

# VIRGINIA ARMY NATIONAL GUARD (VAARNG)

## Environmental Management System Procedures Manual



### eMS Management Champion

BG Frank Batts  
AAG JS/JTF CMD

Revised 10 March 2008

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## **MANAGEMENT APPROVAL**

“This document represents my plan to implement an ISO 14001 conformant environmental management system at the Virginia Army National Guard IAW Executive Order 13148, DoD, DA and ARNG guidance.”

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## SCOPE

Executive Order 13148, *Greening the Government Through Leadership in Environmental Management*, directs the heads of all Federal agencies to take all necessary actions to integrate environmental accountability into agency day-to-day decision making and long-term planning processes across all agency missions, activities and functions. Through development and implementation of Environmental Management Systems (eMS), the Virginia Army National Guard (VAARNG) will ensure strategies are established to support environmental leadership programs, policies and procedures and agency senior level managers explicitly and actively endorse strategies.

This Procedures Manual improves environmental performance and regulatory compliance by defining the elements of the VAARNG Environmental Management System (eMS). A successfully executed and managed eMS provides a systematic way to review and improve operations for better environmental performance in the VAARNG. The five main steps of the VAARNG eMS Program, as defined by ISO 14001 standards, are as follows:

- *Commitment and Policy* – The Command commits to environmental improvement and establishes an environmental policy.
- *Planning* – VAARNG conducts a review of its operations, identifies legal requirements and environmental concerns, establishes objectives, evaluates alternatives, sets targets, and devises a plan for meeting those targets.
- *Implementation and Operation* – VAARNG follows through with the plan by establishing procedures to ensure that environmental targets are met.
- *Checking and Corrective Action* – VAARNG monitors its operations to evaluate whether the targets are being met, and, if not, takes corrective action.
- *Review* – VAARNG modifies the eMS to optimize effectiveness. The review stage creates a loop of continuous improvement for the organization.

The primary elements of the VAARNG eMS Program and their corresponding ISO 14001 Process Steps, ISO 14001 Standards, eMS Elements, and the corresponding chapter numbers in this Procedures Manual are summarized in **Table 1** below:



**Table 1: Summary of eMS**

<b>Procedures Manual Chapter No.</b>	<b>ISO Process Step</b>	<b>eMS Element</b>	<b>ISO 14001 Standard</b>
1	Environmental Policy	Environmental Policy	4.2
2	Planning	Environmental Aspects	4.3.1
		Legal and Other Requirements	4.3.2
		Objectives, Targets, and Action Plans	4.3.4
3	Implementation & Operation	Resources, Roles, Responsibilities, and Authority	4.4.1
		Competence, Training and Awareness	4.4.2
4	Checking & Corrective Action	Communications	4.4.3
		Documentation	4.4.4
		Control of Documents	4.4.5
		Operational Control	4.4.6
		Emergency Preparedness and Response	4.4.7
		Monitoring and Measurement	4.5.1
		Nonconformity, Corrective Action and Preventative Action	4.5.3
		Control of Records	4.5.4
		Audits	4.5.5
5	Management Review	Management Review	4.6

The eMS elements above provide all the building blocks of the VAARNG eMS Program. To develop the Program from these elements, the VAARNG approaches the implementation in the following stages:

- Stage 1: Develop environmental policy  
 Identify environmental aspects  
 Identify legal and other requirements  
 Identify the available resources, the roles and responsibilities of all participants, and the chain of command or authority of each participant  
 Develop procedures for controlling documents
- Stage 2: Identify measurable and achievable objectives and targets and their corresponding programs



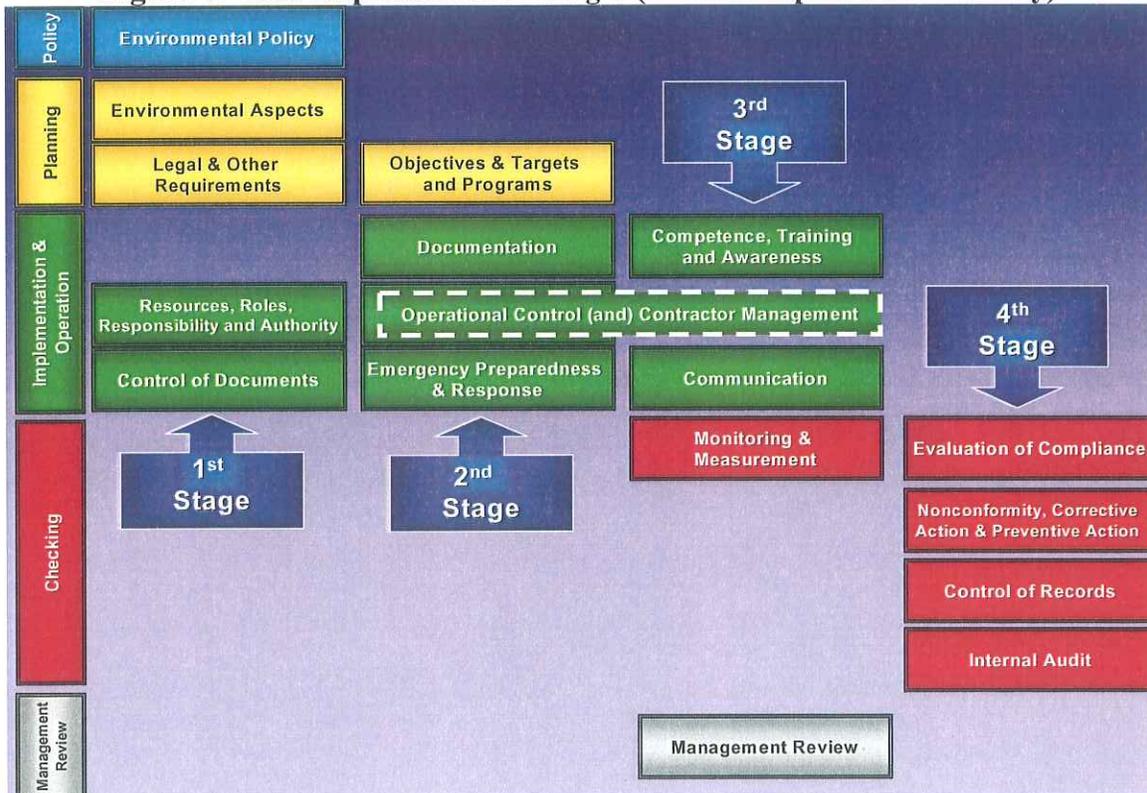
Establish documentation procedures  
 Identify operational controls/contractor management needs  
 Ensure the program includes emergency preparedness and response procedures

Stage 3: Develop and implement training procedures, competency requirements for participants, and an awareness program  
 Identify operational controls/contractor management needs  
 Develop communication procedures and protocols  
 Identify document control monitoring and measurement of objectives and targets  
 Develop procedures and protocols for management review

Stage 4: Develop procedures for evaluating compliance  
 Develop procedures for evaluating nonconformity, corrective action, and preventive action  
 Develop procedures for control of all documentation  
 Develop a schedule and process for internal and external auditing.

**Figure 1** below represents the stages the personnel responsible for the development and implementation of the VAARNG eMS (the eMS Program Team) will follow during the continuous evolution of the eMS Program.

**Figure 1: eMS Implementation Stages (Full Color printout necessary)**



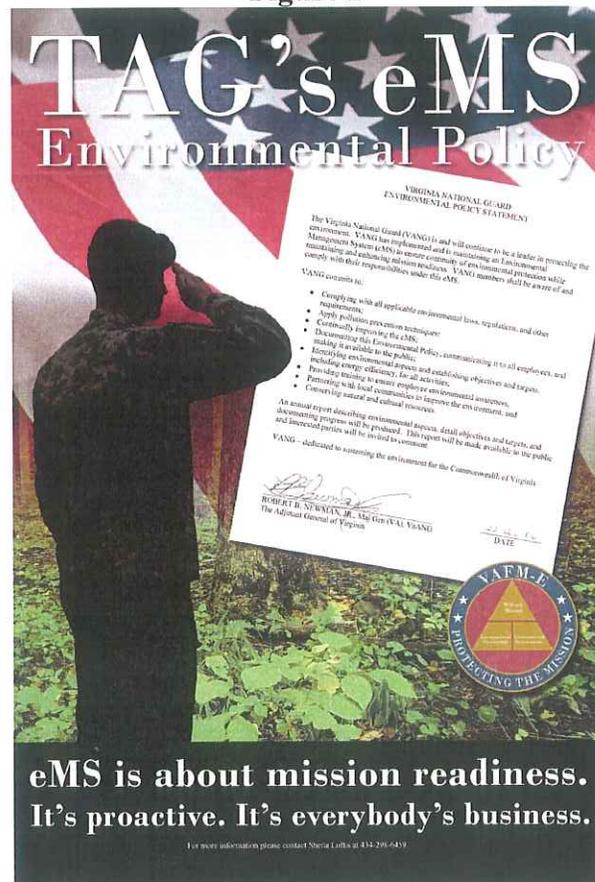
## CHAPTER 1: ENVIRONMENTAL POLICY

The environmental policy is a statement by the Virginia National Guard (VANG) of intentions and principles in relation to overall environmental performance. The Command has defined the organization’s environmental policy statement and ensures that it:

- a) Is appropriate to the nature and scale of the VANG activities, products, and services as well as the environmental impacts they create;
- b) Includes a commitment to continual improvement and prevention of pollution;
- c) Includes a commitment to comply with relevant environmental legislation, regulations, and other requirements to which the organization subscribes;
- d) Provides the framework for setting and reviewing environmental objectives and targets;
- e) Is documented, implemented, maintained, and communicated to all employees;
- f) Is available to the public.

Figure 2 below is the poster presented to all VAARNG facilities and subcontractors as a part of the eMS awareness initiative. The environmental policy is provided in Appendix A.

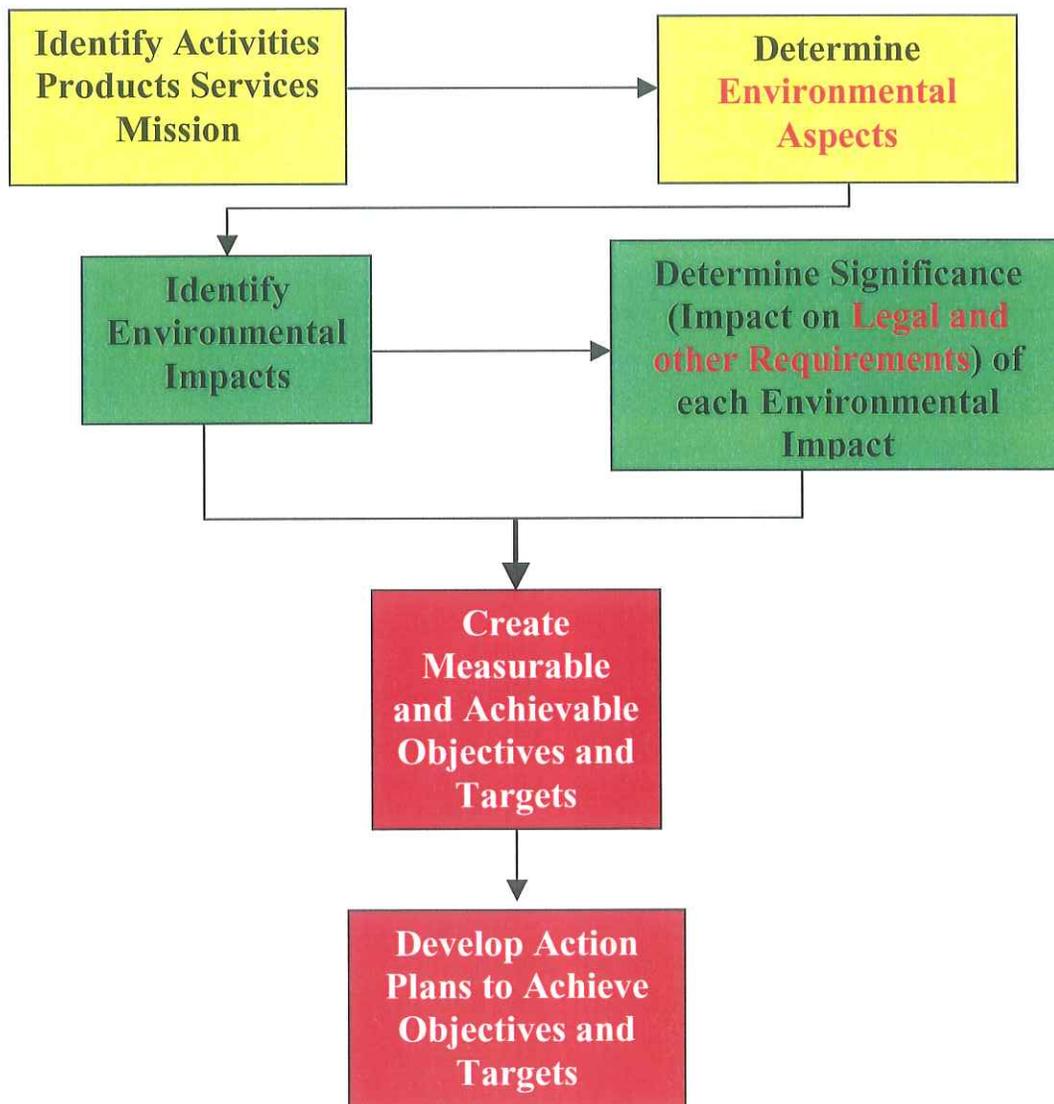
Figure 2



## **CHAPTER 2: PLANNING**

Chapter 2 describes the key elements of the eMS Program that the Program Team will continually research, evaluate and update to ensure the information conveyed during training, committee meetings, and to facility personnel is accurate and to evaluate the success of the Program. The three key elements are: environmental aspects; legal and other requirements; and objectives targets and actions plans. These elements are the foundation of the eMS Program and are utilized in the construction of a viable eMS program. The relationship between these elements in the overall eMS implementation is represented by **Figure 3**:

**Figure 3: Developing Objectives and Targets**



**Figure 3** demonstrates the process of generating the objectives and targets that ultimately become the short-term and long-term goals of the eMS Program. The eMS Coordinator, with support from the Cross Functional Team (CFT) and other stakeholders in the eMS process, routinely gathers information and identifies aspects, impacts, and significant impacts. The CFT chooses the impacts and/or significant impacts that can be controlled. Objectives with measurable targets are established and action plans are generated to achieve the targets. Capabilities and resources are considered in the final decision regarding the pursuit of objectives and targets. The CFT will continually implement information gathering and evaluation procedures to identify VAARNG's environmental aspects and impacts for future improvements.

## **2.1 ENVIRONMENTAL ASPECTS**

An environmental aspect is an element of VAARNG activities, products, or services that can interact with the environment. Environmental impacts are the changes to the environment, whether adverse or beneficial, that result from activities, products, or services. Most areas of VAARNG's operations will have environmental aspects, intended or unintended.

## **2.2 LEGAL AND OTHER REQUIREMENTS**

An important part of the eMS Program is documenting the process used to identify, evaluate and track legal and other requirements that apply to the environmental aspects of the organization's activities, products and services. State and local legal requirements, in addition to federal, Department of Defense (DoD), and National Guard Bureau (NGB) guidance will continually be considered. Understanding all legal and other requirements is critical in determining impacts and evaluating which impacts are significant.

The VAARNG will utilize many resources to stay current on regulatory and legal changes. For example, lists and descriptions of environmental rules, regulations and requirements are located in the front of each protocol section of The Environmental Assessment and Management (TEAM) Guide, available from the Defense Environmental Network and Information Exchange (DENIX, <https://www.denix.osd.mil>). These TEAM Guides and Supplements are updated by DoD quarterly and are available for download and printing.

## **2.3 OBJECTIVES, TARGETS AND ACTION PLANS**

An environmental objective is a specific task, which arises from an environmental goal that the VAARNG has defined, developed a series of steps, and assigned to responsible parties. The environmental objectives will be quantified when practicable. Well-developed objectives provide a framework of clearly defined, action-oriented goals that result in minimizing the potential liability associated with significant environmental



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impacts of activities, products and services. Targets are assigned to each objective and are utilized to establish measurable performance criteria.

VAARNG has established and will maintain documented environmental objectives and targets for impacts and significant impacts identified by the CFT during the planning process. The CFT is responsible for ensuring environmental targets and objectives have been identified, measurable objectives and targets are set, and action plans for achieving the objectives and targets are developed.

The targets are clear, specific, quantified, realistic, and meaningful. The progress in meeting the targets is measured. These measurements are used to evaluate the process and to document success. A “Continual Improvement” process is used to identify concerns.

Once objectives and targets are established, an action plan will be developed by the CFT in coordination with the organization responsible for the impact. The action plan will have target dates, milestones, and responsible parties clearly defined, but will also be flexible to allow for personnel changes and mission needs.



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## **CHAPTER 3: IMPLEMENTATION AND OPERATION**

Chapter 3 describes the elements to establish and continually implement a measurable, successful program. The elements include Program structure, responsibilities of key personnel and teams, training needs, requirements, and goals.

### **3.1 ENVIRONMENTAL MANAGEMENT PROGRAM**

VAARNG will establish and maintain an Action Plan for setting and achieving each objective and target. The CFT has the responsibility for defining the objectives and targets, identifying the Action Plan requirements, and reviewing and approving the Action Plans. All Action Plans will include: (a) the designation of responsible party for each Action Item required to achieve the objectives and targets at each relevant function and level (b) the means and time frame by which they are to be achieved, and (c) the resources needed (financial, personnel, training, etc.) to support the responsible parties in achieving their Action Item(s), and (d) procedures for tracking and documenting the performance versus the established goals.

The eMS Coordinator has developed a series of forms to assist the responsible parties in documenting the implementation process. Below are the key Program forms:

*Form 3.1: Identifying Activities, Products and Services Worksheet*

Utilized by the CFT and the various mission or function areas to document activities, products and services performed that may impact the environment.

*Form 3.2: Activity, Aspect, and Impact Assessment Worksheet*

Utilized to document the process described in Chapter 2 in determining the impacts for each activity, product, and service in the VAARNG.

*Form 3.3: Criteria for Evaluating the Significance of Aspects/Impacts*

Utilized to clearly identify the aspects and impacts from Form 3.1 and to evaluate the environmental, regulatory, and mission impacts of each to determine if the impact is a significant impact.

*Form 3.4: Action Plan Tracking*

Utilized to track the progress of each objective and target by documenting responsible party, resources needed/utilized, schedule, status, and the performance of each action item associated with achieving the objective and associated measurable targets.

The forms are provided in **Appendix C** of this document.



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### **3.2 STRUCTURE AND RESPONSIBILITY**

The following individuals and groups will be responsible for the implementation of the eMS program. The roles and responsibilities of each are clearly defined in the following sections. The people and groups represented in this section make up the eMS Program Team.

#### **The Adjutant General (TAG):**

- a. Understand the eMS and work to gain and maintain the full support of key installation stakeholders and other leaders outside the installation,
- b. Approve an effective leader to serve as the eMS Champion, and
- c. Oversee the eMS and ensure environmental conformance and continual improvement through VAARNG activities by complying with Executive Order 13148.

#### **The Environmental Quality Control Committee (EQCC)**

- a. Promote environmental stewardship and sustainability throughout VAARNG functions in support of TAG's environmental policy,
- b. Track the progress of current eMS targets and objectives,
- c. Track the progress of implementing corrective actions to deficiencies identified in eMS audits,
- d. Conduct annual management review of the VAARNG eMS,
- e. Plan, execute, and monitor actions and programs with environmental implications, and
- f. Identify environmental issues, make recommendations and advise TAG.

#### **The eMS Champion:**

- a. Reports directly to TAG,
- b. Appoints the members of the CFT,
- c. Has the necessary authority to direct employees,
- d. Has an understanding of installation organizations,
- e. Is involved with installation strategic planning and real property planning program,
- f. Chair the Environmental Quality Control Committee/Management Review Team, and
- g. Oversee actions of the CFT, which consists of members from the State-level staff and organizations throughout the Command.

#### **Chief of Staff:**

- a. Provide assistance to the eMS Champion, and
- b. Ensure the State-level staff cooperates with the eMS Champion with regard to conformance with the eMS Program.

#### **Director of Environmental Programs (VAARNG-FM-E):**

- a. Plan, program, budget, and execute environmental research in support of improving VAARNGs environmental performance/conformance,



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- b. Develop long-range programs on water and air pollution control, hazardous waste management and minimization, solid waste management and minimization, and hazardous material management to achieve the goals of applicable laws and regulations,
  - c. Develop and maintain the environmental training program, and
  - d. Act as a Member of the eMS CFT.

**Director of Facilities Engineering and Management:**

- a. Manage environmental aspects of new construction and installation/modification of equipment, and
- b. Act as a Member of the eMS CFT or appoint a Facilities Management Representative.

**Director of Public Affairs Office (PAO):**

- a. Provide policy and oversight for comprehensive public affairs support of the eMS,
- b. Serve as the point of contact for news media inquiries on all VAARNG environmental issues, including but not limited to: oil and hazardous materials spills, requirements regarding conformance with the Community Right-To-Know Act, noise issues, and any environmental issues that may become sensitive to VAARNG, and
- c. Act as a Member of the CFT or appoint a PAO Representative.

**Director of Plans, Operations, Training and Security (ANG-MTC-DPTS):**

- a. Ensure that all personnel training at VAARNG training sites/areas comply with the provisions of AR200-1 and 32 CFR Part 651 (National Environmental Policy Act) by planning, programming, budgeting, and coordinating all research to include Integrated Training Area Management (ITAM.); ensuring environmental evaluation of proposed individual and unit training is considered in Yearly Training Programs (YTPs) by all "AA" entities; and requiring environmental evaluations of proposed activities be submitted with Special Use permits at least 30 days prior to the action, and
- b. Ensure all unit leadership are given an environmental briefing prior to performing military activities on ranges and in training areas.
- d. Act as a Member of the CFT or appoint a DPTS Representative.

**Director of Logistics (DOL):**

- a. Monitor statewide usage of hazardous materials to ensure progress in meeting Federal and Army reduction and minimization goals,
- b. Coordinate with the State Radioactive Protection Officer (RPO) within the Safety and Occupational Health (SOH) Office to properly manage the radioactive unserviceable turn-ins and the appropriate disposal IAW the National Inventory Control Point (NICP) procedures. Manage the radioactive programs for all items turned in to the Stock Record Account. Act as the State coordinator to the radioactive serialization program, ensuring proper accounting and reporting. Coordinate with the State RPO concerning wipe test results and respective reporting thereof IAW AR 710-3,



- c. Ensure that the purchase orders cite requirements for vendors to provide a Material Safety Data Sheet (MSDS) for all procured items,
- d. Provide technical guidance to all units/activities concerning storage and transport of hazardous material and hazardous waste,
- e. Coordinate with VAARNG-FM-E regarding the generation, handling, transporting, labeling, storage, and disposal of hazardous material and hazardous waste (HM/HW) at unit armories and within maintenance, supply, and storage facilities,
- f. Ensure command emphasis is directed toward waste minimization and limited use of hazardous materials during exercises and day-to-day operations,
- g. Ensure VAARNG personnel charged with transporting HM/HW are adequately trained and fully aware of existing DOT restrictions concerning transport of these materials, and
- h. Act as a Member of the CFT or appoint a DOL Representative.

**Director of Safety and Occupational Health Office (SOH):**

- a. Provide policy and guidance to the primary staff of the VAARNG and oversee compliance of worksite safety and occupational health requirements, particularly in accordance with the Occupational Safety and Health Administration (OSHA) standards 29 CFR 1910, 1917, and 1926,
- b. Act as a Member of the CFT or appoint a SOH Representative,
- c. Determine the requirements of a program that provides periodic health hazard training and health monitoring for State and Federal employees of the VAARNG wherever hazardous and toxic material are generated, handled, stored, treated, or disposed,
- d. Provide training and source implementation of the proper storage and disposal of medical waste throughout the VAARNG, and
- e. Provide and disseminate policy and guidance on the health aspects of adverse impacts created by VAARNG.

**Commanders of Training Sites, FMSs, CSMS, AASFs, and Readiness Centers:**

- a. Share with TAG the responsibility of environmental compliance for all operations under their control,
- b. Identify environmental needs and noncompliance situations,
- c. Communicate with VAARNG-FM-E to determine requirements for resources/resolution,
- d. Appoint Environmental Compliance Coordinators (ECC) at the appropriate unit level (AR 200-1) to manage environmental issues and to serve as the local point of contact for regulatory authorities on environmental issues, and
- e. Ensure the appointed ECC completes the required training.

**Environmental Compliance Coordinators (ECC):**

- a. Point of contact for environmental activities in their units,
- b. Ensure operations under their control are in conformance with environmental requirements,



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- c. Identify environmental training needs for Soldiers and employees within their units,
  - d. Promote a responsible environmental ethic, and
  - e. Complete ECC training provided by VAARNG-FM-E.

**CFT Members:**

- a. Gather information and identify environmental aspects and impacts,
- b. Define measurable and achievable objectives and targets,
- c. Establish the parameters and approve the Action Plans,
- d. Establish the eMS Program,
- e. Review annual audit findings,
- f. Prepare implementation plans,
- g. Prepare annual report,
- h. Work with existing committees and organizations to implement the eMS,
- i. Represent all functional areas or core business areas of the organization regardless of actual CFT representation,
- j. Provide command emphasis to implement eMS and comply with environmental requirements,
- k. Manage the reactions to the changes resulting from eMS implementation, and
- l. Promote continual improvement.

**eMS Coordinator:**

- a. Coordinate the eMS with various levels and functions of the VAARNG,
- b. Update procedures manual and related forms, as necessary,
- c. Ensure all elements of the eMS are planned, implemented and maintained,
- d. Act as a Member of the eMS CFT,
- e. Collect and evaluate work,
- f. Arrange training, guidance, and assistance,
- g. Distribute educational materials upon request,
- h. Maintain documents for the eMS Program,
- i. Plan and schedule internal audits, and
- j. Report the eMS results to the Command at EQCC meetings.

**Contracting personnel:**

- a. Ensure that contracts address eMS issues, including ensuring any persons performing tasks for or on the behalf of the VANG that have the potential to cause an impact on the environment are aware of the eMS Policy and agree to conform as it relates to their activities, and
- b. Establish, implement, and maintain procedures related to procuring goods and services used by the VAARNG that may positively/negatively impact the environment and communicate these procedures and requirements to contractors (i.e., Green Procurement, LEED, recycling, spill control procedures, etc.).



**Employees:**

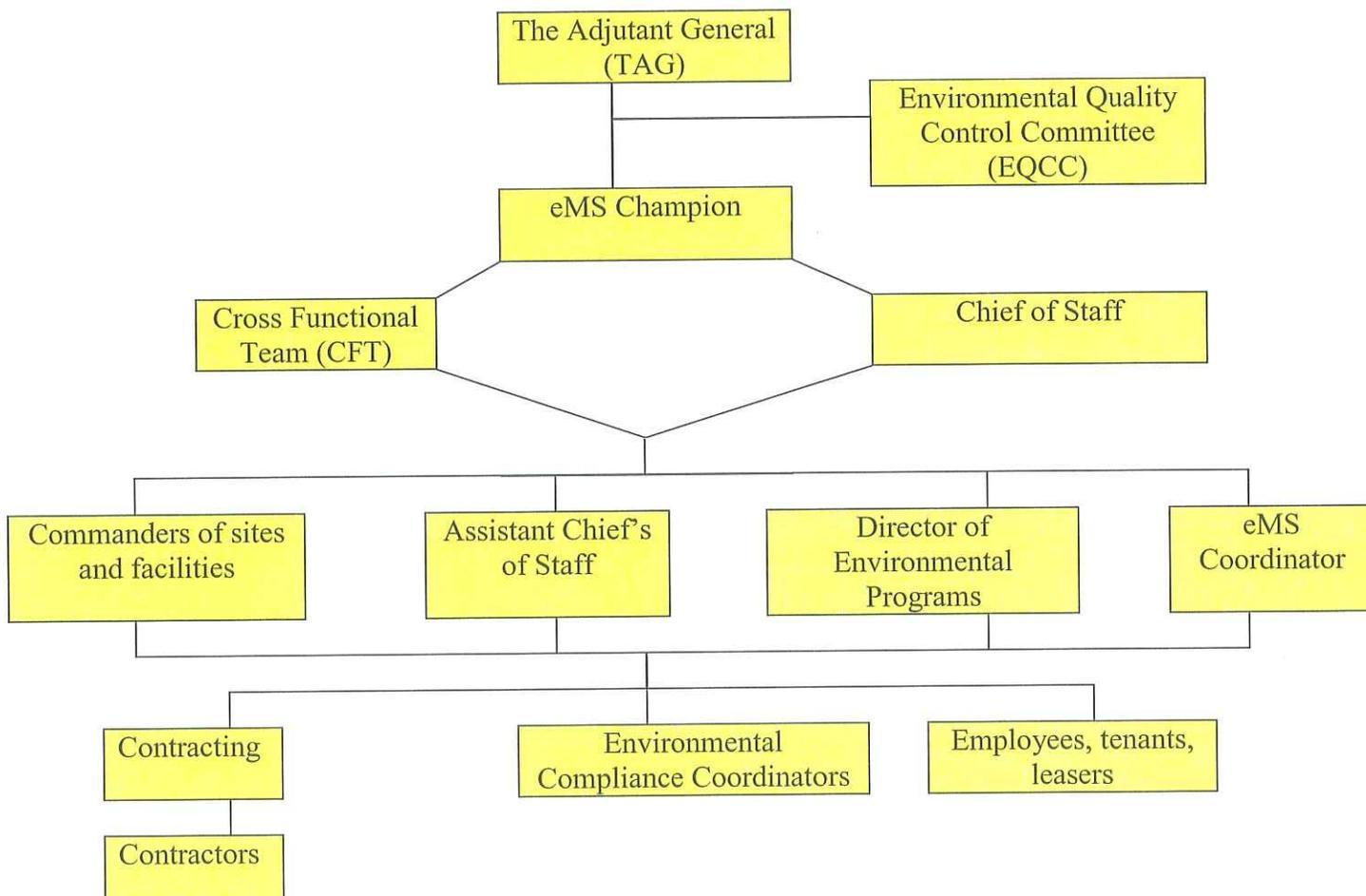
The Guard employees are responsible for:

- a. Attending all required training provided by VAARNG-FM-E and the unit ECC
- b. Operating in conformance with and support of the eMS.

**Onsite Contractors, Tenants, and Leasers** are responsible for operating in conformance with and support of the eMS.

The eMS Program Team Organizational Chart is provided below (**Figure 4**). The chart represents the structure and information flow of the eMS Program, supporting the concept that the eMS program at the VAARNG is everyone’s responsibility.

**Figure 4:  
eMS Program Team Organizational  
Chart**



### **3.3 TRAINING, AWARENESS, AND COMPETENCE**

The VAARNG CFT will identify the appropriate training needs for all personnel whose work may create a significant impact upon the environment. Training needs will be identified for existing, new, or transferred employees/Soldiers. Training may be integrated with other job specific training such as personnel orientation, health and safety education, and quality management education.

The VAARNG has established and maintains a general awareness training program to make employees aware of the importance of conforming to the Environmental Policy and the significant environmental aspects of their work activities.

Environmental training is provided at the frequency needed to ensure compliance with regulatory and other requirements and to maintain sufficient awareness of the eMS within the organization. Specific training on current eMS objectives and targets will be performed as identified by the CFT each year when aspects, impacts, objectives and targets are revised. Training may be provided on-the-job as well as in classroom settings. Primarily, internal resources provide training, however, external resources may be used when specialized skills and knowledge are warranted. Any additional training needs identified by the Commanders will be considered by the CFT.

VAARNG's eMS Program Team, the environmental staff, and key facility personnel will distribute eMS material to all VAARNG facilities. The pocket-sized eMS Awareness Guide will be distributed to all Soldiers, civilians, and contract support personnel. Soldiers will receive the eMS Awareness Guide at weekend drills. Deployed Soldiers should receive their awareness guides upon return to home station at a convenient time. Each responsible directorate will coordinate distribution to civilians and contractors. The guides will be distributed annually to account for new personnel and personnel turnover. The act of distribution constitutes receipt of training as stated on the guide. Requirements for additional training guides will be addressed by the eMS Coordinator.

The VAARNG has implemented the distribution of awareness guides and cards as part of the training program. These cards are provided to Major Subordinate Commands (MSCs) for distribution. In addition, TAGs Environmental Policy posters and eMS awareness videos are provided to the MSCs for distribution to their facilities for eMS training.



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## **CHAPTER 4: CHECKING AND CORRECTIVE ACTION**

Chapter 4 provides the quality control and assurance elements to the eMS Program.

### **4.1 COMMUNICATION**

VAARNG will maintain internal communication regarding eMS between various levels and functions. Revision of objectives, targets, or programs; changes to eMS procedures and practices; effects of activities or mission changes on environmental aspects and significant impacts; and regulatory changes will be communicated internally via the CFT and the environmental staff to MSC's. Commanders/Facility Managers/Supervisors are responsible for communicating the relevant environmental system information provided from the CFT, EQCC, environmental staff, and/or eMS Coordinator, to personnel under their management. Relevant information includes, but is not limited to, the following: roles, responsibilities and authorities; operating procedures; and consequences of deviating from established procedures. Also, environmental problems or incidents and good practices and accomplishments will be communicated. Internal communication may occur through regular meetings, e-mail, memorandums, newsletters, posters, training sessions, and other various communication methods. The selection of the most appropriate communication methods is left to the discretion of the responsible manager.

Procedures for receiving, documenting, and responding to relevant communication from external interested parties will be established and maintained by the CFT. The VAARNG eMS Program aims to fully utilize all communication components, including web-based resources. The environmental office will maintain records of external communication of significant environmental aspects and the subsequent decisions made as a result of external communication.

All employees are responsible for reporting eMS shortcomings and/or deficiencies to their Supervisor. If the Supervisor is not available, employees should report system deficiencies or shortcomings directly to the eMS Coordinator. Any such deficiencies or shortcomings identified are responded to in accordance with *Chapter 14 - Non-Conformity, Corrective Action and Preventative Actions*. Employees are also encouraged to report positive comments regarding the successful execution of environmental programs.

### **4.2 ENVIRONMENTAL MANAGEMENT SYSTEM DOCUMENTATION**

The eMS Coordinator will establish and maintain a document file, in paper and electronic format, to store the core elements of the eMS and its interactions. The document will provide direction to related documentation. Critical steps will be described, such as who, what, where, and when. The purpose of the stored documents is to maintain the documented evidence, proving the eMS will meet mission needs.



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The primary documents guiding the eMS Program are the Procedures Manual, Objectives and Targets, Object and Target-specific Action Plans, and the Implementation Plan. The eMS documentation include:

- The environmental policy, objectives and targets,
- Description of the scope of the eMS
- Description of the main elements of the eMS and their interaction, and reference to related documentation,
- Documents, including records, required by ISO 14001, and
- Documents, including records, determined to be necessary to ensure the effective planning, operation and control of processes that relate to the significant aspects.

### **4.3 DOCUMENT CONTROL**

All documents required by ISO 14001 will be stored on a web-based data storage system and in a hard copy file maintained by the eMS Coordinator to ensure they are located in one place. Documents describe intended actions or provide guidance and can be revised. Documents will be periodically reviewed, revised as necessary, and approved for adequacy by authorized personnel (CFT members). Obsolete documents will be removed from all points of issue and points of use and identified as retained for legal and/or knowledge preservation purposes. Documentation will be legible, dated, readily identifiable and maintained in an orderly manner.

### **4.4 OPERATIONAL CONTROL**

Existing operating procedures will be reviewed and upgraded to ensure the environmental aspects are covered and mission requirements are met. The operations and activities that are associated with the recognized significant environmental impacts will be identified, in accordance with the policy statement. The targets and objectives associated with the environmental impacts will be identified and procedures will be developed in the Action Plans. Documented procedures may include:

- Work instructions
- Specified operating criteria
- Standard Operating Procedures
- Control points
- Operating limits

Environmental requirements and operational controls will also be communicated with contractors/suppliers. Existing operational controls include, but are not limited to:

- Standard Operating Procedures (SOPs)
- Technical manuals
- Military specifications
- NEPA requirements
- Computerized control systems
- Preventive and predictive maintenance programs



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- Environmental permits
  - Performance standards
  - Management Plans
  - Memorandums

When it is determined that additional operational controls are needed, the appropriate manager identifies the need and the CFT evaluates the most efficient means to establish these controls.

#### **4.5 EMERGENCY PREPAREDNESS AND RESPONSE**

The VAARNG maintains various documents required by environmental regulations that address preventing and responding to accidents and emergency situations that can impact the environment. Existing documents include, but are not limited to:

- National Environmental Policy Act (NEPA),
- Spill Prevention Control and Countermeasures (SPCC) Plan, and
- Oil Discharge Contingency Plans (ODCP).

VAARNG has established and maintained procedures that identify the potential for accidents and emergency situations and the responses to these situations. VAARNG has also established and maintained procedures for preventing and mitigating the environmental impacts that may be associated with potential accidents and emergency situations. These procedures will be tested, reviewed, and revised when necessary.

#### **4.6 MONITORING AND MEASUREMENT**

VAARNG will establish and maintain documented procedures to describe the processes used to monitor and measure the key characteristics of the VAARNG's operations that can have a significant environmental impact. Monitoring and measurement of the eMS is necessary to evaluate and improve performance. In addition, monitoring and measurement facilitates identification of areas that require corrective action and to determine the root cause(s) of problem areas. Specific monitoring procedures will be identified in Action Plans developed for achieving objectives and targets. *Chapter 3.1 – Environmental Management Program* addresses the specific forms that will be utilized to monitor progress.

Any monitoring equipment required will be calibrated as recommended by the manufacturer and records of this process will be retained according to documented procedures. An up to date list of such equipment will be maintained by the eMS Coordinator.

The Environmental Quality Control Committee (EQCC) for conformance with relevant environmental legislation and regulations will evaluate monitoring and measurement procedures periodically. The EQCC will seek to identify “critical few” performance indicators that are:



- Objective, verifiable, and reproducible,
- Relevant to the VAARNG activities, products, and services,
- Consistent with the VAARNG Environmental Policy and objectives and targets, and
- Practical, cost-effective and technologically feasible.

The EQCC will perform routine reviews of progress with respect to performance indicators and will periodically evaluate the indicators to determine their effectiveness in measuring and monitoring eMS performance.

The VAARNG Environmental Team periodically reports environmental performance to the National Guard Bureau on the Army Environmental Database – Environmental Quality (AEDB\_EQ).

#### **4.7 NONCONFORMANCE, CORRECTIVE AND PREVENTIVE ACTION**

VAARNG will establish and maintain procedures for nonconformance and corrective actions and preventive actions (CA/PA). CA/PA will be initiated to mitigate any negative impacts. Any changes in the documented procedures resulting from corrective and preventive action will be implemented and recorded. Elements of corrective action include:

1. Identifying the problem
2. Investigating to find the root cause(s)
3. Determining a long-term solution
4. Taking action to eliminate the problem
5. Making permanent changes in the system
6. Using internal audits to evaluate effectiveness

Personnel at any level of the VAARNG, contractors, or any interested party may identify nonconformance items. For nonconformance at the mission/facility/activity level, the supervisor will be informed and will work with the eMS Coordinator and the Environmental Performance Assessment System (EPAS) Manager to identify the root cause(s) and determine the necessary corrective action. For nonconformance items that impact the mission or the overall system, the CFT is directly informed and implements the corrective/preventive action and communicates to the affected personnel and/or mission areas.

The eMS Coordinator is responsible for updates and/or revisions to management system policies and/or procedures to reflect changes that result from the identified corrective/preventive action. Additionally, if the eMS Coordinator determines that the nonconformance is occurring throughout the VAARNG and is representative of a system-level nonconformance, he/she notifies affected Supervisors to implement the appropriate corrective action.



The Environmental Project Manager records the investigation and corrective actions on the respective Environmental Performance Assessment System - Installation Corrective Action Plan (EPAS-ICAP).

Corrective actions will be assigned to responsible personnel and follow-up reviews will be conducted. Mission will always be the main focus when setting CA/PA requirements.

#### **4.8 CONTROL RECORDS**

VAARNG will establish and maintain procedures for the identification, storage, protection, retrieval, retention, maintenance, and disposition of environmental records. Records are a history of what has happened and cannot be changed. These records will include training records as well as the results of audits and will be legible, identifiable, and traceable to the activity, product, or service involved. Legal requirements; DoD, DA, and NGB guidelines or standards; and use of records will be considered when establishing record retention times. They will be readily accessible and protected from damage, deterioration, or loss.

Electronic records will be stored in an electronic data file with appropriate access control and be regularly backed up to prevent loss.

#### **4.9 ENVIRONMENTAL MANAGEMENT SYSTEM AUDIT**

VAARNG will establish and maintain procedures for periodic eMS audits, which will determine if the eMS conforms to planned arrangements for environmental management, including the requirements of ISO 14001 standards. The audits will also determine whether the eMS is effectively implemented and maintained. The audit results will be reported to the the Command for review. The audits may be integrated with Quality System audits, Health and Safety audits, and/or internal or external Environmental Performance Assessment System (EPAS) audits to help minimize disruption. The eMS Coordinator is responsible for planning and scheduling internal audits of the eMS program.

Internal audits will be implemented and conducted by installation personnel with the support of other sources such as the CFT members, Environmental staff, or other state and installation personnel.

The National Guard Bureau personnel conduct external audits with independent auditors in conjunction with the EPAS Program.



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## **CHAPTER 5: MANAGEMENT REVIEW**

The EQCC, CFT, eMS Coordinator, and/or Environmental Project Manager will review the eMS to ensure its continuing suitability, adequacy, and effectiveness. The review will evaluate the following issues:

- The eMS is sustaining and enhancing the mission,
- The opportunities for improvement and the need for changes to the eMS,
- Compliance with legal requirements,
- Proper communications are maintained, both internal and external, including the process of registering compliance and noncompliance,
- The extent to which the objectives and targets are met, and
- The status of corrective and preventive action.

The EQCC will participate in establishing mechanisms for review of the environmental program. The review may address possible changes to policies, objectives, and other elements of the eMS. The review will make needed changes to ensure continual improvement.

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*This document is considered “living” as changes will inevitably be incorporated.*



**Appendix A**  
*VAARNG Environmental Policy Statement*



VIRGINIA NATIONAL GUARD  
ENVIRONMENTAL POLICY STATEMENT

The Virginia National Guard (VANG) is and will continue to be a leader in protecting the environment. VANG has implemented and is maintaining an Environmental Management System (eMS) to ensure continuity of environmental protection while maintaining and enhancing mission readiness. VANG members shall be aware of and comply with their responsibilities under this eMS.

VANG commits to:

- Complying with all applicable environmental laws, regulations, and other requirements;
- Apply pollution prevention techniques;
- Continually improving the eMS;
- Documenting this Environmental Policy, communicating it to all employees, and making it available to the public;
- Identifying environmental aspects and establishing objectives and targets, including energy efficiency, for all activities;
- Providing training to ensure employee environmental awareness;
- Partnering with local communities to improve the environment; and
- Conserving natural and cultural resources.

An annual report describing environmental aspects, detail objectives and targets, and documenting progress will be produced. This report will be made available to the public and interested parties will be invited to comment.

VANG – dedicated to sustaining the environment for the Commonwealth of Virginia

  
\_\_\_\_\_  
ROBERT B. NEWMAN, JR., Maj Gen (VA), VaANG  
The Adjutant General of Virginia

22 Dec 06  
DATE

**Appendix B**  
*List of eMS Aspects, Impacts, Objectives and Targets*

<b>VIRGINIA NATIONAL GUARD</b>	
<b>ENVIRONMENTAL MANAGEMENT SYSTEM</b>	
<b>FORM 3.4: Action Plan Tracking</b>	
Form Completion Date: 14 Feb 08	Completed by: A.O. Haynes
<p>Comments:</p> <p>This objective was the result of coordination with MTC Fort Pickett DPW to address concerns over habitat management and manpower.</p> <p>The following tables are used to document each of the environmental management system objectives and targets and to track performance compared to established goals/performance indicators.</p>	
Objective/Target ID number	Natural Resources FY08-1
Objective	To develop an Ag/Grazing Program for MTC Fort Pickett that focuses on minimizing installation effort for mowing and food plot planting while increasing biodiversity and encouraging the establishment of native plant species.
Target	<ol style="list-style-type: none"> <li>1. Identify the location of all potential locations for native warm season grass establishment on MTC Fort Pickett by 29 Feb 08; develop a GIS layer.</li> <li>2. Identify the location of all potential food plot ag lease sites on MTC Fort Pickett by 29 FEB 08; develop a GIS layer.</li> <li>3. Work with NGB to coordinate all necessary environmental paperwork to petition for an ag/grazing program.</li> <li>4. Coordinate and develop a MOU with USACE for ag/grazing; if this is not possible, coordinate actions through USPFO.</li> <li>5. Have ag leasing program established and funded for FY09 by 30 Sep 08.</li> </ol>
Performance Indicator	Documented location of ag leasing sites (compliant GIS layer), completed environmental paperwork, MOU with USACE or USPFO, funding, and development of ag lease contract for FY09.
Statement of Performance	Proposed today 14 Feb 08
<b>Criteria for Establishing Objectives and Targets</b>	
Environmental Policy	The Conservation Reimbursable and Fee Collection Programs Handbook (Sept 2005)
Applicable Laws and Other Legal Requirements	
Technological Options	GIS
Financial, Operational and Business Considerations	MTC Fort Pickett must run the program once established; funding is reimbursable; USACE or USPFO will handle contracting; ag leases are for 5 yrs.
Stakeholders Views	LTC Bragg & COL Sparks are in favor of establishment; NGB would support request.
<b>Action Plan</b>	

1. Coordinate with DPW and VAFME to locate all ag lease locations
2. Coordinate with state agencies to organize all necessary environmental background paperwork.
3. Petition NGB for establishment of Ag/Grazing Program and FY09 budget.
4. Develop MOU with USACE or coordinate with USPFO for contracting of ag leases.

**Training:** MTC Fort Pickett staff designated to oversee the ag leases will be provided with training on yearly reporting requirements and contracting language.

**Monitoring and Measurement:** Once established, the program must report yearly to NGB and AEC through the RPTS.

Action Item	Priority/Schedule	Responsible Job/Personnel	Personnel Resources Needed	Additional Financial Resources Needed	Status	
1	1	A.H.	My own time	NA		
2	2	A.H.	My own time	NA		
3	3	A.H.	My own time	NA		
Performance Tracking						
		1	2	3	4	Total
Plan/Goal		NA	NA			
Actual		NA	NA			
Update: Objectives and targets proposed at the 2 <sup>nd</sup> QTR FY08 CFT meeting, performance tracking will begin from this date.						

<b>VIRGINIA NATIONAL GUARD</b>	
<b>ENVIRONMENTAL MANAGEMENT SYSTEM</b>	
<b>FORM 3.4: Action Plan Tracking</b>	
Form Completion Date: 14 Feb 08	Completed by: A.O. Haynes
<p>Comments:</p> <p>This objective was the result of the need to develop clear protocol for MTC Fort Pickett installation personnel for basic road, water and range maintenance that has the potential to impact wetlands and aquatic ecosystems.</p> <p>The following tables are used to document each of the environmental management system objectives and targets and to track performance compared to established goals/performance indicators.</p>	
Objective/Target ID number	Natural Resources FY08-2
Objective	To develop a list of activities that are approved by USACE for completion and do not necessitate a USACE or DEQ permit.
Target	<ol style="list-style-type: none"> <li>1. Coordinate with USACE regional wetlands POC to develop a list of activities that are exempted from permitting requirements by 01JUNE08.</li> <li>2. Develop a clear, concise activity checklist that accurately establishes the exemption or need for a permit based on activity being undertaken by 15JUL08.</li> <li>3. Train MTC Fort Pickett DPW and DPTS staff to effectively use the checklist by 01 JAN09.</li> </ol>
Performance Indicator	List of USACE agreed upon exempted activities, MTC Fort Pickett specific activity checklist, and training of MTC Fort Pickett DPW and DPTS staff.
Statement of Performance	Proposed today 14 Feb 08
<b>Criteria for Establishing Objectives and Targets</b>	
Environmental Policy	AR 200-1
Applicable Laws and Other Legal Requirements	CWA
Technological Options	NA
Financial, Operational and Business Considerations	NA
Stakeholders Views	NA
<b>Action Plan</b>	
<ol style="list-style-type: none"> <li>1. Coordinate with DPW and DPTS to determine routine activities they undertake that have the potential to impact wetlands and waterways.</li> <li>2. Coordinate with USACE to develop a list of exempted activities.</li> <li>3. Train MTC Fort Pickett DPW and DPTS in the use of the activities sheet.</li> </ol> <p><b>Training:</b> MTC Fort Pickett staff DPW and DPTS will be trained in the use of the approved activities sheet and when further coordination with VAFM-E is necessary.</p> <p><b>Monitoring and Measurement:</b> Once training is complete, no further monitoring is necessary except informal contact with DPW and DPTS staff to determine areas of improvement for the approved activities sheet.</p>	

Action Item	Priority/Schedule	Responsible Job/Personnel	Personnel Resources Needed	Additional Financial Resources Needed	Status
1	1	A.H.	My own time	NA	
2	2	A.H.	My own time	NA	
3	3	A.H.	My own time	NA	
Performance Tracking					
	1	2	3	4	Total
Plan/Goal	NA	NA			
Actual	NA	NA			
Update: Objectives and targets proposed at the 2 <sup>nd</sup> QTR FY08 CFT meeting, performance tracking will begin from this date.					

<b>VIRGINIA NATIONAL GUARD</b>	
<b>ENVIRONMENTAL MANAGEMENT SYSTEM</b>	
<b>FORM 3.4: Action Plan Tracking</b>	
Form Completion Date: 11 Feb 08	Completed by: J.B. Daniel
<p>Comments:</p> <p>This objective was a direct result of the Va Dept. of Conservation and Recreation informally encouraging the VAARNG to properly maintain existing Stormwater Management Basins at our facilities.</p> <p>The following tables are used to document each of the environmental management system objectives and targets and to track performance compared to established goals/performance indicators.</p>	
Objective/Target ID number	Surface Water Quality FY08-1
Objective	To preserve surface water quality and prevent uncontrolled stream bank erosion by properly maintaining functional stormwater basins at VAARNG facilities (MTC Fort Pickett and Statewide).
Target	<ol style="list-style-type: none"> <li>1. Identify the location of all existing stormwater basins (SWBs) on VAARNG properties and facilities by 1 Apr 08.</li> <li>2. GPS the location and inspect each basin for functionality and document the maintenance repairs necessary by 30 Jun 08.</li> <li>3. Develop a maintenance plan for each SWB and communicate the plan with each responsible party by 30 Jun 08.</li> <li>4. Develop a GIS layer (SDS and FGDC compliant) of the identified SWBs for future addition to the Enterprise GIS Server by 30 Sep 08.</li> <li>5. Provide awareness training on maintenance plan requirements to responsible parties by 30 Sep 08.</li> </ol>
Performance Indicator	Documented location of SWBs, inspection reports, maintenance plans, compliant GIS layer, and awareness training record.
Statement of Performance	Proposed today 11 Feb 08
<b>Criteria for Establishing Objectives and Targets</b>	
Environmental Policy	VAARNG Env Policy Statement 22 Dec 07
Applicable Laws and Other Legal Requirements	CWA and VA Stormwater Management Act
Technological Options	GIS
Financial, Operational and Business Considerations	NA
Stakeholders Views	
<b>Action Plan</b>	
<ol style="list-style-type: none"> <li>1. Coordinate with DPTS, DPW, and VAFM O/M to find all the SWBs.</li> <li>2. Obtain the appropriate inspection criteria for this task.</li> <li>3. Travel to each SWB, conduct inspections, GPS location, and document repairs needed.</li> </ol> <p><b>Training:</b> Responsible parties for maintaining the basins will receive awareness training on the maintenance plans and what is expected/required to maintain</p> <p><b>Monitoring and Measurement:</b> Quarterly at CFT progress updates and during the IPAS.</p>	

Action Item	Priority/Schedule	Responsible Job/Personnel	Personnel Resources Needed	Additional Financial Resources Needed	Status
1	1	J.B.	My own time	NA	
2	2	J.B.	My own time	NA	
3	3	J.B.	My own time	NA	
Performance Tracking					
	1	2	3	4	Total
Plan/Goal	NA	NA			
Actual	NA	NA			
Update: Objectives and targets proposed at the 2 <sup>nd</sup> QTR FY08 CFT meeting, performance tracking will begin from this date.					

<b>VIRGINIA NATIONAL GUARD</b>	
<b>ENVIRONMENTAL MANAGEMENT SYSTEM</b>	
<b>FORM 3.4: Action Plan Tracking</b>	
Form Completion Date: 28 February 2008	Completed by: J.B. Daniel
Comments: Meeting on 27 Feb 2008 with Susan Quinn, Sheila Loftis, and J.B. Daniel. Mrs. Quinn stated what she would like as her FY08 eMS Objectives and Targets relating to federal procurement. Reviewed and approved by Mrs. Quinn on 29 Feb 08.	
The following tables are used to document each of the environmental management system objectives and targets and to track performance compared to established goals/performance indicators.	
Objective/Target ID number	<b>Federal Procurement FY08-1</b>
Objective	For the VAARNG federal contracting office to comply with the Federal Acquisition Regulation (FAR) as it relates to environmental clauses.
Target	<ol style="list-style-type: none"> <li>1. Have federal contracting office staff read, discuss, and understand green procurement requirements in a Tuesday morning training session (Mar 08).</li> <li>2. Insert the appropriate environmental clauses referenced in FAR into service and construction contracts that include but are not limited to energy efficient products, hazardous materials, use of recovered materials and bio-based products, radioactive material, environmentally preferable products and services, and ozone depleting substances (ongoing).</li> <li>3. Incorporate local environmental training in pre performance meetings for all service and construction contractors</li> <li>4. Ensure contractors adhere to environmental clauses in contracts by performing site visits during the contracting period</li> <li>5. Identify green procurement training media to be used in the future for broad scale awareness training for GPC card holders</li> </ol>
Performance Indicator	Red, Amber, Green
Statement of Performance	Proposed February 2008
<b>Criteria for Establishing Objectives and Targets</b>	
Environmental Policy	VAARNG Environmental Policy
Applicable Laws and Other Legal Requirements	Resource Conservation and Recovery Act, Clean Air Act, and the Energy Policy Act
Stakeholders Views	Needs to be done

### Action Plan

1. Identify members/positions within the federal contracting office and ensure they complete informal group training on FAR environmental requirements during a Tuesday morning training session (Mar 08).
2. Use environmental clauses provided in FAR for inclusion into appropriate contracts (Mar 08).
3. Provide eMS awareness training materials in all pre-performance meetings on federal contracts by providing the contractor the VAARNG eMS Notice to Contractors handout, the VAARNG eMS Awareness Guide and referring them to more specific information on the Environmental portion of the Virginia National Guard public website (Mar 08).
4. Have COR's verify that contractors are following environmental clause requirements of their respective contracts during progress meetings and site visits during the contract period (Ongoing).
5. a. Review Green Procurement training resources and identify the training media that would be most beneficial to use across the VAARNG (May 08).
5. b. Meet with other managers within the VAARNG who oversee or manage federal procurement/contracting in other departments and make them aware of the eMS Green Procurement requirements and encourage them to comply (Jun 08).
5. c. Make a list of positions/individuals that need to have Green Procurement Training and make a recommendation to the type of training needed (Jul 08).
5. d. Develop a policy memo that would require Green Procurement Training for all persons procuring goods and services for the VAARNG (Aug 08).

**Training:** Federal contracting staff will train on environmental requirements in the FAR.  
**Monitoring and Measurement:** COR's will monitor implementation of environmental requirements on their respective contracts. Overall objective progress will be monitored at quarterly eMS CFT meetings.

Action Item	Priority/Schedule	Responsible Job/Personnel	Personnel Resources Needed	Additional Financial Resources Needed	Status
1	March	Ms. Quinn	Staff Training Time	NA	
2	March	Ms. Quinn	Staff	NA	
3	March	Fed Contr. Staff	Staff	NA	
4	FY08	Ms. Quinn	Staff	NA	
5a	May		Staff	NA	
5b	June	Ms. Quinn	Staff	NA	
5c	July	Ms. Quinn	Staff	NA	
5d	August	Ms. Quinn	Staff	NA	

Performance Tracking

Quarterly Summary:

<b>VIRGINIA NATIONAL GUARD</b>	
<b>ENVIRONMENTAL MANAGEMENT SYSTEM</b>	
<b>FORM 3.4: Action Plan Tracking</b>	
Form Completion Date: 3 March 08	Completed by: J.B. Daniel
Comments: Initial development was completed by D.J. Hite on 8 Feb 08 and proposed at the eMS CFT meeting on 14 Feb 08.	
The following tables are used to document each of the environmental management system objectives and targets and to track performance compared to established goals/performance indicators.	
Objective/Target ID number	Energy Conservation FY08-1
Objective	To identify parts of 5 statewide facilities that can be modified to improve energy conservation.
Target	1. Conduct comprehensive energy audits at 5 statewide facilities (Norfolk RC, Norfolk FMS, Powhatan RC, Farmville RC, and Virginia Beach RC) before Sept 30 2008.
Performance Indicator	Red, Amber, Green
Statement of Performance	Proposed Feb 2008
<b>Criteria for Establishing Objectives and Targets</b>	
Environmental Policy	VAARNG Environmental Policy
Applicable Laws and Other Legal Requirements	EO 13423
Stakeholders Views	Positive
<b>Action Plan</b>	
<ol style="list-style-type: none"> <li>1. Energy manager will identify and approve energy audit criteria to be used for the energy audits at each of the facilities.</li> <li>2. Energy manager will select a contractor to complete the energy audits.</li> <li>3. Energy manager will oversee the contract and receive the complete, final and approved energy audit including a summary of recommendations of facility upgrades/improvements that would reduce energy usage at each respective facility along with the estimated payback periods.</li> </ol> <p><b>Training:</b> No additional awareness or competence training is needed for this objective.</p> <p><b>Monitoring and Measurement:</b> Quarterly at CFT progress updates and ultimately review of the audit summary.</p>	

Action Item	Priority/Schedule	Responsible Job/Personnel	Personnel Resources Needed	Additional Financial Resources Needed	Status
1	April	D. J. Hite	NA	NA	
2	May	D.J. Hite	NA	NA	
3	August	D.J. Hite	Na	Na	
Performance Tracking					
		1	2	3	4 Total
Plan/Goal					
Actual					
Performance Tracking					
		1	2	3	4 Total
Plan/Goal		NA	NA		
Actual		NA	NA		
Update: Objective and Targets proposed at the 2 <sup>nd</sup> QTR FY08 CFT meeting, performance will be ongoing from this date.					

<b>VIRGINIA NATIONAL GUARD</b>	
<b>ENVIRONMENTAL MANAGEMENT SYSTEM</b>	
<b>FORM 3.4: Action Plan Tracking</b>	
Form Completion Date: 3 March 08	Completed by: J.B. Daniel
Comments: Initial development was completed by D.J. Hite on 8 Feb 08 and proposed at the eMS CFT meeting on 14 Feb 08.	
The following tables are used to document each of the environmental management system objectives and targets and to track performance compared to established goals/performance indicators.	
Objective/Target ID number	Energy Conservation FY08-2
Objective	Reduce energy consumption of 80 vending machines at statewide facilities.
Target	1. Install 80 vending misers (energy saving devices) to vending machines at VAARNG statewide facilities.
Performance Indicator	Red, Amber, Green
Statement of Performance	Proposed Feb 2008
<b>Criteria for Establishing Objectives and Targets</b>	
Environmental Policy	VAARNG Environmental Policy
Applicable Laws and Other Legal Requirements	EO 48
Stakeholders Views	Positive
<b>Action Plan</b>	
<ol style="list-style-type: none"> <li>1. Coordinate with VAFM O/M to prioritize where the vending misers will be installed and finalize the installation plan.</li> <li>2. Install vending misers at designated locations.</li> <li>3. Post the energy star sticker.</li> <li>4. Document the location of each miser on Energy Manager spreadsheet by 30 Sep 08.</li> </ol> <p><b>Training:</b> No additional awareness or competence training is needed for this objective.  <b>Monitoring and Measurement:</b> Quarterly at CFT progress updates.</p>	

Action Item	Priority/Schedule	Responsible Job/Personnel	Personnel Resources Needed	Additional Financial Resources Needed	Status	
1	April	D. J. Hite	NA	NA		
2	August	D.J. Hite	NA	NA		
3	September	D.J. Hite	NA	NA		
Performance Tracking						
		1	2	3	4	Total
Plan/Goal						
Actual						
Performance Tracking						
		1	2	3	4	Total
Plan/Goal		NA	NA			
Actual		NA	NA			
Update: Objective and Targets proposed at the 2 <sup>nd</sup> QTR FY08 CFT meeting, performance will be ongoing from this date.						

**Appendix C**  
*Forms 3.1, 3.2, 3.3, and 3.4*





**VIRGINIA NATIONAL GUARD ENVIRONMENTAL MANAGEMENT SYSTEM**

**FORM 3.3: Criteria for Evaluating the Significance of Aspects/Impacts**

Form completion date:

Completed by:

Comments:

Aspect	Impact	Environmental Risk	Regulatory Liability	Mission Impact	Significant (Yes/No)

	HIGH	MEDIUM	LOW
Environmental Risk			
Regulatory Liability			
Mission Impact			
Significant			

<b>VIRGINIA NATIONAL GUARD</b>	
<b>ENVIRONMENTAL MANAGEMENT SYSTEM</b>	
<b>FORM 3.4: Action Plan Tracking</b>	
Form Completion Date:	Completed by:
Comments:	
The following tables are used to document each of the environmental management system objectives and targets and to track performance compared to established goals/performance indicators.	
Objective/Target ID number	
Objective	
Target	
Performance Indicator (Red, Amber, Green)	
<b>Criteria for Establishing Objectives and Targets</b>	
Environmental Policy	
Applicable Laws and Other Legal Requirements	
Financial, Operational and Business Considerations	
Stakeholders Views	
<b>Action Plan</b>	

Action Item	Priority/ Schedule	Responsible Job/Personnel	Personnel Resources Needed	Additional Financial Resources Needed	Status
<b>Required Training:</b>					
<b>Monitoring and Measurement:</b>					
<b>Performance Tracking Update Documenting Progress Towards Meeting Targets:</b>					

**Appendix D**  
*Definitions*



## Definitions

*Applicable Legal Requirements* - Legal requirements promulgated and enforced by federal, state, or local government authorities that apply to an organization's products, services and activities.

*Auditor* - Person with the competence to conduct an audit.

*Continual Improvement* - Recurring process of enhancing the environmental management system in order to achieve improvements in overall environmental performance consistent with the organization's environmental policy.

*Corrective Action* - Action to eliminate the cause of a detected nonconformity.

*Document* - Information and its supporting medium.

*Environment* - Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans, and their interaction.

*Environmental Aspect* - Element of an organizations activities, products or services that can interact with the environment.

*Environmental Impact* - Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects.

*Environmental Management System* - Part of an organization's management system used to develop and implement its environmental policy and manage its environmental aspects.

*Environmental Objective* - Overall environmental goal, consistent with environmental policy, which an organization establishes and intends to achieve.

*Environmental Performance* - Measurable results from an organization's management of its environmental aspects.

*Environmental Policy* - Overall intentions and direction of an organization related to its environmental performance as formally expressed by the Command.

*Environmental Target* - Detailed performance requirement, applicable to the organization or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.

*Interested Party* - Person or group concerned with or affected by the environmental performance of an organization.

## Definitions (cont.)

*Internal Audit* – Audit performed by a member or team within the organization to objectively determine if the eMS is being implemented in accordance with established eMS procedures.

*Nonconformity* - Non-fulfillment of a requirement.

*Organization* - Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration.

*Other Requirements* - Other requirements to which the VAARNG subscribes, such as DoD, DA, and NGB that applies to the state's activities, products and services. Types of other requirements can include internal regulations, procedures, lease agreements, organizational memberships, etc.

*Preventive Action* - Action to eliminate the cause of a potential nonconformity.

*Prevention of Pollution* - Use of processes, techniques, materials, products, services, or energy to avoid, reduce, or control (separately or in combination) the creation, emission, or discharge of any type of pollutant or waste, in order to reduce adverse environmental impacts.

*Procedure* - Specified method to carry out an activity or a process.

*Record* - Document stating results achieved or providing evidence of activities performed.

*Significant Environmental Aspect* - An environmental aspect that has or can have a significant environmental Impact.