



Lessons Learned: **Integrating EMS and Environmental** **Compliance Auditing**

2009 Environmental, Energy & Sustainability Symposium

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Environmental Performance Assessment System (EPAS)

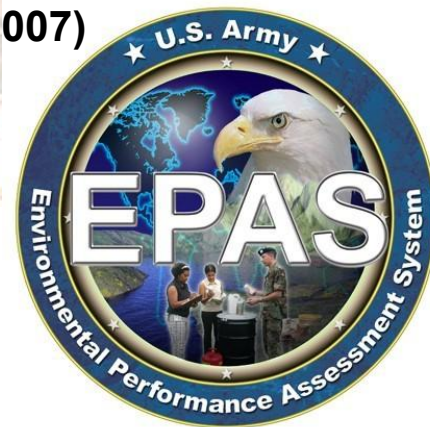
Program Value

- Provide status of installation environmental compliance and management systems to Garrison Commanders
- Provide Command emphasis to environmental programs and management systems
- Ensure management system is complete and effective
- Provide input to Army environmental trends and identification of systemic problems
- Professional development for “in-house” audit team members

Drivers

- EO 13423 (2007)
- EPA Letter recommending self-assessments (1986)
- DODI 4715.5 OCONUS
- DODI 4715.6 CONUS
- AR 200-1 (2007)

This brief only addresses Active Army program.





Program History

1985	EPA Policy	Encouraged voluntary environmental compliance self-audits.
1991	HQDA	Established Environmental Compliance Assessment Program (ECAS). Required external and internal compliance assessments.
1997	AR 200-1	Allowed Installation Status Report (ISR), Part II to be substituted for internal assessments.
2000	EO 13148	Required an EMS program and EMS audits.
2002	ACSIM/DEP	ECAS changed to EPAS, EMS included in assessment Program. Rescinded ISR Part II substitution policy of 1997 AR 200-1, Internal Assessments required.
2006	ACSIM/DEP downward adjustments	OA22 14% tax, and DEP directed major reduction in level of effort for on-site EPAS audits.
2007	Program Rebuilding	Rebuilding program to Sustainability paradigm through stakeholder involvement (HQDA, ACOMS, IMCOM, installations, OCONUS reps).
2008	Paradigm Shift	Combined EMS and Compliance audits on 3 year cycle. Train in-house audit team member pool. Audit to installations' risk assessment, plus spot checks. Track findings for closure and trends analysis.
2008	FY 10-15 POM Build	First time EPAS is built into the POM.
2010	Full Coverage	Full funding expected; audit all compliance media + EMS.



Challenges since 2006

- **Funding for EPAS**
- **Audit planning paradigm shift**
- **Immature environmental management systems**
- **Minimizing disruptions to installation operations while simultaneously providing quality audits**
- **Managing assignments and qualified auditor pool**
- **Funding issuance process (GFEBS Implementation)**
- **Audit documentation software tool**



Improvements

- **Lean Six Sigma Projects Completed**
 - Multiple projects
 - Various aspects of EPAS
 - Stakeholder participation on teams
 - Documented products guiding improvements
- **Funding Challenges Addressed through POM Process**
- **Compliance Media Risk Model Developed and Implemented**
- **Process Flow Diagrams Developed**
- **Army Regulation, Guidance Documents, SOPs, and Templates Updated and/or Developed**
- **Improved Coordination in Planning Actions, Ensuring Leadership Concurrence/Awareness**
- **AKO EPAS Stakeholders Page Established**
- **AKO Knowledge Centers Established for each scheduled audit**



EPAS Process

- **Plan for upcoming FY**
 - Budget
 - Schedule
 - Scope (risk analysis)
 - Assignments (people)
- **Execution**
 - Training
 - Execute audits
 - Review/finalize findings
- **Programmatic Review**
- **Trends analysis**
- **Tracking**
 - Compliance findings
 - EMS conformance



Auditing Actions

Compliance and EMS Audit

- **Trained and experienced auditors develop an audit plan to**
 - Review documents and records
 - Interview staff at all levels
 - Observe operations
- **Installation kept informed of findings as site visit progresses**

Compliance Audit

- **Ensure compliance with legal and regulatory drivers**
- **Auditors audit the compliance media against the**
 - Federal Protocols
 - State Protocols
 - Final Governing Standard Protocols
 - Army Protocols
- **Findings are documented in**
 - AEDB-EPAS (CONUS) [AR 200-1 requirement for all]
 - Access database (OCONUS external audits)
- **Recommend Corrective Actions for all negative findings**
- **Garrison Commander (GC) exit briefed by EPAS Audit Team Leader (external audits)**

EMS Audit

- **Ensure the management system is complete and effective**
- **Auditors audit an EMS against the**
 - ISO 14001:2004 Standard
 - Installation's own commitments and procedures established under their EMS (i.e. are they doing what they said they would do?)
 - Army Policy
- **Findings are documented in a Word report (external audits)**
- **ISO 14001 conformance is determined by the Lead EMS Auditor**
 - Non-conformant = 1 or more major findings and/or a significant number of minor findings
- **Lead EMS Auditor may accompany EPAS Audit TL on GC exit brief (external audits)**



Finding Categories

- **Compliance Findings**

- **Class I:** Noncompliance with existing Federal, State or local regulation, or noncompliance with future regulatory requirement (effective within next 6 months)
- **Class II:** Noncompliance with future regulatory requirement (effective in 6 months to 2 years)
- **Class III:** Noncompliance with Army/DoD regulation, SOP, or guidance, or inconsistent with good management practice
- **Positive:** Above and beyond regulatory requirements

- **EMS Findings**

- **Conformance:** management system conforms to ISO 14001 standard
- **Major Nonconformance:** EMS is missing element of standard or has systemic problem;
- **Minor Nonconformance:** EMS conforms with minor exception
- **Observation:** Optional comment



Pros & Cons of Simultaneous Audits

- **Pros**

- Single site visit
- On-site collaboration between EMS and compliance auditors
- Improves understanding of EMS and compliance media management relationship

- **Cons**

- Larger team size
- EMS auditors have less evidence that the system works, before site visit (e.g., compliance audited and corrective actions implemented)
- Compliance auditors not aware of systemic management problems, if any, before site visit



INSTALLATION MANAGEMENT COMMAND



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