



Program Statement

OPI: HSD/SAF
NUMBER: P1600.10
DATE: 12/14/2007
SUBJECT: Environmental
Management Systems

1. **PURPOSE AND SCOPE.** This policy creates a Bureau Environmental Management System (EMS) that follows the International Organization for Standardization (ISO) 14001 EMS Standard.

In 1992, the Bureau established a comprehensive environmental awareness and pollution prevention program designed to:

- Procure items that promote recycling and source reduction. Implement waste reduction and conservation initiatives.
- Establish cost-effective recycling programs.
- Establish, at each institution, an Environmental Concerns Committee and an Environmental Concerns Coordinator to address environmental and recycling activities.

The Bureau furthers its commitment to environmental protection and pollution prevention by identifying and defining, under the EMS, program responsibilities and compliance standards for laws, regulations, Executive Orders, and other requirements.

2. **PROGRAM OBJECTIVES.** The expected results of this program are:

a. The Bureau's environmental management will be improved by formally identifying environmental responsibilities and duties and establishing an Environmental Management System based on ISO 14001 at Bureau institutions.

b. Staff will receive training and education in identifying, developing, initiating, and maintaining environmental training programs.

c. The Central Office Environmental Concerns Task Force (Task Force) will improve its effectiveness by having responsibilities formally defined.

3. DIRECTIVES REFERENCED

P1600.09 Occupational Safety, Environmental Compliance, and
Fire Protection (10/31/07)
P4100.04 BOP Acquisitions (5/19/04)
P4200.10 Facilities Operations Manual (1/24/06)
P4220.05 Design and Construction Procedures (2/15/00)
P4400.05 Property Management Manual (5/26/04)
P8000.01 UNICOR Corporate Policies and Procedures Manual
(5/13/81)

Exec. Order 13423 - Strengthening Federal Environmental,
Energy, and Transportation Management (1/26/07)
ISO 14001 - Environmental Management Systems - Requirements
With Guidance For Use

4. **STANDARDS REFERENCED.** None.

5. **INSTITUTION SUPPLEMENT.** None required.

6. **ADMINISTRATION.** This section defines the Bureau's environmental program responsibilities at the Central Office, region, and institution levels. It assigns duties to the Central Office Environmental Concerns Task Force and the institution Environmental Management System (EMS) Committee.

This section also sets requirements and assigns responsibilities for developing and implementing an EMS based on ISO 14001 principles.

A. Environmental Responsibilities

1. Central Office

a. **Health Services Division (HSD).** HSD's Occupational Safety and Environmental Health Branch develops and interprets policy on the Bureau's EMS and environmental compliance. The Branch also assists Regional Safety Administrators (RSAs) and institutions and develops environmental training for institution safety staff, RSAs, and Central Office safety staff.

b. **Office of General Counsel (OGC).** OGC provides legal counsel relating to environmental laws, regulations, and requirements.

c. **Federal Prison Industries (FPI).** FPI ensures that it operates its factories, vocational training programs, and education programs in compliance with environmental laws, regulations, and requirements.

d. **Administration Division (ADM)**. ADM ensures environmental compliance in facility management, design and construction, procurement, and property acquisition.

2. **Regional Offices**

a. **Regional Safety Administrators (RSA)**. RSAs report to Regional Directors on environmental issues affecting their regions. They ensure the effectiveness of environmental programs by monitoring operations reviews, program reviews, and EMS internal and external audits, and by performing technical assistance visits. They monitor data generated by the institutions and help with problems that cannot be resolved at the institution level.

3. **Institutions**

a. **Chief Executive Officer (CEO)**. The CEO:

- Periodically reviews the EMS' adequacy and effectiveness.
- Appoints the EMS Committee chairperson (Associate Warden).
- Assigns a top manager to serve as contact concerning the EMS and environmental compliance.
- Ensures that resources are provided to implement and control the EMS.

b. The **EMS Committee Chairperson** ensures the effective functioning of the Environmental Concerns Committee.

c. The **Safety Manager** serves as EMS Coordinator - management's EMS contact. He/she is the EMS technical expert and the focus for EMS-related internal communication. The EMS Coordinator is recorder for the Environmental Concerns Committee, schedules committee meetings, prepares agendas, and prepares a biannual report to the EMS Chairperson on progress toward EMS objectives. He/she ensures that an EMS is maintained per ISO 14001.

The Safety Manager ensures monthly inspections for EMS concurrence and environmental compliance are performed.

d. **Department Heads** ensure departmental concurrence with EMS requirements and ensure that detail supervisors and inmate workers complete required environmental training.

B. Environmental Committees

1. **Central Office Environmental Task Force.** The Task Force meets monthly to:

- Review existing and proposed environmental regulations, laws, and requirements.
- Discuss environmental issues such as potential or actual enforcement actions.
- Discuss best methods for compliance and program administration.
- Advise the Assistant Director Health Services Division on environmental compliance and related issues.

The Task Force has representatives from:

- Office of General Counsel (OGC).
- Health Services Division (HSD).
- Federal Prison Industries (FPI).
- Administration Division (ADM), including Facilities Management, Procurement and Property, and Site Selection and Environmental Review.
- Information, Policy, and Public Affairs Division (IPPA).
- Union representatives. **The committee will have an equal number of representatives from management and the Union.**

A chairperson is appointed by Task Force members to schedule, conduct meetings, and record minutes. This chairperson is to be approved by the Assistant Director Health Services Division.

2. **Institution Environmental Management System (EMS) Committee.**
The EMS Committee:

- Establishes and implements procedures required by ISO 14001 and this PS.
- Conducts an aspect and impact analysis of institution operations and activities.
- Establishes and implements objectives to address environmental issues at the institution.
- Creates and implements environmental management programs under the EMS to achieve specific objectives.
- Meets at least twice per year to:
 - ▶ Review progress toward meeting EMS objectives.
 - ▶ Review actions taken by the EMS Coordinator to correct EMS nonconformance and regulatory noncompliance.
 - ▶ Adjust institution environmental management programs to address operational changes.
- Under the direction of the CEO, meet at least every two years to perform a management review of the institution EMS.

Membership in the EMS Committee includes:

- Associate Warden (Chairperson).
- Safety Manager/Environmental Coordinator.
- Food Service Administrator.
- Facilities Manager.
- Health Services Administrator.
- Union representatives. **The committee will have an equal number of representatives of management and the Union.**
- Business Manager.
- Representative from each UNICOR factory.

7. ENVIRONMENTAL MANAGEMENT SYSTEM (EMS) DEVELOPMENT AND PROCEDURES. This section explains the steps involved in establishing an ISO 14001-based EMS and developing procedures to establish, operate, and maintain an EMS at each Bureau institution.

A. Background. ISO 14001 is an environmental management system based on a methodology known as Plan-Do-Check-Act (PDCA). PDCA is briefly described in ISO 14001, **Environmental management systems - Requirements with guidance for use**, as follows:

- **Plan:** establish objectives and processes necessary to deliver results per the organization's environmental policy.
- **Do:** implement the processes.
- **Check:** monitor processes against environmental policy, objectives, and legal and other requirements and report results.
- **Act:** continually improve performance of the EMS.

ISO 14001 follows the PDCA model by setting requirements within each subsection (Plan, Do, Check, Act):

1. Plan

- Establish and implement a procedure to identify aspects of an organization's activities, services, or products that affect the environment; determine which aspects have a significant affect on the environment; and take into account these significant aspects when establishing and implementing an EMS.
- Establish and implement a procedure to identify legal and other requirements related to environmental aspects; determine how the requirements apply to the environmental aspects.
- Establish and implement objectives to improve environmental performance.

- Establish and implement environmental programs for achieving objectives.

2. Do

- Ensure availability of resources and define roles, responsibilities, and authority.
- Identify training needs.
- Develop internal and external communication procedures related to the EMS.
- Maintain and control EMS documentation.
- Prevent deviations from environmental policy and objectives.
- Prepare for and respond to emergencies.

3. Check

- Monitor and measure controls established to prevent deviation from policy and objectives.
- Evaluate compliance with legal and other requirements related to the EMS.
- Identify and correct EMS nonconformance.
- Identify and protect records related to the EMS.
- Perform EMS audits.

4. Act

- Review the EMS to ensure its continued suitability, adequacy, and effectiveness.
- Initiate actions to maintain the institution's commitment to continual environmental improvement.

B. Establishing EMS Procedures. Procedures play a vital role in an ISO 14001-based EMS. They provide instructions to develop the system and information to manage it.

The Occupational Safety and Environmental Health Branch, Health Services Division (HSD/Safety), will help institutions develop their EMS by providing the following sample documents:

- Identifying Significant Environmental Aspects.
- Identifying Legal and Other Requirements.
- Determining Objectives and Targets.
- Determining Environmental Management Programs.
- Environmental Training for Employees.
- Emergency Preparedness and Response.
- Document Control.
- Records Control.
- Identifying and Implementing Operational Controls.
- Providing Internal Communication.

- Responding to External Interested Parties.
- Internal Auditing.
- External Audits.
- Management Review.
- Monitoring and Measuring EMS Performance.
- Compliance with Legal and Other Requirements.
- EMS Nonconformity, Corrective Action, and Preventive Action.

HSD/Safety provides training on ISO 14001 requirements and procedure development to institution EMS Committee members.

After training is complete, the EMS Committee reviews each sample provided by HSD/Safety and may make modifications (conforming to ISO 14001) to meet institution needs. EMS procedures are used by the EMS Committee to develop, implement, and maintain the institution's EMS.

C. EMS Development Steps. An ISO 14001 EMS has numerous interdependent elements; it is necessary to follow sequential steps when developing the system. The EMS Committee uses the following steps:

- Develop EMS procedures.
- Identify significant environmental aspects.
- Determine objectives, including numerical targets.
- Develop environmental programs, including controls for significant environmental aspects.
- Identify and provide staff training.
- Establish the EMS audit program.
- Establish the management review process.
- Self-declare concurrence with ISO 14001.

/s/
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