Who can I contact to obtain more information?

If your facility is interested in participating in an EMR, or would like to obtain more information on the program, please contact your Regional Federal Facility Coordinator.

EPA Regional EMR Contacts

I	Anne Fenn	(617) 565-3927
II	John Gorman	(212) 637-4008
III	Eric Ashton	(215) 566-2713
IV	Dave Holroyd	(404) 562-9625
V	Lee Regner	(312) 353-6478
VI	Joyce Stubblefield	(214) 665-6430
VII	Jamie Bernard-Drakey	(913) 551-7400
VIII	Dianne Thiel	(303) 312-6389
IX	Sara Segal	(415) 744-1569
X	Kathy Veit	(206) 553-1983

EPA Headquarters
Federal Facilities Enforcement Office

Andrew Cherry ..... (202) 564-5011

Related Guidance

The following reference materials provide more detailed information on the EMR program and its implementation and can be obtained from EPA's Federal Facilities Enforcement Office.

- *Interim Final Policy on Environmental Management Reviews at Federal Facilities,* May 31, 1996.
- *Interim Technical Guidance for Conducting EMRs at Federal Facilities,* May 31, 1996.
- *Generic Protocol for Conducting Environmental Audits of Federal Facilities, Volumes I & II* (EPA 300-B-96-012A & B).
- *Code of Environmental Management Principles (CEMP) for Federal Agencies* (61 FR 54062, October 16, 1996)
- *Guide for Implementing the CEMP* -- Available Winter, 1997.

These documents can be obtained from Enviroene, EPA's free, public, integrated information system. Enviroene may be accessed via modem at (703) 908-2092 or on the World Wide Web at http// es.inel.gov.

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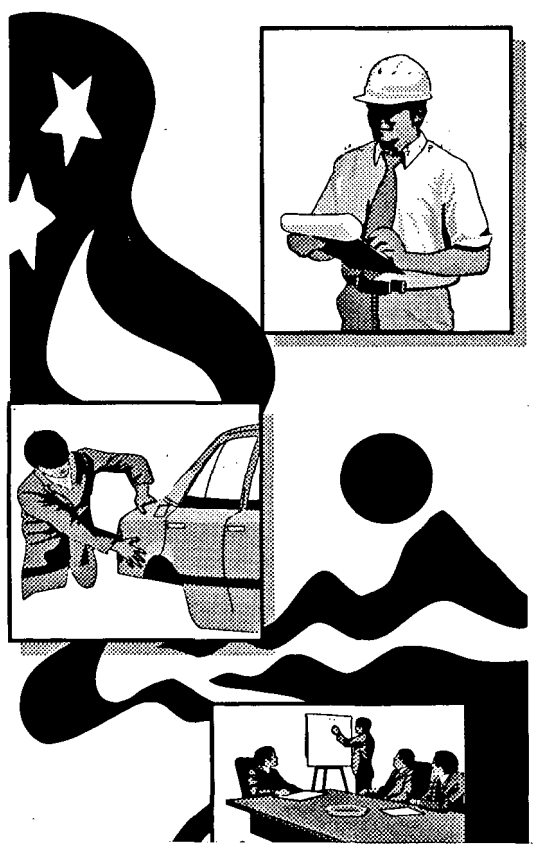
Environmental Management Reviews

At Federal Facilities



What are Environmental Management Reviews?

An Environmental Management Review (EMR) is an evaluation of an individual Federal facility's program and management systems to determine how well the facility has developed and implemented specific environmental protection programs to ensure compliance.

Two EPA Regions (I and VI) have been conducting EMRs over the past few years. Encouraged by the success of their efforts, EPA Headquarters recently issued (May 31, 1996) an interim final policy and technical guidance on conducting EMRs at Federal facilities. The interim policy stipulates that EMRs will be conducted as part of a pilot program. Upon completion of the pilot at the end of FY 1997, EPA intends to identify any lessons learned, modify the policy as appropriate, and implement a final EMR policy.

How do EMRs compare with other on-site assessments?

EMRs are consultative technical assistance visits intended to identify root causes of environmental performance problems. **EMRs are not compliance-oriented assessments, audits, or inspections, nor are they pollution prevention opportunity assessments.** They are voluntary and are often initiated by the recipient agency or facility.

How can my facility benefit from an EMR?

EMRs help Federal facilities improve long-term environmental compliance by developing a sound foundation for an environmental management program. They assist Federal facility personnel in moving beyond immediate symptoms of noncompliance and address underlying problems or root causes. In addition, they may provide an early warning of potential compliance problems. EMRs foster improved working relationships with EPA and encourage an open dialogue on environmental concerns. EMRs also provide informal assessments that are less costly than management assessments conducted by a facility's contractor, and they provide an independent perspective on prior self-assessment activities.

How is the scope of an EMR determined?

EMRs are collaborative efforts between EPA and a Federal facility in which the facility works with EPA to determine the scope of the review. There are seven potential areas of inquiry for an EMR:

- organizational structure;
- management commitment;
- resources;
- formality of program;
- communications;
- evaluation and reporting; and
- planning and risk management.

A typical EMR may address any of these areas, and will take from one to three days to conduct. Once EPA evaluates the results of the EMR, the facility receives a written report.

Who actually conducts the EMR?

EMRs are conducted by a team of EPA Regional staff with the assistance of qualified contractors, when appropriate. Throughout the EMR process, the team will coordinate closely with Federal facility personnel.

How does the EMR process work?

The EMR process typically begins either with an expression of interest by a Federal facility or an EPA inquiry. If, after preliminary discussions, the facility elects to proceed, the EMR planning stage begins.

During the planning stage, EPA staff and Federal facility management will discuss the purpose and scope of the EMR, the ground rules and operating principles for conducting the review, and they may sign a ground rules letter.

EPA and Federal facility personnel may continue regular telephone discussions and correspondence (e.g., pre-site visit questionnaire) to further refine the scope and content of the EMR. During these communications, EPA and the Federal facility will identify technical points of contact. In addition, EPA may work with facility staff to develop a list of information needs (e.g., documents) and persons to be interviewed as part of the site visit, as well as a schedule for the on-site portion of the EMR. The schedule will be customized to address the size and complexity of the facility.

Prior to the site visit, EPA staff will review and evaluate the environmental management program documents identified during the planning stage (e.g., environmental policies, directives, protocols, and standard operating procedures). Careful review prior to the site visit will ensure that EMR staff are sufficiently familiar with facility operations to conduct effective on-site interviews and evaluations.

Although compliance assessment is not the intent, occasionally during the course of an EMR, the team may discover a potential violation. To address this issue, EPA has developed an Incidental Violations Response Policy (IVRP). In situations that may cause an imminent and substantial endangerment to public health or the environment, or serious actual harm, the facility must address the situation immediately. In other cases, EPA allows the facility a 60-day correction period and a waiver of certain potential penalties, subject to formal disclosure of the violation by the facility and the initiation of appropriate corrective action. The IVRP is included within EPA's Interim Technical Guidance on EMRs and should be reviewed to obtain more details.

At the conclusion of the site visit, the EMR team may provide an exit briefing in which preliminary findings are presented to facility management.

Within 60 days after the site visit, the EPA Regional Office will provide the facility with a written report or letter discussing the conclusions of the EMR and making recommendations for follow-up activities. The facility must prepare a written response to the EMR report within 60 days explaining how it intends to address any issues raised by the report. In addition, six months after this response, EPA will ask the facility to provide a brief progress report on the status of any follow-up activities.

How will EMR reports be used?

The final EMR report is a public document, and as such may be obtained by any member of the public who follows proper procedures. However, it is not EPA's intent to actively distribute or otherwise make a report available to the general public or State/local officials. In addition, the EMR can serve as a foundation for on-going technical and compliance assistance activities between EPA and the Federal agency or facility.