

Reference Number: EMS-01	FORT KNOX	Revision Date: 19MAY15
Title: Environmental Management System Manual		
Approved By: 	Fort Knox EMS Representative	

**Environmental Management System
Manual
EMS-01

FORT KNOX**

All of the procedures referenced in this manual are maintained on the Environmental Management Division's webpage.

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1. Purpose

The Garrison Commander has overall responsibility for management of the state of the environment and natural resources of Fort Knox. The Fort Knox Environmental Management Division (EMD) is responsible for managing environmental compliance, conservation, protection, and other environmental programs and the day to day management of the Fort Knox environmental program.

The Fort Knox Environmental Management System (EMS) is intended to be conformant with the criteria defined in the international standard, ISO 14001:2004 *Environmental management systems - Specification with guidance for use*.

This Environmental Management System Manual defines the core elements of the Fort Knox EMS.

2. Scope

This Environment Management System Manual (EMS-01) describes the Fort Knox Environmental Management System (EMS) and applies to the activities, services, operations, facilities and all personnel assigned to Fort Knox.

3. Definitions

- 3.1 **Continual Improvement:** process of enhancing the EMS to achieve improvements in overall environmental performance in line with the organization's environmental policy. *Note – The process need not take place in all areas of activity simultaneously.*
- 3.2 **Environment:** surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation. *Note – Surroundings in this context extend from within an organization to the global system.*
- 3.3 **Environmental Aspect:** element of an organization's activities, products or services that can interact with the environment. *Note – A significant environmental aspect is an environmental aspect that has or can have a significant environmental impact.*
- 3.4 **Environmental Impact:** any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities, products or services.
- 3.5 **Environmental Objective:** overall environmental goal, arising from the environmental policy, that an organization sets itself to achieve, and which is quantified where practicable. Environmental objectives are translated into action through Environmental Management Programs.
- 3.6 **Environmental Target:** detailed performance requirement, quantified where practicable, applicable to the installation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives. Environmental targets are translated into action through Environmental Management Programs.
- 3.7 **Environmental Management Programs:** plans that translate environmental objectives and targets into actions that will result in greater efficiency in environmental management.
- 3.8 **Environmental Management System (EMS):** the part of the overall management system that includes organizational structure, planning activities,

responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy.

- 3.9 **Environmental Management System (EMS) Audit:** a systematic and documented verification process of objectively obtaining and evaluating evidence to determine whether an organization's EMS conforms to the EMS audit criteria set by the organization, and for communication of the results of this process to management.
- 3.10 **Environmental Management System (EMS) Management Representative:** the individual staff member assigned to manage the EMS process on Fort Knox. This person is the installation's overall EMS point of contact.
- 3.11 **Environmental Performance:** measurable results of the EMS, related to an organization's control of its environmental aspects, based on its environmental policy, objectives and targets.
- 3.12 **Environmental Policy:** as formally expressed by top management, an installation's environmental policy expresses the direction and new, required cultural interactions of the organization with regard to environmental management.
- 3.13 **Interested Party:** individual or group concerned with or affected by the environmental performance of an organization.
- 3.14 **Media:** environmental components which are identified by the EMS as targets of potential significant impact and are defined as: air, water, soil, species, habitat, cultural resources, historical resources, and quality of life.
- 3.15 **Prevention of Pollution:** processes, practices, materials or products that will avoid, reduce or control pollution. Prevention of pollution may include, but is not limited to: recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution. *Note – The potential benefits of pollution prevention include the reduction of adverse environmental impacts, improved efficiency and reduced costs.*

4. Environmental Management System (EMS) Requirements

4.1. General: All EMS requirements are summarized in this EMS Manual. Throughout the EMS Manual, reference is made to availability of documents, which can be accessed on the Environmental Management Division's webpage.

4.2. Environmental Policy

The Fort Knox Environmental Policy 13 is the cornerstone of the Fort Knox EMS and is defined and endorsed by the Garrison Commander. The policy defines the environmental vision of the installation and includes a commitment to continual improvement, prevention of pollution and a commitment to meet relevant environmental regulations and other requirements. The policy is reviewed annually by the Garrison Commander and EQCC.

The policy is communicated through training and the Fort Knox Environmental Handbook. It is made available to the public through the Fort Knox web site in the Fort Knox Environmental Handbook.

4.3. Planning

4.3.1. Environmental Aspects

Successful and efficient environmental management requires a thorough understanding of the environmental aspects and impacts of Fort Knox activities, products and services. Although the environmental office manages the day-to-day environmental issues that occur at Fort Knox, the input of all directorates is required to establish a complete list of aspects and to understand the details of installation-wide environmental impacts.

As specified in procedure P-03, *Aspects, Impacts and Significance Determination*, the Environmental Management Division (EMD) and the Cross Functional Team (CFT) review Fort Knox's mission functional areas recurring processes, activities, and services and their associated environmental aspects and impacts. Once the EMD and the CFT have identified the environmental aspects, the aspects are further analyzed for the significance to the environment.

The significant environmental aspects from the final, updated and prioritized aspects list are then considered during the development of Fort Knox's environmental objectives and targets as specified in procedure P-08, *Objectives and Targets*. The Fort Knox significant aspects are available to the public, upon request to the PAO, and through the Environmental Management Division, 502-624-3629.

4.3.2. Legal and Other Requirements

As stated in Fort Knox's Environmental Policy, Fort Knox commits to comply with all applicable federal, state and local environmental legislation and regulations. Additionally, Fort Knox complies with requirements of the Department of Defense and Army Regulations and any other relevant environmental requirements.

The Fort Knox EMD, as stated in P-07, *Legal and Other Requirements*, is responsible for monitoring all applicable environmental legislation and

regulations. EMD program managers are responsible for review of legal and other requirements within their specific program areas.

4.3.3. Environmental Objectives, Targets and Program(s)

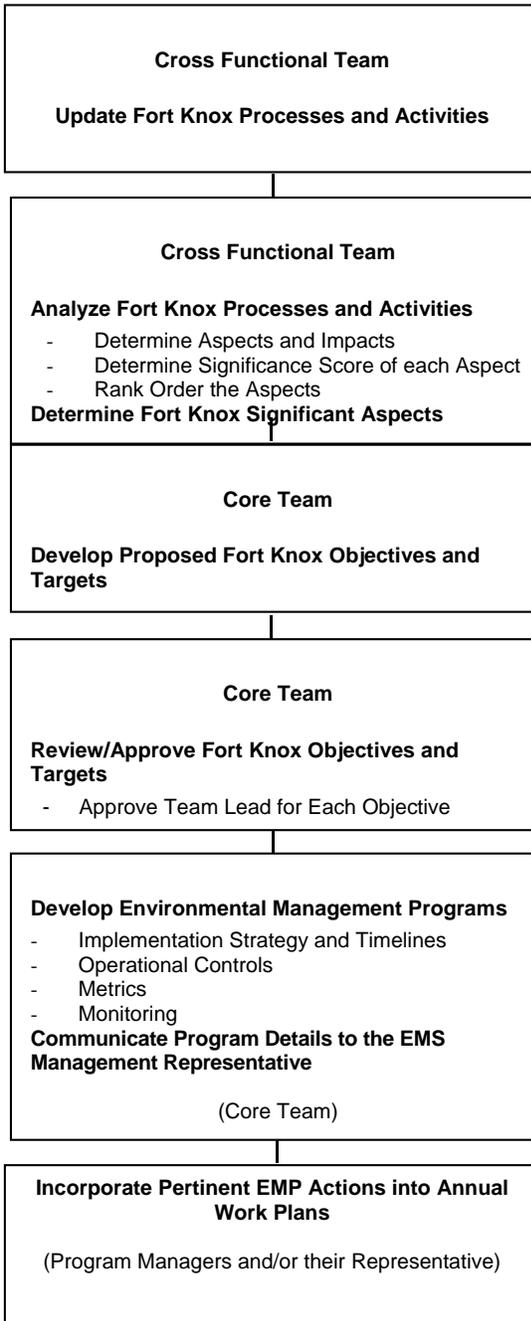
Fort Knox establishes, documents, and maintains environmental objectives to drive environmental improvement in accordance with procedure P-08, *Objectives and Targets*. In establishing environmental objectives, Fort Knox considers its significant Environmental Aspects, Legal and Other Requirements, the Environmental Policy, technological options, and mission priorities.

Fort Knox environmental objectives and targets are translated into action through Environmental Management Programs. An environmental management program (EMP) for each objective is developed that identifies responsible parties, schedules, resources needed and performance indicators to measure completion. The EMS Representative presents the EMPs for approval by the EQCC at a Management Review or other EMS meeting.

When there is insufficient information initially to prepare a complete EMP, the program target may be the completion of a study to gather and analyze data for identifying action alternatives. Upon completion of the study, the CFT develops the EMP to include targets, resources, milestones and metrics, as appropriate. The EMP is then submitted for Management Review and approval as described above.

Affected EMPs are reviewed when significant changes occur in processes, activities or services; in legal or other requirements; or in other factors that require review of the EMP(s).

The chart on the following page shows the linkage of significant aspects, objectives and targets, and EMPs:



4.4. Implementation and Operation

4.4.1. Structure and Responsibilities

To facilitate effective environmental management, roles and responsibilities related to the EMS are defined, communicated and maintained. These roles, responsibilities and authorities are documented within this EMS-01 and within individual EMS procedures.

The Garrison Commander (GC) defines the Fort Knox environmental policy. The GC ensures the provision of resources (human resources, including specialized skills; technology resources; and financial resources) for the operation of the EMS and conducts periodic Management Reviews of the EMS to ensure its effectiveness and appropriateness to the Fort Knox mission and processes.

The Environmental Quality Control Committee (EQCC) is made up of representatives from each of the Fort Knox Commands and Directorates and implements the EMS within their operations along with the Environmental Officers (EOs) providing the needed management support to do so. They coordinate with and provide appropriate assistance to the EMS Representative for Fort Knox post-wide EMS requirements or initiatives. They participate in periodic EMS Management Reviews.

The EMS Representative (MR) is appointed by the GC and reports directly to him on EMS matters. The EMS R has delegated responsibility and authority to implement and manage the overall EMS program (in addition to his/her other responsibilities). Delegated responsibilities include the following:

- Ensuring the EMS is established, implemented and maintained in accordance with the current version of the International Standard ISO 14001.
- Periodic reporting to Fort Knox EQCC on the performance of the EMS.

The EMS R is supported and assisted by the following:

- The Environmental Quality Sub Committee (EQSC) is a subset of the EQCC made up of delegates from each Command and Directorates. They monitor programs and activities covered by the EMS, review objectives and targets, and make recommendations to the EQCC.
- An EMS Core Team, led by the EMS Representative, drives implementation and provides installation-wide EMS for the EQCC, cross functional team and EOs.
- An installation Cross Functional Team (CFT), provides support of EMS facilitation in their respective areas, updates of Fort Knox's processes, activities and services; significant aspects reviews; and input for environmental objectives and targets and associated environmental management programs.
- Internal Auditors who are selected from the Environmental Management Division, trained, and who conduct internal audits. The EMS Representative maintains the roster of internal auditors.
- The Environmental Management Division (EMD) is responsible for environmental program management for Fort Knox. The EMD assists the Fort Knox fire department as On-scene Representative for emergency responses to hazardous substances or releases, and is responsible for

maintaining the Fort Knox Spill Contingency Plan (SCP).

The EMD includes the following individuals who have EMS-related responsibilities:

- EMD Program Managers who manage specific Fort Knox environmental programs and/or plans for media protection and resource conservation including air, groundwater, surface water, soil, cultural resources, pollution prevention, etc.
- A Compliance/EMS Inspection Team that schedules and conducts periodic environmental Compliance/EMS inspections of Fort Knox organizations.
- Environmental Officers (EOs) are appointed by all activities and units, per AR 200-1, in order to ensure environmental compliance in all activities on post. These EOs coordinate with EMD to clarify requirements for assistance, ensure compliance in their work areas, and act as a communications channel between EMD and the civilian, contractor, and military personnel working on post.
- One (or more) technical support personnel who obtains data, conducts research, prepares reports, and performs other EMS-related tasks as needed.

4.4.2. Competence, Training and Awareness

Awareness of environmental matters and the environmental impact of their daily activities make the EMS meaningful to employees. Both environmental awareness and technical competence are necessary for effective job performance.

All appropriate personnel are required to complete EMS General Awareness Training as outlined in procedure P-04, *EMS Awareness and Competency Training*. Additionally personnel performing tasks that may cause significant environmental impacts are required to be competent based on appropriate education, training, and/or experience, as defined in P-04.

The above training procedures assist in developing fully qualified and trained employees and tenants who will effectively accomplish their environmental responsibilities.

4.4.3. Communication

Internal and external communications provide input for formulation as well as dissemination of information relevant to the EMS. Good communications are essential for coordinating the smooth execution of procedures and programs to fulfill the environmental policy and to achieve the objectives and targets.

Fort Knox established P-12, *Communications Procedure*, for internal and external communications relevant to the EMS.

Internal communication procedures within Fort Knox assist in ensuring that information is available at each level to perform required environmental functions.

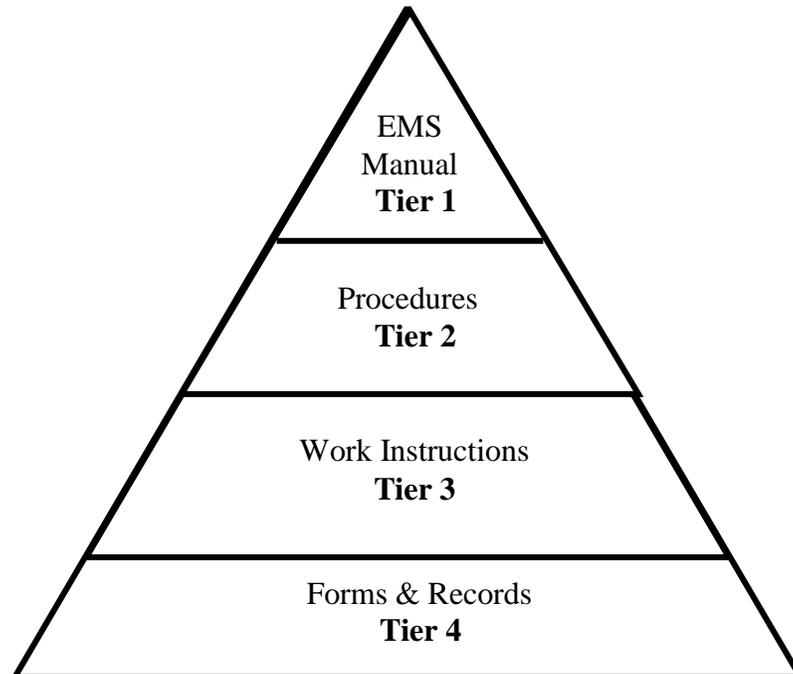
Procedures for external communications provide for managing information flow between Fort Knox and external agencies. Most communications with regulatory

agencies occur directly between the agency and the EMD. Inquiries from the media, the public, and other non-official external agencies are forwarded to the Fort Knox Public Affairs Office (PAO) for response. The PAO coordinates with the appropriate organization in preparing the response. Information regarding aspects and impacts of the EMS will be released externally by the PAO with the cooperation of EMD and Legal.

4.4.4. Environmental Management System Documentation

The EMS documentation provides a standardized structure for organizing policies, procedures, work instructions, and records. Each new level tiers from and refers to the guidelines and principles established in the level before it.

The structure of the documentation is as follows:



This Environmental Management System Manual (Tier One - this document) describes the core elements of the management system and their interrelationships. The Manual provides an overview of the EMS and acts as a procedural reference or baseline for Fort Knox's EMS.

EMS Procedures (Tier Two) detail specific EMS requirements and the roles, responsibilities and authorities to fulfill the requirements. As appropriate, Tier Two procedures may include Environmental Management Programs and reference Tier Three work instructions or forms.

Work instructions (Tier Three) or the developed procedures for meeting EMS and related environmental requirements are documented and maintained within each installation organization, as appropriate.

Forms and records (Tier Four) support and facilitate the implementation of the EMS. Records provide historical, objective evidence that activities have been performed and requirements have been met.

The Fort Knox Environmental Handbook is a controlled multi-tiered document,

comprised of procedures, operational controls, work instructions, and sample forms.

4.4.5. Control of Documents

The procedure P-02, Document Control provides control of the issuance, access and revision of EMS documentation and ensures that each employee has up-to-date documents that are relevant to the employee's activities. This procedure identifies responsible parties, describes where documents can be located and discusses how and when they are reviewed. The procedure ensures that documentation is labeled, approved for use, current revisions are dated and available where used and that any obsolete documents are promptly removed from use.

Documents that are controlled by external agencies and used in the operation of the EMS are listed below. The EMD program managers are responsible for procuring and maintaining current copies of pertinent required documents. Recommendations for changes to the documents are made directly to the entity that controls the document:

- Department of Defense (DoD) and Department of the Army (DA), AR 200-1 and Implementers Guide documents are published and controlled by the Proponent Agency at DoD or DA level.
- Federal, state and local environmental regulations are published and controlled by the responsible regulatory agency.

4.4.6. Operational Controls

As a function of environmental program planning, the EMD and CFT identify the operations and activities associated with Fort Knox significant environmental aspects. The EMD, along with the Directorate Commanders, then plan these operations and activities to ensure that they are performed under specified conditions that follow the environmental policy, contribute to attaining objectives and targets, and comply with specified environmental permits, procedures or requirements. The output of these EMS initiatives is Fort Knox operational controls.

Various mission processes already minimize their potential environmental impacts through such documented operational controls. These existing documents include: US Army Regulation 200-1, Hazards Communication Program, the Fort Knox Spill Contingency Plan, regulatory operating permits, and the Fort Knox Handbook, which contains specific operational controls and work instructions related to the environmental impacts.

Contractors that do business with Fort Knox are notified of pertinent environmental requirements through language in the contract specifications or in the statement of work (SOW). In addition to a standard clause that states contractor responsibilities pertaining to the EMS, specific requirements that are identified during environmental review of a project are included. Depending on the type of contract, contracts are managed by one of three activities: 1) the Louisville District, US Army Corps of Engineers; 2) the Fort Knox Directorate of Contracting (DOC); or 3) the Engineering and Contract Management Division

(ECMD). In each instance, the environmental requirements identified in the contract specifications or the SOW are discussed with the contractor at the pre-construction meeting or at a contract negotiation meeting.

4.4.7. Emergency Preparedness and Response

Proper preparations for and responses to emergency situations minimize adverse environmental impacts in the event of an actual emergency. Procedure P-13, *Emergency Preparedness and Response*, describes Fort Knox's approach to minimize such impacts. The EMD maintains several emergency preparedness and response plans to:

- Identify potential for accidents and emergency situations.
- Respond to accidents and emergency situations.
- Prevent and mitigate the environmental impacts that may be associated with accidents and emergency situations.

At each appropriate worksite, site-specific emergency response plans are prepared and maintained. Personnel at the worksite undergo periodic familiarization training in the emergency response procedures outlined in the plan.

4.5. Checking and Corrective Action

4.5.1. Monitoring and Measurement

Fort Knox has established a procedure, P-09, *Monitoring and Measuring*, to monitor and measure on a regular basis. This includes the calibration, maintenance and associated records-keeping of monitoring equipment. The records of all monitoring and test equipment is maintained in each relevant organization, as appropriate.

4.5.2. Evaluation of Compliance

Fort Knox periodically evaluates compliance with relevant environmental regulations and other requirements to which the installation subscribes utilizing a compliance inspection team within the Environmental Management Division. Every three to five years or as determined by DoA, Fort Knox undergoes an external environmental assessment (the Army's Environmental Performance Assessment System). In addition, local, state and federal regulatory agencies make both announced and unannounced inspections. Results of all inspections, assessments and audits are used to generate management reports such as the Installation Status Report. These results also provide input for EQCC at EMS management reviews.

4.5.3. Non-conformity, Corrective Action and Preventive Action

Continual improvement of the EMS requires that non-conformances are found and effectively corrected through the accurate identification of root causes using the EPAS root cause codes. The *Nonconformity, Corrective and Preventive Action Procedure*, P-11, defines the responsibility and authority for handling and investigating non-conformances, taking action to mitigate impacts and

completing corrective and preventive actions. This procedure also requires the implementation and recording of the changes to documented procedures that may result from the corrective and preventive actions. The EMS Representative coordinates the recording and implementation of said changes. The status of preventive and corrective actions is an agenda item for EMS Management Review meetings.

(Note: These procedures do not include the response to environmental non-compliance findings which are reported and tracked through existing DA systems. Such findings include those tracked through the Environmental Performance Assessment System (EPAS), the Installation Status Report (ISR), findings resulting from compliance inspections by regulatory agencies, and findings from environmental compliance inspections performed by the compliance inspection team).

4.5.4. Control of Records

EMS records provide objective evidence that environmental management at Fort Knox is being conducted as stated in the EMS and helps ensure conformance to certain environmental requirements. P-06, *Records Management Procedure*, is maintained for identification, maintenance and disposition of EMS records – both internal and external. Records are maintained at the EMD and/or in each Fort Knox directorate/command as appropriate.

Records are created, stored and maintained to ensure that they are legible, identifiable, readily retrievable, and protected against damage, deterioration or loss. Retention times for records are as defined in the EMS procedure.

4.5.5. EMS Internal Audits

The EMS undergoes both internal and external audits to provide the means for identifying opportunities to improve the effectiveness of the EMS.

A program and procedures are maintained for periodic internal EMS audits, P-10, *Internal EMS Auditing Procedure*. These audits determine whether the EMS:

- Conforms to planned arrangements for environmental management,
- Conforms to the requirements of ISO 14001, and
- Has been properly implemented and maintained.

Internal audits, conducted annually, are scheduled by the Audit Representative in coordination with the Fort Knox directorates/commands, based on the environmental importance of the activities audited, the work schedule of the directorates, and the results of past audits.

Results of audits are documented and are an agenda item during EMS Management Reviews if pertinent. Non-conformances resulting from the audits are documented and tracked for corrective action, as described in procedures P-11, *Nonconformity, Corrective and Preventive Action Procedure*.

The EMS Representative maintains a current list of trained internal auditors and schedules internal auditor training as needed to maintain an adequate number of auditors available to conduct audits. The auditors are assigned as

appropriate.

Fort Knox periodically undergoes an external EMS audit by the DA as part of the Army's Environmental Performance Assessment System (EPAS). EPAS findings relevant to the EMS are provided to the Garrison Commander for coordinating of preventive and/or corrective action as required.

4.6. Management Review

The Garrison Commander and the EQCC (Management Review Team) lead the continual improvement process by periodically conducting a comprehensive review of the EMS and associated progress toward objectives and targets.

At least annually, an EMS Management Review is conducted to ensure its continuing:

- Suitability to the Fort Knox mission, vision and culture,
- Adequacy in fulfilling policy and requirements of ISO 14001, and
- Effectiveness in managing and improving environmental performance.

Each review considers the need for possible changes in the environmental policy, environmental objectives and/or other elements of the EMS. These changes may be appropriate based on EMS audit results, changing circumstances, and commitment to continual improvement.

Procedure P-05, *Management Review Procedure*, ensures the necessary information is collected to allow top management to perform the review. The EMS Representative sets the agenda for EQCC Management Review meetings and ensures all Reviews are documented in the form of meeting minutes.

5. References

- 5.1 ISO 14001:2004(E), Environmental Management Systems — Specifications with guidance for use.
- 5.2 ISO 14004:2004(E), Environmental Management Systems —General guidelines on principles, systems, and supporting techniques.
- 5.3 ISO 14010:2004(E), Guidelines for Environmental Auditing – General principles
- 5.4 ISO 14011:2004(E), Guidelines for Environmental Auditing – Audit procedures – Auditing

This is an UNCONTROLLED DOCUMENT printed 05/20/15 for reference only.
The current CONTROLLED copy is available on the Environmental Management Division's webpage.

of environmental management systems

- 5.5 ISO 14012:2004(E), Guidelines for Environmental Auditing – Qualification criteria for environmental auditors
- 5.6 Army Regulation 200-1, Environmental Protection and Enhancement.
- 5.7 Army Regulation 200-2, Environmental Effects of Army Actions.

Record of Revisions

Date	Change Description	Page Number
2-Apr-09	Reviewed and Revised format	1-17
23-Apr-09	Reviewed and Revised format	1-17
10-Jul-09	Reviewed and Revised Document Description (Sec 4.4.4)	12
20-Aug-09	Reviewed and updated 4.4.5, 4.4.6, and 4.6	1-17
18 NOV 10	Annual Review with updates to Sections 4.3 and 4.4.6	5 & 12
20 OCT 11	Annual Review with updates to Sections 4.4.1, 4.4.4, and 4.4.6	8 - 17
31MAY12	Updates to Sections 4.2 and 4.4	5 - 12
22AUG12	Update to Section 4.5.3	13 of 16
12AUG13	Removed the word "Sustainability"	1-17
15SEP14	Reviewed and updated with no changes	1-16
19MAY15	Updated complete document.	1-16

Document Reference: P-01	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: WRITING EMS PROCEDURES		
Approved By:		Fort Knox EMS Representative

1.0 PURPOSE

This procedure defines the structure and format to be used for creating or revising Environmental Management System (EMS) procedures.

Control of EMS procedures is addressed in procedure P-02, Document Control.

2.0 SCOPE

This procedure applies to all EMS procedures. It is not applicable to work instructions.

3.0 DEFINITIONS

None.

4.0 RESPONSIBILITIES

None.

5.0 PROCEDURE

5.1 Procedure Format

The following guidelines shall be employed for structuring and formatting an EMS procedure. The main sections of the procedure format include the header, the body and the footer.

5.1.1 Header Section

A header section is required at the top of every page of the document. The first page header must include all elements listed below. Any additional pages shall have a header comprised of the document reference, organization reference, revision date and title. The approval section and Representative designation are reserved for the first page only.

The header section elements are described below:

Document Reference: P-01	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: WRITING EMS PROCEDURES		

Element	Description
Document Control Reference	<p>Unique reference identification assigned by the EMS Document Control Representative. (See procedure P-02 for responsibilities).</p> <p>The EMS document reference will begin with “P” for Procedure, “F” for form, “R” for record, or “E” for any other EMS document. The prefix will be followed by a two-digit number unique to the procedure or document series (example: E-01 or P-03). This reference will be assigned upon issuance of a new procedure and will only be used for the life of the assigned procedure.</p>
Procedure Title	Name the EMS procedure using descriptive action words.
Revision Date	Date of the most recent revision approved for use. Should correspond to the date of the last record of revision entry. See section 5.3, Record of Revisions.
Approved By	<p>Signature or initials of the Fort Knox EMS Representative or designee that approved the procedure for adequacy.</p> <p>**Only required in the first page header of the procedure.</p>

5.1.2 Body Section

The procedure format can be a flow diagram or written in outline form, block form or a combination. (This procedure uses outline and block formats.)

Written procedures must include the following section references. Additional informational sections can be used to ensure relevance and understanding of the procedure as needed. Apply the appropriate sequential reference and a clear and relevant section title.

Section	Description
1.0 Purpose	The reason for the procedure.
2.0 Scope	What the procedure applies to.
3.0 Definitions	Clarify abbreviations, roles/titles or critical terms relevant to consistent understanding of the procedure, if needed.
4.0 Responsibilities	Designated responsibilities by job assignment or title relevant to the procedure.

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5.0 Procedure	Provide directions with an appropriate level of detail so that limited supervision is required to complete the purpose.
6.0 Documentation and Records	List any documents that are applicable to the procedure. May include attached or referenced records, forms or any other related procedures.
7.0 References	List any cited procedures, manuals, regulation or other information that support the understanding or governance of the procedure.
8.0 Flowchart	Diagram of the sequence of operations in the procedure. (Optional)

Each subsection, if any, should be represented by a hierarchical reference that extends from the main section number separated by periods for each sub-level reference. It should also be indented relative to the previous level section reference.

Example: 5.0 Main Section Title (listed above)

 5.1 Section Title (2nd Level)

 5.1.1 Section Title (3rd Level)

5.1.3 Footer Section

The footer must contain the following elements:

Element	Description
Page Number of Total Pages	The individual page number of the total pages that make up the procedure. Total number of pages includes the record of revisions page but does not include any attachments. (Page __ of __)
Controlled Document Reference	Include the statement that references the state of control for the document, if applicable. Refer to Procedure P-02, Document Control.

5.2 Level of Detail

The minimum amount of detail should include the required steps defining what is to happen to consistently and effectively complete the EMS procedure. Sub-steps defining how each step is to be carried out should also be included, if necessary.

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5.3 Record of Revisions

A record of revisions must be included with all EMS procedures and should be maintained on a separate dedicated page for the life of the procedure. The record of revision form should include the following descriptive elements:

Element	Description
Revision Date	Date that the document was revised. If it is a new document, it will be the date of issuance with a change description of "Original Issue".
Change Description	A brief description of what changes were made including where within the document by page reference, if applicable.
Page Number	Page number(s) of document change(s) described for the revision event. If it is a new document issuance, this will be left blank.

An example of the record of revisions log sheet can be found as part of this procedure.

6.0 DOCUMENTATION AND RECORDS

Record of Revisions Log Sheet form (last page of this procedure)

7.0 REFERENCES

EMS Procedure Number P-02, Document Control

Document Reference: P-01	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: WRITING EMS PROCEDURES		

Record of Revisions

Date	Change Description	Page Number
24-Feb-04	Original Issue	N/A
28-Feb-05	Revised document control reference section	2
9-Oct-08	Reviewed and Revised format	1-5
31-Jul-09	Reviewed w/ no changes	1-5
18-Nov-10	Reviewed w/ no changes	1-5
25-Oct-11	Reviewed w/ no changes	1-5
25-Oct-12	Reviewed w/ no changes	1-5
12-Aug-13	Removed the word "Sustainability"	1-5
15SEP14	Reviewed w/no changes	1-5
19MAY15	Audit with changes	1-5

Document Reference: P-02	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: DOCUMENT CONTROL		
Approved By:		Fort Knox EMS Representative

1.0 PURPOSE

This procedure defines document control measures to ensure that current and authorized versions of all relevant Environmental Management System (EMS) documents are in use where needed.

2.0 SCOPE

This procedure applies to all controlled documents in use for the EMS.

3.0 DEFINITIONS

Term	Meaning
Controlled Document	The most recent authorized version of any electronic or hardcopy document in use to support the EMS that may be changed either internally or externally.
Document	Any electronic or hardcopy instructions, forms or reference information related to the EMS.
Master Document List	A list of EMS controlled documents identified by document number, document title, location, latest revision date and responsible person.
Obsolete Document	A controlled document that is no longer in use.

Document Reference: P-02	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: DOCUMENT CONTROL		

4.0 RESPONSIBILITIES

Role	Responsibility
Fort Knox EMS Representative	<p>Responsible for the control of the EMS Manual and assures that supporting documents and any references thereto are routinely reviewed and maintained as appropriate.</p> <p>Authorized to approve EMS procedures and/or revisions in accordance with the purpose of this procedure.</p> <p>Responsible for removing obsolete documents from use.</p> <p>Ensures that the document control process described in this procedure is implemented as needed.</p> <p>Responsible for EMS document control in applicable area or function and assures that relevant documents are routinely reviewed and maintained as appropriate.</p> <p>Authorized to approve area or function specific EMS procedures and/or revisions in accordance with the purpose of this procedure.</p> <p>Responsible for removing obsolete documents from use in respective area.</p> <p>Ensures that the document control process described in this procedure is implemented as needed.</p> <p>Responsible for maintaining the EMS Master Document List, maintaining the document distribution.</p>

Document Reference: P-02	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: DOCUMENT CONTROL		

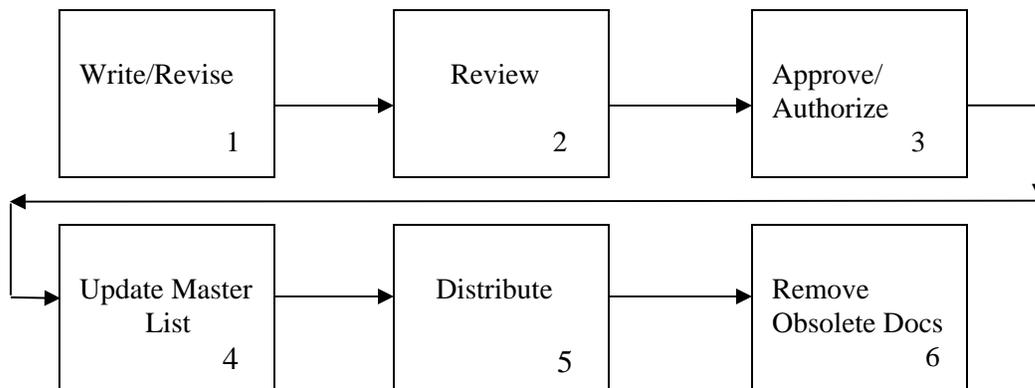
5.0 PROCEDURE

All identified controlled EMS documents shall be referenced on the Master Document List indicating document location for accessibility.

The Fort Knox EMS Representative or designee routinely reviews EMS manual procedures for adequacy.

All new and revised procedures will follow the current ISO procedure P-01 WRITING EMS PROCEDURES to ensure consistent formatting, content and legibility.

The process steps for EMS document control are as follows:



5.1 Write/Revise

Need determinations for new EMS documents or modifications to existing EMS documents that can result from system changes or improvements, product or process changes, periodic reviews or corrective and preventative actions may be initiated by any involved person by communicating the need to the Fort Knox EMS Representative.

The EMS Representative or designee will evaluate appropriateness to the EMS and consider comments from affected individuals or activities, if necessary.

If the need is determined to be appropriate, the Representative or designee will draft the document for review according to P-01 WRITING EMS PROCEDURES.

Document Reference: P-02	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: DOCUMENT CONTROL		

5.2 Review

Drafts of new EMS documents or updated EMS documents having substantive revisions should be circulated to personnel affected by the proposed changes when necessary.

Affected personnel should review the new or revised document for comment to ensure that it reflects actual practice(s).

The Fort Knox EMS Representative or designee will routinely review EMS procedures for appropriateness to the EMS.

5.3 Approve/Authorize

The Fort Knox EMS Representative or designee reviews the final draft procedure for approval. Approval of new and revised EMS procedures is indicated by signature in the approval section of the procedure heading.

The EMS Representative or designee will also update the Record of Revisions for the document revision or creation event as part of the approval process.

The approved controlled copy of the EMS document will be kept by the responsible person at the location designated on the Master Document List or, if it is in electronic format, will be placed on the EMS Internet site. Note: All hardcopies of electronic documents will be considered "Uncontrolled".

The EMS Representative or designee will update the Master Document List with the latest revision date.

5.4 Update Master Document List

The EMS Representative or designee will maintain and keep current the Master Document List updates to any EMS controlled documentation.

The EMS Representative or designee will notify all relevant individuals or areas identified on the document distribution list of the new or revised EMS procedure for implementation. The notification will identify the new or revised procedure by reference number, title, revision date, and necessary steps for implementation, if any.

Document Reference: P-02	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: DOCUMENT CONTROL		

Notifications can be made by electronic mail or memorandum with an attachment of an uncontrolled copy, if necessary. Note: Notifications can reference a posted electronic copy available on the computer network.

5.5 Distribute

The EMS Representative or designee will distribute the controlled document only (without revision record or distribution list) to individuals or areas on the distribution list for the document as needed.

5.6 Remove Obsolete Documents

EMS controlled documents that are replaced by revised or new documents will be marked "Obsolete" and regarded as a record if retained or will be destroyed in accordance with the established record retention policy. Obsolete documents that are retained will be managed in accordance with the EMS Records Management Procedure P-06.

6.0 DOCUMENTATION AND RECORDS

None

7.0 REFERENCES

P-01 WRITING EMS PROCEDURES
EMS Procedure Number P-06, Records Management

Document Reference: P-02	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: DOCUMENT CONTROL		

Record of Revisions

Date	Change Description	Page Number
24-Feb-04	Original Issue	N/A
28-Jul-04	Revision correcting title of the EMS Installation Representative to the Fort Knox EMS Representative	1-3
28-Jul-04	Revision to header approval block	1
9-Oct-08	Reviewed and revised format	1-6
23-APR-09	Made CAR corrections in Sections 5.6 and 7.0	4 & 5-6
31-Jul-09	Updated	1-6
18 NOV 10	Annual review w/no changes	1-6
25 OCT 11	Annual review w/no changes	1-6
25 OCT 12	Annual review w/no changes	1-6
12AUG13	Remove the word "Sustainability".	1-6
15SEP14	Annual review w/no changes	1-6
19MAY15	Audit review and update	1-6

Document Reference: P-03	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Aspects, Impacts and Significance Determination		
Approved By:		Fort Knox EMS Representative

1.0 PURPOSE

To provide a standard procedure for identifying the environmental aspects and associated impacts of Fort Knox's activities and services. Implementation of this procedure will ensure that environmental aspects and impacts are identified and periodically reviewed in order to determine those that are significant.

2.0 SCOPE

This procedure applies to all processes, activities and services within the scope of the Fort Knox environmental sustainability management system, or EMS.

3.0 DEFINITIONS

Term	Meaning
EMS Cross-Functional Team (CFT)	Team of individual Directorates/Command representatives that may be formed to review, maintain and update installation list(s) of functional areas, processes, activities and services; associated aspects & impacts; and significance determination for the purpose of maintaining objectives and targets and environmental management programs.
Environmental Aspect	Element of Fort Knox's 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 Fort Knox's activities, products or services.
Functional Area(s)	Area(s) defined by their key mission tasks.
Processes	A recurring activity or series of activities performed on a continuing basis in the accomplishment of the Fort Knox mission.
Significant Environmental Aspect	An environmental aspect that has or can have significant environmental impact.
Significant Environmental Impact	Any potential significant change (determined by established criteria) to the environment, wholly or partially resulting from Fort Knox's activities, products or services.

Document Reference: P-03	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Aspects, Impacts and Significant Determination		

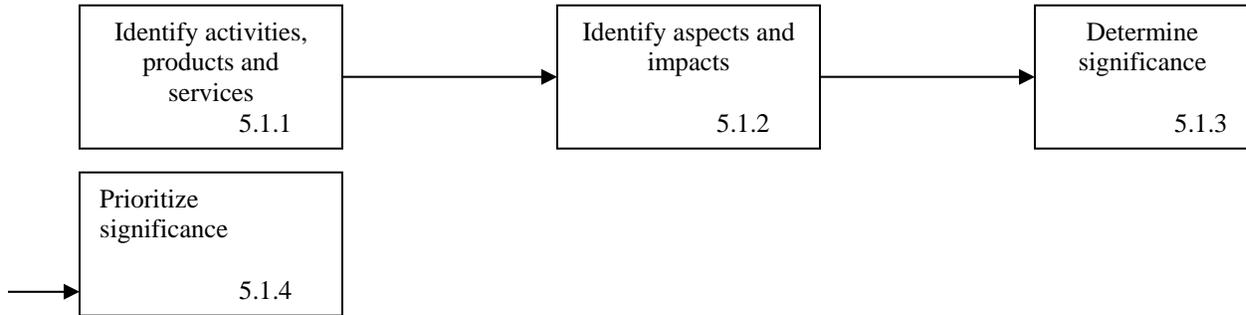
4.0 RESPONSIBILITIES

Term	Responsibilities
EMS Representative	<p>Annually coordinates with Directorates/Commands to ensure continued representation in the EMS.</p> <p>Ensure installation-wide establishment and maintenance of list(s) of processes, activities and services by functional areas; the associated aspects, impacts; significance determination(s); and significant aspects and impacts.</p> <p>Assist personnel in updating information on process, activities and services; aspect/impact identification; and significance determination(s).</p>
EMS Cross-Functional Team	Assist completion of EMS tasks including reviewing and updating lists of processes, activities and services; aspects and impacts and significance determination(s).
EMS Core Team	Assists the CFT in finalizing the aspects and impacts. Identifies the final aspects and impacts to be used with objectives and targets.
Directorates/Commands	<p>Ensure establishment and maintenance of current list of process, activities and services; aspects, impacts significance determination(s); and significant aspects and impacts for their functional area. Provide this information annually to EMS Representative.</p> <p>Ensure awareness of the significant aspects by appropriate personnel (and contractors and suppliers) performing activities related to the significant aspects.</p>

5.0 PROCEDURE

5.1 The EMS Representative, with assistance from the Core Team and the Cross-Functional Team, will determine Fort Knox's aspects, impacts and significance. The guidance document "U.S. Army Environmental Management System Implementer's Guide", was referenced for this activity. Utilizing this guide, Fort Knox identifies the following process steps in determining aspects, impacts and significance:

Document Reference: P-03	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Aspects, Impacts and Significance Determination		



5.1.1 Identify activities, products and services.

The CFT first identifies all mission functional areas and their associated processes. From each process, the activities, products and services are noted on **F-01, Aspects & Impacts Significance Worksheet.**

5.1.2 Identify aspects and impacts.

The CFT identifies environmental aspects associated with each activity, product or service. The CFT then defines how each aspect impacts the environment. **E-01, Fort Knox Aspect and Impact Sample List** may be referenced for this activity. All information is again compiled into **F-01, Aspects & Impacts Significance Worksheet.** The Environmental Management Divisions and CFT will review Fort Knox’s mission functional areas recurring processes, activities and services as well as new activities and processes and their associated environmental aspects and impacts when needed.

5.1.3 Determine significance.

Significance determinations are only required on aspects (and associated impacts) that Fort Knox controls or influences. Significance is based upon the following criteria and corresponding scales (5 being the most severe):

- Frequency or Likelihood (1 to 5)
- Environmental Impact Severity (1 to 5)
- Mission Impact Severity (0 to 5)
- Regulatory Impact (0 to 5)
- Community Concern (0 to 4)

Document Reference: P-03	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Aspects, Impacts and Significance Determination		

Reference **E-02, *Significance Determination Rating Scales***, for additional information. This evaluation is documented on **F-01, *Aspects & Impacts Significance Worksheet***. The significance score (SS) of each aspect and impact is calculated using the following equation:

$$SS = \text{frequency} \times (\text{environmental impact severity} + \text{mission impact severity}) + \text{regulatory status} + \text{community concern}$$

Once a significance score is calculated for each impact, the Fort Knox CFT determines a threshold for significance. Additionally, as specified in **E-02, *Significance Determination Rating Scales***, there is one (1) criteria that triggers automatic significance, as follows:

- A Regulatory Liability Score = 5

5.1.4 Prioritize significance.

The CORE Team will make the final decision on identifying the significant aspects when said impacts have a regulatory rating of 5.

5.2 The EMS Representative obtains approval of the finalized Fort Knox significant environmental aspects from the Garrison Commander.

5.3 The significant aspects and impacts are considered in developing environmental objectives and targets (**P-08, *Establishing Objectives and Targets***) and revising/refocusing environmental management programs and the Environmental Policy where necessary.

6.0 DOCUMENTATION AND RECORDS

F-01 Aspects & Impacts Significance Worksheet

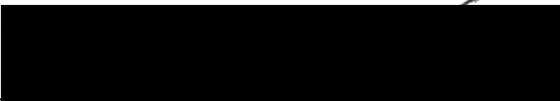
7.0 REFERENCES

E-01 Fort Knox Aspect and Impact Sample List
E-02 Significance Determination Rating Scales
P-08 Establishing Objectives and Targets

Document Reference: P-03	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Aspects, Impacts and Significance Determination		

Record of Revisions

Date	Change Description	Page Number
28-Feb-05	Original Issue	1-5
9-Oct-08	Reviewed and revised format	1-5
23-Apr-09	Made CAR corrections in Section 5.3 and 7.0	4-5
31-Jul-09	Updated	1-5
18-Nov-10	Annual review with no changes	1-5
20-Oct-11	Annual review with no changes	1-5
30-Aug-12	Update to Sections 5.1.3 and 5.1.4	4 of 5
12-AUG-13	Removed the word "Sustainability".	1-5
15SEP14	Annual review with no changes	1-5
19MAY15	Audit Review with updates	1-5

Document Reference: P-04	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Awareness and Competency Training		
Approved By: 	Fort Knox EMS Representative	

1.0 PURPOSE

This procedure ensures training is provided that addresses the Fort Knox Environmental Management System (EMS).

2.0 SCOPE

This procedure applies to all awareness training for the EMS at Fort Knox.

3.0 DEFINITIONS

Term	Meaning
EMS Awareness Training	Training providing a general understanding of EMS at Fort Knox.
Competence	The state of demonstrating adequate abilities or qualities.

4.0 RESPONSIBILITIES

4.0.1 Awareness Training

Role	Responsibility
EMS Representative	Responsible for ensuring all employees receive applicable awareness training; identifying additional training needs; establishing and maintaining procedures for conducting training; and keeping records of the EMS training that has been completed for all installation personnel. Identifies training needs associated with Fort Knox's EMS.
Cross Functional Team (CFT)	Support the EMS Management Representative in ensuring all employees receive applicable awareness training and identifying additional training needs; establishing and maintaining procedures for conducting training; and keeping records of the training that has been completed.
EMS Core Team	Establishing and maintaining procedures for conducting training; and keeping records of the training that has been completed.

Document Reference: P-04	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Awareness and Competency Training		

4.0.1 Competency Training

Role	Responsibility
Cross Functional Team (CFT)	Support the EMS Representative in ensuring all employees receive applicable training and identifying additional training needs.
EMS Core Team	Establish and maintain procedures for conducting EMS training and keep records of the training that has been completed.
Environmental Management Division	Maintain records of the EO training that has been completed.

5.0 PROCEDURE

5.0.1 Awareness Training

EMS Awareness training shall be conducted to ensure all appropriate personnel at each relevant level and function are aware of the importance of conformance with the environmental policy and its associated procedures and system. Awareness training will be disseminated through the directorates/commands.

5.0.2 Competency Training

This training procedure assists in developing fully qualified and trained employees and tenants who will effectively accomplish their environmental responsibilities and have awareness of the following:

- Actual and potentially significant environmental impacts of their work activities;
- Roles and responsibilities in conforming to policy, procedures and EMS requirements:
- Importance of conforming to policy, procedures and EMS requirements;
- Environmental benefits of improved performance;
- Potential consequences of departing from specified operating procedures

EMS competency based training is disseminated through the directorates/commands through the Environmental Officer (EO) Training Course. This 24-hour course includes a module on the Fort Knox EMS program. The course is offered a minimum of four times a year. Army Regulation 200-1, 1-23, 1-24, 1-25, 1-26, 1-27, and 1-28, requires the appointment of EOs at the

Document Reference: P-04	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Awareness and Competency Training		

organizational, company, unit, or shop level. The Environmental Management Division maintains a record of EO certification (appointment orders and EO course completion records).

6.0 FORMS AND RECORDS

6.0.1 Awareness Training

None.

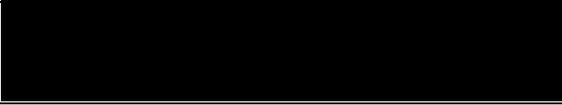
6.0.2 Competency Training

Training records

7.0 REFERENCES

8.0 RECORD OF REVISIONS

Date	Change Description	Page Number
28-Feb-05	Original Issue	1-3
9-Oct-08	Reviewed and revised format	1-3
10-Aug-09	P-04 & P-14 are combined to create P-04 Awareness and Competency Training	1-3
18-Nov-10	Annual review with updates to Section 5.0.2 for ECO Training Hours	2
25-Oct-11	Annual review with updates to Section 5.0.2 for ECO to EO	2
12-AUG-13	Removed the word "Sustainability".	1-3
15SEP14	Annual Review w/no changes	1-3
19MAY15	Audit review with updates	1-3

Document Reference: P-05	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Management Review		
Approved By:		Fort Knox EMS Representative

1.0 PURPOSE

To provide a standard procedure for conducting Management Review of the Fort Knox EMS. Implementation of this procedure will ensure that the EMS is periodically reviewed to determine continuing:

- Suitability to the mission, vision and culture
- Adequacy in fulfilling the policy and requirements of the EMS, and
- Effectiveness in managing and improving environmental performance

2.0 SCOPE

This procedure applies to all elements of the Fort Knox EMS, top management as defined in the EMS, and the EMS Representative.

3.0 DEFINITIONS

Term	Meaning
Preventive and Corrective Actions	Actions taken to eradicate the cause of or prevent a nonconformance.
Objective	An overall environmental goal arising from the environmental policy that Fort Knox strives to achieve. Environmental objectives are quantified whenever practicable.
Target	A detailed performance requirement, quantified whenever practicable and applicable to Fort Knox, or parts thereof, derived from the environmental objectives.

4.0 RESPONSIBILITIES

Role	Responsibility
EMS Representative	Ensures that this procedure is fully and consistently implemented. Responsible for coordinating the agenda, maintaining copies of meeting. Maintaining copies of meeting minutes and ensuring their distribution to EQCC members in a timely fashion.
EQCC Members	Regularly attend Management Review meetings and complete tasks as assigned.

Document Reference: P-05	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Management Review		

5.0 PROCEDURE

5.1 Management Review Frequency

The EMS Representative will schedule and coordinate meetings to conduct a management review of the EMS as needed, but at least annually. The management reviews are a part of the EQCC meetings. The results of the review are documented in the form of meeting minutes.

5.2 Management Review Agenda

The CFT may recommend issues for management review. The EMS Representative will develop and coordinate the agenda and any materials needed. The agenda will include items relevant to the operation of the EMS and its suitability, adequacy and effectiveness. At least annually the management review will contain a complete review of Fort Knox's entire EMS compared against all seventeen (17) elements of the ISO 14001 standard. The CORE Team will make recommendations based on a review of the 17 elements for the Management Team to review and approve. The review will be documented.

6.0 FORMS AND RECORDS

7.0 REFERENCES

8.0 RECORD OF REVISIONS

Date	Change Description	Page Number
28-Feb-05	Original Issue	1-2
9-Oct-08	Reviewed and revised format	1-2
31-Jul-09	Updated	1-2
18-Nov-10	Annual review with updates to Section 5.2	2
25-Oct-11	Annual review with no changes	1-2
25-Oct-12	Annual review with no changes	1-2
12AUG13	Removed the word "Sustainability".	1-2
15SEP14	Annual review with no changes	1-2
19MAY15	Audit review with updates	1-2

Document Reference: P-06	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Records Management Procedure		
Approved By:		Fort Knox EMS Representative

1.0 PURPOSE

This procedure identifies the management of environmental compliance and Environmental Management System (EMS) records at Fort Knox to ensure that they are maintained in an organized and readily retrievable manner and are disposed of according to established retention requirements.

2.0 SCOPE

This procedure applies to all records pertaining to the Fort Knox EMS, including those required by applicable federal, state and local regulatory requirements.

3.0 DEFINITIONS

Term	Meaning
Disposition	The final settlement of a record.
Legal Requirements	All laws, regulations, permits, contracts, memorandums of agreement and consent orders applicable to Fort Knox operations, activities and services.
Other requirements	Requirements not identified under Legal Requirements, and standard practices (DOD, DOA, etc.) to which Fort Knox subscribes.
Record	Documented information that is evidence of an environmental activity or event in support of the EMS or any legal and other requirement retained by schedule for future reference.
Record Holder	Those personnel responsible for retaining records as indicated on F-02, Records Management List . A record holder can be one of the following: An Environmental Management Division Program Manager or individual supporting the program manager; the EMS Management Representative; an EO; or any individual within Fort Knox whose responsibilities require the retention of EMS-related records.
Retention Time	The length of time that a record will be retained before it is no longer required and can be destroyed.

Document Reference: P-06	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Records Management Procedure		

4.0 RESPONSIBILITIES

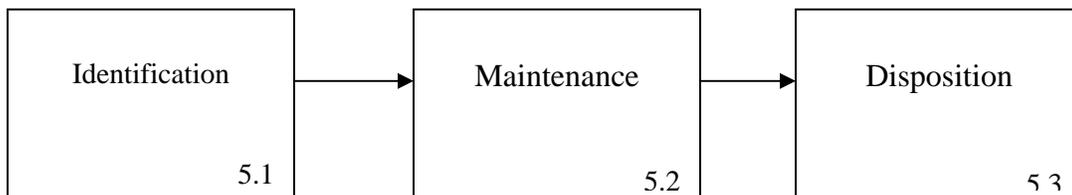
Role	Responsibility
EMS Representative	Responsible for ensuring that environmental compliance and EMS records are maintained according to this procedure. Designates maintenance responsibility of F-02, <i>Records Management List</i> . Maintains F-02, <i>Records Management List</i> and ensures the responsible record holders adhere to the retention times and records disposition as detailed in said list.
Other roles as identified on F-02, <i>Records Management List</i>	See F-02, <i>Records Management List</i> .

5.0 PROCEDURE

All records retained for conformance with the Fort Knox EMS must be:

- Legible, identifiable and traceable;
- Stored and maintained to be readily retrievable and protected against damage, deterioration, or loss; and
- Kept in accordance with established retention times.

The process steps for managing environmental compliance records and EMS records at Fort Knox include the following:



Document Reference: P-06	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Records Management Procedure		

5.1 Identification

The Fort Knox EMS Core Team identifies the required EMS environmental compliance records and the Environmental Management Division (EMD) identifies the required environmental compliance records. Both groups then forward the information to the EMS Representative, who compiles all the records into **F-02, *Records Management List***.

5.2 Maintenance

The EMS Representative or designee maintains **F-02, *Records Management List*** and ensures the responsible record holders adhere to the retention times and records disposition as detailed in **F-02, *Records Management List***. Said list details the location/maintenance, responsible record holder and retention time of the following records:

- Aspect and significant impact(s) list, as derived from **P-03, *Aspects, Impacts and Significance Determination***
- Audit results, as derived from **P-10, *Internal EMS Auditing***
- Calibration records (as derived from **P-09, *Monitoring and Measuring Procedure***)
- Compliance inspections
- External Communications/Records
- Compliance records/reports
- Management review results, as derived from **P-02, *Document Control***
- Sampling and monitoring data
- Training records

Records can either be managed/handled electronically or hardcopy, as detailed in **F-02, *Records Management List***, updated document.

5.3 Disposition

The individual record holders are responsible for the disposition of their respective records. Disposition occurs once the minimum retention time has been achieved. Disposition may include the following:

- Office paper recycling
- Shredded then recycled
- Moved to Fort Knox Storage

Document Reference: P-06	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Records Management Procedure		

6.0 FORMS AND RECORDS

F-02, *Records Management List*

7.0 REFERENCES

P-03, *Aspects, Impacts and Significance Determination*

P-05, *Management Review*

P-09, *Monitoring and Measuring Procedure*

P-10, *Internal EMS Auditing*

8.0 RECORD OF REVISIONS

Date	Change Description	Page Number
28-Feb-05	Original Issue	1-4
9-Oct-08	Reviewed and revised format	1-4
10-Aug-09	Updated 5.2 to include external records	3
18-Nov-10	Reviewed with no changes	1-4
25-Oct-11	Reviewed with changes to section 3.0 – ECO to EO	1-4
25-Oct-12	Reviewed with no changes	1-4
12AUG13	Removed the word “Sustainability”.	1-4
15SEP14	Reviewed with no changes	1-4
19MAY15	Audit Review and update	1-4

Document Reference: P-07	FORT KNOX Environmental Management System	Revision Date: 19MAY15
PROCEDURE FOR LEGAL AND OTHER REQUIREMENTS		
Approved By:		Fort Knox EMS Representative

1.0 PURPOSE

This procedure provides a means for identifying and communicating legal and other requirements applicable to the environmental aspects associated with Fort Knox operations, activities and services.

2.0 SCOPE

This procedure applies to all areas within Fort Knox that have applicable legal or other requirements.

3.0 DEFINITIONS

Term	Meaning
Legal Requirements	All laws, regulations, permits, contracts, memorandums of agreement and consent orders applicable to environmental aspects of Fort Knox operations, activities, and services.
Other Requirements	Requirements not identified under Legal Requirements, and standard practices (DOD, DA, etc.) to which Fort Knox subscribes.

4.0 RESPONSIBILITIES

Role	Responsibility
EMS Representative	Provide information on changes in legal and other requirements during EMS management reviews. Maintain a list of the legal and other requirements that are applicable to Fort Knox.
Environmental Management Division (EMD) Program Managers	Monitor legal and other requirements applicable to Fort Knox for new requirements and actual or proposed changes. Advise the EMS Representative of any new updates.
EO	Responsible for maintaining environmental compliance and EMS records in applicable functional area(s), as defined in P-06, <i>Records Management Procedure</i> .

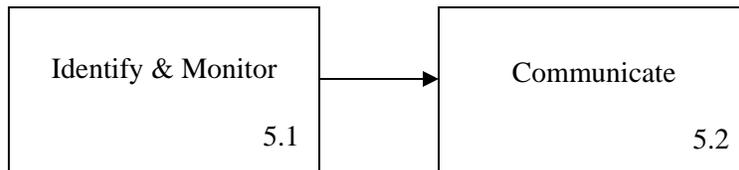
Document Reference: P-07	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: PROCEDURE FOR LEGAL AND OTHER REQUIREMENTS		

5.0 PROCEDURE

Fort Knox does the following regarding legal and other requirements:

- Accesses applicable requirements to which Fort Knox is subject to related to Fort Knox's environmental aspects;
- Determines how the requirements apply to Fort Knox's environmental aspects.

The process steps for managing legal and other requirements at Fort Knox include the following:



5.1 Identify & Monitor

The EMD Program Managers will identify and monitor legal and other requirements applicable to Fort Knox utilizing pertinent information sources as needed. Information sources may include but are not limited to:

- DA Environmental Support
- Staff Judge Advocate (SJA)
- Internet
 - ❖ Regulatory agency WebPages
 - ❖ DOD and Army WebPages
 - ❖ Department of Defense and Army information sources on the Internet (e.g. DENIX)
- Regulatory information services
- Written notices from regulatory agencies
- Communications with State and Federal regulatory agencies
- Communications with Army agencies (e.g. Army Environmental Center, IMA Regional)
- Other
 - ❖ Professional seminars and conferences
 - ❖ Professional publications

Document Reference: P-07	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: PROCEDURE FOR LEGAL AND OTHER REQUIREMENTS		

6.0 FORMS AND RECORDS

*F-03, Environmental Requirements Register list
Compliance/EMS Inspection - FK5113*

7.0 REFERENCES

*P-05, Management Review Procedure
P-06, Records Management Procedure*

8.0 RECORD OF REVISIONS

Date	Change Description	Page Number
28-Feb-05	Original Issue	1-3
9-Oct-08	Reviewed and revised format	1-3
31-Jul-09	Updated	1-3
18-Nov-10	Annual review with no changes	1-3
20-Oct-11	Annual review with changes to section 4.0	1 of 3
20Oct12	Annual review with no changes	1 - 3
12AUG13	Remove the word "Sustainability".	1-3
15SEP14	Annual review with no changes	1-3
19MAY15	Audit review with updates	1-3

Document Reference: P-08	FORT KNOX Environmental Management System	Revision Date: 19MAY15
OBJECTIVES AND TARGETS PROCEDURE		
Approved By:		Fort Knox EMS Representative

1.0 PURPOSE

To establish, implement and maintain environmental objectives and targets that are consistent with the Fort Knox environmental policy and through achievement will demonstrate continual improvement of environmental performance.

2.0 SCOPE

This procedure applies to all relevant levels and functions within Fort Knox that relate to EMS objectives and targets.

3.0 DEFINITIONS

Term	Meaning
Environmental Policy	A statement by Fort Knox of intentions and principles in relation to overall environmental performance that provides the framework for setting objectives and targets.
Environmental Objective	An overall environmental goal arising from the environmental policy that Fort Knox sets to achieve and is quantified whenever practicable.
Environmental Target	A detailed performance requirement, quantified whenever practicable, and applicable to Fort Knox, or parts thereof, derived from the environmental objectives.
Interested Party	An individual or group concerned with or affected by the environmental performance of Fort Knox.

4.0 RESPONSIBILITIES

Role	Responsibility
Cross-Functional Team (CFT)	Responsible for recommending objectives and targets on an annual basis in conjunction with the CORE Team.
EMS Representative	Annually coordinates the review and update of objectives and targets for relevant areas within the scope of the EMS. Responsible for monitoring progress against the environmental objectives and targets and reporting to the EMS Representative.

Document Reference: P-08	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: OBJECTIVES AND TARGETS PROCEDURE		

Garrison Commander	Responsible for approving and endorsing objectives and targets for Fort Knox.
Relevant Functional Areas	Responsible for managing the achievement of applicable objectives and targets and reporting on progress to the EMS Representative. Ensure awareness of the objectives and targets by area personnel, suppliers and contractors that can affect the outcome.

5.0 PROCEDURE

5.1 The setting of objectives and targets will consider:

- Environmental policy commitments
- Applicable laws, regulations and executive orders
- Installation sustainability goals
- Technological options
- Financial, operational and business requirements

5.2 Each objective will be linked to one or more targets which detail the incremental steps toward achievement. In the case of long-term objectives, interim targets may be required to monitor progress.

5.3 The objectives and targets will be used to develop the management programs to achieve improvement of environmental performance.

5.4 Relevant area representatives with direct involvement with attaining the objectives and targets will be made aware of their responsibilities through the distribution of the management programs.

5.5 The objectives and targets will be revised as follows:

- On an annual basis as part of management review
- On relevant changes that occur within the scope of the Fort Knox EMS
- When failure to meet targets is evident through the auditing process
- As a consequence of documented and reported stakeholder concerns

Document Reference: P-08	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: OBJECTIVES AND TARGETS PROCEDURE		

6.0 FORMS AND RECORDS

None.

7.0 REFERENCES

None.

8.0 RECORD OF REVISIONS

Date	Change Description	Page Number
28-Feb-05	Original Issue	1-3
9-Oct-08	Reviewed and revised format	1-3
31-Jul-09	Update	1-3
18-Nov-10	Annual review with no changes	1-3
25-Oct-11	Annual review with no changes	1-3
25-Oct-12	Annual review with no changes	1-3
12-AUG-13	Removed the word "Sustainability".	1-3
15SEP14	Annual review with no changes	1-3
19MAY15	Audit review with updates	1-3

Document Reference: P-09	FORT KNOX Environmental Management System	Revision Date: 19MAY15
MONITORING AND MEASUREMENT		
Approved By:		Fort Knox EMS Representative

1.0 PURPOSE

The purpose of this procedure is to provide guidance that focuses on the monitoring and measurement of the key characteristics of Fort Knox operations and activities as they relate to EMS significant aspects.

2.0 SCOPE

This procedure applies to all relevant levels and functions within Fort Knox relating to EMS significant environmental impacts and EMS objectives and targets.

3.0 DEFINITIONS

Term	Meaning
Calibration	To determine or standardize (as a measuring instrument) by determining the deviation from a standard so as to ascertain the proper correction factors.
Characteristic	Any practice, process, or parameter used to monitor or measure environmental performance.
Operation Control	A control put in place to minimize or reduce the environmental impact of a Fort Knox significant aspect (i.e. engineering control or written SOP).

4.0 RESPONSIBILITIES

Role	Responsibility
Cross-Functional Team (CFT)	Responsible for recommending objectives and targets on an annual basis in conjunction with the CORE Team. Upon request, assist relevant functional areas in establishing and maintaining suitable, adequate, and effective monitoring and measurement.
Environmental Management Division (EMD)	Upon request, assist relevant functional areas in establishing and maintaining suitable, adequate, and effective monitoring and measurement.

Document Reference: P-09	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: MONITORING AND MEASUREMENT		

EMS Representative	Annually coordinates the review and update of objectives and targets for relevant areas within the scope of the EMS. Responsible for monitoring progress against the environmental objectives and targets.
Garrison Commander	Responsible for approving and endorsing objectives and targets for Fort Knox.
Functional Areas	Responsible for managing the achievement of applicable objectives and targets and reporting on progress to the EMS Representative. Ensure awareness of the objectives and targets by area personnel, suppliers and contractors that can affect the outcome.

5.0 PROCEDURE

5.1 Monitoring and Measurement of Significant Aspects, Objectives and Targets and Operational Controls

- 5.1.1 The monitoring and measurement of conformance to specified environmental objectives and targets will be accomplished through the EMD internal audit process, as specified in procedure **P-10, *Internal EMS Auditing***, and through any resulting corrective/preventive action (CA/PA) requests, as specified in procedure **P-11, *Nonconformity, Corrective and Preventive Action***.
- 5.1.2 Operational controls will be monitored and measured as indicated in applicable Environmental Management Programs (EMP), procedures, and work practices.
- 5.1.3 Periodic Evaluation of Regulatory Compliance
Fort Knox periodically evaluates compliance with relevant environmental regulations and other requirements to which the installation subscribes utilizing a compliance inspection team within the Environmental Management Division. Every three to five years, or as DOA specifies,

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Title: MONITORING AND MEASUREMENT		

Fort Knox undergoes an external environmental assessment (the Army's Environmental Performance Assessment System). In addition, local, state and federal regulatory agencies make both announced and unannounced inspections. Results of all inspections, assessments and audits are used to generate management reports such as the Installation Status Report. These results also provide input for EQCC at EMS management reviews.

5.2 Calibration and Maintenance of Environmental Monitoring Equipment

5.2.1 Relevant areas and departments shall ensure that environmental monitoring equipment is calibrated and maintained at a frequency consistent with manufacturer recommendations, or at least annually if those recommendations are unknown. Relevant areas and departments shall maintain calibration and maintenance records as necessary to prove conformance with this procedure.

5.2.2 Calibration and maintenance of environmental monitoring equipment shall be addressed by each area or department and the proper calibration records shall be maintained by the respective/responsible parties.

5.2.3 Each applicable area and department shall maintain a list of EMS equipment requiring calibration citing calibration frequency.

5.2.4 The locations of calibrated equipment are available on F-02, Fort Knox Records Management List.

6.0 FORMS AND RECORDS

F-02, Fort Knox Records Management List
Relevant Calibration Records.

7.0 REFERENCES

P-03, Aspects, Impacts and Significance Determination

P-08, Objectives and Targets Procedure

P-10, Internal EMS Auditing

P-11, Nonconformity, Corrective and Preventive Action

8.0 RECORD OF REVISIONS

Date	Change Description	Page Number
28-Feb-05	Original Issue	1-3
9-Oct-08	Reviewed and revised format	1-3
21-May-09	Added para 5.1.4 Periodic Evaluation of Regulatory Compliance	2-3
31-Jul-09	Updated	1-3
18-Nov-10	Annual Review with no changes	1-3
25-OCT-11	Annual Review with no changes	1-3
25-OCT-12	Annual Review with no changes	1-3
12AUG13	Removed the word "Sustainability".	1-3
15SEP14	Annual Review with no changes	1-4
19MAY15	Audit review with updates	1-4

Document Reference: P-10	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Internal Compliance and EMS Auditing		
Approved By:		Fort Knox EMS Representative

1.0 PURPOSE

This procedure describes how all aspects of the Fort Knox EMS and all regulatory requirements are audited at regular intervals to ensure compliance with the ISO14001 standard, EMS procedures, and the regulatory requirements.

2.0 SCOPE

This procedure applies to all elements of the Fort Knox EMS and regulatory requirements.

3.0 DEFINITIONS

Term	Meaning
Compliance & EMS Audit	A systematic, documented and independent examination to objectively obtain and evaluate evidence to determine whether an organization's EMS conforms to the EMS audit criteria set by the organization.
Regulatory & EMS Documentation	Any EMS related documentation and regulatory documentation that is pertinent to the area being audited, including but not limited to the EMS Manual, relevant Fort Knox procedures and environmental regulations and plans.
Finding/Nonconformity	A nonfulfillment of a specified requirement of the EMS standard, Fort Knox procedure, and environmental regulations supported by objective evidence.
Lead Auditor	Fort Knox personnel who has successfully completed a lead auditor course and is approved by the EMS Representative to conduct and lead internal audits.
Internal Audit Team	Members of the Fort Knox internal audit roster assigned by the EMS Representative to conduct an internal audit having successfully completed an internal auditor course.
Objective Evidence	Information which can be proven true based on facts obtained through observation, measurement, test or other means.
Observation	An undesirable practice that cannot be directly referenced as a requirement of the standard, Fort Knox procedures, and regulations but if left unchecked could lead to a finding of nonconformance.
Corrective and Preventive Action	Action taken to eradicate the cause of or prevent a nonconformance.
Corrective and Preventive Action Request (CAR or PAR) and CAR/PAR Log	A form used to initiate a request to address an existing or potential undesirable situation, nonconformity or other unsatisfactory condition. The CAR/PAR Log is used to track corrective and preventive action requests to ensure completion.

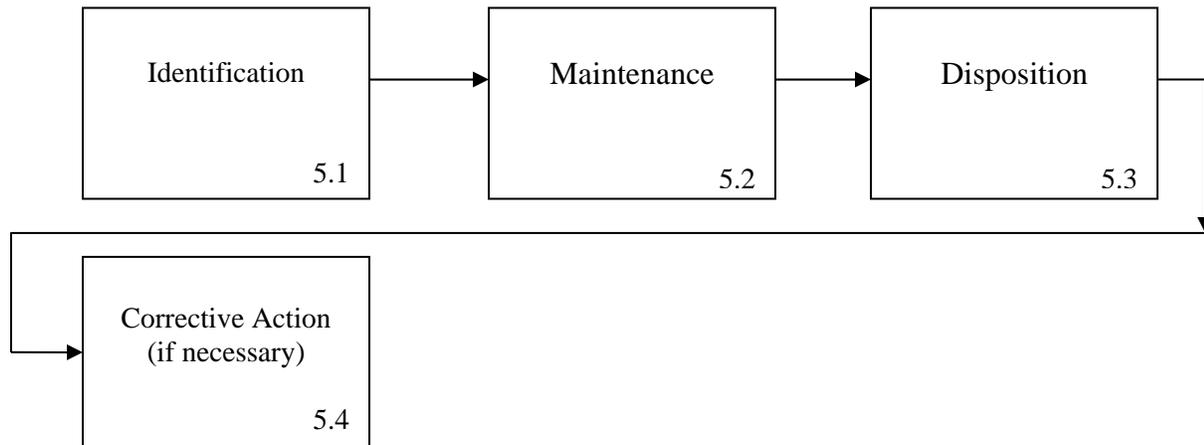
Document Reference: P-10	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Internal Compliance and EMS Auditing		

4.0 RESPONSIBILITIES

Role	Responsibility
EMS Representative	<p>Reviews final audit report and communicates results to GC management review.</p> <p>Ensures all internal auditors are properly trained.</p> <p>Prepares and maintains a schedule for Compliance/EMS internal audits, including audit team selection.</p> <p>Maintains EMD internal audit results. Issues CARs to the appropriate Environmental Program Manager.</p> <p>Provides audit summary results and applicable CAR/PAR status information for GC management review as needed.</p>
Auditor	<p>Coordinates the audit schedule with appropriate Division Chiefs, Directors, Commanders and/or supervisors of the activities assigned to perform the audit. Provides a formal notice for the audit 5-10 days in advance of the audit date.</p> <p>Conducts a closing meeting upon completion of the audit to summarize findings and observations, both positive and negative.</p>
Internal Audit Team	<p>Performs pre-audit preparations.</p> <p>Conducts the audit and documents the findings.</p>
Environmental Program Managers	<p>Reviews the Compliance/EMS Inspection Checklist to determine the need for corrective actions and/or a Corrective Action Request (CAR). Provides the auditee with a copy of the CAR and assistance for resolution.</p>
Division/Directorate Chiefs or Supervisors of the activity being audited	<p>Make applicable personnel and records available during the scheduled locations.</p>

Document Reference: P-10	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Internal Compliance and EMS Auditing		

5.0 PROCEDURE



5.1 Preparation

Preparation shall at a minimum include the following:

5.1.1 Develop Audit Schedule

All EMS elements and regulatory requirements shall be audited during each audit exercise. The EMS Representative or designee will develop the audit schedule accordingly. The EMS elements and regulatory requirements will be included in the FK5113 Compliance & EMS Inspection Checklist.

5.1.2 Define Audit Scope

The EMS Representative or designee shall define the overall scope of the audit to include the specific areas, functions, and activities to be audited.

5.1.3 Identify and Assemble Audit Team

Each system audit shall be performed by no less than two qualified personnel from various departments as selected by the EMS Representative. To assure objectivity, the audit team should include personnel not directly responsible for the area(s) being audited.

5.1.4 Develop Audit Plan

The audit plan shall be the form FK5113, Compliance & EMS Inspection Checklist.

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Title: Internal Compliance and EMS Auditing		

5.1.5 Prepare Audit Checklist

The audit team selects the auditee (activity, unit, organization, contractor, or specific person) from the master list of Fort Knox organizations/ tenants and contractors, or relevant media contact list.

The audit team reviews procedures, work instructions, prior audit findings and other documents as applicable to the audit scope to prepare for using the FK5113 Compliance & EMS Inspection Checklist, an internal document.

5.1.6 Compliance and EMS Inspection Checklist – FK5113

The checklist shall include the follow areas, if applicable, during the audit.

1. Administration – Environmental Officer Certification and Training
2. Administration – EMS Element Questions
3. Air Program
4. Asbestos
5. Bulk Storage Containers
6. Hazardous Material (HM) Storage
7. Hazardous and Universal Waste
8. Maintenance Areas
9. Spill Prevention and Control Countermeasures
10. Solid Waste/Recycling
11. Stormwater/Clean Water Act

5.1.7 Conduct Opening Meeting

The auditor(s) conducts an opening meeting with the auditee(s) and reviews the audit scope and schedule.

5.2 Evaluation

The following steps encompass the evaluation of Regulatory & EMS conformance to the elements:

5.2.1 Perform Audit

The internal audit team collects objective evidence through interviews, review of records, and physical inspections. Audit findings are documented on the FK5113 Compliance & EMS Inspection Checklist.

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5.2.2 Conduct Closing Meeting

The auditor(s) conducts a closing meeting with the auditee(s). A brief review of the findings will be provided to the auditee and others representing the organization. The organization will be given a draft copy of the onsite inspection report. A final report will be sent to the auditee in the form of a completed FK5113 Compliance & EMS Inspection Checklist with applicable supporting inspection documents and photos.

5.3 Reporting

Communicating the Compliance & EMS audit results includes the following:

5.3.1 Prepare Final Report

The internal audit team prepares a final audit report using a completed final copy of the FK5113 Compliance & EMS Inspection Checklist.

5.3.2 Environmental Program Managers

The Environmental Program Managers will review the final report and determine if a Corrective/Preventive Action Request (CAR) is required in their respective environmental areas. The EMS Representative or designee will initiate the CAR and return the CAR to the Environmental Program Manager who will distribute to the appropriate auditee and provide assistance to resolve the CAR.

5.3.3 Management Review

The EMS Representative or designee reviews the final audit report and communicates the audit findings via the Management Review process, as defined in **P-05, *Management Review Procedure***.

5.4 Corrective Action (if necessary)

Representatives from each division or directorate receive relevant findings forms from the auditors and initiate the appropriate corrective and preventative action(s) as detailed in **P-11, *Nonconformity, Corrective and Preventive Action***.

6.0 FORMS AND RECORDS

FK5113 Compliance & EMS Inspection Checklist

7.0 REFERENCES

P-05, Management Review Procedure

P-11, Nonconformity, Corrective and Preventive Action

8.0 RECORD OF REVISIONS

Date	Change Description	Page Number
28 FEB 05	Original Issue	1-5
9 OCT 08	Reviewed and revised format	1-5
23 APR 09	Made CAR Corrections to Sections 5.1.5, 5.2.1, 5.2.5, and 6.0.	1-5
31 JUL 09	Updated	1-5
18NOV10	Annual review with no changes	1-5
27 DEC 11	Annual review with changes to 5.1.5, 5.2.1 and 5.3.1.	1-5
05 DEC 12	Annual review with no changes.	1-5
12AUG13	Removed the word "Sustainability".	1-5
16OCT14	Updated procedure to accommodate combined audits.	1-6
30Jan15	Combination of Compliance and EMS Audits	1-6
19MAY15	Audit review with updates	1-6

Document Reference: P-11	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Nonconformity, Corrective and Preventive Action		
Approved By:		Fort Knox EMS Representative

1.0 PURPOSE

This procedure established guidelines for handling, investigating and correcting Fort Knox EMS nonconformities.

2.0 SCOPE

This procedure applies to all elements of the Fort Knox EMS.

3.0 DEFINITIONS

Term	Meaning
Corrective and Preventive Action (CA/PA)	Action taken to eradicate the cause of or prevent a nonconformance.
Corrective and Preventive Action Request (CAR or PAR) and CAR/PAR Log	A form used to initiate a request to address an existing or potential undesirable situation, nonconformity or other unsatisfactory condition. The CAR/PAR Log is used to track corrective and preventive action requests to ensure completion.
Evidence of Effectiveness	Proof that a decided and desired effect was achieved.
Root Cause Analysis	A process to investigate and categorize the root cause of an event.

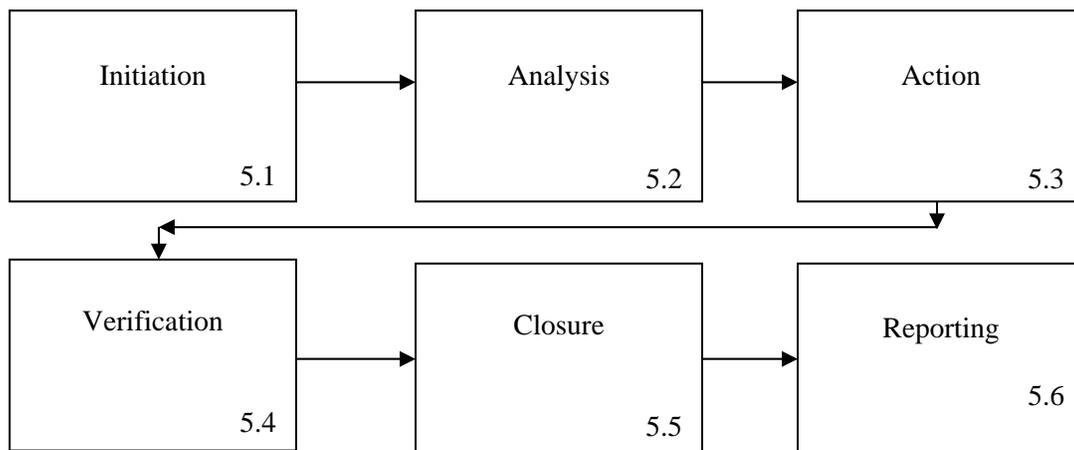
4.0 RESPONSIBILITIES

Role	Responsibility
All Fort Knox Personnel	Engage in Fort Knox's EMS and look for potential nonconformities and opportunities for improvement. Initiate appropriate CAR/PARs as necessary to foster continual improvement of Fort Knox's EMS.
Division Chiefs or Supervisors	Ensure that CAR/PARs are completed as assigned to their responsible areas.
EMS Representative	Review CA/PAs for adequacy and assign verification responsibilities. Close CAR/PARs when completed. Provide status information for EMS management review as needed. Track CAR/PAR status to ensure completion by target date.

Document Reference: P-11	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Nonconformity, Corrective and Preventive Action		

Role	Responsibility
Internal Audit Team Members	Identify nonconformities and issue findings forms. Verify completion of CAR/PARs as necessary.

5.0 PROCEDURE



5.1 Initiation

CAR/PARs can be initiated by any Fort Knox employee having knowledge of an EMS nonconformity or opportunity for improvement to prevent a potential non-conformity. The requests can also result from one of the following conditions:

5.1.1 Internal Audit Finding

If a nonconformity is found during an internal audit, the Activity receiving the finding (**F-08, Internal Audit Findings / Summary Report**), initiates the CAR/PAR utilizing **F-10, Corrective and Preventive Action Request Form, which is a part of the F-10 EPAS EMS-CAR Excel Program**. The Activity is the “issuer” as identified on the request Form and assigns the CAR/PAR to an appropriate delegate to take action. The issuer and the assignee agree upon a target completion date. The information is then entered into the CAR/PAR database, which is maintained by the EMS Representative.

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5.1.2 Regulatory Noncompliance

If a noncompliance is found, usually by the Environmental Management Division (EMD) Inspection Team, issues an inspection report noting the non-compliance. The non-compliance is issued to the Activity responsible for the noncompliance. The issuer and the assignee agree upon a target completion date. This information and the action plan to ensure compliance is entered into the EMD central files.

5.1.3 Management Review Finding

If a finding is discovered as a result of management review, a person delegated by management review initiates the CAR/PAR utilizing **F-10, Corrective and Preventive Action Request Form which is a part of the F-10 EPAS_EMS-CAR Excel Program**. This person is the “issuer” in this case and assigns the CAR/PAR to the appropriate Activity for action. The issuer and the assignee agree upon a target completion date. This information is then entered to the CAR/PAR database, which is maintained by the EMS Representative.

5.2 Analysis

The assignee reviews the listed EPAS root cause-to **F-10, Corrective and Preventive Action Request Form which is a part of the F-10 EPAS_EMS-CAR Excel Program** to understand the origin of the nonconformity. The assignee may offer other possible root causes.

5.3 Action

Once the root cause has been identified, the assignee determines the appropriate action to both correct and prevent the nonconformity from reoccurring. The assignee records the proposed action on **F-10, Corrective and Preventive action Request Form which is a part of the F-10 EPAS_EMS-CAR Excel Program**. Upon completion of the CA/PA, the assignee populates the completion date and submits the CAR/PAR to the EMS Representative for verification.

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Title: Nonconformity, Corrective and Preventive Action		

5.4 Verification

The EMS Representative or designee reviews the CA/PA to determine if the action is appropriate to the magnitude of the problem and commensurate with the environmental impact encountered.

5.4.1 If the EMS Representative or designee does not agree that the CA/PA was appropriate, then she or he rejects the CAR/PAR back to the responsible directorate for further action, repeating the process from section 5.2 above.

5.4.2 If the EMS Representative or designee agrees the action was appropriate, she or he assigns verification responsibility. If evidence of effectiveness exists, the “verifier” notes said evidence on **F-10, Corrective and Preventive Action Request Form which is a part of the F-10 EPAS_EMS-CAR Excel Program**, and signs and dates. If the CA/PA was not verified as effective, the process is repeated from section 5.2 above.

5.5 Closure

If the CA/PA was verified as effective, the EMS Representative or designee will sign **F-10, Corrective and Preventive Action Request Form which is a part of the F-10 EPAS_EMS-CAR Excel Program** and forward the CAR/PAR to the Audit Representative to close the request out of the database. Upon request, a copy of the completed CAR/PAR will be submitted to the requestor and the appropriate Division Chief, as information only.

5.6 Reporting

At any step, the EMS Representative or designee may provide information on the status of a CAR/PAR to Management Review. In the case of a repeated occurrence of any CAR/PAR, the Garrison Commander shall be notified for further action.

6.0 FORMS AND RECORDS

F-10, Corrective and Preventive Action Request Form which is a part of the F-10 EPAS_EMS-CAR Excel Program

Corrective and Prevention Action Database

Document Reference: P-11	FORT KNOX Environmental Management System	Revision Date 19MAY15
Title: Nonconformity, Corrective and Preventive Action		

7.0 REFERENCES

F-10, Internal Audit Findings Form which is a part of the F-10 EPAS_EMS-CAR Excel Program

8.0 RECORD OF REVISIONS

Date	Change Description	Page Number
28-Feb-05	Original Issue	1-5
9-Oct-08	Reviewed and revised format	1-5
23-Apr-09	Made CAR corrections in Sections 5.1.1, 5.1.2, 5.1.3, 5.2, 5.4.2, 6.0, and 7.0.	1-5
10-Jul-09	Removed reference to CAR/PAR from 5.1.2	1-5
18-Nov-10	Annual review with updates to Section 5.2	3
15-Nov-11	Annual review with updates to Sections 5.1.1, 5.1.3, 5.2, 5.3, 5.4.2 and 5.5	1-5
12-Jan12	Annual review with updates to Sections 5.1.1, 5.1.3, 5.2, 5.3, 5.5, 6.0 and 7.0	1-5
22-Aug-12	Updated Section 5.2	3 of 5
12AUG13	Removed the word "Sustainability".	1-5
15SEP14	Annual review with no changes	1-5
19MAY15	Audit review with changes	1-5

Document Reference: P-12	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Communication Procedure		
Approved By:		Fort Knox EMS Representative

1.0 PURPOSE

To provide a standard procedure for internal communications among the various levels and functions of Fort Knox and for external communications from interested parties.

2.0 SCOPE

This procedure applies to communications related to the Fort Knox EMS.

3.0 DEFINITIONS

Term	Meaning
Interested Party	Person or group concerned with or affected by the environmental performance of Fort Knox.

4.0 RESPONSIBILITIES

Role	Responsibility
EMS Representative	Ensures this procedure is effectively implemented.
Public Affairs Office (PAO)	Receives and documents communications from external interested parties.

5.0 PROCEDURE

5.1 Internal Communication

5.1.1 The Garrison Commander communicates the environmental policy and significant environmental aspects among the various levels and functions of the installation via the EQCC meeting(s).

5.1.2 Methods of communication may include, but are not limited to, electronic distribution using email communication and the Fort Knox internet, hardcopy distribution in the form of memorandum, reports or the Fort Knox Environmental Handbook, and through environmental awareness training, EMS management reviews and other methods as needed.

Document Reference: P-12	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Communication Procedure		

5.2 External Communication

5.2.1 External communications will be processed through PAO.

5.2.2 Noise complaints will be forwarded to the Staff Judge Advocate (SJA) or Directorate of Public Works (DPW) based on the nature or scope of the complaint.

a. SJA and DPW will provide documented evidence of noise complaint resolution to the EMS Representative at EMD who will verify the resolution and forward to PAO for inclusion in the tracking document.

5.2.3 A copy of the environmental policy can be provided for general EMS inquiries.

5.2.4 The EMS Representative and the PAO will respond to external requests with respect to significant environmental aspects.

6.0 FORMS AND RECORDS

PAO Complaint General Tracking Excel Spreadsheet

7.0 REFERENCES

None.

8.0 RECORD OF REVISIONS

Date	Change Description	Page Number
28-Feb-05	Original Issue	1-2
9-Oct-08	Reviewed and revised format	1-2
31-Jul-09	Updated	1-2
18-Nov-10	Annual review with no changes	1-2
25 OCT 11	Annual review with no changes	1-2
10 SEP 12	Update to Section 5.0 & 6.0	1-3
12 AUG13	Removed the word "Sustainability".	1-3
15SEP14	Annual review with no changes	1-3
19MAY15	Audit review with updates	1-2

Document Reference: P-13	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Emergency Preparedness and Response Procedure		
Approved By:		Fort Knox EMS Representative

1.0 PURPOSE

To provide guidance with respect to identifying potential emergency situations, anticipating and responding to environmental incidents and emergencies, and for preventing and mitigating any associated adverse environmental impacts.

2.0 SCOPE

This procedure applies to Fort Knox personnel that conduct activities that have the potential for environmental incidents and emergencies that can have an impact on the environment.

3.0 DEFINITIONS

None.

4.0 RESPONSIBILITIES

Role	Responsibility
EMS Representative	Ensures this procedure is effectively implemented.
Environmental Management Division (EMD)	Ensures all associated plans are implemented and maintained.

5.0 PROCEDURE

Fort Knox utilizes the following steps in emergency preparedness and response:

- Accesses applicable requirements to which Fort Knox is subject to related to Fort Knox's environmental aspects;
- Determines how the requirements apply to Fort Knox's environmental aspects.

5.1 Planning

The EMD maintains several plans associated with emergency preparedness and response. These plans include but are not limited to the following:

Document Reference: P-13	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Emergency Preparedness and Response Procedure		

- Spill Prevention Control and Countermeasures Plan (SPCCP)
- Fort Knox Antiterrorism (AT) Plan
- Groundwater Protection Plan
- Storm Water Best Management Practices Plan
- Installation Action Plan

5.2 Revising

Emergency preparedness and response procedures shall be reviewed and revised as necessary, after the occurrence of accidents or emergency situations as defined within the specific plans listed above. Emergency response actions will be critiqued within ten (10) business days of the event. Appropriate revisions will be made to relevant procedures and plans in accordance with recommendations resulting from any critique performed.

5.3 Testing

The EMS Representative ensures testing will coordinate testing of emergency preparedness and response procedures to assure that the plans designed to address incidents and emergencies are appropriate and effective in mitigating adverse environmental consequences. Actual simulations will occur as practicable, but at a minimum tabletop exercises will occur annually. Records of these tests will be maintained in the EMD or the Fire Department

5.4 Reporting

Applicable local, state and federal regulatory authorities govern reporting of environmental incidents and emergencies. Emergency reporting procedures are included in the Fort Knox Environmental Handbook. Emergency reporting forms are available in the Fort Knox Environmental Handbook, or by contacting EMD.

6.0 FORMS AND RECORDS

Spill Incident Report FK5053

Document Reference: P-13	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Emergency Preparedness and Response Procedure		

7.0 REFERENCES

Spill Prevention Control and Countermeasures Plan (SPCCP Plan)
Groundwater Protection Plan
Storm Water Best Management Practices Plan
Fort Knox Antiterrorism (AT) Plan
Installation Action Plan
Fort Knox Environmental Spill Reporting Procedure Binder

8.0 RECORD OF REVISIONS

Date	Change Description	Page Number
28-Feb-05	Original Issue	1-3
9-Oct-08	Reviewed and revised format	1-3
31-Jul-09	Updated	1-3
18-Nov-10	Annual review with changes to Section 5.4.	2
09 Mar 11	Updated Sections 5.4, 6.0 and 7.0 relevant to spill reporting documents and forms for use by field personnel and EMD personnel.	2 & 3
25OCT11	Annual review with no changes.	1-3
25OCT12	Annual review with no changes.	1-3
12AUG13	Removed the word "Sustainability".	1-3
15SEP14	Annual review w/changes to Section 5.4 and 6.0.	1-3
19MAY15	Audit review with changes	1-3

Document Reference: P-14	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Fort Knox Pre-Con Project Environmental Checklist Procedure		
Approved By:		Fort Knox EMS Representative

1.0 PURPOSE

The purpose of this procedure is to provide environmental regulatory guidance and review of all Fort Knox projects to ensure regulatory compliance with federal, state, local, Fort Knox, Department of Army and Department of Defense.

2.0 SCOPE

All Fort Knox projects as defined under projects below are within the scope of this procedure, including but not limited to all units, activities, tenants, and contractors. Projects will be reviewed using the EMS Form F-06 - Fort Knox Pre-Con Project Environmental Checklist.

3.0 DEFINITIONS

Activity	A tenant is an authorized activity located on an installation that is not part of the Garrison Organization. This includes, but is not limited to, tenants, military units, contractors, Partners in Excellence, the Army and Air Force Exchange Services (AAFES), and the Defense Commissary Agency (DeCA).
CAA	Clean Air Act
CWA	Clean Water Act
DPW	Directorate of Public Works
EMD	Environmental Management Division
EMS	Environmental Management System
Projects	Projects are defined as any change or modification that may impact the environment, i.e. <ul style="list-style-type: none"> • air • land, • water, • tenant/unit or activity relocation, • building demolition, construction, and renovation (internal/external), • road/street/bridge installations and/or improvements, • utility installations and/or improvements, • utility service buildings or equipment installations and/or improvements, • land modifications or improvements, and • vegetation modifications or improvements.

Document Reference: P-13	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Fort Knox Pre-Con Project Environmental Checklist Procedure		

NEPA National Environmental Policy Act
RCRA Resource Conservation and Recovery Act
TSCA Toxic Substance Control Act

4.0 RESPONSIBILITIES

Role	Responsibility
Environmental Representative	Ensures this procedure is effectively implemented and adhered to.
Environmental Management Division (EMD)	Ensures all Fort Knox projects are properly reviewed to ensure regulatory compliance in all environmental media and mains a finalized copy in the EMS electronic files.
Chief of the Environmental Management Division	Ensures all compliance issues are resolved prior to project commencement, gives final approval with date and signature, and returns a signed copy to the EMS Representative for the EMS electronic files.
Directorate of Public Works (DPW) & CORPs	Ensures this procedure is used for all projects (engineering and otherwise). All projects must be reviewed with EMD in the conceptual phase and during the project site review with compliance follow up. See definition for projects.
Project Leader-On Site (Government or Contractor)	Ensures on-site project activities are implemented in compliance with all applicable regulations. Maintains interface with the project sponsored unit, activity, tenant, or contractor leadership, and the appropriate EMD POC.
Project POC Off-site	Maintains interface between the Project Leader, the sponsoring organization, and the EMD POC.
DPW POC	Ensures DPW on-site project activities are implemented in compliance with all applicable regulations. Maintains interface between the Project Leader, the contractor, and the EMD POC.
Project COR	Maintains over site of all contractor project activities and ensures interface with the EMD POC.
EMD POC	Provides regulatory review and over site of assigned project and conducts weekly site visits to assigned projects.

5.0 PROCEDURE

5.1 The initial phase of project development will consider the application of and compliance with,

- Air Quality Programs
- Water Quality Programs
- Waste Management Programs
- Recycling Programs
- Cultural Resources
- Natural Resources
- Other governing applications as identified by EMD.

Document Reference: P-13	FORT KNOX Environmental Management System	Revision Date: 19MAY15
Title: Fort Knox Pre-Con Project Environmental Checklist Procedure		

5.2 All projects having a commencement date prior to the implementation of this procedure may be subject to review pursuant to this procedure at the discretion of EMD.

6.0 FORMS AND RECORDS

Fort Knox Pre-Con Project Environmental Checklist - FK5118

7.0 REFERENCES

None

8.0 RECORD OF REVISIONS

Date	Change Description	Page Number
07 Dec 11	Original Issue	1 - 3
07 Feb 12	Added final approval and signature block in Section 4.0.	2 - 3
12 AUG 13	Remove the word "Sustainability".	1-3
15SEP14	Annual review with no changes	1-3
19MAY15	Audit Review with changes	1-3