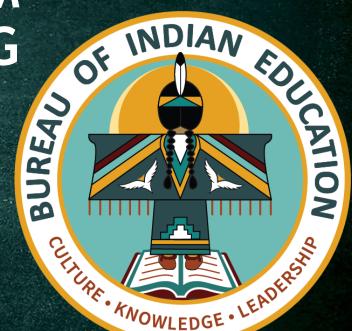


U.S. Department of the Interior **Bureau of Indian Education**

ANNUAL ENVIRONMENTAL MANAGEMENT SYSTEM AWARENESS TRAINING





MEETING TIPS FOR ONLINE TRAINING

- * 1). Place yourself on "Mute" to prevent background noise.
- 2). Use the "Chat with all" feature to ask questions.
 - * Note: All participants will be able to see your comments or questions.
- * 3). Every participant will receive a certificate of completion.

BIE BRANCH OF ENVIRONMENTAL MANAGEMENT (BIE BEM) WHO WE ARE...

Albuquerque Office

John Clymo, Program Manager, Supervisory Environmental Protection Specialist Candace DeSantis, Lead Environmental Protection Specialist Karlisa Benally, Environmental Protection Specialist Priscilla Avila, Environmental Protection Specialist Henryetta Price, Environmental Protection Specialist Rochelle Mariano, Program Support Assistant

Bloomington Office

Russell Brigham, Environmental Protection Specialist

Gallup Office

Karmen Billey- Badonie, Environmental Protection Specialist

AGENDA

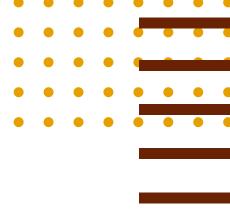
- EMS Overview
- Benefits of Implementing an EMS
- EMS Process
- EMS Elements
- EMS SharePoint Website





WEBINAR OBJECTIVES

- Understand what an EMS is
- Understand EMS elements
- Expectations for the use of BIE's new EMS website





PURPOSE

- Monitor and verify compliance with Federal, State, and Local environmental regulations
- Promote improved environmental performance at BIE facilities
- Educate and promote awareness of environmental compliance and pollution prevention, and sustainability
- Enhance implementation of Environmental Management Systems (EMS)

WHAT IS AN EMS?

- An Environmental Management System (EMS) is a set of processes and practices that enable an organization to reduce its environmental impacts, fulfill compliance obligations, minimize risk, and increase opportunities for operating efficiency
- EMS provides a framework for the management of an organization's environmental programs in a comprehensive, systematic, planned, and documented manner
 - Includes organizational structure, planning, and resources for developing, implementing, and maintaining policy for environmental protection

BENEFITS OF IMPLEMENTING EMS

- ✓ Improves environmental compliance in operations and activities
- ✓ Captures program/operation institutional knowledge
- ✓ Reduces environmental liability
- ✓ Reduces cost for cleanup of environmental contamination
- ✓ Improves communication
- ✓ Improves operational productivity
- ✓ Proactive vs. Reactive

EMS PROCESS - CONTINUAL IMPROVEMENT





EMS ELEMENTS

- Scope
- Environmental Policy
- Roles, Responsibilities, and Authorities
- Aspects and Impacts
- Compliance Obligations
- Objectives and Targets
- Training
- CommunicationDocumented Information

- Operational Controls
- Emergency Preparedness and Response
- Monitoring and Measurement
- Internal Audit
- Nonconformity, Corrective and Preventive Action
- Management Review

EMS SCOPE

- BIE Central Office
- Education Resource Centers
- BIE Funded Schools and Dormitories

ENVIRONMENTAL & SUSTAINABILITY POLICY STATEMENT

- Will define the intentions and direction of BIE related to environmental performance
- Will include commitments to pollution prevention, compliance, continual improvement, and senior leadership participation
- Will be made available on BIE's new EMS SharePoint site

ROLES, RESPONSIBILITIES, & AUTHORITIES

Senior Line Officials should ensure staff are assigned and aware of their environmental roles and responsibilities, e.g.:



Who is your AHERA designated person?



Who conducts water sampling?



Who manages your hazardous and universal waste?



Who is your water operator?



Who conducts lagoon inspections and maintenance?



Who inspects your bulk fuel storage containers?



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Who inspects and maintains your radon mitigation system?



Who submits your annual EPCRA Tier 2 report?



Who maintains your SDS & chemical hygiene plan?

ASPECTS AND IMPACTS

Environmental Aspect

- Element of activity that interacts with the environment
- Fuel storage, wastewater lagoon, generating waste

Environmental Impact

- Change to the environment caused by the activity
- Landfill consumption, air pollution, water discharge

ASPECTS AND IMPACTS

Activity

Environmental Aspect

Environmental Impact

Water Sampling

Water Consumption

Human Health Risk

Lagoon Maintenance

Potential Wastewater Release

Surface Water Contamination

Storage Tank Maintenance

Fuel Storage

Potential Fuel Release

Building Maintenance

Universal Waste Generation

Natural Resources
Contamination



COMPLIANCE OBLIGATIONS

Legal requirements that BIE must comply with and other requirements that BIE must or chooses to comply with

- Federal laws and regulations
- Executive Orders
- State and Tribal environmental regulations (Note: State and Tribal laws may be more stringent than federal laws)
- DOI and IA policies
- Operating and Discharge Permits

Identify and communicate legal and other requirements to affected staff

- Hazardous waste? Resource Conservation and Recovery Act (RCRA)
- Asbestos? Asbestos Hazardous Emergency Response Act (AHERA)
- Water system? Safe Drinking Water Act (SDWA)



OBJECTIVES & TARGETS

- An environmental objective is a statement of an environmental goal consistent with the environmental policy that DOI Bureaus commit to achieve.
- An environmental target is a detailed performance requirement that needs to be met to achieve an objective.

TRAINING

- > Staff need to be trained and competent to perform duties
- > Some training is mandatory and required by law
- Identify training for staff
- Document and track training

Examples include:

- Asbestos two-hour awareness and designated person
- Water operators
- Wastewater operators
- Waste handling, storage, and disposal
- Spill response

COMMUNICATION

- Effectively communicate EMS and environmental information with internal and external stakeholders
- Communication includes:
 - Roles and responsibilities
 - Procedures for environmental compliance
 - Regulatory requirements (e.g., annual consumer confidence report, AHERA annual notification letters, etc.)
 - Results of audits and inspections
 - Responses to regulators and notices of violations/deficiencies

DOCUMENTED INFORMATION

- Documents include policies, procedures, manuals, and plans
- Documents describe how you do something (e.g., evacuate a building, take a water sample, label a waste container, conduct an inspection)
- Examples include:
 - Asbestos Management Plan
 - Water monitoring schedule
 - Spill Prevention, Control, and Countermeasure Plan (SPCCP)
 - Standard operating procedures (SOPs)
 - **Records** provide evidence of conformance and demonstrates that a plan, procedure, regulatory requirement, etc. was followed.
 - Sampling results, inspection forms and logs

OPERATIONAL CONTROLS

- Operational controls are documented plans and procedures that help personnel control their operations and activities
- Operational controls include:
 - Work instructions
 - SOPs
 - Operating and/or permit limits
 - Plans (e.g., Asbestos Management Plan, SPCCP, etc.)
 - Equipment (e.g., secondary containment)

EMERGENCY PREPAREDNESS AND RESPONSE

What potential emergency situations exist at your School? Examples include:

Fire

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- Weather emergency
- Spills/releases
- Active shooter threat

 How do you prepare for and
 practice for those potential
 events?

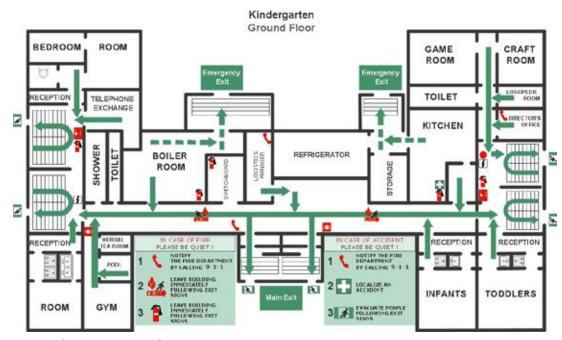


Image Source: www.conceptdraw.com

MONITORING & MEASUREMENT

Continually monitor performance:

- EMAP Compliance Audits (every 3 years)
- Internal periodic monitoring conducted by the school
 - Sampling
 - Boiler maintenance
 - SPCC inspections



EXTERNAL AUDIT'S

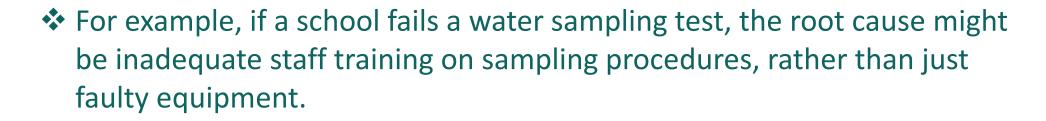
• An **external audit** is a systematic, independent, and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.

NON-CONFORMITY & CORRECTIVE AND PREVENTIVE ACTION

- A **non-conformity** is the non-fulfilment of a requirement, i.e., failure to conform with voluntary requirements such as contracts, agreements, codes, and standards.
- Corrective actions are implemented and/or overseen by the manager/supervisor in the affected area where the nonconformity or noncompliance occurred.
- Preventive action is implemented to prevent recurrence of the original nonconformity or noncompliance by eliminating the root cause.

ROOT CAUSES

A **root cause** refers to the fundamental reason for a problem or non-conformity. It's the underlying issue that, if addressed, will prevent the problem from occurring again. Root cause analysis is a critical step in corrective and preventive actions because it helps identify the real issue rather than just addressing symptoms.

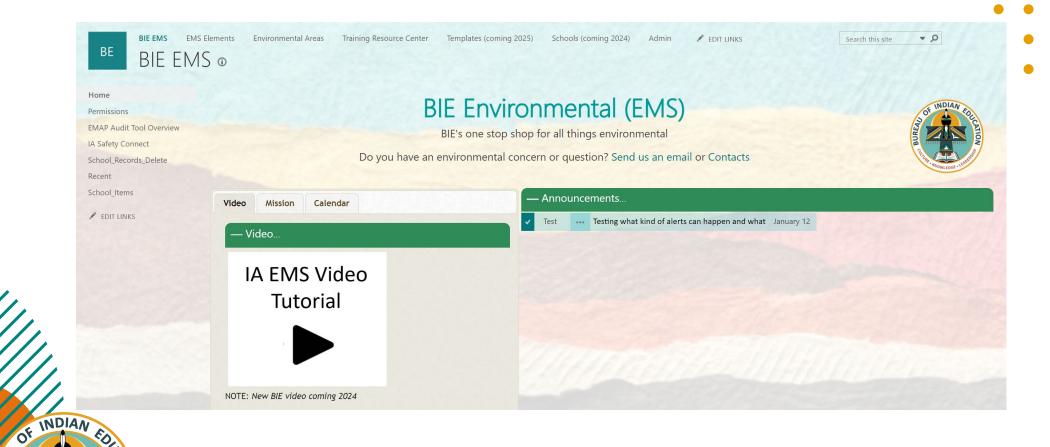


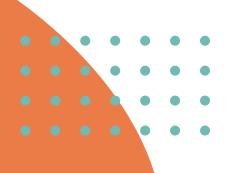
Another example could be repeated spills during hazardous waste handling. The root cause could be a lack of proper containment or outdated spill procedures, rather than just employee error."

MANAGEMENT REVIEW

- Senior Management must annually review the EMS to ensure it is suitable, adequate, and effective
- Management review includes:
 - Status of previous management reviews
 - Objective and targets performance
 - Environmental reporting and EMS information requests
 - Results of compliance and EMS audits and status of corrective actions
 - Adequacy of existing resources
 - Recommendations for future actions and improvements

EMS SHAREPOINT SITE





QUESTIONS?

BIE BEM PROGRAM CONTACTS

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