



EPA Region 1 McCormack Federal Building

EMS Procedure

FY 2012

4.3.2 Legal and Other Requirements

Persons Responsible: Alice Kaufman
Title: EMS Coordinator

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-New England Boston Office identifies, evaluates and maintains awareness of laws, regulations, Federal Executive orders and other internal organizational requirements that apply to the environmental aspects of its activities, products, and services.

2.0 Scope

- 2.1 This procedure covers all environmental legal and other requirements applicable to the activities, products and services within the fenceline of 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 The EPA-NE Boston Office Environmental Policy includes a commitment to comply with legal obligations and other environmental requirements. The environmental legal and other requirements that apply to EPA-NE Boston Office include federal and state environmental statutes and regulations, federal executive orders, and internal EPA policies.
- 4.2 Because the environmental legal and other requirements applicable to the Boston Office facility span a broad mix of programs and authorities, the EMS coordinators serve as the focal point for assembling and maintaining the compilation of applicable requirements, and for assisting line management (primarily OARM managers) by periodically auditing compliance. The EMS coordinators rely on information from Regional and Headquarters offices, to identify appropriate compliance requirements. These may include staff from Contracts and Procurement, Customer Service and Facilities, Assistance and Pollution Prevention, Enforcement, the EMS Core Team, Regional and HQ SHEMP staff, other EPA Regional offices. The EMS Coordinators may also get information from relevant websites such as those of Office of the Federal Environmental Executive, the EPA Regional and Headquarters Compliance Assistance programs, and the Federal Facilities Compliance Assistance site.
- 4.3 The Coordinators regularly update the inventory of legal and other requirements (see Section 5).
- 4.4 The EMS Coordinators and Core Team consider legal and other requirements in developing the list of significant environmental aspects, objectives and targets, operational controls, employee training, and environmental management programs or Action Plans.
- 4.5 Managers and supervisors are responsible for knowing and complying with Environmental Legal and Other requirements applicable to the operations they supervise and for assuring that employees whose work activities may have a significant environmental impact will have knowledge of applicable legal and other requirements.

5.0 Responsibilities

- 5.1 The Regional EMS Executive and the Office Directors, collectively, acting as the EPA-NE EMS Board of Directors, are responsible for ensuring the Boston Office achieves its Environmental Policy commitments, including the commitment to compliance, through appropriate Objectives and Targets, Operational Controls, Employee Training and Awareness, Monitoring, Auditing and Corrective and Preventive Action.
- 5.2 The Office Directors individually, acting as Directors of their respective Offices, are responsible for ensuring staff awareness and conformance with Environmental Legal and Other requirements where applicable.
- 5.3 The Director of OARM is responsible for:
 - 5.3.1 oversight and support of the EMS Coordinators and the Regional Safety and Health Program Officer in compliance related responsibilities;
 - 5.3.2 periodically reviewing the Environmental Legal and Other requirements,

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compliance monitoring results and any proposed corrective actions with the EMS coordinators;

- 5.3.3 promoting and supporting staff awareness and conformance with Environmental Legal and Other requirements within OARM (which is where most requirements are applicable).

5.4 The Boston Office EMS coordinators are responsible for:

- 5.4.1 developing and maintaining a current table of environmental legal and other requirements applicable to the Boston Office and periodically reviewing it with the Director of OARM for review and concurrence;
- 5.4.2 reviewing goals, objectives and Action Plans and assuring that objectives and targets are consistent with environmental legal and other requirements and proposing additional objectives, targets, management programs and operational controls if required to achieve compliance;
- 5.4.3 assisting line management by supplying information on compliance requirements and by conducting periodic compliance reviews or audits;
- 5.4.4 recommending corrective and preventive actions where appropriate;
- 5.4.5 reporting to the relevant managers and supervisors and to the Director of OARM and the EMS Board of Directors on the results of compliance monitoring and audits; and
- 5.4.6 elevating issues of cross-regional importance to the EMS Board of Directors.

5.5 The Regional Health and Safety program manager is responsible for:

- 5.5.1 regional health and safety programs and provides input to the EMS Coordinators in identifying health and safety requirements related to the EMS;
- 5.5.2 participates with Safety Health and Environmental Management Division (SHEMD) in the tri-annual SHEMD compliance audit conducted by EPA Headquarters' SHEMD staff with assistance from an independent contractor;
- 5.5.3 all records pertaining to the SHEM program and audits.

5.6 Managers and Supervisors are responsible for:

- 5.6.1 being aware of requirements applicable to the areas they supervise;
- 5.6.2 assuring employees under their supervision are aware of requirements and are in compliance with them;
- 5.6.3 participating in periodic compliance reviews and audits;

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5.6.4 implementing corrective and preventive actions where required.

6.0 Records and Related Documents

6.1 List of Applicable environmental statutes and regulations, applicable Executive Orders and other requirements (available through EMS document control system).

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.