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## Contents: Environmental Assessments

Effective Date: **June 2001**

Point of Contact: [Management Representative on Environmental Management Systems \(EMS\)](#), [Environmental Compliance Representative \(ECR\)](#)

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<a href="#">2. Training and Qualification of Environmental Assessors</a> <a href="#">3. Preparing for and Conducting Environmental Management System Assessments</a>	<ul style="list-style-type: none"> <li>• Verify that staff are trained and qualified.</li> <li>• Schedule ample time for assessment.</li> <li>• Select assessment criteria.</li> <li>• Plan assessment.</li> <li>• Notify respective operations and functional managers of scope and time of audit.</li> <li>• Review documents related to EMS program requirements before start of assessment.</li> <li>• Conduct assessment.</li> <li>• Analyze data from assessment.</li> </ul>
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<a href="#">6. Documenting Environmental Assessments</a>	<ul style="list-style-type: none"> <li>• Prepare report on self-assessment.</li> <li>• Review preliminary assessment report</li> </ul>

- Review preliminary assessment report.
- Incorporate changes and forward copies to applicable staff.

## [7. Correcting Deficiencies](#)

- Determine if a noncompliance occurred and if notifications are required.
- Prepare Corrective Action Request.
- Track findings and correct assigned deficiencies.
- Close out tracking system action.
- Verify effectiveness of corrective actions.
- Maintain records of assessments.

## [Definitions](#)

### **Exhibits**

[EMS Self-assessment Tool for ANSI/ISO 14001\\*](#)

[Management Review Agenda](#)

[Regulatory Compliance Assurance Self-Assessment Guidance Cards](#)

\*Access Limited to BNL Staff and Authorized Non-BNL Staff

### **Forms**

[BNL Directorate/Department/Division EMS Checklist](#)

## **Training Requirements and Reporting Obligations**

This subject area contains training requirements. See the [Training and Qualifications](#) Web Site.

This subject area may or may not contain reporting obligations. See the subject area until obligations are listed here.

## **References**

[ES&H Standard 1.1.1, Price-Anderson Amendments Act Compliance Validation and Noncompliance Reporting Program](#)

[ES&H Standard 1.2.0, Departmental Environment, Safety & Health Inspections](#)

[ES&H Standard 1.2.1, Corrective Action Management and Tracking for Internal and External Assessments](#)

[Environmental Evaluation of Industrial Processes and Experimental Research](#) Subject Area

[Identification of Significant Environmental Aspects and Impacts](#) Subject Area

[Integrated Assessment](#) Subject Area

ISO 14001, *Environmental Management Systems, Specification with Guidance for Use*

[Lessons Learned](#) Subject Area

[Nonconformance and Corrective and Preventive Action](#) Subject Area

[Records Management](#) Subject Area

[U.S. EPA OECA Environmental Leadership Program \(ELP\) Appendix B: Compliance Audit Guidelines](#)

[3.0-062001-Environmental Leadership Program \(ELP\), Appendix B. Compliance Audit Guidelines](#)

## Standards of Performance

All staff shall comply with applicable Laboratory policies, standards, and procedures, unless a formal variance is obtained.

All staff shall ensure that they are trained and qualified to carry out their assigned responsibilities, and shall inform their supervisor if they are assigned to perform work for which they are not properly trained or qualified.

Managers shall, as appropriate, establish performance objectives, indicators and targets, conduct self-assessments to collect data and monitor progress, and evaluate the data to identify strengths and weaknesses in performance, and areas for improvement.

## Management System

This subject area belongs to the **Environmental Management System** management system.

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## Introduction: Environmental Assessments

Effective: **June 2001**

Point of Contact: [Management Representative on Environmental Management Systems \(EMS\)](#), [Environmental Compliance Representative \(ECR\)](#)

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The BNL Integrated Assessment Program requires systematic reviews to identify strengths and opportunities for improvement, and provides guidance on assessment planning and evaluation criteria. These criteria include compliance to laws, regulations, and contractual requirements. The ISO 14001 Standard on Environmental Management Systems (EMS) and the Executive Order on Greening the Government are specific BNL drivers that require assessments and inspections be conducted to ensure conformance to the EMS and compliance with regulatory requirements. To comply with these requirements, Senior Managers and/or their designees must include Environmental Assessments in their annual Self-assessment Program.

Lastly, the Integrated Assessment Program and the ISO 14001 Standard requires periodic evaluation of environmental performance. This evaluation, referred to as Management Review in ISO terminology, is an analysis of performance data from both internal and external sources, including self-assessments, external reviews or audits, and monitoring data results. Through these assessments, managers self-examine, self-identify, and self-correct their environmental programs, which in turn leads to improved performance and compliance.

This subject area provides the requirements for the following three types of Environmental Assessments:

- Environmental Management Systems Assessment;
- Regulatory Compliance Assessment;
- Environmental Management Review.

These assessments are conducted at both the Laboratory level and organizational level. The expertise needed to conduct these types of assessments, as well as the methods used to assess them are different, and therefore are described separately within this subject area. Thus, information on assessor qualifications, documentation, and correction of deficiencies also is included.

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Subject Area: **Environmental Assessments**

### 1. Planning BNL Environmental Assessments

Effective Date: **June 2001**

Point of Contact: [Management Representative on Environmental Management Systems \(EMS\)](#), [Environmental Compliance Representative \(ECR\)](#)

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## Applicability

This information applies to Senior Managers and/or designees who supervise work that has the potential to impact the environment. It also applies to staff who are assigned the responsibility for conducting environmental self-assessments, both Environmental Management System (EMS) assessments and Regulatory Compliance Assessments, for the responsible Senior Managers and/or designees.

## Required Procedure

Establish a schedule of environmental assessments so that the relevant regulations and all ISO 14001 program requirements are assessed on a periodic cycle in the operational units of the organization. Environmental assessments should be conducted annually; however, frequency may vary for specific operations, regulations, or ISO 14001 program elements due to the importance of the activity, regulatory requirements, or past performance.

Senior Managers and/or designees perform the following steps.

<b>Step 1</b>	Establish a schedule of environmental assessments. Consider the environmental importance of the organizational activities, specific regulatory requirements, previous assessment results, operational schedules, and availability of required resources, such as key staff and qualified environmental assessor(s).
<b>Step 2</b>	Determine the type of assessment that is to be conducted: <ul style="list-style-type: none"> <li>• EMS Assessment;</li> <li>• Regulatory Compliance Assessment;</li> <li>• Environmental Management Review.</li> </ul>
<b>Step 3</b>	Assign lead responsibility for coordinating and conducting the assessment to a staff member.  <b>Note:</b> The <a href="#">Management Representative on EMS</a> has the lead responsibility for conducting Environmental Management Reviews.
<b>Step 4</b>	Authorize resource expenditures (e.g., assessor and team members [if needed], personnel being assessed, contracting of technical experts) for conducting the assessment.
<b>Step 5</b>	Incorporate the schedule of environmental assessments into the organization's Self- Assessment

Program. See the section on [Planning and Conducting Organizational Self-Assessment Programs](#) in the [Integrated Assessment](#) Subject Area for more information.

## Guidelines

Environmental Assessments should be integrated with the organization's Self-Assessment Program and can be conducted in conjunction with other assessments, such as Safety and Health assessments, Quality Management assessments, periodic inspections, walk-throughs, or self-evaluations.

Refer to the sections on [Preparing for and Conducting Environmental Management System Assessments](#), [Preparing for and Conducting Regulatory Compliance Assessments](#), and [Preparing for and Conducting Environmental Management Reviews](#) for additional details on the required frequency for specific types of environmental assessments.

A cross sectional team provides the necessary technical expertise for conducting these assessments. It is recommended that the assessment team include independent personnel, preferably one from outside the organizational unit, to provide new perspectives on conformance. The Directorate's [Management Representative on EMS](#), Quality Engineers, [Environmental Compliance Representatives \(ECR\)](#), or [Environmental Subject Matter Experts](#) are available to assist Senior Managers and/or designees in performing the Environmental Assessments.

## References

[Integrated Assessment](#) Subject Area

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Subject Area: **Environmental Assessments**

## 2. Training and Qualification of Environmental Assessors

Effective: **June 2001**

Point of Contact: [Management Representative on Environmental Management Systems \(EMS\)](#), [Environmental Compliance Representative \(ECR\)](#)

## Applicability

This information applies to assessors who conduct Environmental Management System (EMS) or regulatory compliance assessments. Environmental Assessors include departmental staff assigned to perform the assessment, technical experts from support organizations, or contracted staff.

## Required Procedure

Assessors should have technical knowledge and experience commensurate with the scope of the audit they are conducting. Assessors that do not meet the qualifications may participate as part of the assessment team under the direction of a qualified assessor.

The Department Chair/Division Manager or Lead Assessor performs the following steps.

<b>Step 1</b>	<p>Verify that the EMS or Regulatory Compliance Assessor/Assessment Team has the following:</p> <p>Either formal or on-the-job training in the following areas:</p> <ul style="list-style-type: none"> <li>• Environmental issues (i.e., environmental science, technology, environmental impacts) likely to be associated with the facility operations and related management issues;</li> <li>• Knowledge of (depending on type of assessment) <ul style="list-style-type: none"> <li>◦ Applicable environmental laws, regulations, and related documents; OR</li> <li>◦ Environmental management systems and standards;</li> </ul> </li> <li>• Audit practices, processes, and techniques;</li> <li>• Technical, scientific, and legal terms and concepts; and that</li> </ul> <p>The Lead Assessor has experience conducting assessments. (If technical experts are used on the assessment team, they are not required to have experience conducting assessments.)</p>
<b>Step 2</b>	<p>Ensure that the EMS or Regulatory Compliance Assessor/Assessment Team members have the following personal attributes and skills:</p> <ul style="list-style-type: none"> <li>• The ability to clearly express concepts and ideas, orally and in writing;</li> <li>• Strong observational, organizational, listening, and communication skills;</li> <li>• The ability to maintain independence and objectivity;</li> <li>• The ability to reach sound judgement based on objective evidence.</li> </ul>

<b>Step 3</b>	The Department Chair/Division Manager or designee provides Assessor(s) with refresher training as necessary to ensure that their experience in conducting EMS and/or compliance assessments is current.
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## Guidelines

The recommended experience level for lead assessors is ten equivalent workdays of assessing, or participation on a minimum of two Regulatory Compliance and/or EMS audits (depending on the type of assessment being conducted).

Assessors can satisfy on-the-job training requirements by taking the following courses or equivalent courses) that BNL periodically offers:

- Environmental Laws and Regulations;
- Internal EMS Auditor Training;
- Quality Auditing.

Refresher training (courses, workshops, seminars, or conference participation) is recommended every five years, however, technical experts whose direct job duties are in the above subject areas do not need refresher training. Contact your [Training Coordinator](#) for the schedule and availability of refresher training.

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Subject Area: **Environmental Assessments**

### 3. Preparing for and Conducting Environmental Management System Assessments

Effective Date: **June 2001**

Point of Contact: [Management Representative on Environmental Management Systems \(EMS\)](#)

## Applicability

This information applies to BNL staff (e.g., lead assessors, technical experts) who conduct Environmental Management System (EMS) assessments at BNL for the responsible Senior Manager and/or designee.

## Required Procedure

Organizations (e.g., Directorates) must periodically conduct assessments of the Environmental Management System (EMS) to determine whether it conforms to the requirements of the ISO 14001 Standard and the organization's procedures (i.e., subject areas and internal operating procedures), and whether the EMS is effectively implemented, maintained, and continually improved. The scope and frequency of EMS assessments must be based on the nature of the operations (e.g., facility size and complexity), the significant aspects and impacts associated with the operations (i.e., environmental importance and risk), and the results of previous assessments.

A Laboratory-level internal EMS assessment must be conducted periodically. The scope and frequency of this EMS assessment must be developed by the Laboratory EMS Management Representative and organizational unit EMS representatives, taking into consideration the criteria provided above. The schedule will be documented in the Self-assessment Plan, in accordance with the [Integrated Assessment](#) Subject Area. The scope of each assessment may or may not include all organizational units or all ISO elements; however all organizational units and all ISO elements will be assessed over time.

Organizational units (e.g., Directorate) may rely on the Laboratory-level internal EMS assessment to partially satisfy verification of conformance with EMS requirements. However, they retain the responsibility to ensure that their implementation of the Laboratory-level EMS is adequate and effective. To fulfill this responsibility, organizations must perform additional assessments, as appropriate, with the frequency and scope based on the environmental importance of their operations, and the results of previous assessments. Organizations should document the schedule for any such assessment in their Self-assessment Plans.

For general information on organizational assessments, refer to the section on [Planning and Conducting Organizational Self-assessment Programs](#) and the exhibit [Guidelines for Performing Assessments](#) in the [Integrated Assessment](#) Subject Area.

<b>Step 1</b>	<p>The Senior Manager or Lead Assessor schedules ample time for the assessment.</p> <p><b>Note:</b> Consider the workload and schedule of both assessors and facility personnel. Factor individual schedules, cyclical, and seasonal schedules into the determination of when on-site assessing activities take place (e.g., major overhauls of equipment, downtime, periods of peak production, holidays, and summer vacations).</p>
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<p><b>Step 2</b></p>	<p>The Senior Manager or Lead Assessor selects the appropriate assessment criteria. Choose either a checklist or the ISO 14001 Standard itself as a tool to guide the assessment. Available checklists include</p> <ul style="list-style-type: none"> <li>• <a href="#">*EMS Self-Assessment Tool for ANSI-ISO 14001</a>;</li> <li>• A customized checklist that meets or exceeds the requirements of the above checklists, such as the <a href="#">BNL Directorate/Department/Division EMS Checklist</a>.</li> <li>• The ISO 14001 Standard.</li> </ul> <p>*Access Limited to BNL Staff and Authorized Non-BNL Staff</p> <p><b>Note:</b> Not all seventeen ISO elements have to be audited at one time. However, all seventeen elements must be audited periodically.</p>
<p><b>Step 3</b></p>	<p>The Senior Manager or Lead Assessor</p> <ul style="list-style-type: none"> <li>• Using a graded approach, plans the assessment. See the guidelines below for elements to be considered.</li> <li>• Prepares the assessment team by providing documents for review before the facility assessment begins. These documents may include an audit plan, pertinent program descriptions, procedures, and records (including prior assessment reports) related to the elements being assessed.</li> </ul>
<p><b>Step 4</b></p>	<p>Before beginning the assessment, the Lead Assessor notifies the respective operations and/or functional managers being assessed of the upcoming audit, including scope, schedule, and audit team members.</p>
<p><b>Step 5</b></p>	<p>The Assessor/Assessment Team reviews documents related to EMS program requirements to gain an understanding of the facility operations before the assessment. Refer to the Document Review list in the Guidelines below for the types of records and documents to be reviewed.</p>
<p><b>Step 6</b></p>	<p>The Assessor/Assessment Team conducts the assessment by performing the following tasks, as applicable:</p> <ul style="list-style-type: none"> <li>• Evaluates procedures, EMS program implementation, previous EMS assessment results, and corrective actions taken;</li> <li>• Obtains objective evidence, including staff interviews, records, or direct observation of facility operations or functional processes. Include titles of documents or records that provide objective evidence of conformance on audit checklist or in audit report;</li> <li>• Evaluate applicability and implementation for guests, visitors or contractors who perform work for the organization, as well as suppliers of goods or services.</li> </ul>
<p><b>Step 7</b></p>	<p>The Assessor/Assessment Team immediately addresses any unacceptable conditions, including possible regulatory noncompliance issues by notifying the <a href="#">Management Representative on EMS</a>, <a href="#">Environmental Compliance Representative</a>, or supervisor of the area being assessed, who in turn notifies the <a href="#">Environmental Subject Matter Expert</a> of the potential noncompliance.</p> <p>The Environmental Subject Matter Experts determine if an actual noncompliance has occurred and if formal notifications to regulatory agencies are required.</p> <p><b>Note:</b> Noncompliance issues must receive prompt attention and timely corrective and preventive action by staff. If this type of response is not observed, a finding must be issued.</p>
<p><b>Step 8</b></p>	<p>The Assessor/Assessment Team analyzes data from the assessment to provide useful information for the organization's management.</p> <ul style="list-style-type: none"> <li>• Share data, objective evidence, and preliminary analyses with team members</li> </ul>

	<ul style="list-style-type: none"> <li>- Share data, objective evidence, and preliminary analyses with team members.</li> <li>• Identify the strengths and weaknesses associated with the operations or functions being assessed.</li> <li>• Assess conformance of the organization's EMS program (documents/records and implementation of program requirements) to the ISO 14001 Standard.</li> <li>• Identify audit findings and categorize as one of the following: <ul style="list-style-type: none"> <li>○ Major Nonconformance;</li> <li>○ Minor Nonconformance;</li> <li>○ Opportunity for Improvement;</li> <li>○ Noteworthy Practice.</li> </ul> </li> <li>• Discuss preliminary analysis of the assessment with affected personnel to seek additional information or to verify the findings.</li> </ul>
<b>Step 9</b>	The Lead Assessor concludes the assessment by briefing the Management Representative on EMS, and other managers as appropriate, of the assessment findings.

## Guidelines

### Document Review

Procedures, directives, or program descriptions, and associated records related to the EMS program, including the following, should be considered for review before or during the assessment.

- EMS Procedures
- ES&H Procedures
- Operational Procedures
- Quality Management related Procedures
- Aspects Records
- Phase II Process Evaluations
- ES&H Records
- Training Records
- Communication Records
- Contractor documents that specify environmental requirements
- Effluent and Emission Monitoring Records
- Nonconformance & Corrective and Preventive Action Records
- Maintenance Records
- Obsolete Documents
- Internal/External Assessment Reports, including Management Review Records
- Performance Objectives and Measures Records and Data

EMS Assessments should be integrated with the organization's Self-Assessment Program and can be conducted in conjunction with other assessments, such as Safety and Health assessments, Quality Management assessments, and/or periodic inspections or walk-throughs.

A cross sectional team can provide the necessary technical expertise for conducting these assessments. It is recommended that the assessment team include independent personnel, preferably one from outside the organizational unit, to provide new perspectives on conformance. The Management Representative on EMS, Quality Representatives, Environmental Compliance Representatives (ECRs), or Environmental Subject Matter Experts are available to assist Senior Managers and/or designees in performing the EMS Assessments.

Documenting the assessment plan is recommended. Suggested elements to be considered during assessment planning and included in an assessment plan are

- Scope statement - operations and/or processes to be evaluated, and the order of priority;
- Assessment Criteria - checklists; significant issues from previous occurrences, assessments or nonconformances; performance measures; and best management practices;
- Assessment Team - members and respective qualifications or technical expertise;
- Assessment Strategy - interviews, document reviews, surveillance, verification testing;

- Assessment Strategy - interviews, document reviews, surveillances, verification testing,
- Schedule - dates and coordination activities with affected staff (opening/closing meetings, debriefings, interview schedules).

The frequency of EMS assessments should be annual for operations with a high potential to impact the environment, or for ISO 14001 program elements when past performance warrants additional assessment.

For general information on conducting organizational assessments, refer to the exhibit [Guidelines for Performing Assessments](#) in the [Integrated Assessment](#) Subject Area.

## References

[Integrated Assessment](#) Subject Area

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Subject Area: **Environmental Assessments**

#### 4. Preparing for and Conducting Regulatory Compliance Assessments

Effective Date: **June 2001**

Point of Contact: [Environmental Compliance Representative \(ECR\)](#)

## Applicability

This information applies to Senior Managers who supervise work that has the potential to impact the environment. It also applies to staff (lead assessors, technical experts) who are assigned the responsibility for conducting internal Regulatory Compliance Assessments for the responsible Senior Manager and/or designee.

## Required Procedure

The scope of Regulatory Compliance Assessments includes the organizational processes that are regulated by the DOE, Federal, State, or local environmental regulations. Contact your [Environmental Compliance Representative](#) or refer to the subject areas on environmental compliance to determine applicable requirements.

Establish a schedule of regulatory compliance assessments so that all relevant legal and other requirements are assessed on a three-year cycle, at a minimum. More frequent regulatory assessments may be required or appropriate due to the importance of the operation, regulatory requirements, or past performance.

For general information on organizational assessments, refer to the section on [Planning and Conducting Organizational Self-Assessment Programs](#) in the [Integrated Assessment](#) Subject Area.

<b>Step 1</b>	<p>The Senior Manager or Lead Assessor schedules ample time for the assessment.</p> <p><b>Note:</b> Consider the workload and schedule of both assessors and facility personnel. Factor individual schedules, cyclical, and seasonal schedules into the determination of when on-site assessing activities take place (e.g., major overhauls of equipment, downtime, periods of peak production, holidays, and summer vacations).</p>
<b>Step 2</b>	<p>The Senior Manager or Lead Assessor selects the appropriate assessment criteria. Choose either a checklist, or the regulatory document itself, as a tool to guide the assessment. Available criteria include the following:</p> <ul style="list-style-type: none"> <li>• <a href="#">Regulatory Compliance Assurance Self-Assessment Guidance Cards</a> exhibit;</li> <li>• Subject areas on environmental compliance;</li> <li>• Specific regulations/regulatory documents;</li> <li>• A customized checklist that meets or exceeds the requirements of the above checklists.</li> </ul> <p>When using a checklist, each audit criteria must be addressed as either compliant, noncompliant, or not applicable. Do not leave criteria blank.</p>
<b>Step 3</b>	The Senior Manager or Lead Assessor

	<ul style="list-style-type: none"> <li>Using a graded approach, plans the assessment. See the Guidelines for elements to be considered.</li> <li>Uses existing reviews/inspections when feasible to assess the compliance status of operations, such as annual reviews of Process Evaluations and Experimental Safety Reviews, and Tier I ESH Inspections. See the <a href="#">Environmental Evaluation of Industrial Processes and Experimental Research</a> Subject Area and <a href="#">ES&amp;H Standard 1.2.0, Departmental Environment, Safety &amp; Health Inspections</a> for more information.</li> <li>Perform a focused compliance assessment on a select topic when the risk, importance, or activity warrants an in-depth review, or requires unique audit techniques to ensure a comprehensive assessment of compliance.</li> <li>Prepare the assessor/assessment team by providing documents for review before the facility assessment begins. These documents may include an audit plan and any pertinent documents, procedures, and records (including prior assessment reports) related to the elements being assessed.</li> </ul>
<b>Step 4</b>	Before beginning the assessment, the Lead Assessor notifies the respective operations and/or functional managers being assessed of the upcoming audit, including scope, schedule, and audit team members.
<b>Step 5</b>	The Assessor/Assessment Team reviews documents to gain an understanding of the facility operations before the start of the assessment. Refer to the Document Review list in the Guidelines below for determining what types of documents to review.
<b>Step 6</b>	<p>The Assessor/Assessment Team conducts the assessment by performing the following tasks, as applicable:</p> <ul style="list-style-type: none"> <li>Evaluate procedures, implementation, previous compliance audit results, and corrective actions taken;</li> <li>Obtain objective evidence from staff interviews, a sampling of records, or direct observation of the following: <ul style="list-style-type: none"> <li>routine internal inspections of the facility operations or processes and supporting activities, including waste operations;</li> <li>maintenance activities that are either routine or result from malfunction or noncompliance;</li> <li>applicable training, permitting or licensing that facility staff are required to maintain.</li> </ul> </li> <li>Include titles of documents or records that are used to determine conformance to assessment criteria on the checklist or in the audit report;</li> <li>Evaluate applicability and implementation for guests, visitors, or contractors who work for the organization.</li> </ul> <p><b>Note:</b> Refer to the Facility Inspection list below to determine the types of facility operations and processes to inspect and evaluate.</p> <p><b>Note:</b> Refer to the Records Review list below for the types of records to evaluate compliance status of facility operations.</p>
<b>Step 7</b>	<p>The Assessor/Assessment Team, when applicable, reviews written guidance and procedures for sampling and testing used, and when possible, observes actual sampling and testing practices conducted by facility personnel or contractors. If this is not possible during the audit, note it in the audit report.</p> <p>Consider the need to conduct verification sampling and testing. Refer to the Verification Sampling &amp; Testing list below for examples of situations that may warrant sampling verification.</p>
<b>Step 8</b>	The Assessor/Assessment Team immediately addresses any unacceptable conditions, including

	<p>possible regulatory noncompliance issues by notifying the <a href="#">Management Representative on EMS</a>, <a href="#">Environmental Compliance Representative</a>, or supervisor of the area being assessed, who in turn notifies the <a href="#">Environmental Subject Matter Expert</a> of the potential noncompliance.</p> <p>The Environmental Subject Matter Experts determine if an actual noncompliance has occurred and if formal notifications to regulatory agencies are required.</p> <p><b>Note:</b> Noncompliance issues must receive prompt attention and timely corrective and preventive action by staff. If this type of response is not observed, a nonconformance is issued.</p>
<p><b>Step 9</b></p>	<p>The Assessor/Assessment Team analyzes data from the assessment to provide useful information for the organization's management.</p> <ul style="list-style-type: none"> <li>• Share data, objective evidence, and preliminary analysis with team members;</li> <li>• Identify strengths and weaknesses associated with the operations or functions being assessed;</li> <li>• Assess compliance of the organization's operations to regulatory requirements;</li> <li>• Identify audit findings and categorize as one of the following: <ul style="list-style-type: none"> <li>○ Noncompliance;</li> <li>○ Observation;</li> <li>○ Noteworthy Practice.</li> </ul> </li> <li>• Discuss preliminary analysis of the assessment with affected personnel to seek additional information or to verify the analysis.</li> </ul>
<p><b>Step 10</b></p>	<p>The Lead Assessor concludes the assessment by briefing the Management Representative on EMS, and other managers as appropriate, of the assessment findings.</p>

## Guidelines

### Document Review

The following documents should be considered for review before the assessment begins:

- Phase II Process Evaluations
- Maps showing the facility layout and all waste management and discharge sites
- Process flow diagrams for the overall facility, highlighting the process area(s)
- Brief description of all process areas, including
  - process characterization and materials accounting
  - pollution control equipment
- Sewer maps for process waters, sanitary discharges, and discharges to navigable waterways
- Permits and permit applications
- Prior inspection and assessment reports (internal and external reports)
- List of oils and hazardous materials stored onsite
- List of aboveground and underground tanks
- Enforcement documents, including administrative orders, complaints, consent agreements, notices of noncompliance, deficiency notices, compliance orders and schedules, cease and desist orders, close-out documents, notices of violation, and facility responses to all of the above
- Testing, monitoring, sampling and/or analysis procedures or plans, and quality assurance documentation
- Exemptions and waivers from applicable requirements
- Records of citizen complaints that relate to Regulatory Compliance issues
- A schedule of reporting and recordkeeping requirements
- Annual environmental reports
- Emergency Planning and Community Right-to-Know requirements (SARA Title III).

## Facility Inspection

The assessors should evaluate facility operations, maintenance, and handling procedures as necessary to assess the Regulatory Compliance areas. Observation and evaluation should include, as applicable

- Production processes and operations
- Solid and hazardous waste management operations and practices
- Solid and hazardous waste stream identification, sampling, and analytical practices
- Wastewater and water management and control practices
- Air emissions control equipment and monitoring practices
- CERCLA/SARA reporting practices
- Aboveground and underground tank and drum management practices, including raw material storage
- PCB-containing equipment, management and storage practices
- Reporting/Reporting practices
- Leak detection and repair practices
- Pollution control and monitoring equipment maintenance practices
- Remediation and investigative activities of onsite (and offsite, where applicable) contamination
- If the facility is a hazardous waste generator, evaluation of facility waste minimization efforts
- Any other applicable procedures or practices.

## Records Review

Review a sample of the following types of records and documents as applicable to evaluate compliance of the facility operations:

- Records required to be maintained by Federal, State, and local environmental regulations
- Employee training records
- Testing, monitoring, sampling analysis, and/or data results
- Facility inspection records and maintenance records for equipment and structures, including groundwater monitoring wells and wastewater treatment equipment
- Data on production, raw materials, byproducts, and waste characteristics as pertinent to Federal, State, and local environmental regulations
- A representative sample of facility records, reports, and self-monitoring data required to be maintained by applicable Federal, State, and local environmental regulations
- A representative sample of emission test reports and other reports of testing to measure discharges of pollutants to the environment
- Any other records bearing on compliance with Federal, State, and local environmental regulations under the control of the facility, including those documents kept at the respective support division offices.

## Verification Sampling & Testing

Verification sampling & testing may be performed if on-site observations or the pre-assessment review reveals situations where sampling would be appropriate. Examples of such situations are listed below.

- Leaking drums, tanks, transformers, other containers holding or potentially holding hazardous materials, or other unexpected or improper releases to the environment
- Unknown material is found
- The facility's waste analysis data are incomplete
- Potential waste misclassification
- Unexplained stains or discoloration at the facility
- Unpermitted discharges are identified
- Emissions or discharges from operations or processes that have undergone significant modifications and have not been adequately assessed (e.g., change in fuel, raw material, or pollution control equipment)
- Permitted discharges have a questionable appearance or need to be further characterized
- Environmental or ecological receptors are suspected to contain or be impacted by hazardous materials
- Contaminated sludges or other waste residuals are suspected of being improperly disposed.

Necessary sampling or testing should be performed as soon as practicable should any of the above conditions exist.

Regulatory Compliance Assessments can be conducted in conjunction with other assessments, such as Safety and Health assessments and/or periodic inspections or walk-throughs.

A cross sectional team can provide the necessary technical expertise for conducting these assessments. It is recommended that the assessment team include independent personnel, preferably one from outside the organizational unit, to provide new perspectives on compliance. The Management Representative on EMS, Environmental Compliance Representatives (ECRs), or Environmental Subject Matter Experts are available to assist Senior Managers and/or designees in performing the Regulatory Compliance assessments.

Documenting the assessment plan is recommended. Suggested elements to be considered during the assessment-planning phase and included in an assessment plan include

- Scope statement - operations and/or processes to be evaluated, and the order of priority
- Assessment Criteria - checklists; significant issues from previous occurrences, assessments or nonconformances; performance measures; and best management practices
- Assessment Team - members and respective qualifications or technical expertise
- Assessment Strategy - interviews, document reviews, surveillances, verification testing
- Schedule - dates and coordination activities with affected staff (opening/closing meetings, debriefs, interview schedules).

## References

[ES&H Standard 1.2.0, Departmental Environment, Safety & Health Inspections](#)

[Environmental Evaluation of Industrial Processes and Experimental Research](#) Subject Area

[Integrated Assessment](#) Subject Area

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Subject Area: **Environmental Assessments**

## 5. Preparing for and Conducting Environmental Management Reviews

Effective: **June 2001**

Point of Contact: [Management Representative on Environmental Management Systems \(EMS\)](#)

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## Applicability

This information applies to the staff who conduct Environmental Management Reviews at BNL. It also applies to Senior Managers and their designees, at the respective organizational level being reviewed, and support personnel who provide environmental performance data.

## Required Procedure

The ISO 14001 Standard requires senior management to perform an Environmental Management Review of its environmental performance. This review is consistent with BNL's Performance-Based Management System and the Organizational Self-Evaluations that are required elements of the BNL Integrated Assessment Program. See the section on [Annual Organizational Self-Evaluations](#) in the [Integrated Assessment](#) Subject Area. This review requires a periodic evaluation of overall performance, both qualitatively and quantitatively, for purposes of identifying key improvement opportunities for the Environmental Management System (EMS). Analogously, an ISO 14001 Environmental Management Review provides a forum for a holistic evaluation of the adequacy, effectiveness, and continuing suitability of the organization's EMS. It functions as a key driver of EMS system improvement(s). This review determines if changes to the environmental policy and/or EMS procedures are required in light of environmental performance data or changing circumstances.

Sources of data include information gathered through self-assessments, peer review, independent oversight activities, internal audits, corporate oversight, other external reviews or audits, financial analysis of environmental activities, and trends in performance measures.

Environmental Management Reviews are conducted annually. Data are collected and made available for Senior Managers to perform the evaluation. Decisions made during the management review must be documented.

<b>Step 1</b>	<p>The Management Representative on EMS, acting as lead assessor, schedules ample time for the Management Review, ensuring that Senior Managers are available to attend.</p> <p><b>Note:</b> Consider the workload and schedule of participants and support personnel. Factor in cyclical schedules and availability of relevant performance data needed for evaluation when scheduling Management Reviews (e.g., reports on performance measures, assessment schedules, external assessment schedules).</p>
<b>Step 2</b>	<p>The Management Representative on EMS develops an agenda for the Management Review (see a sample in the <a href="#">Management Review Agenda</a> exhibit) that includes the following items as applicable:</p> <ul style="list-style-type: none"> <li>• Assessment results (summarizing types of findings and causal factors with emphasis on</li> </ul>

	<p>corrective actions, and their effectiveness), including</p> <ul style="list-style-type: none"> <li>○ EMS Assessment results;</li> <li>○ Regulatory Compliance Assessments;</li> <li>○ Environmental Management Reviews;</li> <li>○ External Assessment results.</li> </ul> <ul style="list-style-type: none"> <li>● Expectations/concerns associated with environmental activities expressed by internal or external stakeholders;</li> <li>● EMS improvements and benefits;</li> <li>● Pollution prevention initiatives -- investments and returns on investment;</li> <li>● Effluent/emission monitoring data summaries (air, water, waste);</li> <li>● Environmental occurrences, spills, and/or unexpected releases;</li> <li>● Environmental objectives, performance measures, and performance data;</li> <li>● Identified regulatory noncompliances, violations and/or enforcement actions;</li> <li>● Environmental program costs and benefits;</li> <li>● Evaluation of adequacy suitability and effectiveness of EMS Program;</li> <li>● Recommended improvement areas.</li> </ul>
<p><b>Step 3</b></p>	<p>The Management Representative on EMS collects and/or prepares pertinent documents, procedures, data summaries, trends, and presentation materials on the items listed above before the Management Review.</p> <p><b>Note:</b> Contact the respective Senior Manager, Environmental Support Organizations, and the Critical Outcome Champions or designee, for information or data summaries pertaining to effluent/emissions, external assessments, and performance measures.</p>
<p><b>Step 4</b></p>	<p>The Management Representative on EMS presents information and facilitates discussion on the following topics with Senior Managers, during the Management Review, as applicable:</p> <ul style="list-style-type: none"> <li>● The organization's conformance to EMS procedures;</li> <li>● Trends in assessment results and areas for improvement;</li> <li>● Compliance status and root causes of systemic noncompliances;</li> <li>● Data related to performance on environmental objectives and targets;</li> <li>● The continued suitability of the organization's objectives, targets, and performance measures in light of such things as <ul style="list-style-type: none"> <li>○ changes in environmental impacts and concerns;</li> <li>○ regulatory requirements, current and future;</li> <li>○ concerns of stakeholders;</li> <li>○ business concerns, market or financial pressures, and technological capabilities;</li> <li>○ internal organizational or process changes;</li> <li>○ changes in the environment;</li> <li>○ need for facility-specific performance measures;</li> </ul> </li> <li>● Adequacy of resources, accounting, and information systems, and the organization's processes to identify significant aspects/impacts (including the completeness of the organization's list of significant aspects);</li> <li>● Changes in environmental performance attributable to controls, procedures, corrective actions, preventative measures, and/or improvement efforts. (Document those changes that result in process improvement and share with other organizations, as appropriate);</li> <li>● The EMS program's effectiveness in achieving the commitments in the BNL environmental policy (Compliance, Pollution Prevention, Community Outreach, Cleanup, Continual Improvement).</li> </ul> <p>Document the discussion topics and recommendations made by participants in the meeting minutes, and include a copy of the presentation materials.</p>

<b>Step 5</b>	<p>Senior Managers judge the adequacy, suitability, and effectiveness of the EMS, based upon the above reviews and evaluations, and determine improvement opportunities and actions required in</p> <ul style="list-style-type: none"> <li>• Organizational Issues; <ul style="list-style-type: none"> <li>◦ Staff expertise, training, and resources</li> <li>◦ EMS Program or Procedures (administrative and/or operational)</li> </ul> </li> <li>• Revisions to objectives and performance measures related to pollution prevention, and compliance status, and continual improvement;</li> <li>• Revisions to the environmental policy commitments.</li> </ul> <p>Document judgments made by Senior Managers (on EMS program adequacy, suitability, and effectiveness), and improvement opportunities, or actions recommended in the meeting minutes.</p>

## Guidelines

Environmental Management Reviews can be conducted in conjunction with other self-evaluations of their safety, health, quality, and/or other management systems. For efficiency purposes, consider performing a Management Review at the Directorate level.

Environmental Management Reviews can be conducted more frequently than annually, if internal schedules, changes in operations, and assessment results of performance data warrant it.

Before holding the management review, the Management Representative on EMS should brief the respective Senior Manager(s) of the scope, procedure, and data to be evaluated at the Management Review.

For general information on conducting organizational self-evaluations, refer to [Annual Organizational Self-Evaluations](#) in the [Integrated Assessment](#) Subject Area.

## References

[Integrated Assessment](#) Subject Area

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Subject Area: **Environmental Assessments**

## 6. Documenting Environmental Assessments

Effective: **June 2001**

Point of Contact: [Management Representative on Environmental Management Systems \(EMS\)](#)

## Applicability

This information applies to the Lead Assessor/Assessment Team Members who are assigned the responsibility for conducting environmental assessments for the responsible Senior Managers and/or their designee. It also applies to the Management Representative on EMS who is responsible for documenting Environmental Management Reviews.

## Required Procedure

The Lead Assessor is responsible for preparing an assessment report that objectively and accurately reflects the assessment team's findings regarding conformance to the ISO 14001 Standard and BNL EMS procedures (if documenting an EMS Assessment or Environmental Management Review), or compliance to applicable regulatory requirements (if documenting a Regulatory Compliance Assessment).

An environmental assessment must be documented in a preliminary report within 30 days (nominally), and a final report within 60 days (nominally) of completion of the assessment. Records of environmental assessments and resolutions of deficiencies must be maintained in accordance with BNL Records Management requirements (see the [Records Management](#) Subject Area).

<b>Step 1</b>	<p>The Lead Assessor/Assessment Team prepares a report of the self-assessment, including the following information as applicable:</p> <ul style="list-style-type: none"> <li>• Organization assessment tracking number, if applicable;</li> <li>• Dates of the assessment;</li> <li>• Scope of assessment, locations/operations assessed;</li> <li>• Assessor/Assessment team members;</li> <li>• Assessment procedures and criteria/requirements (e.g., reference the assessment criteria, checklist, regulatory document or guidance cards used);</li> <li>• Assessment Strategy and interviewees;</li> <li>• Findings, including noteworthy practices, as applicable;</li> <li>• Any deviations from the original scope of the assessment (including facilities/activities not assessed as planned, audit criteria that were unable to be assessed) and recommendations for additional follow-up activities needed.</li> </ul> <p>For Regulatory Compliance Assessments include, if applicable</p> <ul style="list-style-type: none"> <li>• Sampling and monitoring results and how those results impact compliance, if performed as part of the assessment;</li> <li>• Each area of noncompliance with regulatory requirements identified, and brief descriptions</li> </ul>
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	<p>as needed to enable follow-up and correction;</p> <ul style="list-style-type: none"> <li>Refer to <a href="#">ES&amp;H Standard 1.2.0, Departmental Environment, Safety &amp; Health Inspections</a> to find specific requirements for documenting a Tier I inspection;</li> <li>Refer to the <a href="#">Environmental Evaluation of Industrial Processes and Experimental Research</a> Subject Area to find specific requirements for documenting a Process Evaluation.</li> </ul> <p>For EMS Assessments include, as applicable</p> <ul style="list-style-type: none"> <li>Objective evidence supporting the findings of the assessment (either by attaching a completed checklist or by describing the criteria assessed and results found within the body of the assessment report);</li> <li>A written description of any nonconformance with sufficient detail for the reader to determine the specific ISO 14001 requirement that was nonconforming, and the objective evidence that demonstrated a nonconforming condition.</li> </ul> <p>For Environmental Management Review,</p> <ul style="list-style-type: none"> <li>Attendees;</li> <li>Topics presented and issues discussed (include presentation materials as an attachment instead of a written description);</li> <li>Decisions made by senior management on the adequacy, suitability and effectiveness of the EMS program;</li> <li>Improvement opportunities and actions identified for follow-up.</li> </ul> <p><b>Note:</b> When using a checklist, each audit criteria must be addressed or identified as "not applicable." Do not leave criteria blank.</p>
<b>Step 2</b>	<p>The Lead Assessor forwards the preliminary assessment report to the following persons for a factual accuracy review:</p> <ul style="list-style-type: none"> <li>Senior Manager and/or designee;</li> <li>Manager(s) of the organizational units assessed;</li> <li>Management Representative on EMS;</li> <li>Environmental Compliance Representative (if it is a Regulatory Compliance Assessment).</li> </ul>
<b>Step 3</b>	<p>The Lead Assessor incorporates changes and corrections, as appropriate, and forwards the assessment reports to the applicable Associate/Assistant Laboratory Directors, with copies to the Managers of the Environmental Support Organizations, Managers of the affected organizational units assessed, assessment team members, and the Management Representative on EMS.</p> <p><b>Note:</b> Assessment findings that indicate weaknesses or deficiencies in areas related to nuclear or radiological programs must also be reported in accordance with <a href="#">ES&amp;H Standard 1.1.1, Price-Anderson Amendments Act Compliance Validation and Noncompliance Reporting Program</a>.</p>
<b>Step 4</b>	<p>The Management Representative on EMS provides summaries of EMS, regulatory compliance, and Environmental Management Review assessment reports to Senior Managers for incorporation into the organization's annual self-evaluation. Refer to the section on <a href="#">Planning and Conducting Organizational Self-assessment Programs</a> in the <a href="#">Integrated Assessment</a> Subject Area.</p>
<b>Step 5</b>	<p>The Management Representative on EMS and/or designee maintains written records of the environmental assessments, including checklists, actions taken to address findings of nonconformance or noncompliance, and related documentation, as applicable. Refer to the <a href="#">Records Management</a> Subject Area for additional information on retaining records.</p>

## Guidelines

Audit Team members should provide a balanced view of the EMS Program by also including discussion and documentation of the *conforming* ISO elements in the audit report and checklist (i.e., titles of documents or records that are used to substantiate conformance to assessment criteria).

Consider applicability of the Lessons Learned Program and forward copy of the report to the BNL [Lessons Learned Coordinator](#) for purposes of sharing noteworthy practices and key nonconformance or noncompliance issues, if applicable. See the [Lessons Learned](#) Subject Area for more information.

## References

[ES&H Standard 1.1.1, Price-Anderson Amendments Act Compliance Validation and Noncompliance Reporting Program](#)

[ES&H Standard 1.2.0, Departmental Environment, Safety & Health Inspections](#)

[Environmental Evaluation of Industrial Processes and Experimental Research](#) Subject Area

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Subject Area: **Environmental Assessments**

## 7. Correcting Deficiencies

Effective: **June 2001**

Point of Contact: [Management Representative on Environmental Management Systems \(EMS\)](#), [Environmental Compliance Representative \(ECR\)](#)

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## Applicability

This information applies to Senior Managers, designees responsible for conducting environmental assessments, and staff assigned responsibility for implementing a corrective action.

## Required Procedure

For general information on developing and tracking corrective actions, see the [Nonconformance and Corrective and Preventive Action](#) Subject Area and [ES&H Standard 1.2.1, Corrective Action Management and Tracking for Internal and External Assessments](#).

Noncompliance with regulatory requirements must receive prompt attention and timely corrective and preventive action.

Records of environmental assessments and resolutions of deficiencies must be maintained in accordance with BNL Records Management requirements (see the [Records Management](#) Subject Area).

For purposes of applying the following steps to Environmental Management Reviews, improvement opportunities and actions can be substituted for noncompliances and/or nonconformances.

<b>Step 1</b>	The Senior Manager and/or designee assigns responsibility for investigating findings of nonconformance and/or noncompliance identified during an environmental assessment, and developing corrective actions that prevent recurrence.
<b>Step 2</b>	The Action Owner prepares a Corrective Action Request to address the nonconformance/noncompliance, including the corrective action required, the person responsible for completing the action, and completion due date.  <b>Note:</b> Refer to the <a href="#">Nonconformance and Corrective and Preventive Action</a> Subject Area for information on investigating nonconformances and developing action plans.
<b>Step 3</b>	The Senior Manager and/or designee tracks observations, and nonconformance and noncompliance findings to ensure prompt completion of corrective actions.  <b>Note:</b> Managers may choose to use the Assessment Tracking System to track corrective actions from internal assessments, or use a Directorate/Department/Division-specific tracking system. Refer to <a href="#">ES&amp;H Standard 1.2.1, Corrective Action Management and Tracking for Internal and External Assessments</a> for specific instructions on tracking corrective actions that originate from

	assessments.
<b>Step 4</b>	The responsible person implements the corrective action
<b>Step 5</b>	The Action Owner closes out the tracking system action by formally notifying the Senior Manager and/or designee that action(s) taken and providing objective evidence of closure actions with the date of completion.
<b>Step 6</b>	The Senior Manager and/or designee verifies the effectiveness of corrective actions during a follow-up environmental assessment.
<b>Step 7</b>	The Management Representative on EMS and/or designee maintains written records of the environmental assessments, including checklists, actions taken to address findings of nonconformance or noncompliance, and related documentation, as applicable.  <b>Note:</b> Refer to the <a href="#">Records Management</a> Subject Area for information on retaining records.

## Guidelines

Audit findings (i.e., nonconformances and/or noncompliances) should be analyzed for trends and root cause before developing a corrective action.

Staff who work in areas where a finding of nonconformance or noncompliance was identified should be consulted for suggestions on corrective actions.

Corrective actions for improvement actions for observations identified in an assessment report should be developed and prioritized accordingly.

The tracking system should include a cross reference to

- The original audit report/finding number;
- Objective evidence of the closure actions, with reference to revised documents, if applicable;
- Keywords, including the ISO element, EMS, environment, and ISO 14001.

## References

[ES&H Standard 1.2.1, Corrective Action Management and Tracking for Internal and External Assessments](#)

[Nonconformance and Corrective and Preventive Action](#) Subject Area

[Records Management](#) Subject Area

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Access to the **EMS Self-Assessment Tool for ANSI/ISO 14001** is limited to BNL staff and authorized non-BNL staff. To view these documents, use the links on the contents page of the subject area.

## **Management Review Agenda**

**<Organization>**

**<Date>**

*Note: Minutes are required; specifically the decisions and recommendations made during section 8 of the meeting agenda must be recorded.*

### **Participants:**

- 1) Assistant Laboratory Director (ALD)
- 2) Department Chair/Division Manager and direct reports
- 3) Management Representative on EMS
- 4) Environmental Compliance Representative
- 5) ESHQ ALD
- 6) EMS Project Manager
- 7) Managers of Environmental Support Organizations (WMD, ESD)
- 8) Other: DOE EMS Point of Contact; Department ESH Staff

### **Purpose:**

Periodically senior management shall review its environmental performance, both qualitatively and quantitatively, for the purpose of identifying key improvement opportunities in the Environmental Management system.

### **Management System Owners:**

- Environmental Management System,
- Integrated Assessment Program,
- Performance Based Management.

### **Agenda:**

- 1) Overview of EMS Program, organization's activities that can impact environment and the organization's significant aspects.
  - a) Evaluate completeness of aspects list.
- 2) Review of Assessment – Summarize results but emphasize the corrective actions that were implemented to prevent recurrence:
  - a) Nonconformances
  - b) Internal EMS Assessment
  - c) Internal Regulatory Compliance Assessment
  - d) External Audits
- 3) Stakeholder Concerns – Issues and actions:

- a) Activists
  - b) Community
  - c) Regulators
- 4) EMS Improvements:
- a) Focus on what was not in place before – training, aspects analysis, system documentation, compliance initiatives, etc.
  - b) Correlation, if any, to improvement in performance.
- 5) Pollution Prevention Initiatives (identify initiatives implemented and results, or planned initiatives).
- 6) Environmental Performance – (list aspects/impacts):
- a) Effluent/Emission Data (as applicable)
    - SPDES Discharge Monitoring Results
    - Groundwater
    - Air Emissions- radiological and non-radiological
    - Waste Volumes
    - Spills and Occurrence Reports
    - Soil, flora, fauna, as applicable
  - b) Environmental Objectives and Performance Measures (be sure all of them are shown-refer to current year objectives/measures):
    - Percent Phase II Actions Completed
    - EMS Implementation/Milestones
    - Compliance with Regulatory Requirements
    - Implementation of Pollution Prevention initiatives/waste reductions
    - Facility Specific performance measures
- 7) Financial Investments:
- a) EMS Implementation
  - b) Pollution Prevention
  - c) Cleanup (unexpected expenditures)
  - d) Fines/Violations
  - e) Monitoring
  - f) Specialized Support (Environmental Compliance Representatives, etc.)
  - g) Lab-wide Initiatives (sanitary upgrade, Underground Injection Control, etc.)
- 8) Questions and Answers:
- 9) Senior Management EMS Program Evaluation – For the purpose of identifying improvement actions and assigning responsibility and resources to implement:
- a) Is the EMS Program effective in achieving environmental policy commitments? (Compliance, Pollution Prevention, Community Outreach, Clean-up, Continual Improvement). [If yes, record the decision; if no, record recommendations.]
  - b) Is the EMS Program effective in achieving the objectives and performance measures? [If yes, record the decision; if no, record recommendations.]

- c) Is the EMS Program adequate in terms of:
- Identifying Significant Environmental Aspects and Impacts?
  - Resource Allocation?
  - Information Systems?
  - Organizational Issues – Staff Expertise; Procedural Requirements?
- [If yes, record the decision; if no, record recommendations.]
- d) Are the Objectives and Performance Measures or EMS System suitable in terms of:
- Environmental Impacts and Current Conditions?
  - Concerns of Stakeholders?
  - Current and Future Regulatory Requirements?
  - Business Interests; Technological Capability?
  - Internal Organizational or Process Changes?
  - Should additional internal performance measures be established?
- [If yes, record the decision; if no, record recommendations.]
- e) Recommended Revisions to:
- Environmental Policy and Commitments?
  - Objectives and Performance Measures?
  - Elements of EMS?

**Documentation Requirements:**

- Document in the meeting minutes the discussion topics and recommendations made by the participants and include a copy of the presentation materials.
- Document in the meeting minutes decisions by senior managers on EMS program adequacy, suitability, and effectiveness as well as improvement opportunities or actions recommended.
- Include copies of the attendance sheet(s).

**Handouts:**

Agenda

Presentations Slides

Optional: Management Review Subject Area; Environmental Policy



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Subject Area: **Environmental Assessments**

### Regulatory Compliance Assurance Self-assessment Guidance Cards

Effective: **June 2001**

Point of Contact: [Management Representative on Environmental Management Systems \(EMS\)](#), [Environmental Compliance Representative \(ECR\)](#)

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The Regulatory Compliance Assurance Self-assessment Guidance Cards are provided as Word files.

[Drinking Water](#)  
[Environmental Monitoring](#)  
[Hazardous Waste Management](#)  
[Liquid Effluents](#)  
[Mixed Waste Management](#)  
[National Environmental Policy Act \(NEPA\) and Cultural Resources Evaluations](#)  
[Nonradioactive Airborne Emissions](#)  
[Oils/PCBs Management](#)  
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## Self-Assessment Guidance Card

<b>Area:</b> <i>(General: Maintenance, Operations, Radiological Control, Etc.)</i> Protection of Public Water Supplies	<b>Date:</b> <i>(Guidance Card Completed)</i>
<b>Topic:</b> <i>(Specific: Work Initiation, Pumping Tank X, Smear Survey, Etc.)</i> Installation and Operation of Cross Connection Control Devices and Protection of the Public Water Supply	<b>Rev:</b> <i>(Optional)</i>
<b>References:</b> <i>(Cite Source Documents for Performance Expectations)</i> Safe Drinking Water Act; New York State Sanitary Code Part 5	

<b>Performance Expectations:</b> <i>(Criteria developed from Source Documents that will be applied throughout the Assessment. Performance expectations should be limited to six maximum to allow the assessment to remain focused. Additional Guidance Cards can be completed to expand the scope of a particular assessment)</i>
1. The Dept./Div. is aware of and knows the location of all Cross Connection Control Devices installed at its facilities?
2. Is access to all devices maintained clear and are all test ports accessible to plumbers for testing?
3. Does the Dept./Div. Provide annual access to the device for testing purposes? Annual access means providing a period where interruption of water service for several hours will not impact facility operations.
4. All industrial equipment that is directly connected to the potable water system is protected by the installation of a double check valve or reduced pressure zone device.
5. All cross connection control devices are tested at least annually and are rebuilt every five years.
6. Are all laboratory sinks, shop sinks and custodial sinks protected by the installation of an atmospheric vacuum breaker or equivalent? This is especially applicable to any sink equipped with a vacuum aspirator or hose connection.
7. If a permit (authorization) is required, has one been obtained and is it still valid (within its effective date)? Are all permit (authorization) conditions being met?
8.
9.

<b>Procedure:</b> <i>(Perform the following as applicable for the assessment)</i> <ul style="list-style-type: none"> <li>▪ Review assessment guidance card.</li> <li>▪ Review applicable procedure/requirements.</li> <li>▪ Observe the activity controlled by the procedure.</li> <li>▪ Interview appropriate personnel about requirements and practices.</li> <li>▪ Record observations based on comparison to guidance.</li> <li>▪ Document the results.</li> </ul>
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<b>Basis for the Assessment:</b> <i>(Why is the assessment being done?)</i> <input type="checkbox"/> Periodic <input type="checkbox"/> Lessons Learned <input type="checkbox"/> Directed by Management <input type="checkbox"/> Responsive <input type="checkbox"/> Targeted	
<b>Assessor(s):</b>	<b>Date of Assessment:</b>
<b>Location of Assessment:</b> <i>(Bldg/Room)</i>	

## Self-Assessment Guidance Card

<b>Area:</b> <i>(General: Maintenance, Operations, Radiological Control, Etc.)</i> Operations	<b>Date:</b> <i>(Guidance Card Completed)</i>
<b>Topic:</b> <i>(Specific: Work Initiation, Pumping Tank X, Smear Survey, Etc.)</i> Environmental Protection and Monitoring	<b>Rev:</b> <i>(Optional)</i>
<b>References:</b> <i>(Cite Source Documents for Performance Expectations)</i> BNL SBMS Subject Area: Environmental Monitoring	

**Performance Expectations:** *(Criteria developed from Source Documents that will be applied throughout the Assessment. Performance expectations should be limited to six maximum to allow the assessment to remain focused. Additional Guidance Cards can be completed to expand the scope of a particular assessment)*

1. Has the Dept/Div identified and evaluated known or potential environmental impacts associated with their current and planned operations?
 

For each known or potential contaminant source area, answer the following questions:

  - a. Have these known or potential contaminant sources been fully characterized either by direct measurements, analyses, or calculations/models (i.e., type of contaminant, concentrations, and potential pathway to environmental release)?
  - b. Are known or potential source areas required to have a permit? If so, under which regulation(s)?
  - c. Are these contaminant source areas currently monitored, and if so, by whom? Are monitoring and reporting requirements understood and documented?
  - d. Has DOE approved the monitoring program? Have regulatory agencies approved the monitoring program (as appropriate)?
  - e. Have engineering or operational controls been employed to reduce potential environmental impacts?
  - f. Does the Dept/Div have a routine schedule for testing and maintaining monitoring equipment and engineering controls?
  - g. Have modifications to previously approved engineering or operational controls, monitoring programs, or monitoring devices been properly documented? Has DOE approved of these changes? Have regulatory agencies approved of these changes (as appropriate)?

**Procedure:** *(Perform the following as applicable for the assessment)*

- Review assessment guidance card.
- Review applicable procedure/requirements. (References)
- Observe the activity controlled by the procedure.
- Interview appropriate personnel about requirements and practices.
- Record observations based on comparison to guidance.
- Document the results.

**Basis for the Assessment:** *(Why is the assessment being done?)*

Periodic   
  Lessons Learned   
  Directed by Management   
  Responsive   
  Targeted

**Assessor(s):**

**Date of Assessment:**

**Location of Assessment:** *(Bldg/Room)*

## Self-Assessment Guidance Card

<b>Area:</b> Waste Generation	<b>Date:</b> March 5, 1999
<b>Topic:</b> Hazardous Waste Management	<b>Rev:</b> 0
<b>References:</b> Hazardous Waste Management Subject Area	

<b>Performance Expectations:</b>
1. Waste generators are trained in hazardous waste management.
2. Waste is adequately characterized. Characterization paperwork is accurately completed and is submitted to the Waste Management Division.
3. Waste is properly containerized and labeled, and stored appropriately.
4. Satellite Accumulation Areas are established and operated according to requirements.
5. 90-Day Accumulation Areas are established and operated according to requirements. 90-Day Area Managers are trained in area operation.
6. PCB Wastes are managed according to requirements.

<p><b>Procedure:</b> <i>(Perform the following as applicable for the assessment)</i></p> <ul style="list-style-type: none"> <li>▪ Review assessment guidance card.</li> <li>▪ Review the subject area for applicable procedures/requirements.</li> <li>▪ Observe the activity(ies) controlled by the procedure.</li> <li>▪ Interview appropriate personnel about requirements and practices.</li> <li>▪ Record observations based on comparison to guidance.</li> <li>▪ Document the results.</li> </ul>
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<p><b>Basis for the Assessment:</b> <i>(Why is the assessment being done?)</i></p> <p> <input type="checkbox"/> Periodic              <input type="checkbox"/> Lessons Learned              <input type="checkbox"/> Directed by Management              <input type="checkbox"/> Responsive              <input type="checkbox"/> Targeted         </p>	
<b>Assessor(s):</b>	<b>Date of Assessment:</b>
<b>Location of Assessment:</b> <i>(Bldg/Room)</i>	

## Self-Assessment Guidance Card

<b>Area:</b> Environmental Regulatory Requirements	<b>Date:</b> <i>(Guidance Card Completed)</i>
<b>Topic:</b> <i>Liquid Effluents</i>	<b>Rev:</b> <i>(Optional)</i>
<b>References:</b> <i>40 CFR 141, 6 NYCRR 750–758, 6 NYCRR 700-703, DOE Order 5400.5</i>	

**Performance Expectations:** *(Criteria developed from Source Documents that will be applied throughout the Assessment. Performance expectations should be limited to six maximum to allow the assessment to remain focused. Additional Guidance Cards can be completed to expand the scope of a particular assessment)*

Does the department have a process to ensure that liquid effluents are evaluated and authorized by ESD prior to discharge?

Is documentation on file which demonstrates that all routine departmental liquid effluent sources have been reviewed for SPDES compliance?

If the department owns a SPDES–permitted discharge point, are records of volume and rate of liquid discharge on file?

### SUGGESTED GUIDELINES

For each floor drain, is there knowledge of whether the drain leads to the sanitary system or the storm system?

Are sinks posted to prevent the inadvertent disposal of restricted chemicals and/or radionuclides to the BNL sanitary system?

Does the department maintain a list of all liquid effluent streams which routinely discharge to either the BNL sanitary system or recharge basins?

**Procedure:** *(Perform the following as applicable for the assessment)*

- Review assessment guidance card.
- Review applicable procedure/requirements. (References)
- Observe the activity controlled by the procedure.
- Interview appropriate personnel about requirements and practices.
- Record observations based on comparison to guidance.
- Document the results within 3 days on Exhibit 5, *Reporting Self-Assessment Results*.

**Basis for the Assessment:** *(Why is the assessment being done?)*

Periodic     Lessons Learned     Directed by Management     Responsive     Targeted

**Assessor(s):**

**Date of Assessment:**

**Location of Assessment:** *(Bldg/Room)*

## Self-Assessment Guidance Card

<b>Area:</b> Waste Generation	<b>Date:</b> March 5, 1999
<b>Topic:</b> Mixed Waste Management	<b>Rev:</b> 0
<b>References:</b> Mixed Waste Management Subject Area	

<b>Performance Expectations:</b>
1. Waste generators are trained in hazardous and radioactive waste management.
2. Waste is adequately characterized. Characterization paperwork is accurately completed and is submitted to the Waste Management Division.
3. Waste is properly containerized and labeled, and stored appropriately.
4. Satellite Accumulation Areas are established and operated according to requirements.
5. 90-Day Accumulation Areas are established and operated according to requirements. 90-Day Area Managers are trained in area operation.
6. PCB Mixed Wastes are managed according to requirements.

<p><b>Procedure:</b> <i>(Perform the following as applicable for the assessment)</i></p> <ul style="list-style-type: none"> <li>▪ Review assessment guidance card.</li> <li>▪ Review the subject area for applicable procedures/requirements.</li> <li>▪ Observe the activity(ies) controlled by the procedure.</li> <li>▪ Interview appropriate personnel about requirements and practices.</li> <li>▪ Record observations based on comparison to guidance.</li> <li>▪ Document the results.</li> </ul>
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<p><b>Basis for the Assessment:</b> <i>(Why is the assessment being done?)</i></p> <p> <input type="checkbox"/> Periodic              <input type="checkbox"/> Lessons Learned              <input type="checkbox"/> Directed by Management              <input type="checkbox"/> Responsive              <input type="checkbox"/> Targeted         </p>	
<b>Assessor(s):</b>	<b>Date of Assessment:</b>
<b>Location of Assessment:</b> <i>(Bldg/Room)</i>	

## Self-Assessment Guidance Card

<b>Area:</b> <i>(General: Maintenance, Operations, Radiological Control, Etc.)</i> Operations	<b>Date:</b> <i>(Guidance Card Completed)</i>
<b>Topic:</b> <i>(Specific: Work Initiation, Pumping Tank X, Smear Survey, Etc.)</i> NEPA	<b>Rev:</b> <i>(Optional)</i>
<b>References:</b> <i>(Cite Source Documents for Performance Expectations)</i> National Environmental Policy Act and Cultural Resource Evaluations	

<b>Performance Expectations:</b> <i>(Criteria developed from Source Documents that will be applied throughout the Assessment. Performance expectations should be limited to six maximum to allow the assessment to remain focused. Additional Guidance Cards can be completed to expand the scope of a particular assessment)</i>	
<i>Suggested approach to assessing NEPA activities is to trace implementation of a sample of projects in your department/division.</i>	
1. Has the Environmental Compliance Representative and/or BNL NEPA Coordinator been notified that a new/modified project is proposed (while still in the proposal phase)?	
2. Has an Environmental Evaluation Notification been prepared for projects, if required?	
3. Was a NEPA and Cultural Resources evaluation done and authorization received?	
4. Are records maintained?	
<b>Procedure:</b> <i>(Perform the following as applicable for the assessment)</i> <ul style="list-style-type: none"> <li>▪ Review assessment guidance card.</li> <li>▪ Review applicable procedure/requirements. (References)</li> <li>▪ Observe the activity controlled by the procedure.</li> <li>▪ Interview appropriate personnel about requirements and practices.</li> <li>▪ Record observations based on comparison to guidance.</li> <li>▪ Document the results.</li> </ul>	
<b>Basis for the Assessment:</b> <i>(Why is the assessment being done?)</i> <input type="checkbox"/> Periodic <input type="checkbox"/> Lessons Learned <input type="checkbox"/> Directed by Management <input type="checkbox"/> Responsive <input type="checkbox"/> Targeted	
<b>Assessor(s):</b>	<b>Date of Assessment:</b>
<b>Location of Assessment:</b> <i>(Bldg/Room)</i>	

## Self-Assessment Guidance Card

<b>Area:</b> <i>(General: Maintenance, Operations, Radiological Control, Etc.)</i> Operations and Equipment	<b>Date:</b> <i>(Guidance Card Completed)</i>
<b>Topic:</b> <i>(Specific: Work Initiation, Pumping Tank X, Smear Survey, Etc.)</i> Non Radiological Airborne Emissions	<b>Rev:</b> <i>(Optional)</i>
<b>References:</b> <i>(Cite Source Documents for Performance Expectations)</i> SEAPPM 6.1.4; BNL ESH Standard 6.1.5	

<b>Performance Expectations:</b> <i>(Criteria developed from Source Documents that will be applied throughout the Assessment. Performance expectations should be limited to six maximum to allow the assessment to remain focused. Additional Guidance Cards can be completed to expand the scope of a particular assessment)</i>
1. Has the Department/Division had ESD evaluate new or modified emission sources for permit applicability?
2. Have permits been obtained for emission sources where needed?
3. Are permits posted near or in close proximity to emission sources, visible to the operator?
4. Are source operators cognizant of permit operating limitations/restrictions?
5. Are records of inspections and maintenance of pollution control devices available?
6. Does the Department/Division have records available or other process knowledge that will allow them to estimate annual source emissions?
7. Does the Department/Division know whom to contact for information on permitting emission sources?
8. If a permit (authorization) is required, has one been obtained and is it still valid (within the effective date)? Are all permit (authorization) conditions being met?
9.
10.

<b>Procedure:</b> <i>(Perform the following as applicable for the assessment)</i> <ul style="list-style-type: none"> <li>▪ Review assessment guidance card.</li> <li>▪ Review applicable procedure/requirements. (References)</li> <li>▪ Observe the activity controlled by the procedure.</li> <li>▪ Interview appropriate personnel about requirements and practices.</li> <li>▪ Record observations based on comparison to guidance.</li> <li>▪ Document the results.</li> </ul>
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<b>Basis for the Assessment:</b> <i>(Why is the assessment being done?)</i> <input type="checkbox"/> Periodic <input type="checkbox"/> Lessons Learned <input type="checkbox"/> Directed by Management <input type="checkbox"/> Responsive <input type="checkbox"/> Targeted	
<b>Assessor(s):</b>	<b>Date of Assessment:</b>
<b>Location of Assessment:</b> <i>(Bldg/Room)</i>	

## Self-Assessment Guidance Card

<b>Area:</b> <i>(General: Maintenance, Operations, Radiological Control, Etc.)</i> Electrical Equipment	<b>Date:</b> <i>(Guidance Card Completed)</i>
<b>Topic:</b> <i>(Specific: Work Initiation, Pumping Tank X, Smear Survey, Etc.)</i> Polychlorinated Biphenyls (PCBs)	<b>Rev:</b> <i>(Optional)</i>
<b>References:</b> <i>(Cite Source Documents for Performance Expectations)</i> BNL SBMS Subject Area: Oil/PCB Management	

<b>Performance Expectations:</b> <i>(Criteria developed from Source Documents that will be applied throughout the Assessment. Performance expectations should be limited to six maximum to allow the assessment to remain focused. Additional Guidance Cards can be completed to expand the scope of a particular assessment)</i>
1. Does the Dept/Div maintain their PCB equipment inventory current?
2. Does the Dept/Div report their annual (calendar year) PCB equipment inventory to the ESD?
3. Does the Dept/Div keep their PCB equipment labeled with the appropriate size EPA-approved label?
4. Does the Dept/Div inspect their PCB equipment containing >500 ppm PCBs on a quarterly basis and do they maintain records of these inspections?
5. Does the Dept/Div ensure that there is no combustible material within five feet of PCB equipment containing >500 ppm PCBs?
6. Does the Dept/Div know who to contact and what to do prior to conducting research involving PCBs?
7. Does the Dept/Div know whom to contact in the event of a PCB spill/release?
8. Does the Dept/Div know what to do in the event of a PCB spill/release?
9. Does the Dept/Div dispose of all PCB-containing equipment as hazardous waste in accordance with BNL ESH Standard 6.2.0?
10. Does the Dept/Div store their waste PCB-containing equipment/material in their 90-day accumulation area and is it labeled with the appropriate size EPA-approved label?
11. If a permit (authorization) is required for research using PCBs, has one been obtained and is it still valid (within effective date)?
Are all permit (authorization) conditions being met?

<b>Procedure:</b> <i>(Perform the following as applicable for the assessment)</i> <ul style="list-style-type: none"> <li>▪ Review assessment guidance card.</li> <li>▪ Review applicable procedure/requirements.</li> <li>▪ Observe the activity controlled by the procedure.</li> <li>▪ Interview appropriate personnel about requirements and practices.</li> <li>▪ Record observations based on comparison to guidance.</li> <li>▪ Document the results.</li> </ul>	
<b>Basis for the Assessment:</b> <i>(Why is the assessment being done?)</i> <input type="checkbox"/> Periodic <input type="checkbox"/> Lessons Learned <input type="checkbox"/> Directed by Management <input type="checkbox"/> Responsive <input type="checkbox"/> Targeted	
<b>Assessor(s):</b>	<b>Date of Assessment:</b>
<b>Location of Assessment:</b> <i>(Bldg/Room)</i>	

## Self-Assessment Guidance Card

<b>Area:</b> Environmental Regulatory Requirements	<b>Date:</b> <i>(Guidance Card Completed)</i>
<b>Topic:</b> <i>Radioactive Airborne Emissions</i>	<b>Rev:</b> <i>(Optional)</i>
<b>References:</b> <i>40 CFR 61, Subpart H, DOE Order 5400.1, DOE Order 5400.5</i>	

**Performance Expectations:** *(Criteria developed from Source Documents that will be applied throughout the Assessment. Performance expectations should be limited to six maximum to allow the assessment to remain focused. Additional Guidance Cards can be completed to expand the scope of a particular assessment)*

1. Does documentation exist which demonstrates that all department radioactive air emission sources have been reviewed for NESHAPs compliance?
2. If the department operates lab hoods in which dispersible radionuclides are used, are accurate inventories of those radionuclides available?
3. If emission points with documented public dose potentials of less than 0.1 mrem/yr are being operated, are periodic, confirmatory measurements being conducted to ensure that annual releases are not increasing? (This does not apply if radionuclide inventory records are being used to demonstrate compliance.)
4. If the department operates monitoring equipment for airborne emissions, does the system have a Quality Assurance Program Plan associated with it?
5. Are air flow rates in radioactive air exhaust systems measured at least annually?
6. If a permit or authorization from a regulatory agency is required to operate the emission source, has one been obtained, and are all conditions of the permit or authorization being met?

- Procedure:** *(Perform the following as applicable for the assessment)*
- Review assessment guidance card.
  - Review applicable procedure/requirements. (References)
  - Observe the activity controlled by the procedure.
  - Interview appropriate personnel about requirements and practices.
  - Record observations based on comparison to guidance.
  - Document the results within 3 days on Exhibit 5, *Reporting Self-Assessment Results*.

**Basis for the Assessment:** *(Why is the assessment being done?)*

Periodic   
  Lessons Learned   
  Directed by Management   
  Responsive   
  Targeted

<b>Assessor(s):</b>	<b>Date of Assessment:</b>
<b>Location of Assessment:</b> <i>(Bldg/Room)</i>	

## Self-Assessment Guidance Card

<b>Area:</b> Waste Generation	<b>Date:</b> March 5, 1999
<b>Topic:</b> Radioactive Waste Management	<b>Rev:</b> 0
<b>References:</b> Radioactive Waste Management Subject Area	

<b>Performance Expectations:</b>
1. Waste generators are trained in radioactive waste management.
2. Waste is adequately characterized. Characterization paperwork is accurately completed and is submitted to the Waste Management Division.
3. Waste is properly containerized and labeled, and stored appropriately.
4. Radioactive Waste Accumulation Areas are established and operated according to requirements.
5. The Decay-In-Storage Program is established and maintained according to requirements.

<p><b>Procedure:</b> <i>(Perform the following as applicable for the assessment)</i></p> <ul style="list-style-type: none"> <li>▪ Review assessment guidance card.</li> <li>▪ Review the subject area for applicable procedures/requirements.</li> <li>▪ Observe the activity(ies) controlled by the procedure.</li> <li>▪ Interview appropriate personnel about requirements and practices.</li> <li>▪ Record observations based on comparison to guidance.</li> <li>▪ Document the results.</li> </ul>
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<b>Basis for the Assessment:</b> <i>(Why is the assessment being done?)</i>	
<input type="checkbox"/> Periodic <input type="checkbox"/> Lessons Learned <input type="checkbox"/> Directed by Management <input type="checkbox"/> Responsive <input type="checkbox"/> Targeted	
<b>Assessor(s):</b>	<b>Date of Assessment:</b>
<b>Location of Assessment:</b> <i>(Bldg/Room)</i>	

## Self-Assessment Guidance Card

<b>Area:</b> <i>(General: Maintenance, Operations, Radiological Control, Etc.)</i> Spill Response, Operations	<b>Date:</b> <i>(Guidance Card Completed)</i>
<b>Topic:</b> <i>(Specific: Work Initiation, Pumping Tank X, Smear Survey, Etc.)</i> Unexpected Releases of Oil, Hazardous Substances, or Radioactive Materials	<b>Rev:</b> <i>(Optional)</i>
<b>References:</b> <i>(Cite Source Documents for Performance Expectations)</i> BNL SEAPPM 6.1.6; BNL ESH Standard 6.1.6	

**Performance Expectations:** *(Criteria developed from Source Documents that will be applied throughout the Assessment. Performance expectations should be limited to six maximum to allow the assessment to remain focused. Additional Guidance Cards can be completed to expand the scope of a particular assessment)*

1. Do Department/Division personnel responsible for operations with environmental permits know who they must contact and what information they must provide when a permit limit has been exceeded?
2. Do Department/Division personnel know who to contact in the event of a spill or release?
3. Do Department/Divisions responsible for operations with environmental permits know the release limits of the permit?

### Suggested Guidelines

1. Does the Department/Division maintain spill response kits?
2. Do Department/Division personnel know how and when to use spill response kits?
3. Are spill response kits appropriate for the substances in use that are likely to be spilled?

**Procedure:** *(Perform the following as applicable for the assessment)*

- Review assessment guidance card.
- Review applicable procedure/requirements.
- Observe the activity controlled by the procedure.
- Interview appropriate personnel about requirements and practices.
- Record observations based on comparison to guidance.
- Document the results.

**Basis for the Assessment:** *(Why is the assessment being done?)*

Periodic   
  Lessons Learned   
  Directed by Management   
  Responsive   
  Targeted

**Assessor(s):**

**Date of Assessment:**

**Location of Assessment:** *(Bldg/Room)*

## Self-Assessment Guidance Card

<b>Area:</b> <i>(General: Maintenance, Operations, Radiological Control, Etc.)</i> Storage and Transfer of Hazardous Materials	<b>Date:</b> <i>(Guidance Card Completed)</i>
<b>Topic:</b> <i>(Specific: Work Initiation, Pumping Tank X, Smear Survey, Etc.)</i> Installation, operation and closure of Toxic or Hazardous Material Storage Facilities	<b>Rev:</b> <i>(Optional)</i>
<b>References:</b> <i>(Cite Source Documents for Performance Expectations)</i> Safety and Environmental Protection Policies and Procedures Manual, 2.1.2; Suffolk County Sanitary Code Article 12	

**Performance Expectations:** *(Criteria developed from Source Documents that will be applied throughout the Assessment. Performance expectations should be limited to six maximum to allow the assessment to remain focused. Additional Guidance Cards can be completed to expand the scope of a particular assessment)*

1. Are all storage facilities currently on-file with the Environmental Services Division and the Suffolk County Department of Health Services? Are the storage facilities consistent with the description on record (e.g., volume, type of material, location)?
2. All storage facilities have been designed, installed, and maintained in accordance with required procedures and SCSC Article 12.
3. Verify the following: (a) Storage facilities are labeled with the volume, material stored, SCDHS Tank Id. and BNL Tank Id.; (b) Records of weekly facility inspection including hi-level and leak detection test reports are maintained and are up-to-date; and (c) Copies of tank and piping system test reports are available and when applicable, have been performed in the presence of the SCDHS.
4. For new installations, were plans submitted to and approved by the SCDHS prior to commencement of construction? Were all required inspections conducted in accordance with this approval?
5. Have any storage facilities been closed or removed since the last review? If so, was this closure inspected and approved by the SCDHS?
6. If a permit (authorization) is required, has one been obtained and is it still valid (within effective date)?  
Are all permit (authorization) conditions being met?
7. GUIDANCE: Does the Dept/Div. maintain a comprehensive list of all storage facilities associated with their operations?

**Procedure:** *(Perform the following as applicable for the assessment)*

- Review assessment guidance card.
- Review applicable procedure/requirements.
- Observe the activity controlled by the procedure.
- Interview appropriate personnel about requirements and practices.
- Record observations based on comparison to guidance.
- Document the results.

**Basis for the Assessment:** *(Why is the assessment being done?)*

Periodic   
  Lessons Learned   
  Directed by Management   
  Responsive   
  Targeted

**Assessor(s):**

**Date of Assessment:**

**Location of Assessment:** *(Bldg/Room)*

## Self-Assessment Guidance Card

<b>Area:</b> <i>(General: Maintenance, Operations, Radiological Control, Etc.)</i> Underground Injection Control	<b>Date:</b> <i>(Guidance Card Completed)</i>
<b>Topic:</b> <i>(Specific: Work Initiation, Pumping Tank X, Smear Survey, Etc.)</i> Installation, Operation and Closure of Underground Injection Control Wells (UICs)	<b>Rev:</b> <i>(Optional)</i>
<b>References:</b> <i>(Cite Source Documents for Performance Expectations)</i> Safe Drinking Water Act; 40 CFR Part 144 – 146	

<b>Performance Expectations:</b> <i>(Criteria developed from Source Documents that will be applied throughout the Assessment. Performance expectations should be limited to six maximum to allow the assessment to remain focused. Additional Guidance Cards can be completed to expand the scope of a particular assessment)</i>
1. Are all UIC devices included in the Laboratory baseline inventory?
2. Have the use of the facility or the characteristics of the wastewater discharged to this UIC device changed since originally described on the baseline inventory?
3. There are no “industrial” operations conducted that contribute wastewater to this UIC. In addition there are no floor drains located in manufacturing or mechanical areas connected to this device.
4. Have any UIC devices been closed/abandoned since the last review? If so, was this closure performed in accordance with required procedures and in accordance with EPA directives?
5. Have any new UICs been installed since the last review? If so, is a copy of the EPA approval maintained in Dept. records?
6. GUIDANCE: For storm water systems, all grates are clear of debris, storage areas are neat and well maintained to prevent contamination of storm water run-off. Materials stored outdoors are free of surface corrosion, and there is no evidence of outdoor fabrication activities (e.g., metal turnings, weld splatter, misc. debris).
7.
8.

<b>Procedure:</b> <i>(Perform the following as applicable for the assessment)</i> <ul style="list-style-type: none"> <li>▪ Review assessment guidance card.</li> <li>▪ Review applicable procedure/requirements.</li> <li>▪ Observe the activity controlled by the procedure.</li> <li>▪ Interview appropriate personnel about requirements and practices.</li> <li>▪ Record observations based on comparison to guidance.</li> <li>▪ Document the results.</li> </ul>
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<b>Basis for the Assessment:</b> <i>(Why is the assessment being done?)</i> <input type="checkbox"/> Periodic <input type="checkbox"/> Lessons Learned <input type="checkbox"/> Directed by Management <input type="checkbox"/> Responsive <input type="checkbox"/> Targeted	
<b>Assessor(s):</b>	<b>Date of Assessment:</b>
<b>Location of Assessment:</b> <i>(Bldg/Room)</i>	

# Brookhaven National Laboratory

## ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>GENERAL REQUIREMENTS</b>		
<b>ELEMENT:</b>	4.1	<b>TITLE:</b>	General Requirements	
<b>ISO 14001 STANDARD:</b>				
		<b>NO</b>	<b>PARTIAL</b>	<b>YES</b>
The organization shall establish and maintain an environmental management system, the requirements of which are described in International Standard ISO 14001-1996				
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>				
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>				
<b>COMMENTS:</b>				
<b>EVALUATION:</b>				
MEETS REQUIREMENT	MINOR NONCONFORMANCE	MAJOR NONCONFORMANCE		
<b>OPTIONAL AUDITOR QUESTIONS:</b>				
<p>Has a program been established?            How long has the program been established?            Is it being maintained the requirements of International Standard ISO 14001-1996?</p>				

# Brookhaven National Laboratory ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>ENVIRONMENTAL POLICY</b>		
<b>ELEMENT:</b>	4.2	<b>TITLE:</b>	Environmental Policy	
<b>ISO 14001 STANDARD:</b>				
		<b>NO</b>	<b>PARTIAL</b>	<b>YES</b>
Top Management shall define the organization's environmental policy and ensure that it: <ul style="list-style-type: none"> <li>a) is appropriate to the nature, scale and environmental impacts of its activities, products, or services;</li> <li>b) includes a commitment to continual improvement and prevention of pollution;</li> <li>c) includes a commitment to comply with relevant environmental legislation and regulations, and with other requirements to which the organization subscribes;</li> <li>d) provides the framework for setting and receiving environmental objectives and targets;</li> <li>e) is documented, implemented, maintained and communicated to all employees;</li> <li>f) is available to the public.</li> </ul>				
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>				
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>				
<b>COMMENTS:</b>				
<b>EVALUATION:</b>				
MEETS REQUIREMENT	MINOR NONCONFORMANCE		MAJOR NONCONFORMANCE	
<b>OPTIONAL AUDITOR QUESTIONS:</b>				
Is the policy defined and is it appropriate to the type, size, and environmental impacts of the Collider-Accelerator activities? Does the policy include a commitment to continual improvement and evidence of such in the organization's operations? Does the policy include a commitment to pollution prevention and evidence of such in the organization's operations? Does the policy include a commitment to compliance to legal requirements and is there evidence indicating intent to comply? Does the policy include a mechanism for setting and reviewing environmental objectives and targets? Is the policy documented, implemented, maintained and communicated to all employees? Is the policy available to the public?				

# Brookhaven National Laboratory ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>PLANNING</b>	
<b>ELEMENT:</b>	4.3.1	<b>TITLE:</b>	Environmental Aspects
<b>ISO 14001 STANDARD:</b>			
		<b>NO</b>	<b>PARTIAL</b>
<p>The organization shall establish and maintain (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. The organization shall ensure that the aspects related to those significant impacts are considered in setting its environmental objectives.</p> <p>The organization shall keep the information up-to-date.</p>			
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>			
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>			
<b>COMMENTS:</b>			
<b>EVALUATION:</b>			
MEETS REQUIREMENT	MINOR NONCONFORMANCE	MAJOR NONCONFORMANCE	
<b>OPTIONAL AUDITOR QUESTIONS:</b>			
<p>Is there a documented and maintained procedure to review and update aspects?            What mechanism is used to initiate aspect review/revision when operations change?            Is there knowledge and use of significance criteria?            Are there records showing that analysis to select significant aspects was done?            Was there effort to include aspects over which there is influence?            Are there any obvious aspects that should have been considered and were not? If not, why not?</p>			

# Brookhaven National Laboratory ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>PLANNING</b>		
<b>ELEMENT:</b>	4.3.2	<b>TITLE:</b>	Legal and Other Requirements	
<b>ISO 14001 STANDARD:</b>		<b>NO</b>	<b>PARTIAL</b>	<b>YES</b>
The organization shall establish and maintain 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.				
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>				
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>				
<b>COMMENTS:</b>				
<b>EVALUATION:</b>				
MEETS REQUIREMENT	MINOR NONCONFORMANCE		MAJOR NONCONFORMANCE	
<b>OPTIONAL AUDITOR QUESTIONS:</b>				
Is there a documented procedure for the organization to identify and have access to all applicable legal requirements?				
Is someone (or more than one) designated to keep unit current on requirements?				
What are that persons resources, references, methods to keep current?				
How is applicability of new requirements determined?				

# Brookhaven National Laboratory

## ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>PLANNING</b>	
<b>ELEMENT:</b>	4.3.3	<b>TITLE:</b>	Objectives and Targets
<b>ISO 14001 STANDARD:</b>			
		<b>NO</b>	<b>PARTIAL</b>
<p>The organization shall establish and maintain documented environmental objectives and targets, at each relevant function and level within the organization.</p> <p>When establishing and reviewing its objectives, an organization shall consider the legal and other requirements, its significant environmental aspects, its technological options and its financial, operational and business requirements, and the views of interested parties.</p> <p>The objectives and targets shall be consistent with the environmental policy, including the commitment to pollution prevention.</p>			
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>			
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>			
<b>COMMENTS:</b>			
<b>EVALUATION:</b>			
MEETS REQUIREMENT	MINOR NONCONFORMANCE	MAJOR NONCONFORMANCE	
<b>OPTIONAL AUDITOR QUESTIONS:</b>			
<p>Has the organization established and maintained objectives and targets all significant aspects?</p> <p>Have the documented objectives and targets considered legal and other requirements?</p> <p>Are objectives and targets reasonable and measurable?</p> <p>Is there a documented and maintained procedure for periodically reviewing objectives and targets?</p> <p>Are objectives and targets communicated to the employees that are supposed to achieve them?</p> <p>Do objectives and targets reflect a commitment to pollution prevention?</p>			

# Brookhaven National Laboratory ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>PLANNING</b>		
<b>ELEMENT:</b>	4.3.4	<b>TITLE:</b>	Environmental Management Programme(s)	
<b>ISO 14001 STANDARD:</b>				
		<b>NO</b>	<b>PARTIAL</b>	<b>YES</b>
<p>The organization shall establish and maintain (a) programme(s) for achieving its objectives and targets. It shall include:</p> <ul style="list-style-type: none"> <li>a) designation of responsibility for achieving objectives and targets at each relevant function and level of the organization;</li> <li>b) the means and time-frame by which they are to be achieved.</li> </ul> <p>If a project relates to new developments and new or modified activities, products or services, programme(s) shall be amended where relevant to ensure that environmental management applies to such projects.</p>				
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>				
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>				
<b>COMMENTS:</b>				
<b>EVALUATION:</b>				
MEETS REQUIREMENT		MINOR NONCONFORMANCE		MAJOR NONCONFORMANCE
<b>OPTIONAL AUDITOR QUESTIONS:</b>				
<p>Are there programs to achieve all the identified objectives and targets?          Do the programs include schedules for completion and resources necessary to achieve the objectives and targets?          Do the programs assign responsibilities for completion of tasks in achieving objectives and targets?          Do the programs specify performance indicators and methods in performing monitoring and measurement?          Are all procedures that supplement the EMP's available to the appropriate personnel and current?          Are operational controls in place and working as expected?          Are records of operational controls and performance indicators managed and retained per plans?</p>				

# Brookhaven National Laboratory

## ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>IMPLEMENTATION AND OPERATION</b>		
<b>ELEMENT:</b>	4.4.1	<b>TITLE:</b>	Structure and Responsibility	
<b>ISO 14001 STANDARD:</b>		<b>NO</b>	<b>PARTIAL</b>	<b>YES</b>
<p>Roles, responsibility and authority shall be defined, documented and communicated in order to facilitate effective environmental management.</p> <p>Management shall provide resources essential to the implementation and control of the environmental management system. Resources include human resources and specialized skills, technology and financial resources.</p> <p>The organization's top management shall appoint (a) specific management representative(s) who, irrespective of other responsibilities, shall have defined roles, responsibilities and authority for</p> <ul style="list-style-type: none"> <li>a) ensuring that environmental management system requirements are established, implemented and maintained in accordance with this International Standard;</li> <li>b) reporting on the performance of the environmental management system to the top management for review and as a basis for improvement of the environmental management system.</li> </ul>				
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>				
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>				
<b>COMMENTS:</b>				
<b>EVALUATION:</b>				
MEETS REQUIREMENT		MINOR NONCONFORMANCE		MAJOR NONCONFORMANCE
<b>OPTIONAL AUDITOR QUESTIONS:</b>				
<p>Are roles and responsibility, and authorities defined, documented and communicated?</p> <p>Has management provided the necessary resources (people, technology, money) to accomplish this EMS?</p> <p>Has top management appointed an environmental management representative?</p> <p>Does the R2A2 of the environmental management representative document sufficient authority to accomplish a &amp; b above?</p>				

# Brookhaven National Laboratory

## ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>IMPLEMENTATION AND OPERATION</b>		
<b>ELEMENT:</b>	4.4.2	<b>TITLE:</b>	Training, Awareness and Competence	
<b>ISO 14001 STANDARD:</b>				
		<b>NO</b>	<b>PARTIAL</b>	<b>YES</b>
<p>The organization shall identify training needs. It shall require that all personnel whose work may create a significant impact upon the environment, have received appropriate training.</p> <p>It shall establish and maintain procedures to make its employees or members at each relevant function and level aware of</p> <ul style="list-style-type: none"> <li>a) the importance of conformance with the environmental policy and procedures with the requirements of the environmental management system;</li> <li>b) the significant environmental impacts, actual or potential, of their work activities and the environmental benefits of improved personal performance;</li> <li>c) their roles and responsibilities in achieving conformance with the environmental policy and procedures with the requirements of the environmental management system, including emergency preparedness and response requirements;</li> <li>d) the potential consequences of departure from specified operating procedures.</li> </ul> <p>Personnel performing the tasks which can cause significant environmental impacts shall be competent on the basis of appropriate education, training and/or experience.</p>				
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>				
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>				
<b>COMMENTS:</b>				
<b>EVALUATION:</b>				
MEETS REQUIREMENT		MINOR NONCONFORMANCE	MAJOR NONCONFORMANCE	
<b>OPTIONAL AUDITOR QUESTIONS:</b>				
<p>Have training needs been identified for those whose work can have a significant impact on the environment?</p> <p>Has the appropriate training been done and, where required, by qualified trainers?</p> <p>Are procedures established and maintained to make employees aware of a – d above?</p> <p>Are there specific, documented minimum requirements for each person performing a task that can cause significant environmental impact?</p>				

# Brookhaven National Laboratory

## ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>IMPLEMENTATION AND OPERATION</b>		
<b>ELEMENT:</b>	4.4.3	<b>TITLE:</b>	Communication	
<b>ISO 14001 STANDARD:</b>		<b>NO</b>	<b>PARTIAL</b>	<b>YES</b>
<p>With regard to its environmental aspects and environmental management system, the organization shall establish and maintain procedures for:</p> <ul style="list-style-type: none"> <li>a) internal communication between the various levels and functions of the organization;</li> <li>b) receiving, documenting and responding to relevant communication from external interested parties.</li> </ul> <p>The organization shall consider processes from external communication on its significant environmental aspects and record its decision.</p>				
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>				
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>				
<b>COMMENTS:</b>				
<b>EVALUATION:</b>				
MEETS REQUIREMENT		MINOR NONCONFORMANCE	MAJOR NONCONFORMANCE	
<b>OPTIONAL AUDITOR QUESTIONS:</b>				
<p>Are there procedures and records that are maintained for communications and activities regarding the company's environmental aspects and its overall EMS?</p> <p>How are internal communications between different levels and different functions documented?</p> <p>How are the receiving, documenting and responding to relevant questions from interested parties documented?</p>				

# Brookhaven National Laboratory ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>IMPLEMENTATION AND OPERATION</b>		
<b>ELEMENT:</b>	4.4.4	<b>TITLE:</b>	Environmental Management System Documentation	
<b>ISO 14001 STANDARD:</b>		<b>NO</b>	<b>PARTIAL</b>	<b>YES</b>
The organization shall establish and maintain information, in paper or electronic form, to: <ul style="list-style-type: none"> <li>a) describe the core elements of the management system and their interaction;</li> <li>b) provide direction to related documentation.</li> </ul>				
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>				
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>				
<b>COMMENTS:</b>				
<b>EVALUATION:</b>				
MEETS REQUIREMENT		MINOR NONCONFORMANCE		MAJOR NONCONFORMANCE
<b>OPTIONAL AUDITOR QUESTIONS:</b>				
How is the department's EMS documented and maintained? Does the EMS documentation address all ISO 14001 clauses? Is there organizational flow and continuity between all EMS documentation? Does the system document how the related documentation [regulations, permits, forms, etc.] is to be used?				

# Brookhaven National Laboratory ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>IMPLEMENTATION AND OPERATION</b>		
<b>ELEMENT:</b>	4.4.5	<b>TITLE:</b>	Document Control	
<b>ISO 14001 STANDARD:</b>		<b>NO</b>	<b>PARTIAL</b>	<b>YES</b>
<p>The organization shall establish and maintain procedures for controlling all documents required by this International Standard to ensure that:</p> <ul style="list-style-type: none"> <li>a) they can be located;</li> <li>b) they are periodically reviewed, revised as necessary, and approved for adequacy by authorized personnel;</li> <li>c) 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;</li> <li>d) obsolete documents are promptly removed from all points of issue and points of use, or otherwise assured against unintended use;</li> <li>e) any obsolete documents retained for legal and/or knowledge preservation purposes are suitably identified.</li> </ul> <p>Documentation shall be legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner and retained for a specific period. Procedures and responsibilities shall be established and maintained concerning the creation and modification of the various types of document.</p>				
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>				
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>				
<b>COMMENTS:</b>				
<b>EVALUATION:</b>				
MEETS REQUIREMENT		MINOR NONCONFORMANCE		MAJOR NONCONFORMANCE
<b>OPTIONAL AUDITOR QUESTIONS:</b>				
<p>Are there procedures for controlling and maintaining all documents required by this standard? Are the documents accessible?          Are the documents periodically reviewed, revised and approved for adequacy by authorized personnel?          Are latest versions of documents available in all areas and by all personnel that perform tasks essential to the effective functioning of the EMS?          Are obsolete documents removed from use and assured from unintended use? Are historical copies maintained &amp; labeled?          Are those obsolete documents that are retained for legal or knowledge reasons clearly identified?          Are documents dated with the latest revision, orderly, legible and retained for a specified period?          Are there procedures that define the who and how of creating or modifying documents?</p>				

# Brookhaven National Laboratory ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>IMPLEMENTATION AND OPERATION</b>		
<b>ELEMENT:</b>	4.4.6	<b>TITLE:</b>	Operational Control	
<b>ISO 14001 STANDARD:</b>		<b>NO</b>	<b>PARTIAL</b>	<b>YES</b>
<p>The organization shall identify those operations and activities that are associated with the identified significant environmental aspects in line with its policy, objectives, and targets. The organization shall plan these activities, including maintenance, in order to ensure that they are carried out under specified conditions by:</p> <ul style="list-style-type: none"> <li>a) establishing and maintaining documented procedures to cover situations where their absence could lead to deviations from the environmental policy and the objectives and targets;</li> <li>b) stipulating operating criteria in the procedures;</li> <li>c) 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 the suppliers and contractors.</li> </ul>				
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>				
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>				
<b>COMMENTS:</b>				
<b>EVALUATION:</b>				
MEETS REQUIREMENT		MINOR NONCONFORMANCE		MAJOR NONCONFORMANCE
<b>OPTIONAL AUDITOR QUESTIONS:</b>				
<p>Have the operations and activities been identified that are associated with the significant environmental aspects?          Are the identified operations and activities consistent with the company's policy, objectives and targets?          Is there a maintenance plan for the above identified operations and activities?          Have procedures been established and maintained for the above operations that, if they are not followed for these situations, could lead to deviations from the environmental policy and the objectives and targets?          Are operating criteria clearly established and documented in the procedures for the operations and activities identified above?          Have the significant environmental aspects of raw materials, supplies and services used in the above operations and activities been identified?          Are there procedures for handling raw materials, supplies and services used in the activities associated with significant impacts?          Are relevant procedures and requirements communicated to the appropriate suppliers and contractors?</p>				

# Brookhaven National Laboratory ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>IMPLEMENTATION AND OPERATION</b>		
<b>ELEMENT:</b>	4.4.7	<b>TITLE:</b>	Emergency Preparedness and Response	
<b>ISO 14001 STANDARD:</b>		<b>NO</b>	<b>PARTIAL</b>	<b>YES</b>
<p>The organization shall establish and maintain procedures to identify potential for and respond to accidents and emergency situations, and for preventing and mitigating the environmental impacts that may be associated with them.</p> <p>The organization shall review and revise, where necessary, its emergency preparedness and response procedures, in particular, after the occurrence of accidents or emergency situations.</p> <p>The organization shall also periodically test such procedures where practicable.</p>				
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>				
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>				
<b>COMMENTS:</b>				
<b>EVALUATION:</b>				
MEETS REQUIREMENT		MINOR NONCONFORMANCE		MAJOR NONCONFORMANCE
<b>OPTIONAL AUDITOR QUESTIONS:</b>				
<p>Are there maintained procedures to identify potential for accidents and emergency situations?</p> <p>Are there maintained procedures to respond to accidents and emergency situations?</p> <p>Are there maintained procedures to prevent and minimize the environmental impacts that may be associated with the identified accidents and emergency situations?</p> <p>Are there reviews and revisions of the emergency preparedness and response procedures, particularly after an incident?</p> <p>Are there periodical tests of the above procedures?</p>				

# Brookhaven National Laboratory

## ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>CHECKING AND CORRECTIVE ACTION</b>		
<b>ELEMENT:</b>	4.5.1	<b>TITLE:</b>	Monitoring and Measurement	
<b>ISO 14001 STANDARD:</b>		<b>NO</b>	<b>PARTIAL</b>	<b>YES</b>
<p>The organization shall establish and maintain 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. This shall include the recording of information to track performance, relevant operational controls and conformance with the organization's environmental objectives and targets.</p> <p>Monitoring equipment shall be calibrated and maintained and records of this process shall be retained according to the organization's procedures.</p> <p>The organization shall establish and maintain a documented procedure for periodically evaluating compliance with relevant environmental legislation and regulations.</p>				
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>				
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>				
<b>COMMENTS:</b>				
<b>EVALUATION:</b>				
MEETS REQUIREMENT		MINOR NONCONFORMANCE		MAJOR NONCONFORMANCE
<b>OPTIONAL AUDITOR QUESTIONS:</b>				
<p>Are procedures documented and maintained to monitor and measure operations that can have a significant impact on the environment?</p> <p>Is there a calibration system for monitoring equipment?</p> <p>Does the company have a documented procedure for periodically evaluating compliance with environmental legislation and regulations?</p>				

# Brookhaven National Laboratory

## ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>CHECKING AND CORRECTIVE ACTION</b>		
<b>ELEMENT:</b>	4.5.2	<b>TITLE:</b>	Nonconformance and Corrective and Preventive Action	
<b>ISO 14001 STANDARD:</b>		<b>NO</b>	<b>PARTIAL</b>	<b>YES</b>
<p>The organization shall establish and maintain procedures for defining responsibility and authority for handling and investigating nonconformance, taking action to mitigate any impacts caused and for initiating and completing corrective and preventive action.</p> <p>Any corrective or preventive action taken to eliminate the causes of actual and potential nonconformances shall be appropriate to the magnitude of problems and commensurate with the environmental impact encountered.</p> <p>The organization shall implement and record any changes in the documented procedures resulting from corrective and preventive action.</p>				
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>				
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>				
<b>COMMENTS:</b>				
<b>EVALUATION:</b>				
MEETS REQUIREMENT		MINOR NONCONFORMANCE		MAJOR NONCONFORMANCE
<b>OPTIONAL AUDITOR QUESTIONS:</b>				
<p>Are procedures documented and maintained for defining responsibility and authority for handling, investigating and taking action to minimize impacts of nonconformances?</p> <p>Are procedures documented and maintained for initiating and completing corrective and preventive action?</p> <p>Are appropriate corrective and preventive actions taken?</p> <p>Are the results of the corrective and preventive actions implemented and recorded?</p>				

# Brookhaven National Laboratory

## ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>CHECKING AND CORRECTIVE ACTION</b>		
<b>ELEMENT:</b>	4.5.3	<b>TITLE:</b>	Records	
<b>ISO 14001 STANDARD:</b>				
		<b>NO</b>	<b>PARTIAL</b>	<b>YES</b>
<p>The organization shall establish and maintain procedures for the identification, maintenance and disposition of environmental records. These records shall include training records and the results of audits and reviews.</p> <p>Environmental records shall be legible, identifiable, and traceable to the activity, product or service involved. Environmental records shall be stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss. Their retention times shall be established and recorded.</p> <p>Records shall be maintained, as appropriate to the system and to the organization, to demonstrate conformance to the requirements of this International Standard.</p>				
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>				
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>				
<b>COMMENTS:</b>				
<b>EVALUATION:</b>				
MEETS REQUIREMENT		MINOR NONCONFORMANCE		MAJOR NONCONFORMANCE
<b>OPTIONAL AUDITOR QUESTIONS:</b>				
<p>Are procedures documented and maintained for the identification, maintenance and disposition of environmental records?</p> <p>Are the records legible, identifiable and traceable to the activity, product or service involved?</p> <p>Are the records stored and maintained such that they are readily retrievable and protected against damage, deterioration or loss?</p> <p>Are there documented specified retention times for all of the records identified?</p> <p>Are the records maintained in a manner to demonstrate accordance with the standard and appropriate to the system and the organization?</p>				

# Brookhaven National Laboratory ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>CHECKING AND CORRECTIVE ACTION</b>		
<b>ELEMENT:</b>	4.5.4	<b>TITLE:</b>	Environmental Management System Audit	
<b>ISO 14001 STANDARD:</b>				
		<b>NO</b>	<b>PARTIAL</b>	<b>YES</b>
<p>The organization shall establish and maintain (a) programme(s) and procedures for periodic environmental management system audits to be carried out, in order to:</p> <ul style="list-style-type: none"> <li>a) determine whether or not the environmental management system               <ul style="list-style-type: none"> <li>1) conforms to planned arrangements for environmental management, including the requirements of this International Standard; and</li> <li>2) has been properly implemented and maintained; and</li> </ul> </li> <li>b) provide information on the results of audits to management.</li> </ul> <p>The organization's audit programme, including any schedule, shall be based on the environmental importance of the activity concerned and the results of the previous audits. In order to be comprehensive, the audit procedures shall cover the audit scope, frequency and methodologies, as well as the responsibilities and requirements for conducting audits and reporting results.</p>				
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>				
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>				
<b>COMMENTS:</b>				
<b>EVALUATION:</b>				
MEETS REQUIREMENT		MINOR NONCONFORMANCE	MAJOR NONCONFORMANCE	
<b>OPTIONAL AUDITOR QUESTIONS:</b>				
<p>Are procedures documented and maintained for periodic EMS audits?          Does the procedure for EMS audits include the scope of the audit, frequency, methodologies used, responsibilities, requirements, and method of reporting results.          Does the EMS audit determine whether their EMS has been implemented and maintained and conforms to this standard?          Does the EMS audit provide results of the audits to management?</p>				

# Brookhaven National Laboratory ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

Environmental Management System Model		<b>MANAGEMENT REVIEW</b>	
<b>ELEMENT:</b>	4.6	<b>TITLE:</b>	Management Review
<b>ISO 14001 STANDARD:</b>			
		<b>NO</b>	<b>PARTIAL</b>
<p>The organization's top management, shall at intervals that it determines, review the environmental management system, to ensure its continuing suitability, adequacy, and effectiveness. The management review process shall ensure that the necessary information is collected to allow management to carry out this evaluation. The review shall be documented.</p> <p>The management review shall address the possible need for changes to policy, objectives and other elements of the environmental management system, in the light environmental management system audit results, changing circumstances and the commitment to continual improvement.</p>			
<b>FACILITY IMPLEMENTATION OF STANDARD:</b>			
<b>EXISTING PROCEDURES AND DOCUMENTATION (LIST):</b>			
<b>COMMENTS:</b>			
<b>EVALUATION:</b>			
MEETS REQUIREMENT	MINOR NONCONFORMANCE	MAJOR NONCONFORMANCE	
<b>OPTIONAL AUDITOR QUESTIONS:</b>			
<p>Has the top management performed a documented review of the EMS on a periodic basis?</p> <p>Does the review address the system's continued suitability, the system's adequacy, the system's effectiveness, the system's possible need to change its policy, the system's possible need to change its objectives and other elements of the EMS in light of the audit results, continual improvement, etc., the system audit as required in 4.5.4, and the Nonconformances and Corrective and Preventive Action?</p> <p>Is there a record of decision that outlines actions for the coming year?</p>			

# Brookhaven National Laboratory ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

CRITERIA	Activity 1:	Activity 2:	Activity 3:	Activity 4:	Activity 5:
Knowledge of EMS policy	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____
Knowledge of existence of EMS	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____
Environmental aspects of personal task	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____
Awareness of how to avoid environmental degradation	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____
Awareness of how to contribute to unit's programs (e.g., recycling)	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____
Awareness of emergency response/actions	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____
How have affected employees been made aware of new requirements	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____		

# Brookhaven National Laboratory ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

<u>Footnotes/Comments:</u>	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____
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# Brookhaven National Laboratory ISO 14001 EMS Assessment

Organization:

Date:

Lead Auditor:

How are objectives and targets known to the employees that are supposed to achieve them	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____
Do affected employees know their roles, authorities and responsibilities	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____
Are operational controls in place and working as specified in OCF	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____
Are records on operational controls managed and retained per plans	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____		
Are employees aware and ready to execute emergency procedures for such	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____		
Have contractors been informed on any relevant operational controls	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____	<input type="checkbox"/> CON <input type="checkbox"/> MIN <input type="checkbox"/> MAJ <input type="checkbox"/> COM <input type="checkbox"/> OBS <input type="checkbox"/> Footnote: _____		
<u>Footnotes/Comments:</u>					



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## Definitions: Environmental Assessments

Effective: **June 2001**

Point of Contact: [Management Representative on Environmental Management Systems \(EMS\)](#), [Environmental Compliance Representative \(ECR\)](#)

Term	Definition
assessment	A formal evaluation of a work process, including both documented requirements and implementation.
Environmental Management System	A continual cycle of planning, implementing, reviewing, and improving environmental activities, including the associated programs, procedures, and records that define and support this system.
finding	Results of the evaluation of the collected audit evidence compared with the agreed audit criteria. "Finding" is a generic term used to describe the full continuum of audit conclusions, from major nonconformance through noteworthy practice.
nonconformance	Objective evidence exists that a requirement has not been addressed (intent), a practice differs from the defined system (implementation), or the system is not effective (effectiveness). <ul style="list-style-type: none"> <li>• major nonconformance - A system element missing, or there is evidence that a system element is not implemented or not effective. Multiple minor nonconformances may be grouped together as a major, if they are all examples of the same type of nonconformance.</li> <li>• minor nonconformance - A single observed lapse in a procedure or requirement, with evidence that the overall system requirement is defined, implemented, and effective.</li> </ul>
noncompliance	Nonadherence to an applicable regulatory requirement.
noteworthy practice	Performance that exceeds expectations in terms of efficiency and/or effectiveness and provides a model for others to follow. A noteworthy practice is a positive condition or strength.
observation	Not a nonconformance, but something that could lead to a nonconformance, if allowed to continue uncorrected; or an existing condition without adequate supporting evidence to verify that it constitutes a nonconformance.
senior manager	Associate/Assistant Laboratory Director and Director/Deputy Director, Department Chair/Division Manager, as applicable, and/or their designee.

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## Revision History: Environmental Assessments

Point of Contact: [Management Representative on Environmental Management Systems \(EMS\)](#), [Environmental Compliance Representative \(ECR\)](#)

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## Revision History of this Subject Area

Date	Description	Management System
June 2001	<p>This subject area was revised to</p> <ul style="list-style-type: none"> <li>• Eliminate annual EMS and Compliance Assessment requirements, which were replaced with the following:               <ul style="list-style-type: none"> <li>◦ EMS Assessment - As per ISO 14001, frequency based on importance of activity and past performance</li> <li>◦ Compliance Assessment - As per Executive Order 13148, all applicable regulatory requirements assessed every 3 years. (The requirement for annual Management Review remains the same, consistent with the requirement for annual self-evaluations, as per the Integrated Assessment Program).</li> </ul> </li> <li>• Use existing reviews (i.e., Experimental Safety Review, Process Evaluation Process) and inspections (i.e., Tier 1, 90-Day Area) to assess compliance.</li> <li>• Eliminate the requirement for an audit plan, describing instead the audit planning process and the use of the graded approach.</li> <li>• Add a requirement for the Assessor to brief the affected managers on the findings at the conclusion of the assessment.</li> <li>• Provide better descriptions in the Definitions for categorizing assessment findings, covering the full range from "noteworthy practice" to "major nonconformance."</li> <li>• Provide flexibility to auditors in use of checklists, equivalent qualifications, and size of assessment team (i.e., team of one is acceptable).</li> <li>• Provide references to the Integrated Assessment Subject Area, the latest revisions to the Nonconformance and Corrective and Preventive Action Subject Area, and ES&amp;H Standard 1.2.1, Corrective Action Management and Tracking for Internal and External Assessments.</li> <li>• Clarify and accurately describe expectations,</li> </ul>	Environmental Management System

	<p>facilitate ease in implementation, and remove redundancies, as recommended during a review of external audit findings.</p>	
August 1999	<p>A requirement for establishing a schedule of environmental assessments, based on the importance of the activity as well as past assessment results, has been added. The scope and applicability for EMS assessments has been clarified to cover both general awareness of EMS requirements as well as facility operations that have been determined to have significant impacts. A requirement to provide background documents to senior management for their review before the Management Review process has been removed, and an exhibit providing an sample agenda has been included.</p>	Environmental Management System
March 1999	<p>This subject area satisfies a new requirement to comply with ISO 14001 and the DOE/EPA Memorandum of Agreement. The audits replace the old Tier II audit system and should be integrated with departmental Tier I inspection programs and the Self Assessment Program.</p>	Environmental Management System

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