Joint Base Lewis-McChord (JBLM)	
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1. Authorization

In accordance with Army Regulation (AR) 200-1, the Joint Base Commander has overall responsibility for management of the environmental resources of JBLM (JBLM). Public Works (PW), JBLM is the staff directorate responsible for managing environmental compliance, conservation, protection and other environmental programs. The Environmental Division (ED) of PW is the installation environmental office and is responsible for day to day management of the JBLM environmental program.

The JBLM Environmental Management System (EMS) is intended to be conformant with the criteria defined in the international standard, ISO 14001:04 *Environmental Management Systems - Specification with Guidance for use.*

This Environmental Management Manual (EMM) provides an overview of JBLM's EMS. PW ED is the document proponent. Questions may be directed to (253) 967-5337.

2. Scope

2.1 The JBLM EMS applies to all Staff Directorates, activities, resident organizations, contractors, Sub-installations (Yakima Training Center) and off-base units/agencies utilizing JBLM facilities. For the purposes of this procedure, "resident organizations" are those defined as tenants in AR 200-1. Per AR 200-1, such organizations must follow host installation environmental policy.

2.2 The JBLM Directorate of Logistics has authority to deviate, as appropriate, from these procedures and follow the procedures in their Business Process Manual as long as they maintain compliance with both ISO 9001:2008 and ISO 14001:2004.

2.3 Yakima Training Center (YTC) is a sub-installation of JBLM and as such must conform to JBLM EMS procedures unless deviation is authorized. Any deviation must be coordinated with the JBLM EMS Coordinator.

2.4 Recognizing that many activities operating on JBLM fall under different command or supervisory authority and often have internal procedures for meeting operational requirements, these activities may deviate from prescribed JBLM procedures and format as long as deviations are coordinated with the JBLM EMS Coordinator and maintain conformance with ISO 14001:2004.

2.5 This manual reflects requirements implemented through the Army-led Joint Base Command. Non-Army units on JBLM will continue to meet any additional and applicable environmental requirements in coordination with their higher and/or Service headquarters. Joint Base Command does not inspect to these other Service requirements, though an organization may be subject to external inspection from their Service or higher headquarters.

3. References

3.1 ISO 14001:2004(E) (Environmental Management Systems — Specifications with Guidance for use)

3.2 ISO 19011: 2012 (Guidelines for Quality and/or Environmental Management Systems Auditing)

3.3 AR 200-1 (Environmental Protection and Enhancement), 13 December 2007

3.4 Fort Lewis Regulation 200-1 (Environmental Protection and Enhancement), 1 November 2004

3.5 JBLM Regulation 420-30 (Fire Prevention and Protection), 11 February 2013

3.6 JBLM Regulation 25-35 (Preparing and Publishing Joint Base Lewis-McChord Administrative Publications), 27 August 2012

3.7 JBLM Regulation 525-27 (Installation Emergency Management Program), 2 May 2011

3.8 U.S. Army Environmental Management System Implementers Guide, version 3.1, September 2007

4. Environmental Management System (EMS) Requirements

JBLM EMS requirements are summarized in this EMM. Throughout, reference is made to availability of documents on the JBLM Internet. The Internet address is: http://www.lewis-mcchord.army.mil/publicworks/sustainability/EMS/Default.aspx.

4.1 Definitions

For the JBLM EMS, the following definitions apply:

Auditor: person with the competence to conduct an audit.

Continual Improvement: recurring process of enhancing the EMS in order to achieve improvements in overall environmental performance consistent with the organization's environmental policy.

Corrective Action: action to eliminate the cause of a detected nonconformity.

Document: information and its supporting medium. The medium can be paper, magnetic, electronic or optical computer disc, photograph or master sample, or a combination thereof.

Environment: surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans and their interrelation. Surroundings in this context extend from within an organization to the global system.

Environmental Aspect: element of an organization's activities, products, or services that can interact with the environment. A significant environmental aspect is an environmental aspect that has or can have a significant environmental impact.

Environmental Impact: any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects.

Environmental Management System (EMS): part of an organization's management system used to develop and implement its environmental policy and manage its environmental aspects.

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

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

Environmental Objective: overall environmental goal, consistent with the environmental policy, that an organization sets itself to achieve.

Environmental Operating Permit (EOP): A comprehensive environmental document designed to include organizations without an EMS into the JBLM EMS. It is tailored to identify organizational activities and provide information necessary for the organization to meet environmental requirements applicable to their activities.

Environmental Performance: measurable results of an organization's management of its environmental aspects. In the context of environmental management systems, results can be measured against the organization's environmental policy, environmental objectives, environmental targets and other environmental performance requirements.

Environmental Policy: overall intentions and direction of an organization related to its environmental performance, as formally expressed by top management. The environmental policy provides a framework for action and for the setting of environmental objectives and targets.

Environmental Target: detailed performance requirement, applicable to the organization or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.

Installation Sustainability and EMS Management Review Board (IS/EMS-MRB): A board chaired by the Joint Base Commander and attended by senior management that meets quarterly to review environmental initiatives, progress, and issues; and provide guidance for the path forward.

Interested Party: person or group concerned with or affected by the environmental performance of an organization.

Internal Audit: systematic, independent, and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the EMS audit criteria are fulfilled.

Note : In many cases, particularly in smaller organizations, independence can be demonstrated by the freedom from responsibility for the activity being audited.

Nonconformity: non-fulfillment of an EMS requirement.

Organization: company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration.

Preventive Action: action to eliminate the cause of a potential nonconformity.

Pollution Prevention: use of processes, practices, techniques, materials, products, services or energy to avoid, reduce, or control (separately or in combination) the creation, emission, or discharge of any type of pollutant or waste in order to reduce adverse environmental impacts. Pollution Prevention can include source reduction or elimination; process, product, or service changes; efficient use of resources; material and energy substitution; reuse, recovery, recycling, reclamation and treatment.

Procedure: specified way to carry out an activity or a process.

Record: document stating results achieved or providing evidence of activities performed.

4.2. Environmental Policy

The Environmental Policy provides a common vision for managing JBLM environmental activities. The Joint Base Commander has defined and documented the Environmental Policy, which is accessible through the Sustainability link on the JBLM public website (http://www.lewis-mcchord.army.mil/publicworks/sustainability/default.aspx). A direct link to the Environmental Policy is http://www.lewis-mcchord.army.mil/publicworks/sustainability/EMS/environ_policy.aspx.

The Environmental Policy is communicated throughout JBLM organizations. It serves as the foundation for establishing and operating the JBLM EMS. The Environmental Policy is reviewed periodically by the Joint Base Commander and Joint Base Organization Directors/Heads to ensure that it remains appropriate to the nature, scale, and environmental impacts of JBLM activities, products, and services. It is updated as appropriate.

Contractors currently performing projects and services on JBLM are notified of and provided a copy of the JBLM environmental policy by the applicable contracting office. The policy and related EMS requirements are addressed during the post-award meeting between the contractor and the contracting office.

In addition to and complementing the above Policy, installation Regulation 200-1 contains specific policy statements related to mandated programs to conserve, protect and enhance the environment at JBLM.

4.3. Planning

4.3.1. Environmental Aspects

Successful environmental management requires that all organizations operating on JBLM have a thorough understanding of the environmental aspects and impacts of JBLM activities, products, and services.

Established procedures in installation Regulation 200-1 require that all major actions such as construction or deconstruction, brigade and higher-level field training exercises, and other actions that could have significant environmental impact be assessed prior to commencement under the National Environmental Policy Act process.

On a periodic basis, or as directed, JBLM reviews its recurring processes, activities, and services along with their associated environmental aspects. The scope of this review includes contributing actions by neighbors (e.g., the VA Hospital or Camp Murray), resident, and contractors. JBLM then identifies those environmental aspects over which it can exercise control or influence. Once identified, the aspects are further analyzed for the significance of their impact on the environment or personnel health and safety (see EMS-210, Identification of Environmental Aspects and Impacts, available on the JBLM Internet). As a result of this process, the JBLM EMS Coordinator and Organization EMS Representatives update the list of recurring JBLM processes, activities, and services. The list is then reviewed by the JBLM Environmental Division to identify the aspects and potential environmental impacts. The analysis concludes with a ranking of the aspects in order of potential significance, and a determination of the JBLM significant aspects.

The JBLM EMS Management Director and EMS Organizations will review the final list and present it at the next scheduled JBLM Installation Sustainability and EMS Management Review Board (IS/EMS-MRB) for approval. The determined significant aspects help inform and guide the ongoing establishment of installation environmental objectives.

4.3.2. Legal and Other Requirements

The JBLM commitment to comply with all applicable federal, state and local environmental legislation and regulations is contained in the Environmental Policy and in installation Regulation 200-1. Additionally, JBLM complies with Department of Defense and Department of the Army policies and regulations. PW, as the directorate that manages the JBLM environmental program, is responsible for monitoring all applicable environmental legislation and regulations. Each organization has the responsibility to notify PW ED of any regulatory or other changes unique to their operations that have the potential for impacting environmental operations.

PW ED accomplishes this function using the procedures described in EMS-200 (Identification of Legal and Other Requirements, available on the JBLM Internet). ED program managers are responsible for the review of legal and other requirements related to their specific program areas. Organizations are kept informed by the ED's Monthly Environmental Regulation Alert Summary, disseminated by e-mail to all applicable JBLM Organizations. In addition, ED program managers may directly interface with affected JBLM elements to ensure compliance.

Major changes in regulatory or legal requirements are also an agenda item at the IS/EMS-MRB. Such changes may result in revision of existing JBLM regulations or other documents. When notified of legal and other requirements, affected organizations review and revise their procedures and contracts as necessary to achieve compliance.

4.3.3. Objectives, Targets, and Program(s)

JBLM focuses its strategic sustainability planning by setting specific, measurable environmental objectives and targets that directly relate to the long-term goals of the

Installation Sustainability Program. These objectives and targets are relevant to the interests of JBLM, its stakeholders and other interested parties.

JBLM establishes documents and maintains environmental objectives and targets using the procedures in EMS-215 (Development of Environmental Objectives and Targets, available on the JBLM Internet). When establishing environmental objectives and targets, JBLM considers it's Significant Environmental Aspects, Legal and Other Requirements, the Environmental Policy, technological options, mission priorities and views of interested parties.

Proposed environmental objectives and targets are developed by PW ED and coordinated with applicable organizations. The proposed objectives and targets, or changes thereto, are presented for review by the Joint Base Commander and JBLM Organization Directors /Heads during an IS/EMS-MRB. Progress in achieving objectives and targets is also reviewed at these meetings.

Environmental objectives and targets are reviewed and revised as needed when regulatory/ program requirements or other influencing factors change. Organization EMS Representatives may recommend changes to established or proposed objectives and targets.

Each organization is responsible for implementing efforts towards achieving the objectives and targets by appointing an appropriate number of personnel to champion the effort within the organization. An organization's efforts are translated into action through Environmental Management Programs (see EMS-220, Environmental Management Programs; available on the JBLM Internet).

Each applicable objective and target must be incorporated into the organization's management program so as to be working toward meeting objectives and targets by the identified suspense. It is recommended that programs utilize a cross-functional team with representation from each of the sections within the organization in order to track and facilitate full organizational conformity. Key features of an environmental management program include:

- Designating personnel within the organization responsible for ensuring the completion of each applicable environmental objective and associated target(s).
- Developing and implementing a strategy for achieving each applicable objective and associated target(s) in accordance with the stated timeframe. This includes identifying resources that will be required.
- Developing or revising operational controls as necessary to achieve each applicable objective and target(s).
- Determining and periodically tracking performance indicators (metrics) necessary to measure completion.

Upon approval by management, implementation of an organizational management program is coordinated by the designated personnel and/or program team.

Performance data is periodically reported by the designated personnel or team leader to the Organization EMS Representative. The Representative in turn keeps organizational leadership apprised of status, particularly any issues that may preclude meeting the suspense. Representatives submit organization status on each objective and associated targets to the JBLM EMS Coordinator at the end of each fiscal year quarter or other indicated suspense.

A chart showing the linkage of significant aspects, objectives and targets and environmental management programs is at Figure 1.

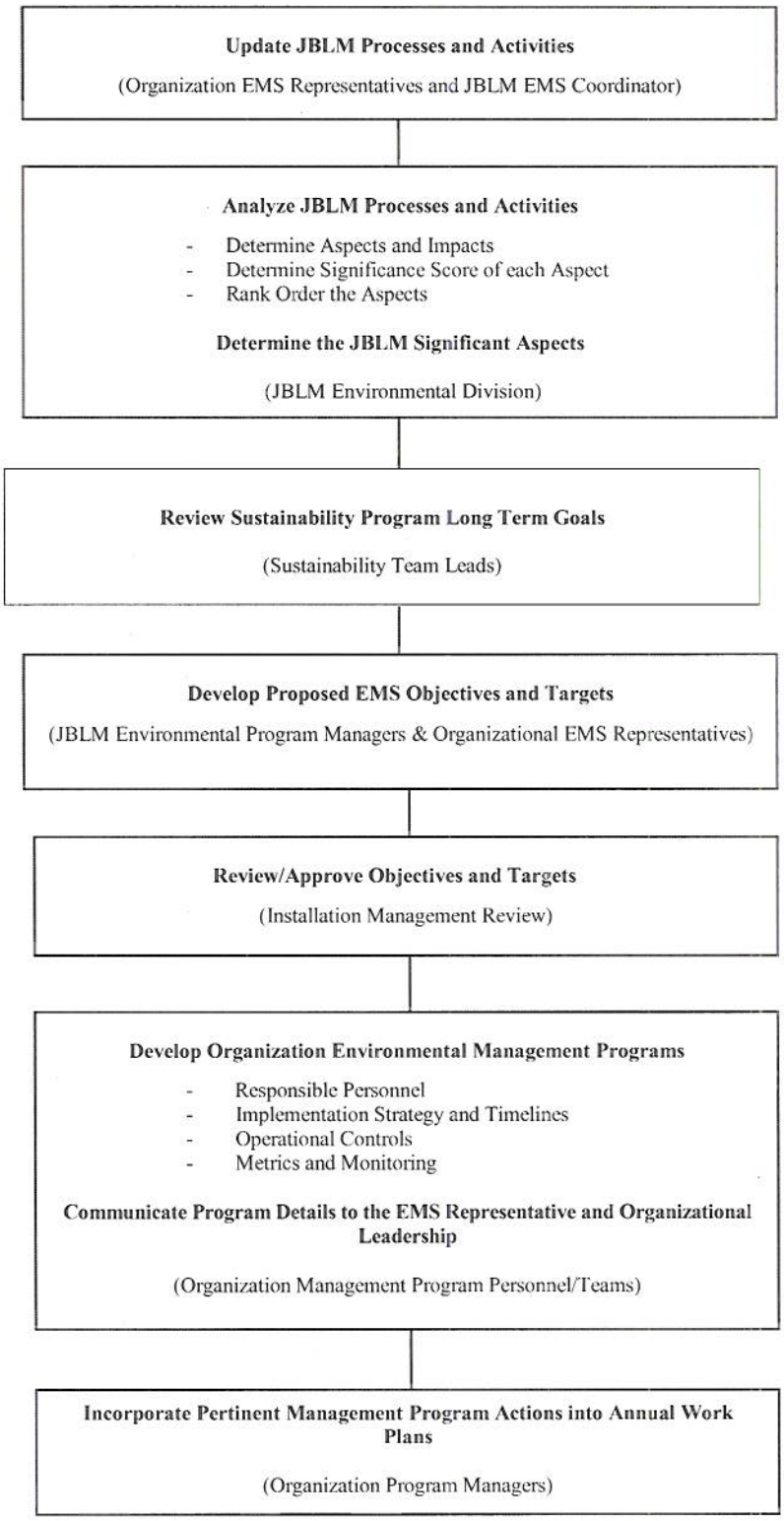

Figure 1. Linkage of Significant Aspects, Objectives and Targets, and Environmental Management Programs

4.4. Implementation and Operation

4.4.1. Resources, Roles, Responsibilities, and Authority

To facilitate effective environmental management, roles and responsibilities related to the EMS are assigned. Authority is granted, commensurate with each employee's responsibilities.

As stated at 4.3.2 and 4.3.3, procedures have been established and roles and responsibilities assigned for EMS planning activities. This includes the identification of environmental aspects and impacts, identification of legal and other requirements, and the establishment of objectives and targets; as well as the programs necessary to achieve those goals.

Operational control responsibilities include, but are not limited to, process and hazardous waste handling, implementing procedures, monitoring and measurement, document control and training. Trained individuals in each activity area manage environmental awareness and operational controls. See 4.4.6 below.

This section provides a general description of the installation EMS program's structure. The various procedures referenced in this EMM provide further detail on the assigned roles and responsibilities within that program. See also the JBLM EMS Summary of Responsibilities at the Appendix.

The Joint Base Commander defines the JBLM environmental policy and ensures the provision of resources (human resources, including specialized skills; technology resources and financial resources) for the operation of the EMS. The Joint Base Commander conducts periodic management reviews of the EMS to ensure its effectiveness and appropriateness to the JBLM mission and processes. In addition, the Joint Base Commander serves as, or appoints, the JBLM EMS Management Director.

The Deputy Joint Base Commander and/or Chief of Staff assist the Commander in carrying out top management's EMS responsibilities. The Deputy acts for the Commander in the Commander's absence.

The JBLM EMS Management Director has overall responsibility and authority to implement and manage the day-to-day operation of the JBLM EMS in coordination with the Organization Directors/Heads. If appointed, the JBLM EMS Management Director reports to top management (Joint Base Commander, or the Deputy Joint Base Commander during the Commander's absence).

The JBLM EMS Management Director is supported and assisted by the following:

- Organization Directors/Heads, who will ensure their management programs incorporate all applicable environmental requirements and considerations—to include installation objectives and targets—and are in conformance with the current ISO 14001 standard. Directors/Heads implement the JBLM EMS within their organizations, providing the needed management support and resources to do so. They appoint an EMS Representative to assist the JBLM EMS Coordinator in implementing and managing the day-to-day operation of the EMS. Directors/Heads also participate in periodic JBLM EMS management reviews and are responsible for ensuring their organizations meet the Directorate/Sub-installation roles and responsibilities identified at the Appendix.
- The PW ED Chief, who oversees and is responsible for installation environmental programs, including the EMS Program. The ED Chief approves Tier II documents and supervises the following individuals who have EMS-related responsibilities:

- ED Program Managers, who manage specific JBLM environmental programs and/or plans for media protection and resource conservation. Along with installation Sustainability Team Leads, they provide input regarding proposed objectives and targets. In addition, Program Managers review legal and other requirements and inform affected JBLM elements.
- The Installation Sustainability Coordinator, who works with Sustainability Team Leads to develop Sustainability Program Goals and formulate proposed objectives and targets.
- The JBLM Environmental Compliance Assessment Team that schedules and conducts periodic environmental compliance assessments of JBLM organizations.
- The JBLM EMS Coordinator, who coordinates implementation of and maintains requirements for the JBLM EMS. This includes monitoring, implementing and organizing the installation's effort. The EMS Coordinator initiates actions called for by the ISO standard, Army and Higher Headquarters and the JBLM procedures for EMS.
- The Environmental Operating Permit Coordinator, who prepares and maintains Environmental Operating Permits for JBLM organizations. An Environmental Operating Permit is a one-source environmental management document tailored for the organization which describes the organization's processes, environmental aspects, legal and other requirements, hazardous materials used and hazardous wastes generated, training and documentation requirements and other pertinent information such as recommended best management practices for pollution prevention.

- Organization EMS Representatives, each of whom serves as the organization point of contact for responding to and meeting EMS reporting and on call requirements. The Organization EMS Representative is supported and assisted by the following:
  - Designated internal personnel who help the organization meet current objectives and targets. Such personnel are pulled from each organization section and/or from organization functions related to the objectives and targets. As such, they are in a position to revise and/or track organization procedures, policies, etc., as needed to demonstrate meeting the objectives and targets. One method for achieving this is to form and task a cross-functional team.
  - Trained internal auditors from each EMS organization whose task is to conduct JBLM surveillance/internal audits. The Organization EMS Representative maintains the roster of internal auditors.
  - Personnel who perform administrative functions in support of the organization document control system.

Irrespective of other responsibilities, EMS management personnel on JBLM will ensure the following:

- The EMS is established, implemented and maintained in accordance with the current version of the International Standard ISO 14001 while supporting accomplishment of JBLM environmental management requirements and responsibilities.

- Joint Base and Organization top management; receive periodic reporting on the performance of the EMS. This will occur quarterly at a minimum, but will be as frequent as necessary to ensure the proper functioning of the EMS at both the organization and installation levels.
- Make recommendations to Top Management for improving the EMS.

Any employee may identify problems and initiate action to isolate nonconformities related to a procedure, process, work instruction or any element of the EMS. Responsibility and authority for; recording problems, initiating and recommending problem solutions and preventive actions, verifying solution implementation and controlling nonconforming products until corrections have been implemented are defined in EMS-255, Preventive and Corrective Action.

Emergency response procedures are detailed in the JBLM Integrated Contingency Plan (ICP). Site-specific emergency response plans are prepared and periodic familiarization training is provided to employees at the worksite.

JBLM EMS Management Reviews are conducted quarterly by the Joint Base Commander with the EMS Organization Directors/Heads. EMS-270, Environmental Management Review (available on the JBLM Internet), describes the management review process. Management Review meetings include a review of the overall system, internal audit results, corrective action status and other matters relevant to the operation and effectiveness of the EMS.

The Joint Base Commander and Organization Directors/Heads oversee environmental compliance and health and safety programs in the workplace. Some organizations such as PW, Madigan and the Joint Base Safety Office have an oversight responsibility that extends beyond their own organization—as defined in their mission and internal guidance.

4.4.2. Competence, Training and Awareness

Awareness of environmental matters and the impact of their daily activities make the EMS meaningful to employees. Both environmental awareness and technical competence are necessary for effective job performance. Any persons (including contractors) performing tasks that may cause significant environmental impacts on or on behalf of JBLM are required to be competent based on appropriate education, training and/or experience.

As part of the ISO 14001 EMS implementation, JBLM Organization Directors/Heads or their subordinate supervisors must identify training needs applicable to their personnel for tasks having the potential to cause an environmental issue. These training needs can be developed from a review of legal and other requirements. Identifying training needs provides the basis for preparing training plans. These plans are then used to schedule and track accomplishment of required training. Training needs are reviewed and updated at least annually. Organization Directors/Heads ensure that their personnel receive the appropriate training and that the training is documented. Training records are maintained in each organization as outlined in EMS-265, Environmental Records (available on the JBLM Intranet).

JBLM has established, implemented and maintains procedures for environmental training and qualification (See EMS-225, Environmental Training and Qualification; available on the JBLM Internet). The procedures will assist in developing fully qualified and trained persons, working for or on behalf of the organization, who will effectively accomplish their environmental responsibilities and have awareness of the following:

- Significant environmental impacts, actual and potential, of their work activities.
- Employee's role and responsibilities in conforming to policy, procedures and EMS requirements, including technical competency and emergency preparedness and response requirements.
- Importance of conforming to policy, procedures and EMS requirements.
- Environmental benefits of improved personal performance.
- Potential consequences of departing from specified operating procedures.

4.4.3. Communication

Internal and external communications allow for formulation and dissemination of information relevant to the EMS. Good communications are essential for proper execution of procedures and programs, allowing organizations and the installation to fulfill the environmental policy and achieve objectives and targets.

Procedures have been established for internal and external communications relevant to the EMS. (See EMS-230, Environmental Communications; available on the JBLM Internet).

Internal communications procedures provide for up, down and lateral flow of essential EMS and environmental-related information within organizations. These communications help ensure that the needed information is available at each level to perform the required environmental functions.

Procedures for external communications help manage information flow between organizations and external agencies and audiences. Most communications with regulatory or other outside agencies occur directly between the agency and the applicable JBLM organizations. Official communications with JBLM higher headquarters, where appropriate, is routed through the Joint Base Commander. Inquiries from the media, the public and other non-official external agencies are forwarded to the JBLM Public Affairs Office (PAO) for response. The PAO coordinates with the appropriate organization in preparing the response.

The Joint Base Commander has determined that the Environmental Policy will be available through the JBLM Public Web Site and upon request through the JBLM PAO.

4.4.4. Documentation

JBLM EMS Procedure Documents provide guidance for standardizing EMS-related policies, procedures, and records across the installation. EMS documents are categorized using a Tier system linking them to the applicable ISO 14001 element (requirement). The following elements constitute JBLM's EMS guidance documents:

Tier One Document. The Environmental Management Manual (EMM) provides an overview of the EMS, and refers to and cross-references related documentation such as EMS Procedures, Standard Operating Procedures (SOPs) and Environmental Management Programs.

Tier Two Documents. Includes Installation EMS procedures which are used to meet specific EMS requirements, they also outline the roles, responsibilities and authorities to fulfill the requirements. As appropriate, Tier Two procedures reference related documentation such as regulations, Environmental Management Programs and SOPs. Environmental compliance procedures are also referenced as appropriate in the Tier Two level of the EMS documentation.

Tier Three Documents. These include organizational-level work instructions (SOPs) and are developed to communicate specific organizational requirements for their mission

operations. SOPs are developed to communicate procedures which guide the organization to meeting regulatory and other requirements.

Tier Four documents are records required to be maintained by regulation and other requirements. They provide historical, objective evidence that activities have been performed and requirements have been met. Organizations must maintain such records, to include evidence of environmental information presented to top management (e.g., meeting minutes, meeting agendas, staff notes).

4.4.5. Control of Documents

JBLM Regulation 25-35 provides procedures for preparing, publishing and managing JBLM HQ and JBLM-wide administrative publications. Document management, to include document control, must also follow other applicable DoD and/or Service requirements, such as those cited in JBLM Regulation 25-35.

EMS-generated documents are controlled by established procedures (see EMS-240, Document Control; available on the JBLM Internet). Documents controlled by JBLM include those with installation-wide applicability, such as this EMM (Tier One) and general procedures (Tier Two). Work Instructions (Tier Three) and forms are maintained by the individual organization. Document coordinators within each organization maintain the pertinent lists of controlled documents and information about the documents (title, date, owner, location, etc.) in a document database or tracking system.

Controlling the issue, access and revision of EMS documentation ensures that each employee has up-to-date documents that are relevant to the employee's activities.

Agencies external to JBLM who generate documents used in the operation of the EMS are summarized below.

- Department of Defense (DoD) and applicable Service documents are published and controlled by the Proponent Agency at DoD or Service level.
- JBLM official publications such as JBLM regulations, circulars and forms are controlled through the Directorate of Human Resources.
- Resident Organization official publications that guide internal procedures are controlled by the Organization's Higher Headquarters
- Non-DoD/Service documents such as federal, state and local environmental regulations are published and controlled by the responsible agency.

Supervisors in organizations are responsible for obtaining, maintaining and controlling distribution of current copies of required documents. A list of these reference documents is maintained in the organization's document database or tracking system. Recommendations for changes to documents are made directly to the Proponent Agency responsible for the document.

As part of document control procedures, EMS Documents:

- Are not issued unless approved by the appropriate JBLM/Organization approving authority as outlined in EMS-240.
- Are numbered for identity.
- Are reviewed IAW DoD, JBLM and applicable Service policy requirements, unless other requirements are specified. SOPs (work instructions) are reviewed annually.
- Include the date of issue, if new. If revised, they contain the revision number and date of revision.

- When maintained online via an intranet or internet site, are Read Only files. When printed from these sites, they are clearly identified as uncontrolled documents for reference only.
- Are retained for a specified period.
- Are available in current versions where essential activities of the EMS are performed.
- Are promptly removed from issue and use once obsolete.
- When retained for legal or other purposes, are clearly identified as obsolete to prevent their unintended use.

Forms are controlled by having a title and date on the form and by being part of a controlled document (Tier Two Procedure or Tier Three Work Instruction) or, if not part of a controlled document (i.e., a separate form), by being listed in the organization's document database (or other document tracking system) or publications webpage.

4.4.6. Operational Controls

Operational Controls ensure that JBLM complies with environmental regulatory and other requirements, and progresses toward fulfilling its objectives and targets. JBLM uses various means to provide operational control for processes and their potential environmental impacts. These include installation regulations, Environmental Operating Permits, Hazard Communication Programs, an ICP, regulatory operating permits, SOPs and specific work instructions.

As a function of environmental program planning, organizations identify the operations and activities associated with their significant environmental aspects. Organizations plan these operations and activities (including maintenance) to ensure that they are performed under specified conditions that follow environmental policy, contribute to attaining objectives and targets, and comply with specified environmental permits, procedures or requirements.

Contractors that do business with JBLM organizations are notified of pertinent environmental requirements through contract language and meetings with contract administrators. Organizations must incorporate a general EMS clause as well as specific applicable environmental requirements identified during the contract development and review process (see EMS-235, Identification and Incorporation of Legal and Other Requirements in organizational Contracts and Work Specifications; available on the JBLM Internet). Contracts on JBLM are managed by a variety of contracting offices. These include, but are not limited to; US Army Corps of Engineers, US Army Mission and Installation Contracting Command, MEDCOM Western Regional Contracting Office, Army Family and Morale, Welfare and Recreation Command, Defense Commissary Agency, Defense Logistic Agency and Army Air Force Exchange Service. In each instance, the environmental requirements identified in the contract are discussed with the contractor at the post-award, pre-construction, contract negotiation and/or other meetings prior to work or service commencement.

4.4.7. Emergency Preparedness and Response

JBLM Regulation 525-27 establishes and describes the emergency management program on JBLM. Procedures must also follow other applicable DoD and/or Service requirements, such as those cited in JBLM Regulation 525-27. Additionally, emergency response procedures are detailed in the JBLM ICP. Site-specific emergency response plans are prepared and periodic familiarization training is provided to employees at the worksite.

Proper preparations for and responses to emergency situations minimize adverse environmental impacts in the event of an actual emergency. Organizations maintain emergency preparedness and response procedures to:

- Identify potential for accidents and emergency situations.
- Respond to accidents and emergency situations.
- Prevent and mitigate the environmental impacts that may be associated with accidents and emergency situations.

The primary type of emergency with potential environmental impacts is a hazardous substance spill and/or release. Organizations follow the emergency response procedures for hazardous substance spills and releases that are detailed in the JBLM ICP.

The JBLM Fire Department is a first response agency for hazardous spills and releases, and participates in emergency response exercises that are conducted periodically to practice procedures in the ICP. As practicable, these exercises are conducted in cooperation with local emergency response agencies and range from tabletop to full field events. They provide the opportunity to rehearse coordination and control procedures such as the Incident Command System, exercise communications systems, and hone the skills of first response agencies (these include the Fire Department, Military Police, Madigan Army Medical Center and PW ED). Scenarios for the exercises are developed for potential emergencies such as hazardous substance spills, aircraft disasters, fires and earthquakes.

Responses to emergencies such as fires, floods and earthquakes are implemented through an Organization Emergency Operations Plan. If the severity of the emergency requires, both the JBLM Emergency Operations Center and organizational Departmental Operation Centers may be activated. If the emergency also requires a response to a hazardous substance spill or release, the spill or release is handled as prescribed in the ICP.

At each appropriate worksite, site-specific emergency response plans are prepared and maintained. Employees at the worksite undergo periodic familiarization training in the emergency response procedures outlined in the plan.

Established procedures in JBLM Regulation 420-30 require organizations to ensure a fire prevention program is established, implemented and maintained.

4.5. Checking

4.5.1. Monitoring and Measurement

Organizations establish, implement and maintain procedures to monitor and measure the key characteristics of its operations and activities that can have a significant impact on the environment and/or employee health and safety.

Monitoring and measurement is necessary to verify operational control, evaluate the organization's performance in achieving their objectives and targets and to provide input for management decisions. For organizations without an EMS, Environmental Operating Permits provide information to assist in execution of the operational controls at the organizational level.

At the environmental management program level, metrics are developed for monitoring and measuring achievement of organizational objectives and targets. Examples of items monitored include; reduction in hazardous substance spills, air emissions, toxic air releases, hazardous wastes generated and inventories of hazardous chemicals. Procedures for information reporting for monitoring purposes are contained in pertinent chapters or

appendices of installation Regulation 200-1, Environmental Operating Permits and in various environmental management plans.

Monitoring and measuring equipment is calibrated and maintained according to established procedures (see EMS-245, Maintenance and Calibration of Monitoring and Measuring Equipment; available on the JBLM Internet). These procedures include provisions for record keeping. A log of all monitoring and test equipment is maintained in each organization as appropriate.

Organization procedures for monitoring and measurement include the periodic evaluation of environmental compliance (see EMS-250, Monitoring and Measurement; available on the JBLM Internet). A compliance assessment team in ED conducts periodic compliance assessments at the organizational level. Additionally, every three years JBLM undergoes an external environmental compliance assessment (the Army's Environmental Performance Assessment System, or EPAS) and EMS audit. Results of all assessments and audits are used to generate management reports such as the Installation Status Report for use by Joint Base Command senior management. These results also provide input for EMS management reviews.

4.5.2 Evaluation of Compliance

Organizations establish, implement and maintain procedures for periodically evaluating compliance with legal requirements. Records of the evaluation results are maintained.

Organizations also evaluate compliance with other applicable requirements (e.g., installation, headquarters and/or Service policies) and maintain records of the results.

4.5.3. Non-conformance, and Corrective and Preventive Action

Continuous improvement of the EMS requires that non-conformances are identified and effectively corrected through the accurate identification of root causes.

Procedures are maintained for identifying and handling non-conformances and other conditions requiring preventive and corrective action.

The preventive and corrective procedures (see EMS-255, Preventive and Corrective Action; available on the JBLM Internet) define the responsibility and authority for:

- Investigating the non-conformance or condition
- Taking action to mitigate any impact of the non-conformance or condition
- Initiating and completing corrective and preventive action.

Actual and potential non-conformances are identified in a number of ways, including employee observations as well as internal and external audits. The non-conformances are documented, assigned for identification of root cause and corrective action and tracked to final resolution by the Organization EMS Representative and JBLM EMS Coordinator. If the non-conformance is an organization-wide systemic problem, the EMS Representative will coordinate with the JBLM EMS Coordinator for root cause determination and corrective action.

Corrective and preventive action resulting from non-conformances may result in changes to documented procedures. The Organization EMS Representative coordinates the recording and implementation of the changes and reports them back through the Preventive and Corrective Action Plan (PCAR) system.

The status of preventive and corrective actions is an agenda item at JBLM EMS Management Review meetings.

Note that these procedures do not include the handling of neighbor complaints that affect organizations; these are resolved through existing JBLM systems. Nor do they include all responses to environmental non-compliance findings, which are reported and tracked through existing Army or PW systems (e.g., EPAS, the Installation Status Report, findings resulting from compliance inspections by regulatory agencies and findings from the JBLM Environmental Compliance Assessment Team). Only such findings that are subsequently converted into a JBLM PCAR fall under JBLM EMS procedures for preventive and corrective action.

Neighbor complaints: These are addressed individually by JBLM as they arise. Noise and other complaints from the public are forwarded to and replied to by the PAO (or, if received by another agency, are forwarded to the PAO). The PAO coordinates with the responsible JBLM organization in preparing the response. For example, if a PW activity were the cause of the complaint, then PW would investigate the complaint and prepare a draft response for the PAO. Complaints or issues from external agencies that interact with JBLM sometimes come directly to the JBLM command group. These are forwarded to the responsible JBLM organization for investigation and reply.

Feedback from neighbors that may require action is also received by JBLM personnel who are members of or participate in recurring contacts with external groups. For example, JBLM personnel participate in meetings of local environmental groups such as natural resources and water quality groups, and local emergency planning committees on hazardous materials. Issues that these individuals receive from their contacts with neighbors are forwarded to the responsible JBLM organization for investigation and resolution. Such issues are coordinated with PAO, as appropriate.

4.5.4. Control of Records

EMS records provide objective evidence that environmental management in organizations is being conducted as stated in the EMS.

Procedures for maintaining records are established by the Army Records Information Management System (AR 25-400-2), or equivalent Headquarters/Service requirements for non-Army components. Records are maintained by organizations as appropriate.

Environmental records are traceable to the activity, product or service involved. Records are created, stored and maintained to ensure that they are legible, identifiable, readily retrievable and protected against damage, deterioration or loss.

Retention times for records are as defined in the Army Records Information Management System or in meeting other statutory or regulatory requirements.

4.5.5. Internal Audit

The EMS undergoes surveillance through internal and external audits. The audits provide the means for identifying opportunities to improve the effectiveness of the EMS.

A program and related procedures are maintained for periodic internal EMS audits (see EMS-260, Internal Audit; available on the JBLM Internet). These audits determine whether the EMS:

- Conforms to planned arrangements for environmental management
- Conforms to the requirements of ISO 14001
- Has been properly implemented and maintained

Internal surveillance audits of installation organizations are scheduled by the JBLM EMS Coordinator in coordination with the Organization EMS Representatives.

Results of audits are documented by the JBLM EMS Coordinator and are an agenda item during JBLM and Organization EMS Management Reviews, if pertinent. Non-conformances resulting from the audits are documented and tracked for corrective action as described in EMS-255 (Preventive and Corrective Action, available on the JBLM Internet).

Internal auditors throughout JBLM have been trained. The JBLM EMS Coordinator and Organization EMS Representatives maintain a current list of these auditors and the JBLM EMS Management Coordinator schedules internal auditor training as needed to maintain an adequate number of auditors available to conduct audits. The auditors are assigned as appropriate to accomplish the internal surveillance audits.

Every three years, JBLM undergoes an external audit by Army Environmental Command as part of the Army's EPAS. The Program Management portion of the EPAS is assessed according to ISO 14001 standards. EPAS findings relevant to specific organizations and the EMS are provided to the JBLM EMS Coordinator and applicable Organization EMS Representatives for the coordination of preventive and/or corrective action as required.

4.6. Management Review

The Joint Base Commander leads the Continual Improvement process by periodically conducting a comprehensive review of the EMS and as part of the IS/EMS-MRB associated progress toward objectives and targets.

Quarterly, the Joint Base Commander and Organizational Directors/Heads review the EMS to ensure its continuing:

- Suitability to the JBLM mission, vision and culture
- Adequacy in fulfilling policy and requirements of ISO 14001
- Effectiveness in managing and improving environmental performance

Each review considers the need for possible changes in the Environmental Policy, Environmental Objectives and other elements of the EMS. These changes may be appropriate based on EMS audit results, changing circumstances and commitment to continual improvement.

JBLM has established a process for Management Review that ensures the necessary information is collected to allow top management to perform the review. (See EMS-270 Management Review; available on the JBLM Internet). The EMS Representative coordinates the agenda for Management Review meetings. All Reviews are documented.

H. CHARLES HODGES, JR.
Colonel, IN
Commanding

Appendix A

JBLM EMS Summary of Responsibilities

(See Page A6 for Military Resident, Contractor, and Non-Military Resident Responsibilities)

	JBLM Leadership		Environmental Division (PW ED)		JBLM Directorates/Subinstallations	
	What	How	What	How	What	How
EMS Elements						
4.2 Environmental Policy	• Approve the Installation Environmental Policy • Provide resources needed to implement	• Approve and sign the policy • Ensure resources are accounted for and available	• Develop, maintain, and communicate the policy • Identify resources necessary to implement and notify Joint Base Leadership	• Draft, staff, and finalize the policy • Research, determine, and then communicate through established channels	• Review and provide input • Communicate to employees/subinstallation organizations • Ensure compliance with the policy within the organization/subinistallation	• Review and comment during staff action • Post on web site and/or official Bulletin Boards. Brief during environmental awareness training • Monitor for non-conformance and implement appropriate preventive and corrective actions when detected
4.3 Planning						
4.3.1 Aspects	Understand the Installation Significant Aspects and the objectives and targets that address them	Review and provide input during EMS Management Reviews	Identify Significant Environmental Aspects (SEAs). Review annually to determine if current or if new should be developed	• Collect Processes from across the installation utilizing input from EMS organizations and EOPs • Team leaders/Program Managers review processes and determine SEAs annually • Review processes to identify SEAs using JBLM EMS procedures	• Annually identify and review your processes that impact the environment • Submit to Environmental Division annually as required	Collect and collate information from Division/Section Chiefs
4.3.2 Legal and Other Requirements	Commit to compliance with all applicable legal and other requirements	• Incorporate into Environmental Policy and other applicable direction to JBLM organizations • Monitor compliance through management reviews, reviews of audit findings, and other appropriate briefings/status updates	• Keep a current listing of regulatory requirements affecting Installation programs • Transmit changes monthly to EMS organizations and the Installation EMS / EOP Coordinator	• Program Managers identify and keep a current listing of applicable regulatory requirements for their program • Review /update Reg 200-1 and other applicable installation regulations and policies as required • Consolidate regulatory updates and transmit to EMS organizations. • Update regulatory references in the EOP and Review and update applicable environmental procedures (Best Business Practices) as required	• Identify legal and other requirements applicable to organization activities annually • Monitor compliance to environmental requirements for all organization/ subinstallation actions, to include contracts	• Review installation Reg 200-1 to identify your JBLM and other general environmental requirements • For actions with potential environmental impacts, identify and maintain a list of additional regulatory and other requirements unique to your operations and not covered by installation Reg 200-1. Review and update the list annually. Inform JBLM EMS/EOP Coordinator of these additional requirements

	JBLM Leadership		Environmental Division (PW ED)		JBLM Directorates/Subinstallations	
	What	How	What	How	What	How
4.3.3 Objectives and Targets	Approve objectives and targets as well as the programs and milestones to attain them	Review and approve as submitted and during EMS Management Reviews	• Establish Installation Sustainability Goals based on review of significant environmental aspects • Establish annual objectives to support Sustainability Goals	Program Managers review and develop using EMS procedures	• Review and provide input • Implement planning and actions to achieve objectives and targets	• Review organization/subinstallation actions to determine planning and action necessary to achieve • Identify and designate personnel who will lead the effort for each objective and associated targets • Implement plans and actions • Monitor progress as often as needed to meet stated suspense • Review and provide input during EMS Management Reviews. Recommend any changes at EMS Management Reviews and/or to EMS Coordinator • Notify EMS Coordinator of obstacles that preclude achieving objectives and targets.
4.4 Implementation and Operation						
4.4.1 Resources, Roles and Responsibilities	• Appoint JBLM EMS Director from within Joint Base Command • Meet roles and responsibilities defined herein and in EMS-100		• Designate and staff JBLM EMS Coordinator • Meet roles and responsibilities defined herein and in EMS-100		• Appoint EMS Representative • Identify personnel that manage environmental programs and support Representative. Invest with authority to do so	• Designate and/or appoint such individuals on orders, as requested and necessary to achieve requirements and maintain EMS conformance • Meet roles and responsibilities defined herein and in EMS-100
4.4.2 Competence Training and Awareness	• Provide resources necessary • Establish requirement for identifying and conducting applicable training for actions with the potential to impact the environment		• Identify regulatory and mandated training requirements applying to environmental programs • Communicate requirements to applicable organizations	• Review regulations, policies, and guidance. • Communicate via email or other appropriate method using established communications procedures	• Identify training requirements applicable to organization/subinstallation processes that have the potential of impacting the environment • Develop a system for tracking and maintaining training qualifications	• Review training requirements provided by PW ED • Review organizational processes and determine if there is potential for environmental impact. For such actions, determine what training is appropriate to avoid an environmental hazard • Establish a training management system for tracking and keeping current all training requirements • Either conduct or provide the identified training to those who require training, to include contractors • When initiating contracts, incorporate general EMS clause and all environmental requirements in the contract language • Provide input to PW ED as required and requested • Conduct environmental awareness training annually

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	JBLM Leadership		Environmental Division (PW ED)		JBLM Directorates/Subinstallations	
	What	How	What	How	What	How
4.4.3 Communications	• Communicate importance of EMS • Communicate with internal and external entities as required and necessary	• Provide support/emphasis for the EMS at Directors meetings and during Management Reviews • Communicate in accordance with established procedures	• Communicate environmental requirements, changes, policies etc • Address inquiries from regulators and appropriate organizations /individuals • Inform stakeholders of environmental goals, programs, and objectives	• Via regulations, procedures, EOPs, email, meetings, outreach activities, etc • Coordinate with, or direct inquiries to, PAO as appropriate	• Communicate environmental requirements, changes, policies, etc, to employees/subinstallation personnel • Answer or route external inquiries as appropriate • Inform stakeholders of environmental goals, programs, and objectives	Use established communications procedures
4.4.4 Documentation	Support installation documentation procedures	Sign/approve applicable regulations, policies, and guidance	Develop and maintain installation policy, aspects, Sustainability Goals, objectives and targets, EMS manual and procedures	In accordance with installation documentation and EMS procedures	Develop and maintain appropriate/applicable appointment orders, SOP's, plans, objectives and targets, meeting minutes, staff notes, etc	In accordance with installation documentation and EMS procedures
4.4.5 Control of Documents	Provide support for management procedures	• Sign/approve applicable regulations, policies, and guidance • Address nonconformance via Management Reviews and applicable PCAR reviews	• Establish and communicate EMS document control procedures • Identify and maintain Environmental Program management documents (e.g., SOPs and records)	• In accordance with established installation documentation, communication, and EMS procedures • Program Managers identify and maintain list of management documents, review annually, and update as required	Identify documents maintained by the organization (e.g., SOPs and records) related to actions/processes with a potential environmental impact	Maintain a list of such documents, review annually, and update as required in accordance with installation EMS procedures
4.4.6 Operational Control	Provide support for management procedures	• Sign/approve applicable regulations, policies, and guidance • Address nonconformance via Management Reviews and applicable PCAR reviews	• Communicate installation environmental requirements to JBLM organizations • Develop and maintain SOPs and other appropriate operational controls for installation environmental programs	• Write, review, maintain, and disseminate installation Reg 200-1 and other operational controls • Develop the Environmental Operating Permit (EOP) for designated organizations • Establish EMS procedures • Coordinate operational controls with JBLM organizations as appropriate (e.g., regulatory permits)	• Identify organization/ subinstallation procedures with the potential to impact the environment • Determine if a SOP or other operational control is required • Develop operational control and have available for use by workers • Maintain a current list of SOPs and other operational controls	In accordance with installation documentation and EMS procedures
4.4.7 Emergency Preparedness and Response	Review effectiveness as necessary	During Management Reviews, emergency management, briefings, etc	As part of established audits and assessments, determine if potential environmental dangers have been identified and appropriate measures are in place	Conduct EPAS, Environmental Compliance Assessments, and EMS Audits.	• Identify areas and actions with the potential for emergency events with impact to the environment • Develop an emergency response plan • Practice the plan • Maintain a record of exercising the plan • Develop contingency plans as required by mission	• Review processes performed and materials used • In accordance with installation emergency and contingency planning requirements and Reg 200-1

	JBLM Leadership		Environmental Division (PW ED)		JBLM Directorates/Subinstallations	
	What	How	What	How	What	How
4.5 Checking						
4.5.1 Monitoring and Measurement	Review objective and target metrics	During EMS Management Reviews and as necessary	• Identify regulatory requirements for monitoring environmental areas and communicate as necessary • Identify ED controlled equipment used in the monitoring and arrange for proper maintenance/calibration of monitoring equipment	• Review regulatory drivers for monitoring requirements • Review equipment manuals for maintenance and calibration requirements.	• Identify and examine monitoring and measurement equipment used by the organization to determine if misuse or inaccurate readings could lead to an environmental issue • Determine maintenance and calibration requirements for any such equipment. • Schedule maintenance and calibration requirements as required. Maintain records	Maintain and calibrate equipment in accordance with equipment manuals and applicable ARs or other requirements
4.5.2 Evaluation of Compliance	Provide resources, review assessments as appropriate and provide support, as necessary, to cause corrective action to occur.		• Conduct Environmental Compliance Assessments annually. Provide a written assessment of each organization • Coordinate external evaluations by regulatory inspectors and DoD/Army auditors. Address any identified noncompliance • Conduct routine monitoring and testing as required and appropriate	In accordance with AR 200-1, installation Reg 200-1, and other applicable federal, state, local, DoD, and Army requirements	• Conduct internal compliance evaluations as applicable and required • Prepare for and facilitate installation inspections and audits of the organization as required	Review installation Reg 200-1 for applicable inspection and audit requirements
4.5.3 Nonconformity, Corrective and Preventative Action	Review corrective action completion status and provide guidance/support as necessary	During staff meetings and Management Reviews	Establish and communicate procedures for reporting, evaluating, documenting, and following up on environmental issues and concerns	Via installation Reg 200-1 and EMS Tier II documents	• Monitor for and identify instances of non-conformance or non-compliance • Once identified, conduct a root cause analysis • Develop and implement corrective actions as appropriate	In accordance with installation Reg 200-1 and Tier II EMS guidance
4.5.4 Control of Records	Provide resources and support as needed	• Sign/approve applicable regulations, policies, and guidance • Monitor status via Management Reviews and adjust resources as needed to address non-conformances	Develop and communicate procedures for maintenance of environmental records	Via installation Reg 200-1 and EMS Tier II documents	Implement procedures for maintaining records and assure pertinent records are maintained	In accordance with JBLM EMS requirements and Reg 200-1

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	JBLM Leadership		Environmental Division (PW ED)		JBLM Directorates/Subinstallations	
	What	How	What	How	What	How
4.5.5 Internal Audit	• Remain apprised of status • Provide resources and support as needed	Review audit results and provide input during EMS Management Reviews and as needed	• Coordinate/conduct Internal Auditor training • Plan and conduct Installation Surveillance audits with tasked organizational auditors • Maintain Surveillance audit reports	• Via internal assets or through a contract arrange for annual auditor training • Using tasked EMS auditors from JBLM organizations • Reports maintained by EMS Coordinator	• Conduct an annual audit of EMS requirements • Maintain a pool of trained EMS auditors • Provide EMS auditors, as required, for Installation Surveillance audits	• Using JBLM EMS audit guidance. Record findings. Develop and implement a corrective action plan • Train and provide auditors in accordance with EMS procedures
4.6 Management Review	Ensure an installation EMS Management Review is held at least annually	• Participate in, provide input for, and implement guidance from the quarterly EMS Management Reviews (IS/EMS-MRB) • Require participation by identified JBLM EMS organizations	Coordinate, plan, and conduct Management Reviews. Cover required topics. Maintain a record (minutes) of the Management Review	• Establish date with the Command Group • Collect data from contributors • Compile information for presentation • Conduct management review • Write and post minutes from the Review • Track actions on taskers	• Participate in the JBLM EMS Management Review • Provide input as required • Conduct and document organizational meetings at which environmental topics are addressed	• Attend scheduled EMS Management Reviews • Provide input for required objectives and other assigned tasks • Include and document environmental topics in staff meetings

	Military Residents		Contractors		Non-Military Residents	
	What	How	What	How	What	How
EMS Elements						
4.2 Environmental Policy	Communicate policy to Service members and employees	• Post on official bulletin boards, websites, SharePoint, etc • Address the policy during organizational environmental awareness training	Communicate to employees	Through internal communications and training systems	Communicate to employees	• Post on official bulletin boards, websites, SharePoint, etc • Address the policy during organizational environmental awareness training
4.3 Planning						
4.3.1 Aspects	Coordinate and establish EOP with PW ED	• Review EOP annually in coordination with PW ED • Verify that the unit's potential impact on the environment is accurately identified in the EOP • Identify and review processes in coordination with PW ED	• Determine if you are part of a company-wide Environmental Management System • Determine if it is in accordance with ISO 14001 or some other standard • Coordinate with the JBLM EMS Coordinator	• Maintain your EMS as required by your company • If there is no EMS, establish an Environmental Operating Permit (EOP) with the JBLM EMS Coordinator • If working on JBLM for more than a year, update your EOP (annual requirement)	• Determine if you are part of a headquarters or other EMS. If so, determine if it is in accordance with ISO 14001 or some other standard • Participate in the JBLM EMS • Annually identify and review your processes with potential to impact the environment	• Maintain your EMS as required by your organization • Coordinate JBLM participation with the JBLM EMS Coordinator • Collect and collate process information from Division/Section Chiefs. Submit to PW ED annually as required
4.3.2 Legal and other requirements	• Establish EOP. Update annually and upon Change of Command • Set up your compliance program • Establish environmental accounts and arrange for pollution prevention equipment • Establish and monitor environmental programs	• Coordinate with EOP Coordinator • Coordinate with the Environmental Compliance Assessment Team • Coordinate with the Environmental Operations Branch and Pollution Prevention Program • Establish programs as required by regulation and policy. Monitor compliance to requirements, including in contracts	• Identify legal and other requirements applicable to your operations on JBLM • Coordinate with the JBLM EMS Coordinator	• Review requirements identified in your contracts pertaining to actions on or for JBLM • Review requirements identified in installation Reg 200-1 • If operating under your company's EMS, review legal and other requirements identified therein • Coordinate with EMS/EOP Coordinator. If required to write an Environmental Protection Plan, provide a finalized copy • Review for each new contract, modification, option, etc. For longer contracts, review annually	• Identify legal and other requirements applicable to organization activities • Monitor compliance to environmental requirements for all who work for you, including contractors	• Review requirements identified in installation Reg 200-1 and determine which are applicable to your actions on or in support of JBLM • Identify and maintain a list of additional regulatory, policy, and other requirements applicable to your operations with potential environmental impact • Review Annually

	Military Residents		Contractors		Non-Military Residents	
	What	**How**	**What**	**How**	**What**	**How**
4.3.3 Objectives and targets	• Select environmental areas on which to focus	• Review the suggested objectives included in the EOP and select areas that your unit will emphasize	• Identify and meet objectives and targets identified in your company EMS • If not operating under a company EMS, identify environmental areas on which to focus	• Review and adhere to company EMS procedures • Review the suggested objectives included in the EOP and select areas to emphasize	• Review installation objectives and targets and provide input • Implement planning and actions to achieve installation (and any organizational) objectives and targets	• Review organization actions to determine planning and action necessary to achieve • Identify and designate personnel who will lead the effort for each objective and associated targets • Implement plans and actions • Monitor progress as often as needed to meet stated suspense • Review and provide input during EMS Management Reviews. Recommend any changes at EMS Management Reviews and/or to EMS Coordinator • Notify EMS Coordinator of obstacles that preclude achieving objectives and targets.
4.4 Implementation and Operation						
4.4.1 Resources, roles and responsibilities	Identify and designate personnel to fulfill required roles and responsibilities within the unit. Invest them with authority to do so	• Review EOP. Installation Reg 200-1 specifies position and rank requirements for certain environmental positions. • Appoint on orders when required	Identify and designate personnel to fulfill required roles and responsibilities. Invest them with authority to do so	• Review roles and responsibilities identified in company EMS or local EOP, contracts, and installation Reg 200-1 • Appoint in writing as required	• Appoint EMS Representative to coordinate planning, actions, and reporting with JBLM • Identify personnel that manage environmental programs and support Representative. Invest with authority to do so	• Designate and/or appoint such individuals on orders, as requested and necessary to achieve requirements and maintain EMS conformance • Meet roles and responsibilities defined herein, in EMS-100, and any organizational EMS
4.4.2 Competence training and awareness	• Train personnel to conduct their operations to applicable DoD and Service standards • Have environmental personnel trained IAW JBLM requirements • Coordinate with Environmental Advisor (from Pollution Prevention) for section EOP training	• Review EOP to identify environmental training requirements and procedures for enrolling in appropriate classes • Coordinate with the Environmental Advisor for EOP guided training • Conduct environmental awareness training annually	• Identify training requirements applicable to contracted projects/services • Develop a system for tracking and maintaining training qualifications	• Review training requirements identified in contracts and installation Reg 200-1 • Review contracted projects/services and determine if there is potential for environmental impact. For such actions, determine what training is appropriate to avoid an environmental hazard • Establish a training management system for tracking and keeping current all training requirements • Either conduct or provide identified training to all applicable employees. Ensure subcontractors complete required training. • Conduct environmental awareness training annually	• Identify training requirements applicable to organization processes that have the potential of impacting the environment • Develop a system for tracking and maintaining training qualifications	• Review training requirements provided by PW ED • Review organizational processes and determine if there is potential for environmental impact. For such actions, determine what training is appropriate to avoid an environmental hazard. • Establish a training management system for tracking and keeping current all training requirements • Either conduct or provide the identified training to those who require training, to include contractors • When initiating contracts, incorporate general EMS clause and all environmental requirements in the contract language • Provide input to PW ED as required and requested • Conduct environmental awareness training annually

	Military Residents		Contractors		Non-Military Residents	
	What	**How**	**What**	**How**	**What**	**How**
4.4.3 Communications	• Communicate environmental requirements to personnel • Communicate related issues to PW ED	• Through the chain of command and other established procedures • Communicate issues with applicable PW ED program , your Environmental Advisor, or the EOP Coordinator	• Communicate environmental requirements to personnel • Communicate environmental compliance status and issues	• Communicate to personnel through your established procedures • Communicate status and issues to Contracting Officer or their representative. Seek any clarification from PW ED, via the contracting official	• Communicate environmental requirements to personnel • Communicate status and issues	• Communicate to personnel through your Chain of Command or supervisor chain utilizing established procedures • Communicate status and issues to the JBLM EMS Coordinator
4.4.4 Documentation	• Establish EOP • Establish documents required in the JBLM Environmental Compliance book • Maintain required environmental records	• Coordinate with the JBLM EOP Coordinator • Coordinate with JBLM Environmental Compliance Assessment Team (ECAT) • Review documentation table in EOP	• Establish documents required in the JBLM Environmental Compliance book • Maintain required environmental records	• Coordinate with the JBLM Environmental Compliance Assessment Team (ECAT) • If required to have an EOP, maintain documents listed in EOP documentation table • Maintain documents listed in submittal register and other contract language • Coordinate with the JBLM EMS Coordinator	Develop and maintain appropriate/applicable appointment orders, SOP's, plans, objectives and targets, meeting minutes, staff notes, etc	Maintain IAW organizational and JBLM documentation and EMS procedures
4.4.5 Control of Documents	Ensure environmental documents are current and accurate	Using applicable DoD, Service, and installation documentation procedures	For actions on or in support of JBLM, identify documents maintained by company personnel (e.g., SOPs and records) related to actions/processes with a potential environmental impact	• Maintain a list of such documents, review annually, and update as required in accordance with contract terms and installation EMS procedures • Ensure subcontractors do likewise • If required to have an EOP, identify as part of the process. Review and update annually • If operating under a company EMS, coordinate with JBLM EMS Coordinator	Identify documents maintained by the organization (e.g., SOPs and records) related to actions/processes with a potential environmental impact	Maintain a list of such documents, review annually, and update as required in accordance with installation EMS procedures
4.4.6 Operational Control	• Establish unit EOP • Develop unit specific environmental SOPs as needed	• Coordinate with JBLM EOP Coordinator • Review operations and identify need for additional SOPs. Draft and issue as needed, in coordination with Environmental Advisor	• Adhere to contract requirements • If required to create a quality assurance plan, adhere to plan • Develop SOPs as needed • Establish EOP, if required after coordination with JBLM EMS Coordinator	• Review and follow contract terms in coordination with contracting officials • Review operations and identify need for additional SOPs • Coordinate with JBLM EMS Coordinator	• Identify organizational procedures with the potential to impact the environment • Determine if a SOP or other operational control is required • Develop operational control and have available for use by workers • Maintain a current list of SOPs and other operational controls	In accordance with organizational and installation documentation and EMS procedures

	Military Residents		Contractors		Non-Military Residents	
	What	How	What	How	What	How
4.4.7 Emergency Preparedness and Response	• Identify areas and actions with the potential for emergency events with impact to the environment • Develop an emergency response plan • Practice the plan • Maintain a record of exercising the plan	• In accordance with installation emergency and contingency planning requirements and Reg 200-1 • Review and utilize the format provided by the ECAT	• Identify areas and actions with the potential for emergency events with impact to the environment • Develop an emergency response plan • Practice the plan • Maintain a record of exercising the plan	• In accordance with installation emergency and contingency planning requirements and Reg 200-1 • Review and utilize the format provided by the ECAT	• Identify areas and actions with the potential for emergency events with impact to the environment • Develop an emergency response plan • Practice the plan • Maintain a record of exercising the plan	• In accordance with installation emergency and contingency planning requirements and Reg 200-1 • Review and utilize the format provided by the ECAT
4.5 Checking						
4.5.1 Monitoring and measurement	• Identify equipment needing calibration • Adhere to TMDE, PMEL, etc as applicable • Submit equipment for calibration by trained personnel as scheduled. Maintain records	Review applicable technical manuals/orders, equipment manuals, , manufacturer's technical guidance, DoD and Service guidance (e.g., AR 750-43), local guidance (e.g., installation Reg 750-01) etc for maintenance and calibration requirements	• Identify equipment needing calibration • Arrange for calibration by appropriate trained personnel • Submit equipment for calibration as scheduled. • Maintain records	Review equipment manuals, manufacturer's technical guidance, and regulatory requirements	• Identify equipment needing calibration • For military units, adhere to TMDE, PMEL, etc as applicable • Submit equipment for calibration by trained personnel as scheduled. • Maintain records	Review applicable technical manuals/orders, equipment manuals, manufacturer's technical guidance, DoD and Service guidance (e.g., AR 750-43) for maintenance and calibration requirements
4.5.2 Evaluation of compliance	Conduct internal inspections	In accordance with installation Reg 200-1 and EOP	• Establish monitoring/quality control procedures (e.g., via a quality assurance plan) • Conduct internal quality control/inspections • Facilitate surveillance audits by contracting quality control personnel	• In accordance with contract terms, company procedures, installation Reg 200-1 • If required to have an EOP, in accordance with EOP	Conduct internal compliance inspections and Internal EMS audits as required	Review installation Reg 200-1 for compliance inspections. Review JBLM EMS procedures for EMS audits
4.5.3 Nonconformity, corrective and Preventative action	• Report spills or other environmental accidents per installation Reg 200-1 • Report systemic or significant issues through Chain of Command and appropriate forums (e.g., ICE, PCAR)	IAW FL Reg 200-1 and through the Chain of Command	Establish procedures for reviewing environmental issues and developing corrective action. Maintain documentation for action taken.	Review company procedures.	Conduct a root cause analysis of environmental issues applicable to organization operations. Develop and implement corrective actions as appropriate.	Follow FL EMS procedures.

	Military Residents		Contractors		Non-Military Residents	
	What	**How**	**What**	**How**	**What**	**How**
4.5.4 Control of Records	Maintain environmental records (appointment orders, inspections, inventories, etc) specified by the ECAT	In accordance with installation Reg 200-1 and ECAT guidance	Maintain records required by law, contract terms, and regulation	Review regulatory requirements, contract terms, and installation Reg 200-1	Implement procedures for maintaining records and assure pertinent records are maintained	In accordance with JBLM EMS requirements and Reg 200-1
4.5.5 Internal Audit	Incorporate environmental requirements into routine inspections	Utilize EOP tables as part of identifying requirements during a unit inspection	Incorporate environmental requirements into routine inspections and quality control/assurance procedures	• Review regulatory requirements, contract terms, and installation Reg 200-1. Revise inspection and QA/QC procedures as needed to address • If required to have an EOP, utilize EOP tables as part of identifying requirements	• Conduct an annual audit of EMS requirements • Maintain a pool of trained EMS auditors • Provide EMS auditors, as required, for Installation Surveillance audits	• Using JBLM EMS audit guidance. Record findings. Develop and implement a corrective action plan • Train and provide auditors in accordance with EMS procedures
4.6 Management Review	Review and sign the EOP annually, and within 60 days of a Change of Command	The start of the annual requirement is determined by the date of the Commander's last signature or the date of the change of leadership. Updating an EOP includes: • Reviewing environmental policy • Reviewing processes for accuracy and potential impact to the environment • Appointing and maintaining required and sufficiently trained environmental personnel • Having pollution prevention equipment inventoried and hand receipted	Participate in contract performance reviews with contracting officials If required to have an EOP, review and sign the EOP annually or within 60 days of a Change of Site Manager/Supervisor.	Meet as directed by contracting officials. Supply requested information for review and evaluation For those with an EOP, the start of the annual requirement is determined by the date of the Manager/Supervisor's last signature or the date of the change of leadership. Updating an EOP includes: • Reviewing environmental policy • Reviewing processes for accuracy and potential impact to the environment • Appointing and maintaining required and sufficiently trained environmental personnel • Having pollution prevention equipment inventoried and hand receipted	• Participate in the JBLM EMS Management Review • Provide input as required • Conduct and document organizational meetings at which environmental topics are addressed	• Attend scheduled EMS Management Reviews • Provide input for required objectives and other assigned tasks • Include and document environmental topics in staff meetings

Appendix B

Document Revision History

Original Document Issue Date: 27 June 2003		
REVISION NUMBER	**DATE OF REVISION**	**REVISION SUMMARY**
1	2 February 2005	4.3.2 Incorporates the requirement that organizations are informed about changes in Legal & Other Requirements when the Chief, ED prepares and disseminates a Monthly Environmental Regulation Alert Summary (MERAS) by e-mail to all applicable Installation Organizations. 4.4.7 Incorporates the requirements of FL Ref 420-30, Fire Prevention and Protection. Made appropriate changes to applicable elements so they support the requirements of the 2004 ISO 14001 Standard. 4.4.1 Incorporated the requirement for organizations to adopt the "Functional Level Responsibility and Expected Knowledge" or an equivalent format as the means of documenting EMS roles and responsibilities. Example at Appendix 1.
2	22 June 2007	Updated Owner, Approval Authority and posted policy statement.
3	28 March 2011	Updated Header changing owner to Chief Environmental and Approval Authority.
4	20 June 2013	Significant content revision to be current: • JBLM/joint Service language added • Previous appendix replaced with new summary of responsibilities tables • PW ED Chief given authority to approve Tier II documents • JBC given option to serve as or appoint EMS Management Director • Associated JBLM guidance (e.g., documentation and emergency management regs) referenced • Links and information sources updated • More details provided regarding residents and contractors