Lessons Learned: Integrating EMS and Environmental Compliance Auditing

2009 Environmental, Energy & Sustainability Symposium

Pamela M. Klinger
U.S. Army Environmental Command
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Our Mission: Lead and execute environmental programs and provide expertise that enables Army training, operations, acquisition and sustainable military communities.

ENABLING MISSION READINESS
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Environmental Performance Assessment System (EPAS)

Program Value

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

Drivers

- EO 13423 (2007)
- DODI 4715.5 OCONUS
- DODI 4715.6 CONUS
- AR 200-1 (2007)

This brief only addresses Active Army program.
# Program History

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 Rescinded ISR Part II substitution policy of 1997 AR 200-1, Internal Assessments required.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

Challenges since 2006

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

• Lean Six Sigma Projects Completed
  – Multiple projects
  – Various aspects of EPAS
  – Stakeholder participation on teams
  – Documented products guiding improvements

• Funding Challenges Addressed through POM Process

• Compliance Media Risk Model Developed and Implemented

• Process Flow Diagrams Developed

• Army Regulation, Guidance Documents, SOPs, and Templates Updated and/or Developed

• Improved Coordination in Planning Actions, Ensuring Leadership Concurrence/Awareness

• AKO EPAS Stakeholders Page Established

• AKO Knowledge Centers Established for each scheduled audit
EPAS Process

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

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

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

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

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

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

Pros & Cons of Simultaneous Audits

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

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

“Sustain, Support and Defend”