

Environmental Aspects Identification of Aspects and Determination of Significance

I. PURPOSE

The purpose of this procedure is to identify the environmental aspects of Region 9's activities, products, and services. This Procedure also provides guidance on the determination of which aspects are significant under the Region's Environmental Management System (EMS).

II. SCOPE

This procedure covers those environmental aspects of activities, operations, products, and/or services that the Region can control, or over which it can influence. This procedure, therefore, applies only to the activities and processes at the facilities and to employee actions that are managed by EPA Region 9 itself. Periodically, the fenceline definition will be reviewed and revised as needed under EMS Scope.

This procedure is applied by the EMS Implementation Team (EMS Team) when evaluating the environmental aspects of Region 9. Follow up evaluations will be conducted to account for changes in the organization's mission, activities, facilities or processes.

III. GENERAL INFORMATION

The EMS Team is responsible for identifying and documenting aspects and the determination of significance.

Definitions

Environmental aspect – A component of the organization's activities, operations, products and/or services that are likely to interact with the environment, potentially causing an impact.

Significant Environmental aspect – 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 the activities and services of the organization.

Executive Order – An order given by the U.S. President.

The Natural Step – Defines four sustainability principles, also known as "conditions" that must be met in order to have a sustainable society. In a sustainable society, nature is not subject to systematically increasing:

1. concentrations of substances extracted from the earth's crust;
2. concentrations of substances produced by society;
3. degradation by physical means and, in that society;
4. human needs are met worldwide.

Sustainability – The ability to meet the needs of the present while ensuring an equitable, healthy future for all people and the planet.

One of the foundations of an EMS is a periodic, master inventory of an organization's environmental aspects. The inventory of aspects developed by the EMS Team serves as the master list of issues that could be managed by Region 9 to improve environmental performance.

From this inventory, the EMS Team determines which aspects are significant. Significant environmental aspects identified through the evaluation process are considered in the setting of environmental objectives and targets. These significant aspects are then controlled, improved, or studied further as part of ongoing programs (Environmental Management Programs) in the Region.

The EMS Team uses the Natural Step framework or other methods of its choosing, when inventorying the environmental aspects, determining whether they are significant, and in setting objectives and targets. The Region wishes to use its EMS to move toward sustainability, so broad frameworks for sustainability (such as the Natural Step) are considered in determining significance and in setting objectives and targets.

IV. APPROACH

1. The EMS Team (Team) develops the aspects inventory. The Team includes representatives from each major area of the organization (See SP-EAC/EIT). These areas may include each division / office or other functions as appropriate. Separate teams may be formed to evaluate particular groups of activities and services. The Team may call upon other individuals in the organization, as needed.
2. The Team considers those environmental aspects of activities, operations, products and/or services that Region 9 can control or over which it can be expected to have an influence. While the Team focuses primarily on the activities occurring at the Office, the Team also considers employee commuting and travel activities, as well as activities, operations, products or services purchased by the Region.

For purposes of this evaluation, activities, operations, products and/or services with similar characteristic may be grouped.

3. The Team conducts a complete aspects inventory for the Region either as a whole or broken down into operation units, as appropriate. The Team uses expertise and knowledge of the activities, operations, products and services to compile an inventory of all activities, operations, products and/or services and their associated environmental aspects. Team members may also request the assistance of non-team members in their areas to complete the inventory. For the final inventory, the Team aggregates all activities, operations, products and/or services by environmental aspect. Every EMS cycle (2 years) the Team briefly reviews this inventory to be sure it's complete and account for any changes that result in new environmental aspects. The results of the aspects inventory are documented.
4. The Team next reviews the inventory of environmental aspects in order to determine which aspects are significant. Each EMS cycle (2 years) the Team reviews the aspects to determine if there are changes in the significance of existing aspects.

An environmental aspect is considered potentially significant if one or more of the following are true:

1. It is regulated by Federal, State or local law
2. It is targeted by Headquarters or the Region as a significant goal or aspect by inclusion in the EPA Strategic Plan or via directive or Executive Order.
3. The Natural Step framework - certain aspects may be considered significant due to significant dependence on activities articulated by one of the four system conditions.
4. Other factors at the discretion of the Team, such as local goals may be used as well.

Taking into account the above considerations, the EMS Team makes a final qualitative evaluation of aspects considered for significance.

5. The determination of significant aspects is documented in Team meeting minutes. If the Team determines that additional information is needed to evaluate a particular product or activity, the EMS Lead assigns the responsibility for collecting that information to an appropriate member. Decisions regarding determination of significant aspects is kept in Team meeting minutes.
6. The EMS Lead presents the results and recommendations regarding significant aspects to the EMS Advisory Committee (The Advisory Committee includes management representatives from each major area of the organization: SP-EAC/EIT) for final approval. This decision is documented in meeting notes.

V. RECORDS

- 1) List of environmental aspects (aspects inventory)
- 2) List of significant aspects
- 3) Meeting minutes (documentation of the rationale and decisions regarding the determination of aspect significance)

VI. REVISION HISTORY

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