

Appendix H: EMS Gap Analysis and Checklist

These questions are designed to allow you to identify specific gaps between where the current system is and a fully implemented EMS. The questions in the checklist include statements that, if satisfied, meet the requirements for a functional EMS. The checklist also includes questions that indicate a well developed and sustainable EMS. An EMS that satisfies the requirements of standards such as ISO 14001 will typically satisfy most if not all of the requirements of this checklist. However, this checklist is not designed to determine if an EMS meets the requirements of any one particular standard, but rather provide a comprehensive list of EMS criteria against which to gauge the facility's EMS as implementation progresses. In order to satisfy all the criteria in this checklist a facility will need to have a robust, fully developed, implemented and continuously improved (has gone through at least one full plan-do-check-act cycle) EMS in place. Think of the content of this checklist as the high bar against which you can gauge the facility's EMS.

This checklist satisfies the standard EMS requirements of EPA's National Environmental Performance Track Program (PT). It does not examine performance and other related reporting requirements of PT. For more information on PT go to: <http://www.epa.gov/performancetrack>. There are two suggested evaluation approaches to use with this checklist.

Method A: Simplified

A checkmark ✓ in a box signifies that the evidence of conformance with the associated requirement has been observed and verified. An X in a box signifies that the associated requirement does not appear to be satisfied or that evidence of the requirement having been satisfied was not present or available.

Method B: Scored level of Completeness

A numerical score is placed in each box to signify the degree to which the EMS is completed. Suggested scoring is as follows:

- 0 - not initiated
- 1 - under development
- 2 - developed/documented
- 3 - deployed
- 4 - assessed/verified/improved

Only a score of 4 signifies that that requirement of the EMS is complete and that evidence of the requirement having been satisfied is present or available. You may

find that placing these questions in an electronic spreadsheet program allows for greater ease in adding up scores and tracking of progress over time.

It is the responsibility of the user of this checklist to utilize due care and good judgement as an auditor to ensure that each requirement has been met or not met and where prudent retain evidence.

Environmental Management System (EMS) Requirements

(a) Policy

The facility has a written environmental policy, defined by top management, and committing to,

Compliance with both:

? legal requirements and

? voluntary commitments.

? Pollution prevention (based on a pollution prevention hierarchy where source reduction is the first choice).

? Continuous improvement in environmental performance, including areas not subject to regulations.

? Sharing information on performance of the EMS with the community.

(b) Planning

? The facility has a process for identifying its aspects and determining their significance.

? The facility has identified its significant aspects.

? The facility has identified all EPA permits and ID numbers.

? The facility has a process for identifying its legal requirements.

? The facility has identified its legal requirements. i.e. The facility has identified its environmental requirements in accordance with the attached application checklist (see Appendix B).

? The facility has procedures for integrating anticipated changes to the facility's requirements or commitments into the EMS.

The facility has established measurable objectives and targets to;

meet

? policy commitments and

? legal requirements,

? to reduce its impacts associated with its significant environmental aspects, and

? to meet performance commitments made by the facility.

The facility has active, documented programs to achieve the objectives, targets and commitments in the EMS, including the following to ensure completion;

? the means, and

? the timeframes.

(c) Implementation and Operation

? The facility has identified a top management representative with authority and responsibility for the EMS.

? The facility has established roles, responsibilities, and dedicated the required resources for meeting its objectives and targets of the overall EMS.

? The facility has established roles and responsibilities for compliance with legal requirements.

The facility has defined procedures for:

? achieving and maintaining compliance,

? meeting performance objectives,

? communicating relevant information regarding the EMS, including the facility's environmental performance, throughout the organization,

? providing appropriate incentives for personnel to meet the EMS requirements, and

? document control, including where documents related to the EMS will be located and who will maintain them.

? The facility has established a public outreach program.

? The facility has a designated point of contact with direct access to facility management.

The facility has described its activities / plans / procedures in the following areas:

- ? identifying and responding to questions or concerns of local residents.
- ? informing community members of important matters that affect them.

The facility is able to:

- ? list any current or ongoing citizen concerns with the facility.

The facility has defined its training needs and has environmental training programs for:

- ? all employees,
- ? specific training for those whose jobs and responsibilities involve activities directly related to achieving objectives and targets, and
- ? specific training for those whose jobs and responsibilities involve activities directly related to compliance with legal requirements.

The facility has documented key EMS elements including:

- ? the environmental policy,
- ? significant environmental aspects,
- ? objectives and targets,
- ? identification of a top management representative,
- ? an EMS audit program, and
- ? overall EMS authority.

? The facility retains EMS documentation.

? The facility has operation and maintenance programs for equipment and for other operations that are related to legal compliance.

? The facility has operation and maintenance programs for equipment and for other operations that are related to other significant environmental aspects.

? The facility has an emergency preparedness program.

(d) Checking and Corrective Action

The facility has active program(s) for:

- ? assessing performance,
- ? detecting non-conformance with legal and other requirements of the EMS,
- ? preventing non-conformance with legal and other requirements of the EMS,
- ? prompt corrective action of any non-conformance with legal and other requirements of the EMS, and
- ? conducting EMS audits.

(e) Management Review

The facility has a process for, conducts, and documents management reviews covering:

- ? performance with regard to the objectives and targets,
- ? the effectiveness of the EMS in meeting policy commitments.