
US EPA, Region III

**Environmental Management System
ISO 14001 Assessment Report**

Prepared for: HQ
Prepared by:

Jeffrey Alper, OPM
Lorna Rosenberg, OEI

January, 2002

Table of Contents

	Page
I. <u>Summary</u>	2
II. <u>ISO 14001 Gap Analysis</u>	5
III. <u>Conclusion</u>	16

I. Summary

The purpose of this report is to summarize the current status of US EPA, Region III's environmental management system with respect to meeting the requirements of ISO 14001 as of for management and/or the Board of Directors. The report is strictly confidential and is not intended for external use.

Section II, "Gap Analysis," analyzes the results of US EPA, Region III's assessment and automatically provides a status report on its performance with respect to meeting each requirement of ISO 14001. Section III, "Recommended Actions," identifies the actions that US EPA, Region III intends to take to meet the requirements of ISO 14001. It includes an implementation schedule in which the priority, person with overall responsibility, estimated costs and start and end dates for each action are identified.

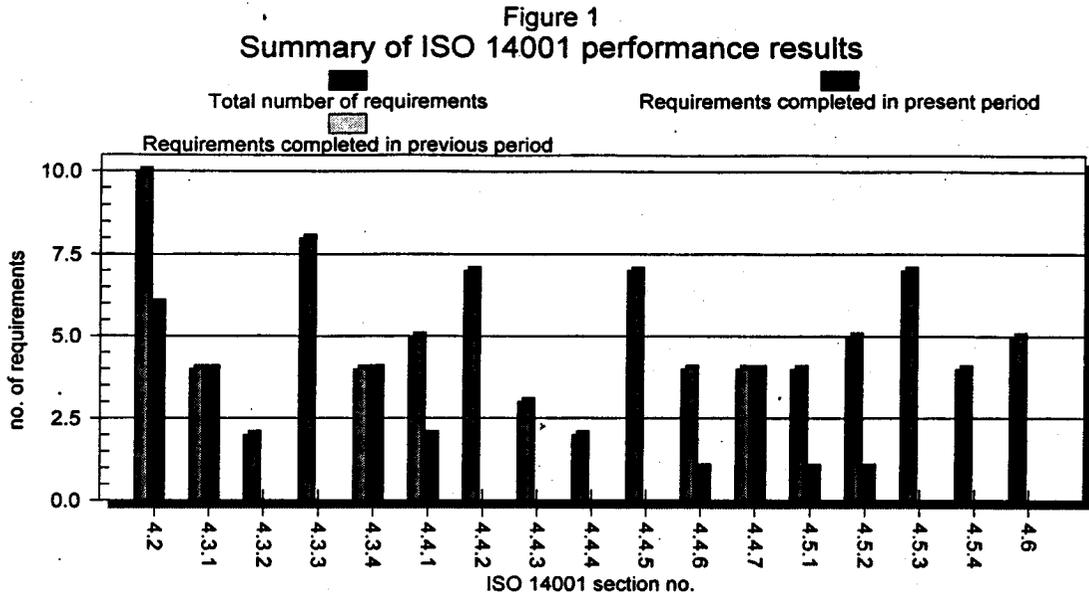
The following is a summary of the key results for US EPA, Region III presented in this report.

1. The overall score for US EPA, Region III's assessment with respect to meeting the requirements of an environmental management system as specified in the ISO 14001 standard is **48%**.
2. **27%** of the requirements for an environmental management system as specified in ISO 14001 were met.
3. **41%** of the requirements for an environmental management system were partially met.
4. **12%** of the ISO 14001 requirements were not met.
5. **20%** of the ISO 14001 requirements were not assessed.
6. The total estimated cost of meeting the requirements of ISO 14001 is **\$**.

This section compares the total percentage of requirements met, requirements partially met and requirements not met by ISO section in the current period.

ISO 14001 section		Overall Score (%)	Met (%)	Partially Met (%)	Not Met (%)	Ref.
4.2	Environmental policy	80	60	40	-	4.2.10
4.3.1	Environmental aspects	100	100	-	-	4.3.11
4.3.2	Legal and other requirements	50	-	100	-	4.3.21
4.3.3	Objectives and targets	-	-	-	-	4.3.31
4.3.4	Environmental management programme(s)	100	100	-	-	4.3.41
4.4.1	Structure and responsibility	70	40	60	-	4.4.11
4.4.2	Training, awareness and competence	43	-	86	14	4.4.21
4.4.3	Communication	50	-	100	-	4.4.31
4.4.4	Environmental management system documentation	50	-	100	-	4.4.41
4.4.5	Document control	-	-	-	100	4.4.51
4.4.6	Operational control	63	25	75	-	4.4.61
4.4.7	Emergency preparedness and response	100	100	-	-	4.4.71
4.5.1	Monitoring and measurement	63	25	75	-	4.5.11
4.5.2	Nonconformance, corrective and preventive action	50	20	60	-	4.5.21
4.5.3	Records	43	-	86	14	4.5.31
4.5.4	Environmental management system audit	-	-	-	25	4.5.41
4.6	Management review	-	-	-	-	4.6.10

Figure 1 compares by ISO section the total number of requirements met by US EPA, Region III in the current period to the total number of requirements in ISO 14001, and, if available, the total number of requirements met in the previous period.



II. ISO 14001 Gap Analysis

This section provides a detailed comparative analysis of the performance of US EPA, Region III's environmental management system with respect to meeting each of the requirements of ISO 14001 and provides the corresponding checklist references.

4.2 ENVIRONMENTAL POLICY

4.2 Environmental policy

Checklist reference: 4.2.10

The environmental policy is crucial for establishing an overall sense of direction and identifying the parameters of action for US EPA, Region III. It also forms the basis for setting US EPA, Region III's objectives and targets and provides the impetus for implementation and ongoing improvement of the environmental management system. Top management must define this policy.

Environmental policy requirements	Met	Partially Met	Not Met
• Top management has defined the organization's environmental policy.		X	
• Top management has ensured that the environmental policy is appropriate to the nature, scale and environmental impacts of the organization's activities, products or services.		X	
• Top management has ensured that the environmental policy includes a commitment to continual improvement and prevention of pollution.	X		
• Top management has ensured that the environmental policy includes a commitment to comply with relevant environmental legislation and regulations, and with other requirements to which the organization subscribes.	X		
• Top management has ensured that the environmental policy provides the framework for setting and reviewing environmental objectives and targets.		X	
• Top management has ensured that the environmental policy is documented.		X	
• Top management has ensured that the environmental policy is implemented.	X		
• Top management has ensured that the environmental policy is maintained.	X		
• Top management has ensured that the environmental policy is communicated to all employees.	X		
• Top management has ensured that the environmental policy is available to the public.	X		

4.3 PLANNING

4.3.1 Environmental aspects

Checklist reference: 4.3.11

The purpose of identifying environmental aspects is to determine which aspects have or can have significant environmental impacts. When establishing its objectives, US EPA, Region III should ensure that all the aspects relative to these significant impacts are reflected (see also ISO 14001 Section 4.2.3, Objectives and targets).

US EPA, Region III has met all of the requirements for this section of ISO 14001.

Environmental aspects requirements	Met	Partially Met	Not Met
• The organization has established (a) procedure(s) to identify the environmental aspects of its activities, products or services that it can control and over which it can be expected to have an influence in order to determine those which have or can have significant impacts on the environment.	X		
• The organization maintains a procedure to identify the environmental aspects of its activities, products or services that it can control and over which it can be expected to have an influence in order to determine those which have or can have significant impacts on the environment.	X		
• The organization has ensured that the aspects related to the significant impacts are considered in setting its environmental objectives.	X		
• The organization has ensured that the information on its organization's environmental aspects and significant environmental impacts is kept up-to-date.	X		

4.3.2 Legal and other requirements

Checklist reference: 4.3.21

US EPA, Region III must have in place procedures for identifying and accessing all the legal and other requirements that apply to the environmental aspects of its activities, products and services.

Legal and other requirements	Met	Partially Met	Not Met
• The organization has established a procedure to identify and have access to legal and other requirements to which the organization subscribes that are applicable to the environmental aspects of its activities, products or services.		X	
• The organization maintains the procedure to identify and have access to legal and other requirements to which the organization subscribes that are applicable to the environmental aspects of its activities, products or services.		X	

4.3.3 Objectives and targets

Checklist reference: 4.3.31

Establishing objectives and targets is the next major step in implementing the environmental management system. This requires translating US EPA, Region III's environmental policy and identified environmental aspects of its activities, products and processes that have significant environmental impacts into specific objectives and targets.

US EPA, Region III has not assessed any of the requirements for this section of ISO 14001.

Objectives and targets requirements	Met	Partially Met	Not Met
• The organization has established documented environmental objectives and targets at each relevant function and level within the organization.		Not assessed	
• The organization maintains documented environmental objectives and targets at each relevant function and level within the organization.		Not assessed	
• The organization has considered the legal and other requirements when establishing and reviewing its objectives.		Not assessed	
• The organization has considered its significant environmental aspects when establishing and reviewing its objectives.		Not assessed	
• The organization has considered its technological options when establishing and reviewing its objectives.		Not assessed	
• The organization has considered its financial, operational and business requirements when establishing and reviewing its objectives.		Not assessed	
• The organization has considered the views of interested parties when establishing and reviewing its objectives.		Not assessed	
• The organization has ensured that its objectives and targets are consistent with the environmental policy, including the commitment to prevention of pollution.		Not assessed	

4.3.4 Environmental management programme(s)

Checklist reference: 4.3.41

US EPA, Region III's environmental management programme(s) should describe how its objectives and targets will be achieved and should include identifying responsibilities, procedures and timing.

US EPA, Region III has met all of the requirements for this section of ISO 14001.

Environmental management programme(s) requirements	Met	Partially Met	Not Met
• The organization has established and maintained (a) programme(s) for achieving its objectives and targets.	X		
• The organization has included in the programme(s) the designation of responsibility for achieving objectives and targets at each relevant function and level of the organization.	X		
• The organization has included in the programme(s) the means and time-frame by which the objectives and targets are to be achieved.	X		

Cont'd	Met	Partially Met	Not Met
<ul style="list-style-type: none"> The organization has amended the programme(s) where relevant to ensure that environmental management applies to projects relating to new developments and new or modified activities, products or services. 	X		

4.4 IMPLEMENTATION AND OPERATION

4.4.1 Structure and responsibility

Checklist reference: 4.4.11

US EPA, Region III must define the roles, responsibilities and authorities in its environmental management system to ensure successful implementation of the system. Responsibilities should not be restricted to the environmental aspects of US EPA, Region III's operations, but should include other areas such as operational management and staff functions other than environmental. Management must allocate resources appropriately to implement and control the system, and top management must appoint specific management representatives.

Structure and responsibility requirements	Met	Partially Met	Not Met
<ul style="list-style-type: none"> The organization has defined and documented roles, responsibility and authorities in order to facilitate effective environmental management. 	X		
<ul style="list-style-type: none"> The organization has communicated roles, responsibility and authorities in order to facilitate effective environmental management. 	X		
<ul style="list-style-type: none"> The organization has ensured that management provides resources essential to the implementation and control of the environmental management system, including human resources and specialized skills, technology and financial resources. 		X	
<ul style="list-style-type: none"> The organization has ensured that top management appoints (a) specific management representative(s) who, irrespective of other responsibilities, have defined roles, responsibilities and authority for ensuring that environmental management system requirements are established, implemented and maintained in accordance with the ISO 14001 standard. 		X	
<ul style="list-style-type: none"> The organization has ensured that the specific management representative(s) appointed by top management have defined roles, responsibilities and authority for reporting on the performance of the environmental management system to top management for review and as a basis for improvement of the environmental management system. 		X	

4.4.2 Training, awareness and competence

Checklist reference: 4.4.21

US EPA, Region III must identify its training needs and ensure that all personnel whose work may have a significant environmental impact are trained appropriately. This requires ensuring that these personnel are competent in terms of their education, training and/or experience.

Training, awareness and competence requirements	Met	Partially Met	Not Met
• The organization has identified training needs.		X	
• The organization has required that all personnel whose work may create a significant impact upon the environment have received appropriate training.		X	
• The organization has established and maintained procedures to make its employees or members at each relevant function and level aware of the importance of conformance with the environmental policy and procedures and with the requirements of the environmental management system.		X	
• The organization has established and maintained procedures to make its employees or members at each relevant function and level aware of the actual or potential significant environmental impacts of their work activities and the environmental benefits of improved personal performance.		X	
• The organization has established and maintained procedures to make its employees or members at each relevant function and level aware of their roles and responsibilities in achieving conformance with the environmental policy and procedures and with the requirements of the environmental management system including emergency preparedness and response requirements.		X	
• The organization has established and maintained procedures to make its employees or members at each relevant function and level aware of the potential consequences of departure from specified operating procedures.			X
• The organization has ensured that personnel performing the tasks which can cause significant environmental impacts are competent in terms of appropriate education, training and/or experience.		X	

4.4.3 Communication

Checklist reference: 4.4.31

US EPA, Region III must establish and maintain procedures for internal and external communication about its environmental aspects and environmental management system. For example, internal communication of the results of environmental management system monitoring, audits and management reviews helps solve problems and raises awareness. Similarly, external communication to interested parties should be considered as it demonstrates management's commitment to the environmental management system.

Communication requirements	Met	Partially Met	Not Met
• With regard to its environmental aspects and environmental management system the organization has established and maintained procedures for internal communication between the various levels and functions of the organization.		X	

Cont'd	Met	Partially Met	Not Met
<ul style="list-style-type: none"> The organization has established and maintained procedures for receiving, documenting and responding to relevant communication from external interested parties regarding its environmental aspects and environmental management system. 		X	
<ul style="list-style-type: none"> The organization has considered processes for external communication on its significant environmental aspects and recorded its decision. 		X	

4.4.4 Environmental management system documentation

Checklist reference: 4.4.41

US EPA, Region III's environmental management system documentation must be sufficient to describe the core elements of its environmental management system and should be integrated with the documentation of its other systems.

Environmental management system documentation requirements	Met	Partially Met	Not Met
<ul style="list-style-type: none"> The organization has established and maintained information, in paper or electronic form, to describe the core elements of the management system and their interaction. 		X	
<ul style="list-style-type: none"> The organization has established and maintained information, in paper or electronic form, to provide direction to related information. 		X	

4.4.5 Document control

Checklist reference: 4.4.51

Proper control and management of documents are critical to the successful implementation of an environmental management system, and US EPA, Region III's documentation control procedures therefore should be effective and efficient.

US EPA, Region III has not met any of the requirements for this section of ISO 14001.

Document control requirements	Met	Partially Met	Not Met
<ul style="list-style-type: none"> The organization has established and maintained procedures for controlling all documents required by the ISO 14001 standard to ensure that the documents can be located. 			X
<ul style="list-style-type: none"> The organization has established and maintained procedures for controlling all documents required by the ISO 14001 standard to ensure that they are periodically reviewed, revised, as necessary and approved for adequacy by authorized personnel. 			X

Cont'd	Met	Partially Met	Not Met
<ul style="list-style-type: none"> The organization has established and maintained procedures for controlling all documents required by the ISO 14001 standard to ensure that the current versions of relevant documents are available at all locations where operations essential to the effective functioning of the environmental management system are performed. 			X
<ul style="list-style-type: none"> The organization has established and maintained procedures for controlling all documents required by the ISO 14001 standard to ensure that obsolete documents are promptly removed from all points of issue and points of use or otherwise assured against unintended use. 			X
<ul style="list-style-type: none"> The organization has established and maintained procedures for controlling all documents required by the ISO 14001 standard to ensure that any obsolete documents retained for legal and/or knowledge preservation purposes are suitably identified. 			X
<ul style="list-style-type: none"> The organization has ensured that documentation is legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner and retained for a specified period. 			X
<ul style="list-style-type: none"> The organization has established and maintained procedures and responsibilities concerning the creation and modification of the various types of document. 			X

4.4.6 Operational control

Checklist reference: 4.4.61

The purpose of establishing proper operational controls is to ensure that US EPA, Region III's environmental policy, objectives and targets are met. In this regard, US EPA, Region III must identify the operations and activities associated with its significant environmental aspects consistent with its policy, objectives and targets. It also must plan these activities to ensure that they are carried out.

Operational control requirements	Met	Partially Met	Not Met
<ul style="list-style-type: none"> The organization has identified those operations and activities that are associated with the identified significant environmental aspects in line with its policy, objectives and targets. 	X		
<ul style="list-style-type: none"> The organization has planned the activities associated with the identified significant environmental aspects, including maintenance, to ensure that they are carried out under specified conditions by establishing and maintaining documented procedures to cover situations where their absence could lead to deviations from the environmental policy and objectives and targets. 		X	

Cont'd	Met	Partially Met	Not Met
<ul style="list-style-type: none"> The organization has planned the activities associated with the identified significant environmental aspects, including maintenance, to ensure that they are carried out under specified conditions by stipulating operating criteria. 		X	
<ul style="list-style-type: none"> The organization has planned the activities associated with the identified significant environmental aspects, including maintenance, to ensure that they are carried out under specified conditions by establishing and maintaining procedures related to the identifiable significant environmental aspects of goods and services used by the organization and communicating relevant procedures and requirements to suppliers and contractors. 		X	

4.4.7 Emergency preparedness response

Checklist reference: 4.4.71

Emergency preparedness and response procedures must be established and maintained in order to identify the potential for and respond to emergencies and accidents, and to prevent or minimize their environmental impacts.

US EPA, Region III has met all of the requirements for this section of ISO 14001.

Emergency preparedness and response requirements	Met	Partially Met	Not Met
<ul style="list-style-type: none"> The organization has established and maintained procedures to identify potential for and respond to accidents and emergency situations. 	X		
<ul style="list-style-type: none"> The organization has established and maintained procedures to prevent and mitigate environmental impacts that may be associated with accidents and emergency situations. 	X		
<ul style="list-style-type: none"> The organization has reviewed and revised, where necessary, its emergency preparedness and response procedures, particularly after the occurrence of accidents or emergency situations. 	X		
<ul style="list-style-type: none"> The organization has periodically tested its emergency preparedness and response procedures where practicable. 	X		

4.5 CHECKING AND CORRECTIVE ACTION

4.5.1 Monitoring and measurement

Checklist reference: 4.5.11

US EPA, Region III must establish and maintain documented procedures for regularly monitoring and measuring the key characteristics of its operations and activities that can significantly impact the environment. This includes documenting performance tracking information, relevant operational controls and conformance with its environmental objectives and targets.

Monitoring and measurement requirements	Met	Partially Met	Not Met

Cont'd	Met	Partially Met	Not Met
<ul style="list-style-type: none"> The organization has established and maintained documented procedures to monitor and measure on a regular basis the key characteristics of its operations and activities that can have a significant impact on the environment. 		X	
<ul style="list-style-type: none"> The organization's procedures to monitor and measure include the recording of information to track performance, relevant operational controls and conformance with its environmental objectives and targets. 		X	
<ul style="list-style-type: none"> The organization has ensured that monitoring equipment is calibrated and maintained and that records of this process are retained according to its procedures. 	X		
<ul style="list-style-type: none"> The organization has established and maintained a documented procedure for periodically evaluating compliance with relevant environmental legislation and regulations. 		X	

4.5.2 Non-conformance, corrective and preventive action

Checklist reference: 4.5.21

US EPA, Region III must establish and maintain procedures for addressing nonconformances, mitigating environmental impacts and taking corrective and preventive actions.

Nonconformance, corrective and preventive action requirements	Met	Partially Met	Not Met
<ul style="list-style-type: none"> The organization has established and maintained procedures for defining responsibility and authority for handling and investigating nonconformance. 		Not able to assess	
<ul style="list-style-type: none"> The organization has established and maintained procedures for taking action to mitigate any impacts caused. 		X	
<ul style="list-style-type: none"> The organization has established and maintained procedures for initiating and completing corrective and preventive action. 		X	
<ul style="list-style-type: none"> The organization has ensured that any corrective or preventive action taken to eliminate the causes of actual and potential nonconformances is appropriate to the magnitude of problems and commensurate with the environmental impact encountered. 	X		
<ul style="list-style-type: none"> The organization has implemented and recorded any changes in the documented procedures resulting from corrective and preventive action. 		X	

4.5.3 Records

Checklist reference: 4.5.31

US EPA, Region III must establish and maintain procedures for its environmental records, including training records and audit and review results, to the extent appropriate to demonstrate its conformance to the requirements of ISO 14001.

Records requirements	Met	Partially Met	Not Met
• The organization has established and maintained procedures for the identification of environmental records, including training records and the results of audits and reviews.		X	
• The organization has established and maintained procedures for the maintenance of environmental records, including training records and the results of audits and review.		X	
• The organization has established and maintained procedures for the disposition of environmental records, including training records and the results of audits and reviews.		X	
• The organization has ensured that its environmental records are legible, identifiable and traceable to the activity, product or service involved.		X	
• The organization has ensured that its environmental records are stored and maintained such that they are readily retrievable and protected against damage, deterioration or loss.		X	
• The organization has ensured that the retention times for its environmental records are established and recorded.		X	
• The organization has ensured that its environmental records are maintained, as appropriate to the system and to the organization, to demonstrate conformance to the requirements of the ISO 14001 standard.			X

4.5.4 Environmental management system audit

Checklist reference: 4.5.41

US EPA, Region III must establish and maintain programmes and procedures for periodically conducting audits of its environmental management system. These are necessary to evaluate the system performance in terms of meeting ISO 14001 requirements and to provide information about audit results to management.

Environmental management system audit requirements	Met	Partially Met	Not Met
• The organization has established and maintained (a) programme(s) and procedures for periodic environmental management system audits to be carried out, in order to determine whether or not the environmental management system conforms to planned arrangements for environmental management including the ISO 14001 requirements, and that the environmental management system is properly implemented and maintained.		Not able to assess	

Cont'd	Met	Partially Met	Not Met
<ul style="list-style-type: none"> The organization has established and maintained (a) programme(s) and procedures for periodic environmental management system audits to be carried out, in order to provide information on the results of audits to management. 			X
<ul style="list-style-type: none"> The organization has ensured that its audit programme, including any schedule, is based on the environmental importance of the activity concerned and on the results of previous audits. 		Not able to assess	
<ul style="list-style-type: none"> The organization has ensured that, in order to be comprehensive, the audit procedures cover the audit scope, frequency and methodologies, as well as the responsibilities and requirements for conducting audits and reporting results. 		Not able to assess	

4.6 MANAGEMENT REVIEW

4.6 Management review

Checklist reference: **4.6.10**

US EPA, Region III's management must periodically assess the continuing suitability, adequacy and effectiveness of its environmental management system. This documented and comprehensive review must ensure the collection of information necessary for the evaluation. It also must address the potential need to make changes to various aspects of the system based on the audit results, changing circumstances and management's commitment to continual improvement.

Management review requirements	Met	Partially Met	Not Met
<ul style="list-style-type: none"> The organization has ensured that its top management has determined the intervals at which it will review the environmental management system. 		Not able to assess	
<ul style="list-style-type: none"> The organization has ensured that its top management has reviewed the environmental management system to ensure its continuing suitability, adequacy and effectiveness. 		Not able to assess	
<ul style="list-style-type: none"> The organization has ensured that the management review process has collected the necessary information to allow management to carry out the evaluation. 		Not able to assess	
<ul style="list-style-type: none"> The organization has ensured that the management review is documented. 		Not assessed	
<ul style="list-style-type: none"> The organization has ensured that the management review addresses the possible need for changes to policy, objectives and other elements of the environmental management system, in light of environmental management system audit results, changing circumstances and the commitment to continual improvement. 		Not able to assess	

III. Conclusion

US EPA, Region III's overall assessment score with respect to meeting the requirements of an environmental management system as specified in ISO 14001 is **48%**. **27%** of the requirements were met in the current period. **41%** of the ISO 14001 requirements were partially met, **12%** of the requirements were not met and **20%** were not assessed.