

Identification and Evaluation of Legal and Other Requirements for the EMS

I. PURPOSE

The purpose of this procedure is to identify, analyze and respond to all legal and other environmental requirements that apply to Region 9 activities, products and services as part of the EMS.

II. SCOPE

The scope of this procedure is limited to environmental regulations and requirements, and environmental policies or mandates that the Region must follow to meet expected environmental or sustainability objectives.

III. GENERAL INFORMATION

The Region needs to be fully aware of all of its legal and other requirements that apply to environmental aspects. Legal requirements include federal, state, and local statutes. Other requirements that apply to the EMS include federal executive orders and internal EPA policies.

Environmental programs are in place to ensure that compliance is maintained for legal requirements and that progress toward significant compliance with federal executive orders and internal EPA policies is achieved.

The Safety Health and Environmental Management Program (SHEMP) Manager has responsibility for conducting health and safety compliance activities. This is not part of the Region 9 EMS.

IV. APPROACH

1. Since EPA Region 9 is a tenant in our building and we have a GSA "full service lease," our building management is responsible for complying with legal and other requirements associated with our facility operation and removing our waste (solid, wastewater, etc.).
2. The EMS Lead relies on information gained through the network of national EMS Leads / Coordinators and other sources to ensure that the appropriate legal, executive order, and internal EPA policy requirements are identified. These are gathered together in a "Legal and Other Requirements" table. The table is evaluated by at least one member of the EMS Team, vetted for input from the entire EMS Team and routed to the EMS Advisory Committee for their input and concurrence.

3. Annually, the EMS Lead gets updates from the network of national EMS Leads / Coordinators, identifies a member of the EMS Team to review the Legal and Other Requirements Table, and vets any additions/deletions, as appropriate, through the EMS Team for input and the EMS Advisory Committee for their concurrence.
4. Annually, the EMS Lead appoints a compliance inspector to check for compliance with the appropriate legal, executive order, and internal EPA policy requirements identified in the “Legal and Other Requirements” table.

V. RECORDS

Records include:

1. Legal and Other Requirements table
2. Record of compliance with the requirements

VI. REVISION HISTORY

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