

Glacier National Park

Environmental Management System Procedures



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Table of Contents

I. EMS Overview.....	1
II. EMS Components.....	3
II.A. Environmental Commitment Statement.....	5
II.B. Park Activities and Environmental Impacts	5
II.C. Objectives, Targets, and Environmental Management Plans.....	7
II.D. Roles, Responsibilities, and Accountability	9
II.E. Document Control, Recordkeeping, and Reporting.....	10
II.F. Communication	12
II.G. Training.....	13
II.H. Operational Control and Monitoring.....	14
II.I. Evaluation and Corrective Action.....	15
II.J. Management Review	17

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

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I. EMS Overview

The Glacier National Park (GLAC) environmental management system (EMS) provides the framework within which the park manages all of its activities and operations to reduce environmental impacts; ensure compliance with environmental laws, regulations, and policies; and increase resilience and sustainability of the park's operations. The EMS process is team-based and applies continuous improvement and strategic planning to achieve excellent environmental performance.

Scope of the EMS

The scope of the EMS is limited to the facilities of the park that are owned and operated by the National Park Service (NPS), and all of the functions and activities of park staff. The EMS also encompasses the operations of park contractors and concessioners to the extent that environmental requirements are included in contracts with these entities. *Whenever possible, contract language includes environmental performance requirements, and contractor performance relative to these is monitored.* At this time, the activities of partners, visitors, volunteers, and others are not addressed within the EMS; however, their activities and impacts may be considered in the EMS at the discretion of the EMS Team and the Superintendent/Management Team.

Park's Legacy of Environmental Stewardship

The park has a long history of park staff working collectively to improve environmental performance. These past achievements as well as positive practices and best management practices (BMPs) that have been incorporated into routine park operations are inventoried in an Excel spreadsheet, Attachment I., Environmental Stewardship Legacy, for park staff and stakeholders to reference. This legacy of accomplishments is updated each year during the annual review of EMS progress.

Definitions for EMS Terminology

Definitions are provided in each section of these EMS Procedures as they become relevant. In addition, they are hyperlinked below for the convenience of the user.

[Best Management Practice \(BMP\)](#)

[Documents](#)

[Environmental Impact](#)

[Environmental Management Program \(EMP\)](#)

[Key Metric](#)

[Objective](#)

[Operational Control](#)

[Records](#)

[Reports](#)

[Significant Activity/Environmental Impact](#)

[Standard Operating Procedure \(SOP\)](#)

[Target](#)

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

EMS Annual Cycle of Activities

The general outline of EMS activities on an annual cycle is provided below. Specific scheduling details (such as how frequently the EMS Team meets and provides updates to the park Management Team) are provided in the procedures in Section II.

- The EMS is managed by an EMS Team appointed by the Superintendent and the park Management Team that is representative of all park divisions as well as the geographic span of the park.
- The EMS Team annually reviews, updates, and develops EMS objectives and targets.
- The park Management Team annually approves EMS objectives and targets as well as EMS roles and responsibilities; these provide the framework within which the EMS functions.
- EMS roles and responsibilities are incorporated into staff appraisals and performance standards as appropriate.
- The EMS Team holds periodic meetings or confers by email to review progress toward fulfilling objectives and targets and otherwise monitor the status of the park's environmental performance, and provides updates to the park Management Team on EMS progress.
- No less than annually, the park provides a training session for all park staff on the EMS to include the environmental commitment statement, objectives and targets, and general expectations.
- Annually, the park undertakes at least one management review of the EMS, culminating in feedback from and approval by the Superintendent.
- Following the management review(s), the EMS Team reviews feedback from the park Management Team, updates the EMS (including these procedures) as appropriate, and resets objectives and targets.
- The scheduled due dates for each of the tasks outlined above are shown on the calendar in the e-Tools.

Change in Superintendent

With the arrival of a new Superintendent to the park (following an outgoing Superintendent or Acting Superintendent's term), the EMS Team will, within six months:

- Update the Superintendent's presentation (found in the e-Tools Library) to reflect the park's current EMS commitment statement, objectives and targets, and roles and responsibilities, including highlights of the park's history of environmental accomplishments;
- Make a presentation to the incoming Superintendent to orient him or her to the purpose, function, and value of the EMS; and
- Request the Superintendent to sign the commitment statement to signify approval of the existing EMS.

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

Moving forward, the Superintendent will provide feedback on the performance of the EMS during scheduled updates to the park Management Team and through the annual management review process.

II. EMS Components

The EMS is composed of the EMS procedures outlined in this document, the environmental stewardship legacy described in Section I, and the ten required components. EMS documentation is maintained in an online EMS data management system, the NPS Intermountain Region (IMR) e-Tools, as well as in supplemental documents that are uploaded to the online EMS Library within the e-Tools. The table below identifies where EMS information is maintained for each of the EMS components, with the arrows indicating where to locate the information within the e-Tools:

<i>EMS Component</i>	<i>Associated Documentation</i>	<i>Notes</i>
I. EMS Overview	NPS IMR e-Tools → EMS Library → Glacier National Park EMS Procedures (Word)	The park-level procedures that guide park staff in the process of managing the EMS.
	NPS IMR e-Tools → EMS Library → I. Environmental Stewardship Legacy (Excel)	Summary of the park's accomplishments to date, as well as BMPs that been adopted and are routinely followed at the park.
II.A. Environmental Commitment Statement	NPS IMR e-Tools → Environmental Commitment Statement → Glacier National Park Environmental Commitment Statement	A scanned copy of the EMS commitment statement signed by the Superintendent is also maintained in the EMS Library.
II.B. Park Activities and Environmental Impacts	NPS IMR e-Tools → Park Activities, Environmental Impacts → Park-defined Activities and Environmental Impacts	Documentation of brainstorming and discussion process used to develop the initial inventory of activities/environmental impacts is maintained in the EMS Library.
	NPS IMR e-Tools → EMS Library → II.B. Activities and Impacts Process (Word)	The steps used by the EMS Team to initially brainstorm park activities/environmental impacts.
	NPS IMR e-Tools → Document Control, Recordkeeping, and Reporting → Documents → Legal and Other Requirements → Park-defined Legal and Other Requirements	The park's external environmental audit report is used to assist with identifying specific legal and other requirements.
II.C. Objectives, Targets, and Environmental Management Plans	NPS IMR e-Tools → Objectives, Targets, Environmental Management Plans → Park-defined Objectives, Targets, and Environmental Management Plans	Note: Various reports on the EMS objectives and targets can be accessed from NPS IMR e-Tools → Document Control, Recordkeeping, and Reporting → Reports.

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

<i>EMS Component</i>	<i>Associated Documentation</i>	<i>Notes</i>
II.D. Roles, Responsibilities, and Accountability	NPS IMR e-Tools → Roles, Responsibilities, Accountability → Park-assigned Roles and Responsibilities	Note: Descriptions of park's EMS responsibilities can be accessed from NPS IMR e-Tools → Roles, Responsibilities, Accountability → Roles and Descriptions.
II.E. Document Control, Recordkeeping, and Reporting	NPS IMR e-Tools → EMS Library → II.E. Matrix of EMS Documentation (Excel)	Located in the EMS Library, lists all environmental management documents, records, and reports being tracked within the EMS.
	NPS IMR e-Tools → Document Control, Recordkeeping, and Reporting → Document Management Matrix → Park-specific EMS Document List	A report of the subset of all EMS documentation that is managed within the e-Tools, including documents maintained in the EMS Library.
II.F. Communication	NPS IMR e-Tools → EMS Library → II.F. Annual Communication Plan (Excel)	Key communication messages for the current year, located in the EMS Library.
	NPS IMR e-Tools → External Communication Log → Park-specific External Communications	A log of key external environmental communications.
II.G. Training	NPS IMR e-Tools → EMS Library → II.G. Training Matrix	Located in the EMS Library, lists all environmental management training being tracked within the EMS.
II.H. Operational Control and Monitoring	NPS IMR e-Tools → Operational Control and Monitoring → Park-specific Activity/Impact → Park-specific Operational Controls	For each of the park's significant activity/impact areas, identifies key operational controls in place to prevent or reduce environmental impacts.
II.I. Evaluation and Corrective Action	NPS IMR e-Tools → EMS Library → NPS IMR External Environmental Compliance Audit Report	Park's most recent external environmental compliance report (executive summary and audit findings).
	NPS IMR e-Tools → EMS Library → NPS IMR External EMS Evaluation	Park's most recent external EMS evaluation report.
	NPS IMR e-Tools → Evaluation and Corrective Action → Corrective Actions → Park-specific Corrective Action Plans	Open and resolved corrective action plans to address to EMS non-conformances.
II.J. Management Review	NPS IMR e-Tools → Management Review → Park-specific Management Review	Park's most recent and historic EMS management review reports.

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

II.A. Environmental Commitment Statement

The environmental commitment statement is the documented intention of the Superintendent to achieve excellence in environmental management. It guides the efforts of park staff to develop, implement, and maintain the EMS. It is required to include the following commitments:

- To comply with all applicable laws, including federal, state, and local laws, regulations, requirements, and policies, as well as executive orders (e.g., executive orders 13423 and 13514) and addressing the protection of the environment;
- To demonstrate environmental leadership by incorporating sustainable practices (including greenhouse gas reductions), pollution prevention, and environmentally preferable purchasing into park activities and operations; and
- To strive for continual improvement in the park's environmental performance through following the EMS process.

When developing the environmental commitment statement, the park considers the park's overall mission, the park General Management Plan, and longer term visions for the park's environmental performance, including sustainable operations. The park strives for a succinct environmental commitment statement that is realistic, yet also inspiring.

Procedure

The park develops and maintains the environmental commitment statement as follows.

- The EMS team develops or updates the draft environmental commitment statement.
- The Superintendent reviews, approves, and signs the final environmental commitment statement.
- The EMS Team maintains the environmental commitment statement in the NPS IMR e-Tools.
- The environmental commitment statement is annually reviewed by the EMS Team.
- If the EMS Team proposes changes, the updated environmental commitment statement is reviewed and signed again by the Superintendent within one month. (Note: See Section 1 for procedures for the environmental commitment statement in the event of a change in Superintendents.)
- The updated environmental commitment statement is maintained in the NPS IMR e-Tools, and a signed copy is maintained in the EMS Library.

Note: Communication of the environmental commitment statement is described in Section II.F., Communication.

II.B. Park Activities and Environmental Impacts

The park has established and documented a procedure that identifies how its activities, operations, and services interact with and impact the environment. Identified activities that have significant

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

environmental impacts as well as legal and other requirements are the top priorities for setting specific environmental objectives and targets, and for establishing operational controls and monitoring. This procedure, together with selection of goals, objectives, and targets, moves the park beyond compliance by focusing on impacts (in addition to regulatory requirements) and encourages environmental leadership. The following definitions are pertinent to carrying out this component of the EMS:

Environmental Impact – The effects of a park’s activities, operations, or services (or proposed activities or operations) upon specific natural resources or any other dimension of environmental quality. Impacts considered may be past, present, or potential; direct or indirect; singular or cumulative; or **beneficial** or adverse.

Note: Most impacts of concern that will fall under control of the EMS will be adverse impacts. Over time, it is still useful to note beneficial (positive) impacts of the park’s activities, operations, or services to help the EMS Team identify ways to expand upon them.

Significant Activity/Environmental Impact – An area of the park’s activities, operations, or services that has been identified as having multiple impacts of concern, or having a particularly severe actual or potential consequence to the environment.

Procedure

Initial Determination of Significant Activities/Environmental Impacts

- The park EMS Team initially identified a list of park activities/environmental impacts during a cross-divisional brainstorming session. The procedures for conducting this initial brainstorm (Attachment II.B., Activities and Impacts Process) and the results, organized according to park division, are maintained in the EMS Library.
- The park EMS Team identified the following criteria through a qualitative decision process for determining significance:
 - Primary Criteria
 - Duration – Temporary vs. multi-year ongoing; sporadic vs. continuous
 - Scope and extent of actual or potential impacts (Geographic scope? Does it cross media?)
 - Severity (Minor vs. moderate or major)
 - Probability
 - Risk of exposure (human, wildlife, ecosystems, water resources, other sensitive receptors)
 - Secondary Criteria
 - Span of control?
 - Ability to mitigate?
 - Feasibility (skill set, cost, resources)?
 - Cost savings?

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

- Hot topic/controversial topic?
- After developing the initial list of park activities/environmental impacts, the EMS Team applied the above criteria to identify significant activities/environmental impacts that will be managed under the EMS through the use of objectives and targets.
- Each significant activity/environmental impact was then identified and fully described in the IMR EMS e-Tools.

Updating Significant Activities/Environmental Impacts

- The park EMS Team annually reviews and updates the list of activities/environmental impacts. This can be done by reviewing the initial list for changes in park activities and associated impacts, or by conducting the brainstorming session anew, as deemed the best approach by the EMS Team.
- For new or changed activities/environmental impacts, the EMS Team applies the criteria to determine significance. The updated significant activities/environmental impacts are documented by the EMS Team in the IMR EMS e-Tools and used as a basis for updating objectives and targets.
- The park uses meeting minutes, maintained in the EMS Library, to document the process through which activities/environmental impacts are updated (discussion or brainstorming).

Determining Legal and Other Requirements

- The EMS Team assigns responsibility for determining applicable environmental laws, regulations, executive orders, and other requirements (including state and local regulations), along with other environmental management roles and responsibilities. (See Section II.D. of these EMS procedures.)
- Responsible individuals identify and list applicable environmental laws, regulations, executive orders, and other requirements in the Legal and Other Requirements report within e-Tools, and update the report when a new applicable requirement is identified.
- In addition, responsible individuals will annually review information sources and regulatory agency web pages and update the Legal and Other Requirements report accordingly.

II.C. Objectives, Targets, and Environmental Management Plans

The park subscribes to environmental goals expressed in executive orders, Department of the Interior (DOI) policies, NPS Director's Orders, and other official NPS policies. The park supports these external goals and additional park environmental management priorities through establishing objectives and targets.

The following definitions pertain to this component of the EMS:

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

Objective – An objective is a statement of intent to which the park has committed. It is a formal goal to meet a desired environmental outcome (e.g., “...reduce electrical energy consumption”) that supports the environmental commitment statement or addresses significant activities/environmental impacts.

Target – A target is a detailed, measurable, and scheduled performance requirement that supports the fulfillment of an environmental objective (e.g., “...reduce park-wide annual electrical energy consumption by 25% by the end of FY 2016”).

Key Metric – A key performance indicator and can be used to verify progress toward achieving a target.

Environmental Management Program (EMP) – The action plan, including steps, assigned responsibilities, and schedule to achieve an environmental target.

The following guidelines are used by the EMS Team when developing and updating objectives and targets in the park’s EMS:

- The park establishes and tracks progress on objectives and targets based on significant environmental impacts; environmental compliance obligations; IMR Region environmental and sustainability policies, plans, and program direction; and the goals identified in executive orders 13423 and 13514, as well as in the NPS Green Parks Plan.
- The EMS Team uses previous environmental compliance audit reports and any other relevant reports or data on key metrics associated with significant activities/environmental impacts, to support the creation of objectives and targets. Where data is inadequate, the park may set a target focused on obtaining improved data for environmental decision-making.
- Identified targets are specific, measureable, achievable, and realistic, and have a proposed timeframe for completion (i.e., be SMART targets).
- The park Management Team assesses the timely achievement of targets in support of objectives during scheduled progress updates and the annual EMS management review.

Procedure

- The EMS Team sets annual objectives and targets, giving priority to those related to compliance and significant activities/environmental impacts. The EMS Team annually reviews the legal and other requirements and the latest environmental audit findings to identify where park operations and activities may not be in full compliance, and sets objectives and targets accordingly.
- Each year, the EMS Team reviews existing objectives and updates, retires, and adds to them to reflect changes in significant activities/environmental impacts, environmental compliance obligations, or management priorities.
- Each year, the park EMS Team defines targets and EMPs in support of achieving environmental objectives. The park EMS Team proposes who is responsible for each target and a timeline for completion.

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

- Proposed objectives, targets, and associated EMPs are annually presented to the park Management Team for approval.
- The EMS Team monitors progress on established objectives and targets on a trimester basis. Progress is documented through “Note” entries in the tasks of specific targets in the EMS e-Tools.
- The EMS Team updates the park Management Team three times a year. If targets are not on schedule when reviewed, the park EMS Team evaluates and updates targets and associated EMPs to more effectively maintain progress.
- New objectives and targets can be added at any time.
- Following feedback from the annual management review, the past year’s objectives and targets may be retired, added to the park’s legacy EMP accomplishments, converted to park BMPs or standard operating procedures (SOPs), or updated accordingly.

II.D. Roles, Responsibilities, and Accountability

The success of the EMS depends on a balanced, realistic allocation of environmental roles and responsibilities among park staff. Even voluntary commitments should be defined so that supervisors can understand the real impact on an employee’s core job function and so that employee contributions can be recognized. This part of the EMS ensures that specific employees are assigned responsibility for particular tasks within the EMS so that significant environmental activities/environmental impacts are effectively controlled. The park uses the following guidelines when developing or updating this section of the EMS:

- The EMS Team proposes employee roles and responsibilities that support the achievement of EMS objectives and targets, maintain the function of the EMS, and fulfill day-to-day environmental compliance functions.
- Responsibilities are assigned through approval by the park Management Team and, where applicable, supervisors.
- Individuals with assigned environmental responsibilities are accountable for the environmental performance associated with their role and responsibilities.
- Personnel, budget, and organizational needs, among other factors, are considered when assigning environmental roles and responsibilities so that the EMS will function effectively.
- When assigning environmental roles and responsibilities for EMS and everyday environmental tasks, the park also considers:
 - Each person’s current responsibilities as a park employee and how EMS and everyday environmental responsibilities can be aligned with existing core park responsibilities.
 - How the natural strengths and abilities of employees can be matched with the types of EMS responsibility they are asked to fulfill.

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

- Where appropriate, division chiefs and supervisors integrate EMS responsibilities into employee performance plans and include evaluation of the employee's performance in carrying out EMS responsibilities as part of the annual performance review.
- Whenever a change or vacancy occurs for a staff position that has defined EMS roles and responsibilities, the EMS Team leader will be responsible for recommending reassignment of the individual's EMS responsibilities, for approval by the park Management Team, so EMS functions and activities do not lapse.

Procedure

- The EMS Team annually updates employee roles and responsibilities that support the EMS as described above.
- The park Superintendent and Management Team reviews proposed environmental roles and responsibilities, provides input for finalization, and then approves the final roles and responsibilities.
- The park Superintendent and Management Team works with division chiefs and supervisors to assign approved roles and responsibilities and integrate them into annual employee performance plans.
- Where appropriate, the park Superintendent and Management Team incorporates EMS and sustainability responsibilities into position descriptions to ensure that new hires will be prepared with skills and competencies that support these areas.

II.E. Document Control, Recordkeeping, and Reporting

The purpose of this component of the EMS is to:

- Ensure the accuracy and completeness of documentation maintained by the park;
- Organize and make accessible documentation required to demonstrate that the park is in compliance with applicable laws, regulation, and requirements; and
- Improve the efficiency of park operations by allowing park personnel to quickly and easily maintain and retrieve environmental documentation and data.

Types of documents and records accounted for in the EMS includes:

- Those required by, or necessary to demonstrate compliance with, applicable environmental laws, regulations, and requirements;
- Those required to support EMS functions and activities, including identifying activities/environmental impacts, setting objectives and targets, conducting training, monitoring and evaluating progress, and conducting the annual management review; and
- Those related to sustainability metrics, such as energy use and water use.

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

The following definitions are pertinent to this component of the EMS:

Documents – These include park-level policies, plans (e.g., Spill Prevention, Control, and Countermeasures Plan, Hazard Communication or HAZCOM Plan, Emergency Action Plans), and SOPs and BMPs associated with environmental management.

Records – These are notes to file, completed checklists, shipping documents, receipts of recycling or disposal, or other information that provides concrete evidence that tasks and regulatory obligations are being carried out. Records are not changed once they are created.

Reports – Reports are a form of a record that communicates results. These include both regularly occurring internal reports that the park uses to monitor environmental performance, reports required to be submitted to regulatory agencies (e.g., chemical inventory reporting required under the Emergency Planning and Community Right-to-Know Act), and other external reports (i.e., reports directed outside the park) relating to environmental management (e.g., NPS fuel use reporting and DOI sustainability, environmental disposal liability, and environmental management reporting through FedCenter).

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

Procedure

- The EMS Team determines which documents, records, and reports are controlled within the EMS. The EMS Team reviews legal requirements when making this determination to ensure that all legally required documents, records, and reports are accounted for.
- EMS documentation is maintained within the NPS EMS e-Tools and the EMS Library.
- EMS documentation is listed in the Document Management Matrix within the e-Tools.
- For EMS documentation that is maintained outside of the e-Tools, the EMS Team identifies documents, records, and reports in an Excel matrix, Attachment II.E, Documentation Matrix, maintained in the EMS Library.
- For each document, record, and report, the EMS Team determines who is responsible for it, where it is located, and (for documents) the frequency of review and the upcoming revision date.
- Records of required training as determined under Section II.G. are identified and tracked in the EMS Documentation Matrix.

Note: To the greatest extent possible, environmental documents, records, and reports are maintained either in the online EMS Library or on the park shared drive so that they are readily accessible to park staff.

II.F. Communication

The purpose of the communication component of the EMS is ensure that park staff and stakeholders are aware of the park's commitment to environmental performance, the current objectives and targets of the EMS, and roles and responsibilities relative to the EMS. The EMS Team in coordination with the Chief of Interpretation, the Public Affairs Officer, and the Superintendent will develop an annual plan for communication about the EMS. The EMS Team strives to keep communication about the park's environmental performance simple, integrated into existing park communication processes, and focused on a few key messages a year.

Procedure

- The park EMS Team develops and maintains an annual communication plan to support the EMS. The plan addresses key messages and content, the intended audience, the method of communication, and who will have lead responsibility. In particular, the communication plan identifies how the park's environmental commitment statement is communicated to all park staff and made available for review by visitors and other stakeholders.
- The Public Affairs Officer (PAO) is responsible for external communication of EMS messages. The park EMS Team involves and seeks approval from PAO for any planned external communications.

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

- The EMS Team uses the Excel spreadsheet in Attachment II.F., Communication Plan, to document the annual communication plan.
- Significant external communications are recorded in the external communication log in the NPS IMR e-Tools.

II.G. Training

Successful implementation of any system is dependent upon the knowledge, skills, and attitudes of the people within that system. The training component of the EMS ensures staff understanding of environmental responsibilities and requirements.

The EMS Team develops and establishes the training component based on applicable laws, regulations, and other requirements. Through an EMS Training Matrix, the EMS Team identifies specific training requirements, receives management approval for training, and confirms that all individuals who have a role or responsibility within the EMS receive the necessary training.

Procedure

- The EMS Team annually identifies and updates training requirements to support the EMS, giving priority to training that is required under applicable laws and regulations as well as that training directly related to controlling significant activities/ environmental impacts. The EMS Team ensures that training addresses relevant individual competence and responsibilities and is sufficient to fulfill environmental legal requirements and support the park's BMPs and SOPs.
- Training requirements are listed in Attachment II.G., Training Matrix (an Excel spreadsheet). The Training Matrix identifies for each training requirement 1) who needs training (by position), 2) how frequently the training is provided, 3) who is responsible for providing or arranging for the training, and 4) the date that training is provided.
- Assignments of staff responsible for training (e.g., the staff that arrange for, coordinate, or provide the training) are approved by the park Management Team as part of the annual approval of proposed roles and responsibilities described under Section II.D.
- The EMS Team provides annual EMS training session for all park staff to inform them of the EMS commitment statement, current EMS objectives and targets, and other key information. This is provided initially through presentations to park staff with annual updates during all employee meetings 1-2 times per year.
- Records are maintained of each training session; records may include attendance rosters, agenda or description, and any training materials.
- For each category of training identified in the Training Matrix (Attachment II.G.), the Documentation Matrix (Attachment II.E.) specifies where records are maintained and who is responsible.

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

II.H. Operational Control and Monitoring

Operational controls are specific documented tools, such as checklists, training programs, engineering controls, SOPs, work instructions, or BMPs developed to control significant activities/environmental impacts. For reference, a formal definition follows.

Operational Control – Proper operations and protocol, documented in guidance documents or SOPs, used to control adverse environmental impacts from significant activities/environmental impacts under foreseeable and reasonably expected operating conditions.

Best Management Practice (BMP) – A practice that applies the most current means and technologies available to not only comply with mandatory environmental regulations, but also to maintain a superior level of environmental performance.

Standard Operating Procedure (SOP) – A written document that details the approved method for an operation, analysis, or action, with prescribed techniques and steps, especially for performing routine or repetitive tasks.

Note: It is possible to have BMPs as well as SOPs that support or function as defined operational controls. Additionally, an SOP may also be a BMP if it applies the most current approach to ensure compliance or to take the park beyond compliance.

When developing operational controls, the EMS Team considers the following:

- What significant activities/environmental impacts are being proactively managed by park staff?
- What tasks are associated with substantial environmental legal requirements?
- What tools, procedures, or measures do park staff currently use that can be formalized or improved to better manage significant activities/environmental impacts?
- Who will be responsible for implementing the operational control and how will it be monitored or measured?

Procedure

- The EMS Team identifies and documents operational controls for each significant activity/environmental impact to control, reduce, or prevent environmental impacts. The EMS Team works with park staff responsible for significant activities/environmental impacts to support and maintain operational controls.
- The EMS Team works with the park Management Team and staff to assign responsibilities for monitoring (e.g., regular visual inspections, checklists to be completed for high risk processes) to ensure operational controls are functioning properly.
- Operational controls for significant activities/environmental impacts are defined in the IMR EMS e-Tools. More specific SOPs that supplement these defined operational controls are uploaded to the EMS Library within the e-Tools.
- The EMS Team reviews and updates the operational controls annually.

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

- The EMS Team monitors, on an annual basis or more frequently, whether or not the EMS operational controls are achieving their intended outcomes.
- If monitoring determines that an operational control has failed, the EMS team will conduct a corrective action, as described in Section II.I., Evaluation and Corrective Action, to identify any actions that should be taken to strengthen the operational control.

II.I. Evaluation and Corrective Action

The purpose of this component of the EMS is to establish and maintain procedures to identify opportunities for improvement in the EMS. Specifically, through this component the park:

- Evaluates the EMS to ensure that it is fully functional and conforms to NPS EMS policy and guidance (Director's Order 13-A);
- Evaluates compliance with legal and other requirements; and
- Provides for corrective action to remedy those elements of the EMS that have failed to fulfill their function including lack achievement of EMS objectives and targets.

Procedures

There are internal and external evaluation procedures for evaluation and corrective action. The NPS IMR Environmental Management Program periodically conducts external environmental compliance audits as well as EMS evaluations. In addition, the park conducts internal audits and evaluations to check the performance of the EMS.

External Environmental Compliance Audit

No less than every five years, the park undergoes an external environmental compliance audit through the NPS IMR Environmental Management Program. The park regards this as a key method of evaluating the status of the park's environmental compliance programs.

- The IMR Environmental Management Program initiates the audit through an email to the Superintendent.
- Park management appoints a point of contact (POC) for the audit process.
- The IMR Environmental Management Program sends an audit pre-visit questionnaire to the designated park POC for the audit.
- The park POC coordinates with the external audit team leader, the IMR Environmental Program Manager, and park staff as necessary to plan and conduct a thorough audit and to provide initial comments on the draft environmental audit report.
- On receipt of the final environmental audit report, park management appoints a team to coordinate development of corrective action plans for each audit finding and to monitor the timely closure of audit findings.
- A copy of the latest final environmental audit report is maintained in the EMS Library within the e-Tools for reference.

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

- The EMS Team reports progress on audit finding closures to the park Management Team semi-annually, until all audit findings are closed.
- The park's progress in closing findings is documented in the online environmental audit database maintained by the Washington Area Support Office (WASO) Environmental Compliance and Response Branch. (Log-in and password information is obtained through the IMR Environmental Program Manager.)
- The park EMS Team reviews the audit results to identify where systematic changes are necessary to prevent recurrence of findings, focusing attention on programs not established, or programs that have systematic gaps, as identified in the audit executive summary.
- The park EMS Team develops appropriate objectives and targets to guide the systematic changes to environmental compliance programs.

External EMS Evaluation

Every three years, the park undergoes an external EMS evaluation through the NPS IMR Environmental Management Program. The park regards this as a key method of evaluating the effectiveness of the park's EMS.

- Park management appoints a POC for the EMS audit process.
- The park POC coordinates with the external EMS audit team leader, the IMR Environmental Program Manager, the EMS Team, and other park staff as necessary to plan and conduct a thorough audit of the park's EMS and to provide initial comments on the draft EMS evaluation.
- On receipt of the final EMS evaluation report, the park EMS team reviews the results and develops a corrective action plan to address each non-conformance.
- The corrective action plans are presented to the park Management Team for review, input, and approval (as documented by meeting minutes).
- The EMS Team monitors progress toward completing corrective actions and confirms their effectiveness through monitoring.
- Corrective action plans are documented using the corrective action form available in the IMR EMS e-Tools.

Internal Environmental Compliance Audit

No less than every two years and prior to external audits, the park conducts internal audits to determine the compliance status of park environmental programs:

- The park utilizes the NPS Environmental Audit Program Guide and the associated EnviroCheck Sheets to conduct internal audits of its own operations. These resources are available on the WASO Hazardous Materials website (link available from the NPS IMR Environmental Program Manager).
- The EMS Team determines the scope of the internal audit (e.g., which facilities and divisions are included, audit criteria topics, and the period under review). The scope may be narrow or broad, depending on available staff resources, staff expertise, and the park's level of performance on its latest external audit.

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

Revision Number: None

Revision Date: N/A

- The EMS Team develops a proposed audit plan, including who will conduct the audit, when it will be conducted, and how results will be reported.
- The audit plan is reviewed and approved by the park Management Team.
- The audit is conducted according to plan and audit results are presented to the park Management Team.
- The EMS Team, with support as necessary from the park Management Team, works with division chiefs and supervisors to address internal audit findings in their work areas.
- Corrective action plans are documented using the corrective action form available in the IMR EMS e-Tools.
- As appropriate, the EMS Team develops or updates objectives and targets to address systematic gaps identified by the internal audit process.

Internal EMS Evaluation and Corrective Action

In general, the park relies on the annual management review (described in Section II.J.) as the primary means for evaluating and improving the park's EMS. However, in case of significant mid-year deviations from expected performance, the EMS Team will convene a corrective action team to develop a corrective action plan. Examples of circumstances that trigger the need for a mid-year corrective action plan include, but are not limited to:

- Failure to make any progress in completing objectives and targets as recognized during a scheduled progress update to the park Management Team;
- Receipt of evidence that the park's environmental management programs are not maintaining compliance with legal requirements (e.g., a Notice of Violation or notice of non-compliance from the state environmental regulatory agency or the Environmental Protection Agency); or
 - Failure of operational controls to manage or prevent environmental impacts (e.g., occurrence of a spill, improper disposal of waste, unanticipated or previously unknown discharge of contaminants).

Corrective action plans are documented using the corrective action form available in the IMR EMS e-Tools.

II.J. Management Review

The park Management Team plays an integral role in the establishment and the continuous improvement of the park's EMS components. Annual reviews by the park Superintendent and Management Team are necessary to evaluate the suitability and effectiveness of the EMS in relation to broader park goals and resources. A key function of the management review is to provide clear direction to the EMS Team as they undertake the annual update of EMS roles and responsibilities and reset the park's EMS objectives and targets.

Glacier National Park Environmental Management System Procedures

Issue Date: December 2012

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Procedure

- At the end of the annual EMS cycle, the EMS Team will prepare a preliminary management review that summarizes EMS progress, including status of objectives and targets, milestones achieved, and challenges encountered during the year.
- The EMS Team may use the management review form in the IMR EMS e-Tools to document the preliminary management review or may document the summary in any other manner they deem appropriate (e.g., report, meeting minutes). Note: The documented annual summary is maintained in the EMS Library if it is not developed within the management review form of the e-Tools.
- The park Management Team (including the Superintendent) will review and provide feedback on the preliminary management review. This should include discussion of EMS management priorities for the coming year. Input may be documented through meeting minutes or formally transmitted in writing to the EMS Team.
- The EMS Team will incorporate the Management Team's comments to finalize the management review.
- The Superintendent will signify approval of the management review by signature or by authorizing release of the document as final in the e-Tools.
- The EMS Team will update and modify the EMS according to the findings of the management review on an annual basis.