



USAGH Hohenfels - JMRC Hohenfels Environmental Management System

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Document Name:	Procedure for Evaluation of Compliance		
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Document Owner:	for Alexandra Smith <i>Annette Stanes</i>		Approval: <i>Kevin J. Quarles</i>
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1 BACKGROUND

Based on the requirements of ISO 14001 standard USAGH-JMRC shall be able to demonstrate that it has evaluated compliance with the legal requirements (including applicable permits, or licenses) identified, and the other identified requirements to which it has subscribed.

Consistent with its commitment to compliance, the USAGH-JMRC has already established, implemented and maintained procedures for periodically evaluating compliance with applicable legal requirements (internal and external Environmental Performance Assessment - EPAS).

The USAGH-JMRC is already keeping records of the results of the periodic evaluations of its legal requirements (Internal Performance Assessment System Database [IPAS 7.4]). The USAGH-JMRC continuously revises existing procedures in order to integrate the EPAS into the USAGH-JMRC EMS. The EQCC will be responsible for this decision-making and implementation process.

The USAGH-JMRC will evaluate compliance with other requirements to which it subscribes. The USAGH-JMRC may wish to combine this evaluation with the evaluation of legal compliance, or to establish a separate procedure(s) for evaluation and record keeping.

2 PURPOSE

The purpose of this procedure is to define standard methods for assessing compliance with legal and other requirements to which the USAGH-JMRC subscribes.

3 APPLICABILITY

This procedure applies to all employees and contractors involved in environmental performance assessments, as well as USAGH-JMRC personnel whose activities, services or products are related to significant aspects.

4 DEFINITIONS

A comprehensive list of terms and definitions used in and related to the EMS Hohenfels provides the Glossary of EMS Terms and Definitions (EMS410_002_Glossary.doc).



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EMS Coordinator – An individual, appointed by the Commander or EMS Management Representative (EMSR), who assists the EMSR in handling day-to-day operations (Examples: EMS Training Coordinator, EMS Document Control Coordinator).

EMS Implementation Cross-Functional Team (CFT) - A team appointed by the Environmental Quality Control Committee (EQCC), and led by the EMS Management Representative (EMSR) to review processes, activities and services and update the prioritized list of environmental aspects and impacts. The CFT includes representatives from the directorates, tenants, and/or activities whose operations are representative of the entire facility or whose normal operations are likely to affect the environment.

EMS Management Representative (EMSR) — An individual appointed by the Commander to be responsible for managing and overseeing the EMS implementation effort.

Environmental Management Program (EMP) – An EMP relates to one significant environmental aspect only. Thus, for each significant aspect identified, one EMP must be developed in order to achieve full EMS implementation. EMPs include but are not limited to spill prevention, air, groundwater, surface water, soil, cultural resources, pollution prevention, etc.

Environmental Management Program Manager (EMP Manager) – An individual appointed by the EMSR to manage a specific environmental management program (EMP).

Environmental Management System (EMS) – A management system standard defined by the International Standards Organization (ISO) in the ISO 14001 standard as follows: Part of an organization's management system used to develop and implement its environmental policy and manage its environmental aspects.

NOTE 1: A management system is a set of interrelated elements used to establish policy and objectives and to achieve those objectives.

NOTE 2: A management system includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources.

Environmental Performance Assessment System (EPAS) – An audit developed to assist in achieving, maintaining, and monitoring compliance with environmental laws and regulations, as well as to adhere to the principles of Environmental Management Systems (EMS) based on ISO 14001 standard elements. Internal EPAS takes place annually while external ones are performed every three years.

Internal audit – systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the EMS audit criteria set by the installation are met.

Legal Requirements – All laws, regulations and guidance documents, permits, and memorandums of agreement applicable to the USAGH-JMRC activities, products and/or services. (See Other Requirements)

Organization – is a company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration. *NOTE: For organizations with more than one operating unit, a single operating unit may be defined as organization.*

Other Requirements - Requirements not identified under Legal Requirements, and standard industry practices (e.g. ANSI, ASTM, MILSPECs) to which USAGH-JMRC subscribes.

P2 Manager – An individual appointed by the Chief Environmental Division responsible for performing environmental audits concerning all media (air, water, hazardous waste and material) and to provide recommendations for risk and cost reduction.



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Pollution Prevention (P2) – use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant or waste in order to reduce adverse environmental impacts.

5 SUPPORTING DOCUMENTS

Document ID	Title
AR 200-1	Environmental Protection and Enhancement
ISO 14001: 2004	Environmental Management Systems – Specification with Guidance for Use
ISO 14004: 2004	Environmental Management Systems – General Guidelines on Principles, Systems and Support Techniques
Implementers Guide	US Army Environmental Management System Implementers Guide, Version 3.0, December 2005
<u>EMS420 000 Policy.doc</u>	United States Army Garrison Hohenfels (USAGH) and Joint Multinational Readiness Center (JMRC) Hohenfels Joint Environmental Policy, latest version.
<u>EMS410 001 ImplemPlan.doc</u>	EMS Implementation Plan, US Army Garrison Hohenfels (USAGH) and Joint Multinational Readiness Center (JMRC) Hohenfels, Germany, Oct 2005
<u>EMS432 000 Legal.doc</u>	Procedure for Legal and Other Requirements Identification
<u>EMS453 000 NonConformity.doc</u>	Procedure for Nonconformity, Corrective Action, and Preventive Action
EPAS/EPAR	Environmental Performance Assessment Report for the USAGH-JMRC, prepared May 2007.
Garrison Internal Corrective Action Plan	List of internal detected environmental non-compliance per fiscal year signed by CDR.
IPAS Database	Database with current status of environmental non-compliance
<u>EMS400 000 TOC.doc</u>	Table of Contents of the USAG Hohenfels EMS Manual
<u>EMS433_EMP02_internal_EPAS_Inspection.doc</u>	Procedure to conduct Internal EPAS assessments.
<u>EMS433_EMP03_Hardst and_Inspection</u>	Procedure to conduct Hardstand Assessments.

6 PROCESS

Responsible	No.	Action
EMS Coordinator	1	Coordinates all audit and inspection programs.



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Responsible	No.	Action
P2 Manager(s)	1	Schedule and document regular environmental compliance inspections at facilities that pose an environmental risk.
	2	Perform root cause analysis according to the EMS Procedure for 'Nonconformity, Corrective Action and Preventive Action', and suggest pertinent preventive/corrective action(s) for all nonconformity items identified during compliance inspections.
	3	Provide compliance inspection trends and summary data to the EMS Management Representative for presentation at EMS management reviews.
EMSR	1	When appropriate, present compliance inspection trends and summary data at EMS Management Reviews.
	2	If required, coordinate with the Division Chiefs and EMP Managers for reporting of non-compliance items, identified during the compliance assessments, to the appropriate Federal, State, or Local Regulatory Agency or Agencies.
Internal EPAS Team Leader (internal EMS audit)	1	Perform annual compliance assessments according to the EPAS procedures and report to the EMSR for presentation at EMS management reviews.
External EPAS Team Leader (External EMS audit)	1	Perform regular (every 3 years) compliance assessments according to the EPAS procedures and report to the EMSR for presentation at EMS management reviews.
		<i>End of activity</i>

7 DOCUMENT REVISION SUMMARY

Revision Number	Date of Revision	Revision Summary
1.0	20 Dec 2006	Erased Document ID until standardized
1.0	20 Dec 2006	Spelled out EPAS and EPAR on page 1
1.0	20 Dec 2006	Updated date in footer, pages 1-5
1.0	20 Dec 2006	Changed date and version of the Implementers Guide on page 3 from "Version 2.1, March 2005" to "Version 3.0, December 2005"



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2.0	28 Nov 2007	- Revised filename/document ID IAW new EMS Manual format; - updated Supporting Documents table; - updated hyperlinks
3.0	20 Feb 2008	Added Environmental Management Program (EMP) for - internal Environmental Performance Assessments - Hardstand Inspections as appendices.
4.0	18 Feb 2009	No changes
5.0	05 Mar 2010	List of supporting documents has been updated.