# SAFETY, HEALTH AND ENVIRONMENTAL MANAGEMENT SYSTEM OPERATING PROCEDURE

## **Management Review**

Effective Date: January 14, 2010

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APPROVED:				
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## **TABLE OF CONTENTS**

<b>Section</b>	Section Title	<u>Page</u>
<b>A.</b>	PURPOSE AND APPLICABILITY	Page 3 of 8
В.	DEFINITIONS	Page 3 of 8
<b>C.</b>	PROCEDURAL STEPS	Page 3 of 8
D.	RECORDS MANAGEMENT	Page 5 of 8
<b>E.</b>	QUALITY ASSURANCE AND QUALITY CONTROL	Page 5 of 8
F.	REFERENCES	Page 6 of 8
ATTAC	HMENTS:	
	ent 1. SHMS Management Review Meeting Minutes Template ent 2. EMS Management Review Meeting Minutes Template	Total Pages: 1 Total Pages: 1

#### A. PURPOSE AND APPLICABILITY

The purpose of this Operating Procedure (OP) is to establish a uniform process for ensuring Region 7's Environmental Management System (EMS) and Safety & Health Management System (SHMS) are thoroughly reviewed by the Region's Senior Management so that they may determine if the systems are being maintained in a manner that is suitable, adequate, and effective for meeting the desired levels of performance. Although this OP applies generally to both the EMS and SHMS, there are some requirements that are unique to one system or the other; these are identified with either an (EMS) or (SHMS).

#### **B. DEFINITIONS**

All definitions may be found in the document titled *US Environmental Protection Agency Region 7 Safety, Health, and Environmental Management System Terms and Definitions* (SHEMS 1006.9000.02) contained in the EMS Manual or in the SHMS Manual. For the purposes of this OP, the following terms apply:

- Activity, Product, or Service
- Continual Improvement
- Document
- Environmental Aspect
- Environmental Objective
- Environmental Policy
- Environmental Target
- Hazard
- Interested Party
- Management Program (MP)
- Record
- Risk
- Safety & Health Objective
- Safety & Health Program (SHP)
- Senior Management
- Significant Environmental Aspect

### C. PROCEDURAL STEPS

- 1. To conduct the Management Review, the EMS and SHMS Coordinators will compile information related to the performance of the system from the current cycle. This information will include, but not be limited to:
  - a. The processes used to determine the Region's aspects and significant aspects (EMS), hazards and risks (SHMS), legal and other requirements, objectives, targets, and programs;
  - b. The level of success towards achieving the objectives and targets;

- c. Previous discussions with members of the Region's Senior Management relative to the success, direction, etc. of the system;
- d. After action reports from incidents and/or exercises;
- e. Results of the previous audits and compliance evaluations; and
- f. Status of corrective and preventive actions.
- 2. The EMS and SHMS Coordinators will prepare briefings for Region 7's Senior Management using the information collected above. This briefing will include, at a minimum, the following information:
  - a. The results of the previous audits and compliance evaluations/inspections;
  - b. The results of participation and consultation (SHMS);
  - c. Communications with interested parties (including any complaints);
  - d. The overall environmental or safety and health performance of the Region;
  - e. The level of success towards achieving the objectives and targets;
  - f. The status of incident investigations (SHMS) and corrective and preventive actions;
  - g. Follow-up actions from previous Management Reviews;
  - h. Changing circumstances that could affect the scope of the Region's EMS or SHMS; and
  - i. Recommendations for improvement.
- 3. Prior to the EMS Management Review, the EMS Coordinator will conduct a review of the presentation with the EMS Integration Team to address the questions listed below and any others that may arise to assess the suitability, adequacy, and effectiveness of the EMS and to develop improvement recommendations (as necessary). Similarly, the SHMS Coordinator will review their presentation with the members of the Region's Safety and Health Committee (SHC). Management Review presentations are EMS or SHMS documents, as appropriate.
  - a. Are the processes used to determine the aspects, significant aspects, legal and other requirements, and objectives and targets sufficient relative to the Region's environmental policy and its activities, products, and services? (EMS)
  - b. Have the various Management Programs (MPs) been properly developed, maintained, and resourced to ensure the successful completion of objectives and targets?
  - c. Are the planned/implemented operational controls sufficient for ensuring continued compliance with all legal and other requirements related to the Region's significant aspects (EMS) or hazards (SHMS)?
  - d. Do the OPs provide sufficient structure, direction, and accountability to the system?

- e. Is the level of internal and external communication sufficient to achieve the desired level of awareness, participation, and consultation? (SHMS)
- 4. The EMS and SHMS Coordinators will update their presentations based on the team and committee reviews, as necessary, and will prebrief the EMS or SHMS Management Representative. The Review must be scheduled during a time when the Regional Administrator (or Acting Regional Administrator if an appointment is pending) and at least half of the Senior Staff is available; it will also typically be scheduled during the final month of the system's cycle.
- 5. During the Management Review, Senior Management will consider the information presented; ask any clarifications necessary to determine the suitability, adequacy, sustainability and effectiveness of the system; and make recommendations they feel are necessary to ensure the system achieves the desired level of performance. Completion of the Management Review will be documented in the minutes of the meeting, approved by the Regional Administrator, using the template included at Attachment 1 (SHMS) or Attachment 2 (EMS). The Management Review presentation and its results will be posted to the SHMS/EMS intranet site as appropriate.
- 6. If the nature of the Senior Management's recommendations/action items require that a corrective and preventative action be taken, the EMS or SHMS Coordinator will initiate the action as defined in the current version of SHEMS 1006.7210.12. The EMS or SHMS Coordinator will provide periodic updates on the status of the recommendations/action items to Senior Management until they are completed.
  - a. Less formal management review sessions may be held on an as needed basis throughout the system's cycle. These sessions may be held with all of the Region's Senior Management or with select members (*e.g.*, the Assistant Regional Administrator). These sessions will be documented as EMS or SHMS Records as appropriate and in accordance with the most current version of SHEMS 1006.7210.02 and/or SHEMS 1006.7210.17.

#### D. RECORDS MANAGEMENT

This OP requires the generation of the following records:

Record	Responsible Person	Record Location
EMS Sustainment Team Minutes	EMS Coordinator	EMS Working Files
SHC Minutes	SHMS Coordinator	SHMS Working Files
Senior Management Meeting Minutes	Regional Administrator	EMS or SHMS Manual

This OP may also result in the generation of additional EMS or SHMS records. Any records created will be managed in accordance with the most current version of SHEMS 1006.7210.02, *Document Control* and SHEMS 006.7210.17, *Records Management*.

## E. QUALITY ASSURANCE AND QUALITY CONTROL

The quality assurance and quality control (QA/QC) success of the EMS Management Review process, as detailed in this OP, will be determined through the internal and external EMS conformance audit

processes. Deficiencies noted during these audits will be managed through the Region's Corrective/Preventive Action Process as defined in the current version of SHEMS 1006.7210.12.

#### F. REFERENCES

Current versions of the following references are assumed if no date is provided.

- 1. ISO 14004:2004(E); Environmental Management Systems General Guidelines on Principles, Systems, and Support Techniques; November 15, 2004
- 2. OHSAS 18001:2007; Occupational Health and Safety Management Systems Requirements; July 2007
- 3. USEPA R7, US Environmental Protection Agency Region 7 Safety, Health, and Environmental Management System Terms and Definitions, SHEMS 1006.9000.02
- 4. USEPA R7, Document Control, SHEMS 1006.7210.02
- 5. US EPA R7, Corrective/Preventive Action Process, SHEMS 1006.7210.12
- 6. US EPA R7, Environmental Management System Audit, EMS 1006.7210.13
- 7. US EPA R7, Records Management, SHEMS 1006.7210.17

## **ATTACHMENT 1**

# **SHMS Management Review Meeting Minutes Template**

Da	te:
Me	embers Present: [List names of the Senior Staff members present]
Pre	esenter(s): [List name(s) of individual(s) presenting the Management Review]
Sui	mmarize the Presentation and Discussion in the Following Areas:
•	Results of Internal Audits, Compliance Assessments / Inspections
•	Results of Participation and Consultation
•	Communications with External / Internal Parties
•	Overall Safety & Health Performance
•	Success in Achieving Objectives
•	Status of Incident Investigations, Corrective Actions, and Preventive Actions
•	Follow-up Actions from Previous Management Reviews
•	Changing Circumstances that Could Effect the Region's Hazards and Risks
•	Recommendations for Improvement
Sui	mmarize Decisions and Actions Related to Possible Changes in the Following
•	Safety & Health Policy
•	Objectives and Programs
•	Other Elements of the SHMS
AP	PROVED / DISAPPROVED
Re	gional Administrator — — — — Date

## **ATTACHMENT 2**

## **EMS Management Review Meeting Minutes Template**

Date:
Members Present: [List names of the Senior Staff members present]
Presenter(s): [List name(s) of individual(s) presenting the Management Review]
Summarize the Presentation and Discussion in the Following Areas:
• Results of Audits and Compliance Assessments / Inspections
• Communications with External / Internal Parties
Overall Environmental Performance
• Success in Achieving Objectives and Targets
Status of Corrective and Preventive Actions
• Follow-up Actions from Previous Management Reviews
Changing Circumstances that Could Effect the Environmental Aspects
• Recommendations for Improvement
Summarize Decisions and Actions Related to Possible Changes in the Following:
Environmental Policy
Objectives, Targets, and Programs
• Other Elements of the EMS
APPROVED / DISAPPROVED
Regional Administrator Date