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Making Permitting More Efficient and Effective Through the Use of Environmental Management Systems

What is an EMS?

An EMS is a continual cycle of planning, implementing, reviewing and improving the processes and actions that an organization undertakes to meet its business and environmental goals. EMSs are purely voluntary and do not replace the need for regulatory and enforcement programs, they simply create an environment in which regulators and regulations can work more efficiently and effectively. The major components of an EMS are: 1) Policy, 2) Planning, 3) Implementation and Operation, 4) Checking and Corrective Action , 5) Management Review.

Why are we promoting the use of EMSs?

EPA believes that using EMSs can improve environmental performance, and we are actively promoting EMSs in a variety of programs and forums including the Agency's Innovation Strategy, the Performance Track Program and through compliance assistance. In these contexts, EPA is increasingly confronted with questions of whether EMSs can be used to improve the efficiency and effectiveness of regulatory tools (such as rules and permits) and what roles, if any, regulatory tools should play in promoting EMSs. EMSs have also been identified as one of the key strategies to provide further direction to the Resource Conservation Challenge.

OSW wants to facilitate and encourage the widespread adoption of successful, high quality EMSs at RCRA facilities, and ensure that, at a minimum, the RCRA permitting program is constructed in a way that allows for and facilitates EMS implementation, with continuous emphasis on pollution prevention, improved environmental performance and compliance. To accomplish this, OSW is working with the Regions and States to use EMSs as a tool in voluntary programs and to pilot changes in the permitting program that allow EMS-based changes to be made under the issued permit through dissemination of EMS information and the development of appropriate assistance programs.

OSW initiatives underway include EMS training for staff and management, sector-based EMS assistance to specific industrial sectors (e.g., mining, oil and gas), and potential additional RCRA incentives for Performance Track facilities.

As we move forward with integrating EMSs into the RCRA program, we are working with States that are interested in setting up a statewide EMS program. We are also interested in hearing from states, regions, and/or industry groups to provide us with additional ideas and feedback on EMS-related projects. Interested parties can talk with OSW EMS listed below.

Background

Over the last ten years, there has been a growing commitment in the private sector toward improved environmental practices. The emergence of voluntary environmental management systems (EMSs), such as those suggested by ISO and others, coupled with the adoption of those systems, bears witness to this growing commitment. Clearly, operational practices that continually reduce environmental impact are not only good for the environment, but good for businesses as well.

In May of 2002, U.S. EPA Administrator Christine Todd Whitman released a position statement describing a new regulatory model revolving around the concept of EMSs. The announcement was made quietly and without fanfare, but many believe it to be the dawning of a new regulatory era of cooperative working relationships between the regulator and the regulated, one that will ultimately streamline the permitting process, and benefit the environment.

For More Information

Call Glynis Hill at (703) 308-0032 or George Faison at (703) 305-7652.

An EMS serves the organization and its mission. It's a process, not an event, it's the people and their actions, not the words and aspirations. Improvement rests on changing attitudes and behaviors to "want to, not have to."