



EPA Region 1 McCormack Federal Building

EMS Procedure

FY 2012

4.3.1 Environmental Aspects

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Document location: The official controlled version of this document is the electronic version maintained on-line in the Lotus Notes Database.

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1.0 Purpose

- 1.1 The purpose of this procedure is to ensure the EPA-NE Boston Office identifies all of the environmental aspects and impacts of the activities, products, and services within the EMS fenceline of the Boston Office, and to provide a consistent and systematic framework for ranking their significance.

2.0 Scope

- 2.1 This procedure covers the identification and ranking of environmental aspects and impacts of activities, products, and services within the EMS fenceline of the EPA-NE Boston Office.

3.0 Definitions

- 3.1 For definitions of common terms for EPA-NE Boston Office EMS procedures, refer to EMS document EMS Definitions.

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4.0 Approach

4.1 Development of Significant Environmental Impacts List

- 4.1.1 The EMS Core Team prepares an initial list of all EPA-NE Boston Office activities, products and services that may interact with the environment and identified the environmental aspects and potential impacts to the environment for each activity. This team evaluates each identified environmental aspect using the rating system described below and then determines which aspects are significant based on an average significance rating score as described below.
- 4.1.2 Ranking System: A number of factors are used to evaluate the environmental aspects of the Boston Office's operations. The factors can generally be split between those that are environmental (four factors) and those that are business considerations (four factors). The first four factors were used to determine the environmental significance of the aspects. Significant environmental aspects must be considered in setting objectives and targets, but business considerations (legal and other requirements, technical options, and financial and operational requirements, plus the views of interested parties) must also be considered in order to optimize both environmental benefits and allocation of resources. The EMS team developed a process that includes these considerations up front, in reviewing aspects. (See table below 4.1.15)
- 4.1.3 The significance of the environmental aspects of the activities, products and services of the Boston Office are evaluated using the scoring system for factors 1-4 of 4.2.1 and all ratings are averaged to a single score. Any environmental aspect with a score of 2.5 or greater is considered a significant environmental aspect which must be considered in setting objectives and targets.
- 4.1.4 The business considerations associated with the environmental aspects of the activities, products and services of the Boston Office are evaluated using the scoring system for factors 5-8 of 4.2.1. The four business consideration ratings are also averaged to a single score. The business consideration factors are not used to determine environmental significance but they are used, both as an average and individually, together with the environmental significance ranking, in selection of appropriate objectives and targets and environmental improvement programs (Action Plans). A high average score under business considerations indicates that there is some combination of legal risk, large amount of interest and minimal effort to change a particular aspect that would make it a worth considering even if it did not have a high environmental significance. Conversely, low business consideration scores indicate that there is some combination of low public concern or disproportionately high financial and / or technical barriers which must be weighed against the environmental benefits that can be achieved.

4.2 Review and Revision of Significant Environmental Impacts List

- 4.2.1 To assure that the lists of activities, aspects and impacts and the significance determination remain current, upon completion of EMS self-certification, the EMS

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Coordinator and the EMS Core Team, shall periodically review the list of significant environmental impacts, using the procedure described above.

- 4.2.2 The EMS Core Team shall strive to obtain broad input to the aspects review. The Team shall solicit input from the Director of Public Affairs regarding any relevant public interest, concerns, or complaints and shall solicit internal input Region-wide through intranet posting or similar means. The future EMS Internet site may also provide a means for solicitation of public interests.
- 4.2.3 On completion of the review of the Significant Environmental Impacts List, the EMS team shall report the results and any recommended changes to the Director of OARM and the EMS Board of Directors.
- 4.2.4 The Core Team and the Director of OARM may also determine the need to more frequently update the EPA-NE Boston Office Significant Environmental Aspects List based on changes in policy or operations, building renovation plans, office relocation, or other factors.

4.3 Document Control

- 4.3.1 Because the Policy is a Regional directive, the Office of Administration and Resources Management (OARM) maintains the official Agency record and has issued a control number (Class. No./Order:1000.13 Change xx) to the Environmental Policy. The Regional Directives Officer in the Human Resources Office of OARM is responsible for document control and maintaining the official agency record.

4.4 Review and Revision of the EPA-NE's Boston Office Environmental Policy

- 4.4.1 Upon completion of EMS self-certification, the EMS Coordinator and the EMS Core Team shall provide support to the Director of OARM, in the periodic review of the Environmental Policy with the EMS Board of Directors to determine whether any modifications are needed. Such modifications may be necessary and appropriate in order to ensure that the Environmental Policy continues to be relevant and effective in light of changing circumstances such as operational changes, budget developments, technological development, EMS audit results, the Boston Office's commitment to continuous improvement, new or revised Federal or Regional policies, or other relevant factors,

4.5 Communication of Environmental Policy

- 4.5.1 The Boston Office uses multiple approaches to ensure the Policy is communicated to all staff. Means of communication include email, staff meetings, the Regional intranet and web page, printed posters, and awareness and training activities. In-house EMS trainings and new employee training will also cover the Environmental Policy as part of course curriculum. The environmental policy is available on-line. For external communications, the Environmental Policy is available to the public on request, is posted in visitor conference rooms and will be included on the EPA Region I EMS website when it is complete.

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The significance rating system includes eight attributes outlined in the table below.

Ranking Factor	Point system		
1. Scale/Magnitude of actual or potential impact on the environment	1 (low or no impact)	2 (potential for moderate impact)	3 (potential for major impact)
2. Relative severity of environmental affect	1 (low or no likely affect)	2 (possible moderate affect)	3 (possibility of major affect on environment)
3. Frequency of impact or occurrence (risk of occurrence)	1 (yearly or less)	2 (quarterly or weekly)	3 (daily or more often)
4. Duration of activity causing impact	1 (instantaneous or brief)	2 (all workday long)	3 (continuously operating)
5. Potential for legal/regulatory exposure as result of activity	1 (none)	2 (moderate)	3 (very likely/ certain)
6. Concerns of interested parties	1 (no complaints)	2 (occasional complaints)	3 (frequent complaints)
7. Effect of the activity on public image	1 (none)	2 (moderate)	3 (large effect)
8. Ease of changing the aspect or its impact	1 (impossible to change)	2 (foreseeable or do-able)	3 (minimal or negligible effort to make change)

5.0 Responsibilities

5.1 The Regional Environmental Executive and the Office Directors, collectively, acting as the EPA-NE EMS Board of Directors, are responsible for:

- 5.1.1 leading and/or participating in management reviews of the EMS, including the list of significant aspects; and
- 5.1.2 reviewing and approving changes to the EMS, including the list of significant aspects.

5.2 The Office Directors individually, acting as Directors of their respective Offices, are responsible for:

- 5.2.1 ensuring employees' awareness of the significant aspects and the associated impacts and their role in managing them.

5.3 The Director of OARM is responsible for assuring there is periodic review and update of the

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environmental aspects list consistent with this procedure.

5.4 EMS Core Team is responsible for:

- 5.4.1 developing the procedure for identification of the environmental aspects and impacts of the EPA-NE Boston Office activities, products, and services and the procedure for significance determination;
- 5.4.2 preparing the initial list of environmental significant aspects; and
- 5.4.3 providing support in the periodic review and update of the environmental aspects list and the significance determination.

5.5 The EMS Coordinator is responsible for:

- 5.5.1 leading the environmental aspects development and maintenance efforts;
- 5.5.2 leading the periodic review and update of the environmental aspects list and the significance determination, and for more frequent review of the aspects list and significance as required based on changes in policy or operations, building renovation plans, office relocation or other factors; and
- 5.5.3 bring aspects lists and recommended changes to the Director of OARM and the EMS Board of Directors for review and approval.

6.0 Records and Related Documents

6.1 Environmental Aspects Review & 2011 EMS Core Team Sign-Off Sheet.

6.2 Significant Aspects Summary - 2011

7.0 Distribution

7.1 The EMS Core Team's documentation lead has placed the most current version this procedure in an electronic repository. It is available electronically to users of the EPA Regional 1 intranet. Procedures are subject to revision. The EPA Intranet EMS Page (<http://r1-gis-web.r1.epa.gov:9876/oarm/ems/index.html>) has a link to the latest version.