping contractors,
  - Exterior cleaning and maintenance contractors (e.g. landscaping, parking lot, and stormwater structures such as detention/retention ponds, catch basins, etc.),
  - Heating, ventilation, and air conditioning (HVAC) and refrigeration, service providers,
  - Emergency generator operations and maintenance contractors,
  - On-site fueling service providers,
  - Third-party transportation providers, and
  - Providers of in-home customer services (e.g. delivery, installation and repair);
- Reverse logistics;
- Storage and handling of chemicals;
- Wastewater treatment;
- Vehicle maintenance;
- Transportation;
- Operation and maintenance of equipment;
- Management of contractors;
- Marketing and advertising to ensure public statements are consistent with your environmental and sustainability policies and programs;
- Acquisition, construction, remodeling, and maintenance of property and facilities;
- Negotiation of zoning and entitlement for new store construction and communication of environmental obligations to internal teams;
- Negotiation of leases* and responsibility for performance of environmental obligations and maintenance of assets and equipment with the potential for environmental obligations; and
- Communication of the company's responsibility for environmental obligations to the appropriate internal teams.

* Standard contracts and leases are a kind of operational control. Given that environmental management is not typically a core strength of the contract negotiators, it is important to document the reasons for, and acceptable deviations from, the EMS-related terms and conditions in your company's standard legal forms. Where possible, include contract language so that your contractors will help you achieve your environmental goals.

** Operational controls are especially critical when there are multiple regional or zone contractors and/or they perform the services through subcontractors.

Implementing Control of Processes based on Operating Criteria

Developing operational control procedures can be a detailed process. However, it is unlikely that you will be starting from scratch as your company probably has many controls already in place. For example, procedures to comply with health and safety regulations may also apply to environmental areas. You can use *Tool 12-1: Operational Controls Questionnaire* to help identify existing operational controls and processes.

Listed below are steps for developing operational control procedures.

1. Determine the causes of environmental impacts and areas of regulatory risk.

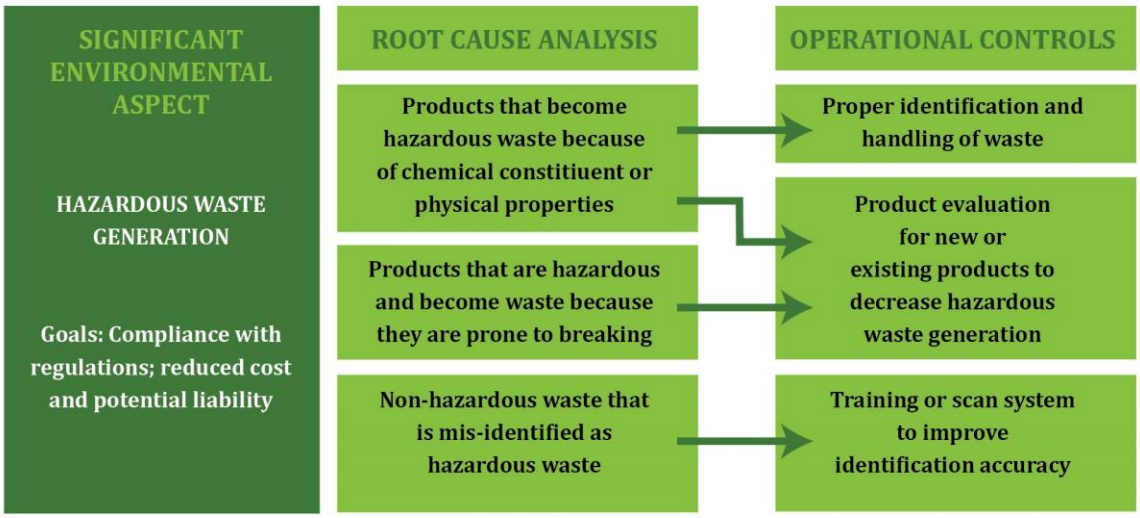
For all your SEAs, you should research the causes of the associated impacts and see if it is possible to change processes or operations to reduce or eliminate regulatory obligations and environmental impacts, for example, by using a different cleaning chemical or type of fluorescent bulb. The root cause analysis described in *Chapter 13: Checking* – Improvement can help your Environmental Compliance Team identify the cause of impacts in order to design controls that are focused on where they will be most effective.

During this research, you should identify procedures that already exist for activities associated with SEAs. This information can be recorded in *Tool 12-2: Sample Worksheet for Determining Which Operations or Activities Require Operational Controls*. You will need to evaluate these procedures to decide if they need to be updated and/or documented.

Good Operational Controls Help Avoid Problems

A store retrofitted its lighting to new energy efficient fixtures. When the old fluorescent light fixtures were removed, the electrical contractor discovered that the transformers contained polychlorinated biphenyl compounds (PCBs) with disposal regulated under the Toxic Substances Control Act (TSCA). Since neither the Procurement Specialist nor Energy Manager were aware that fluorescent light fixtures might contain PCB transformers, they failed to include it in the bid specs or perform a pre-construction hazardous materials survey of the lighting fixtures. This ultimately led to a significant budget overrun.

2. Review the targets and measurement indicators you established for environmental performance.
It is important to keep your objectives and targets in mind when developing operational control procedures. When reviewing your objectives and targets, you may find that the goals you set are more or less difficult to reach than anticipated and therefore need to be adjusted.



3. Develop operational controls.
It is useful, if not critical, to involve the people who will implement the procedures. You might meet with relevant employees and ask them to describe current procedures, discuss the environmental objectives, and get their input on operational controls that will meet these objectives. For existing, but undocumented procedures, draft or revise the operational controls based on interviews.

You can use *Tool 12-2: Sample Worksheet for Determining Which Operations or Activities Require Operational Controls* to help manage the process of establishing operational controls.

Keep written operational controls simple and concise. Your documentation should include the appropriate actions, precautions, and required notifications. You should also document your process for developing and maintaining operational procedures. You can refer to *Procedure 12-1: Sample Procedure for Development of Operational Control Procedures* for guidance on developing operational controls.

The table below has examples of operational controls for typical retail activities.

Category of Activity	Example Operational Control
Customer Returns	• Sort: Return-to-Inventory, Markdown & Sell, Return-to-Vendor, or Waste Out • Management of leaks • Hazardous waste determination
Spills and Damaged Product	• Management of leaks • Clean-up and disposal of spill residual, sorbent, and supplies • Sort damages: Return-to-Inventory, Markdown & Sell, Return-to-Vendor, or Waste Out • Hazardous waste determination
Recalls and Return to Vendor (RTV)	• Hazardous waste determination • Sort: Dispose-on-site or RTV • Hazardous materials shipping
Reverse Logistics (RL)	• Hazardous waste determination • Sort: Dispose-on-site or RTV • Hazardous materials shipping • Environmental clauses in contracts with third-party RL providers • Review of contracts with third-party RL providers by Environmental Management
Waste and Recycling	• Sorting damages and returns: Return-to-Inventory, Markdown & Sell, Return-to-Vendor, or Waste Out • Hazardous waste determination • Hazardous waste management procedures • Waste manifest/chain of custody • Hazardous waste storage area inspection • Used lamp/light bulb storage and recycling • Used battery storage and recycling • Used electronics storage and recycling • Collection of used electronics from the public, including storage and recycling • Collection of public “DIY” used oil, storage, and recycling • Mandatory takeback and recycling programs (e.g. mattresses, paints, plastic bags, beverage containers) • Cardboard and plastic recycling • Environmental clauses in contracts with Services Providers • Review by Environmental Management of contracts with Services Providers
Bulk Oil Storage and Management (Auto Service Center)	• Aboveground storage tank and drum storage inspection • Secondary containment inspection • Transfer of new and used oil into/out of tanks • Drum handling • Spill reporting and clean-up

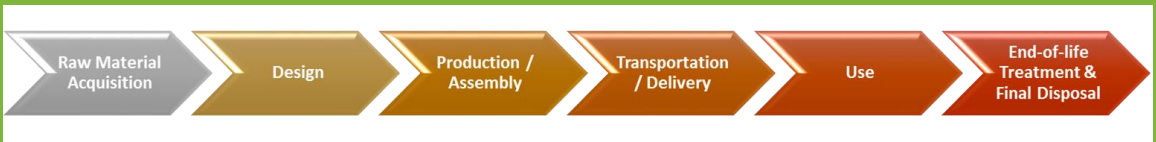
Category of Activity	Example Operational Control
Facility Wastewater Management	• Oil/water separator monitoring and cleaning (auto service) • Grease trap monitoring and cleaning (deli/meat, restaurant, fryers, rotisserie chicken) • Environmental clauses in contracts with Services Providers • Review by Environmental Management of contracts with Services Providers
Stormwater Management	• Monitoring, cleaning, and maintenance of stormwater structures (e.g. ponds, catch basins, ditches, swales, culverts) • Parking lot sweeping and litter control • Snow plowing and on-site storage • Pressure-washing of building exteriors and carts • Exterior storage of materials, waste and surplus fixtures • Environmental clauses in contracts with Services Providers • Review by Environmental Management of contracts with Services Providers
Facility Maintenance	• HVAC and refrigeration maintenance, recordkeeping, and reporting • Generator and fire pump engine permitting, maintenance, recordkeeping, and reporting • Remodel and maintenance contractor management of materials and wastes • Asbestos-containing materials management • Pre-demolition hazardous building-materials assessments • Permitting of regulated equipment (e.g. tanks, oil/water separators, grease traps, diesel engines for emergency generators and fire suppression pumps) during maintenance and remodel projects • Environmental clauses in contracts with Services Providers • Review by Environmental Management of contracts with Services Providers

Helpful Tip

Taking a **life cycle perspective** may help you in determining **where** – both within your operations (activities, products, and services) as well as across your value chain – you may benefit from operational controls to improve environmental and compliance performance. A life cycle lens could also help to identify environmental hotspots and what should be addressed for each of these areas within your business.

Note: The focus should be on what and where your company may control or have influence.

Typical stages of a product (or service) life cycle include those in the diagram below:



Need more help? Review *Chapter 3 of the Planning Action guide – Address Risks and Opportunities*.

Maintaining Documented Operational Controls

 *CLM Section 4.9*

Your operational controls are only effective if they are periodically reviewed to ensure they are working and are updated as circumstances change.

Hints for Maintaining Operational Controls

1. Designate responsibility.

Designate staff who are responsible for maintaining the controls and ensuring that procedures are followed and deviations corrected. Generally, staff members responsible for the relevant SEA will be responsible for implementing its operational controls. Your organization's subject matter expert will most likely be responsible for regularly reviewing the controls. You can use *Tool 12-3: Sample Worksheet for Operational Control Responsibilities* to help assign and track these responsibilities.

2. Develop training.

Training is required for employees who are responsible for implementing, maintaining, or reviewing controls. Your training program, including on-the-job training, should ensure that everyone understands the controls and their role in following them. You can use *Tool 12-4: Sample Worksheet for Training Plan for Operational Controls* to identify, plan, and track staff training needs. This information should be combined with general environmental training to create an integrated training plan for your EMS (See *Chapter 9: Doing – Competence and Awareness*).

3. Take corrective action when objectives are not met.

Revise operational controls as quickly as possible when environmental objectives are not met. You can record corrections *on Tool 15-2: Sample Corrective and Preventive Action Notice* included in *Chapter 15: Nonconformity and Corrective and Preventive Action.*

Example Operational Control for Used Light Bulb Management

The following is a sample operational control procedure. If you use this, it is critical to review the requirements for your facility in accordance with the most recent federal, state, and local requirements.

ENVIRONMENTAL OPERATING PROCEDURE/WORK INSTRUCTION

PROC-EMS-12-1: Used Light Bulb (Universal Waste) Management & Recycling
1.0 Purpose: Maintain compliance with federal and state regulations for storing and recycling used and damaged light bulbs (also called "used lamps") at stores in [Name of Facility]. *Note: For the management and recycling of used lamps generated during a complete store re-lamping event performed by an outside services provider, see Facilities Maintenance Procedure PROC-FM_XX-YY.*
2.0 Overview: This operational control procedure applies to the storage, recycling, and disposal of used light bulbs in the store, including incandescent, fluorescent, compact fluorescent lamp (CFL), high-intensity discharge (HID), halogen, and light-emitting diode (LED). Only incandescent bulbs may be thrown in the regular trash. All other bulbs must be stored and recycled as described below.
3.0 Responsibility: 3.1 The Environmental Manager is responsible for maintaining and checking for implementation of this operational control procedure. 3.2 The designated Inventory Controls Coordinator for implementation of this procedure at the store is [name/title]. 3.3 Employees who replace light bulbs are responsible for bringing used light bulbs to the Inventory Controls Coordinator. 3.4 Employees who discover damaged light bulb merchandise or damaged light bulb packaging are responsible for taking the items to the "Potential Damages Staging Area" where the items will be assessed on a daily basis for markdown and sale or for recycling and inventory write-down. 3.5 Customer Service Clerks are responsible for placing customer-returned light bulbs in the "Potential Damages Staging Area".
4.0 Procedure: 4.1 [Acme Lamp Recycler] is the vendor that recycles the company's used light bulbs and supplies the company with mail-back boxes and supplies. They also keep records of each store's recycling amounts and compliance with the 12-month storage time limit. 4.2 ALL used light bulbs must be assessed by the Inventory Controls Coordinator. ONLY the Inventory Controls Coordinator may dispose of used light bulbs following these procedures. 4.3 Only incandescent light bulbs may be thrown in the regular trash (i.e. compactor or dumpster, as the store is equipped). All others (e.g. fluorescent, CFL, HID, halogen, LED) must be recycled through [the Acme Lamp Recycler mail-back program].

4.4 Each store should have two different kinds of lamp recycling boxes:
1. 4-foot boxes for fluorescent tubes; and
2. 2-foot cube-shaped boxes for CFL, HID, halogen, and LED bulbs.
The boxes are labeled and marked with:
a) The store name and address;
b) The [Acme Lamp Recycler] Customer Number; and
c) An expiration date 12 months from the date the box was shipped to the store.

4.5 The Inventory Controls Coordinator must set up the boxes.
a) Unfold the boxes and set them up next to the Hazardous Waste Storage Area.
b) The boxes must be protected from traffic, including forklifts, carts, hand trucks, pallet jacks, and people walking.
c) The 4-foot box must be secured to the wall or sturdy racking with a rope or bungee cord.
d) Post the Lamp Recycling Poster (rev. 12-2014) above the boxes, where it can be consulted for reminders on this procedure.
e) The lid on each box MUST be kept CLOSED unless you are actively adding bulbs.

4.6 At least once per day, the Inventory Controls Coordinator MUST process "Potential Damages" in the "Potential Damages Staging Area" (see the EMS-12-XX, Sorting Damages/Returns for Return-to-Inventory, Markdown & Sell, Return-to-Vendor, Waste Out) and must:
a) Place waste incandescent bulbs in the regular trash;
b) Place ALL OTHER used bulbs in the appropriate [Acme Lamp Recycler] box;
c) Place broken bulbs in the special zipper lock bags before placing them in the [Acme Lamp Recycler] box; and
d) Re-close the lid of the [Acme Lamp Recycler] box.

4.7 The Inventory Controls Coordinator must mail back each lamp-recycling box once it is full OR by the expiration date, whichever comes first.

4.8 Email [EHS@ourretailcompany.com] or call [the Environmental Health and Safety (EHS) Hotline at 1-800-555-ENHS] if you have a question or need help.

5.0 Records:
5.1 [Acme Lamp Recycler] will electronically deliver store lamp recycling records to the Environmental Manager.

5.2 Should an inspector request copies of records, please inform him or her that they are managed by [corporate EHS] and they can be emailed or faxed during the next business day. Then, email [EHS@ourretailcompany.com] or call [the EHS Hotline at 1-800-555-ENHS] to request that the records be sent to the inspector.

6.0 Revision:
Date: December 2017, PROC-EMS-12-1 (REV 1)
Approved by: Environmental Management Representative

Next

Developing and documenting your operational controls and procedures is only the first step. The controls need to be reviewed periodically to ensure that they are being followed and are effective.

Helpful tips

- Use your company's existing systems, programs, tools, or other resources to support the development and implementation of your environmental operational planning and controls.
- Use samples provided under Tools & Procedures as a starting point to developing your own.
- Refer to the Compliance Leadership Program (CLP) matrix to fine-tune your environmental operational planning and controls.
- Refer to your Environmental Policy to ensure operational planning, controls and related activities are aligned with the goals of this policy.

Tools & Procedures

Tool 12-1: Operational Controls Questionnaire

Tool 12-2: Sample Worksheet for Determining Which Operations or Activities Require Operational Controls

Tool 12-3: Sample Worksheet for Operational Control Responsibilities

Tool 12-4: Sample Worksheet for Training Plan for Operational Controls

Procedure 12-1: Sample Procedure for Development of Operational Control Procedures

11. Emergency Preparedness and Response

 *CLM Section 4.10*

Despite an organization's best efforts, accidents and other emergency situations can occur. Effective emergency preparation and response can reduce injuries; prevent or minimize environmental impacts; protect employees, customers, and neighbors; reduce asset losses; protect brand reputation; and minimize downtime. Your EMS needs to provide for emergency preparedness and response (EP&R) by ensuring that environmental impacts are covered in your existing emergency program or by developing an EP&R plan specific to environmental impacts. Because you probably already have EP&R programs in place, this chapter focuses on additional items to consider for your EMS.

Whether your EP&R program is part of your EMS or simply referred to in the EMS, an effective EP&R program should include provisions for:

1. Assessing the potential for accidents and emergencies;
2. Preventing incidents and their associated environmental impacts;
3. Responding to incidents using emergency plans and procedures;
4. Testing of emergency plans and procedures periodically; and
5. Mitigating impacts associated with accidents and emergencies.

Consistent with EMS's focus on continual improvement, it is important to review your emergency response performance after an incident. Use this review to determine what could have prevented the incident or made the response more effective; for example, more training could be needed or emergency plans and procedures could require revision.

This is another area where you should not have to start from scratch. Your insurance carrier may require an "all-hazards" or similarly titled plan. Several environmental and health and safety regulatory programs require emergency plans and/or procedures, especially at distribution and transportation centers. Examples of federal requirements related to EP&R that may apply to your business are listed in the table below.

Regulatory Driver	Requirement
Resource Conservation and Recovery Act (RCRA)	Contingency plan (large quantity generators [LQG]), preparedness and prevention plan (LQG and small quantity generators [SQG])
Clean Water Act (CWA)	Spill prevention, control, and countermeasure plan (SPCC) and stormwater pollution prevention plans (SWPPP)
Oil Pollution Act (OPA)	Facility response, SPCC
Coast Guard	Facility response plan
Clean Air Act (CAA)	Risk management plan
Emergency Planning and Community Right-to-Know Act (EPCRA)	Community right-to-know reporting and coordination with Local Emergency Planning Committees and State Emergency Response Commissions

Some facilities use integrated contingency plans (ICPs) that combine the requirements of multiple regulatory programs into one plan. The federal government has issued guidance for the development of ICPs. While reviewing your EP&R documents for your EMS, you may consider adopting this streamlined approach.

Hints for Emergency Preparedness and Response

In retail, spills are a common emergency that you need to prepare for and address. The hints below relate to spills.

1. Identify what should be protected from hazardous materials spills in order to prevent the material from getting into the environment. Examples include floor drains, stormwater catch basins, water wells, and surface waters. Consider possible spill scenarios and how to mitigate that threat.
2. Make sure you have spill kits with sufficient supplies and equipment to address potential spills. Ask yourself the following questions:
   - Are the spill supplies, such as sorbent, compatible with the hazardous materials you store?
   - Are you prepared for different kinds of hazardous materials spills? (For example, a battery-acid spill will require a neutralizer as well as a sorbent or a sorbent with acid-neutralizing capability. An oil spill will require a different kind of sorbent.)
   - Are spill kits readily accessible and located near likely releases?
   - Do you have appropriate personal protective equipment for safe spill response?
3. Your facility should clearly define when employees can clean up spills on their own and when they should call in a spill response contractor, for example, depending on the amount or type of material spilled.
4. Clearly understanding and enabling responsible staff to report spills or other events as per regulatory requirements.
5. Mock drills can be an excellent way to reinforce training and get feedback on the effectiveness of your plans and procedures.
6. Post copies of your EP&R plans and procedures (or at least critical contact names and phone numbers) around your facility and especially in areas where significant hazards exist. Include phone numbers for your on-site emergency coordinator, local fire department, local police, hospital, rescue squad and others as appropriate.
7. Revise and improve your EP&R plans and procedures as you learn from mock drills, feedback, training, or actual emergencies.

Getting Started

You can use the questionnaire in *Tool 13-1: Emergency Preparedness and Response Questionnaire* to understand your company's current EP&R approach and *Tool 13-2: Emergency Preparedness and Response Requirements Matrix* to start compiling a list of potential emergency scenarios. A sample EP&R procedure is included as *Procedure 13-1: Sample Procedure for Emergency Preparedness and Response*.

When developing EP&R procedures, ask yourself: How will we ensure that everyone – including new employees, contractors, and site visitors – knows what to do in an emergency? Your EP&R plan should include the following types of information:

- Potential emergency situations (e.g. fires, explosions, spills, or releases of hazardous materials and natural disasters);
- Unusual operating conditions such as facility opening and closure, start-up, and shutdown of equipment;
- Hazardous materials used and stored on site and at their locations;
- Key organizational responsibilities, including Emergency Coordinator;
- Arrangements with local emergency support providers;
- Emergency response procedures, including emergency communication procedures;
- Locations and types of emergency response equipment;
- Maintenance of emergency response equipment;
- Training/testing of personnel, including the on-site emergency response team if applicable;
- Testing of emergency alarms and public address systems;
- Evacuation routes and exits (map); and
- Assembly points.

Too few organizations are proactive in their emergency planning and fail to identify the potential for accidents and emergencies or consider how to prevent them or mitigate impacts. An Environmental Compliance Team (with representatives from operations, engineering, maintenance, and environmental health & safety, for example) can identify most potential emergencies by asking "what if" questions related to areas with likely issues such as hazardous materials, fueling operations, and tank management.

Next

Like the other elements of your EMS, your EP&R plans need to be updated on a periodic basis or when there are changes in your facility or operations. For example, the plan would need to be updated if you purchased emergency generators or a fuel tank. In addition, always be considering how emergency situations can be avoided or harmful impacts reduced.

Helpful tips

- Use your company's existing systems, programs, tools, or other resources to support your emergency response and preparedness procedures.
- Use samples provided under Tools & Procedures "as is" or as a starting point to developing your own.
- Refer to the Compliance Leadership Program (CLP) matrix to fine-tune your emergency response and preparedness procedures.
- Refer to your Environmental Policy to ensure emergency response and preparedness procedures and related activities are aligned with the goals of this policy.

Tools & Procedures

Tool 13-1: Emergency Preparedness and Response Questionnaire

Tool 13-2: Emergency Preparedness and Response Requirements Matrix

Procedure 13-1: Sample Procedure for Emergency Preparedness and Response