



PRINCE WILLIAM COUNTY

*DEPARTMENT OF
FACILITIES & FLEET
MANAGEMENT*

*Exemplary Environmental Enterprise (E3)
Membership Application*

July 2022

PROGRAM STRUCTURE

Prince William County (County) adopted an Environmental Management System (EMS) in 2003, the same year the first Virginia Environmental Excellence Program (VEEP) Certification was sought. The Risk and Wellness Division was appointed to facilitate and oversee all participating groups. Risk and Wellness' Senior EHS Manager holds the position of Program Coordinator and is tasked with ensuring audits are completed, programs are kept current, required training is offered, and annual VEEP filing and certification renewals are completed on time.

The Program Coordinator also facilitates EMS Council meetings. The EMS Council was formed in 2003 and serves as the governing body for all VEEP members. The Council reviews procedures, conducts audits, sets policies, and advises partner groups on program development. Currently, there are 6 departments with individual VEEP Certifications, some of which are composed of multiple sites and/or multiple divisions. This application is for a 7th department to obtain certification, Facilities & Fleet Management:

- Department of Parks & Recreation (E3)
- Department of Library Services (E2)
- Police Department (E2)
- Department of Fire & Rescue (E3)
- Department of Public Works (E3)
- **Department of Facilities & Fleet Management (E3)**
- Department of Public Works, Solid Waste Landfill and Compost Facility (E4)

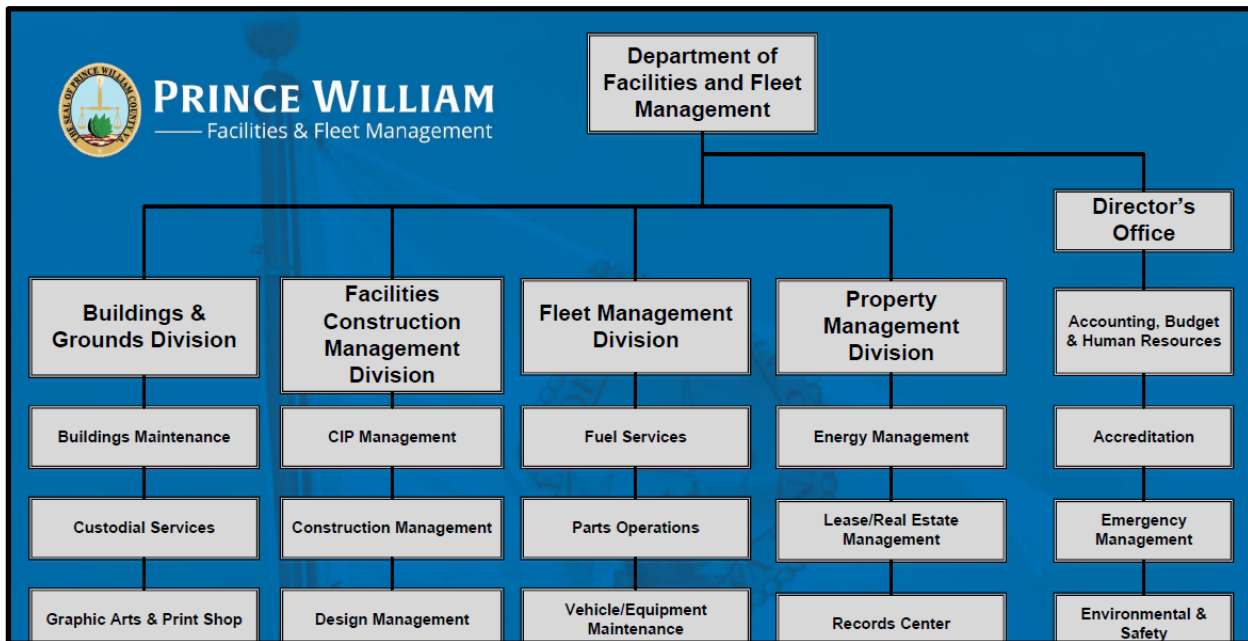
The EMS Council is responsible for updating and maintaining documents that are shared by the entire Council. In addition to all procedures, this includes:

- 01-01 Environmental Policy Statement
- 09-01 Environmental Communications
- 11-01 Audit Checklist (audit results for each facility)
- EMS Glossary of Terms

In 2021, the Department of Public Works was separated in to two groups: one retaining its name as the Department of Public Works that provides services to the public, and the newly formed Department of Facilities & Fleet Management (FFM) that provides services internal to County operations. FFM made the decision to seek independent E3 certification at an E3 level because several divisions have already participated in VEEP and have a robust EMS program.

DEPARTMENT OF FLEET AND FACILITIES MANAGEMENT STRUCTURE

In addition to the Director's Office, FFM is composed of 4 divisions.



FFM assigns an EMS Department Coordinator who facilitates the completion of shared documents for the EMS program. These shared worksheets include:

- 03-01 Legal and Other Regulatory Requirements
- 05-01 Roles and Responsibilities
- 06-01 Training
- 07-01 Emergency Preparedness & Response
- 10-01 Recordkeeping & Reporting
- 12-01 Operational Control Procedure
- 13-00 Program Review Procedure

Buildings & Grounds

Buildings and Grounds (B&G) Division Headquarters, located at 9412 Peabody Street in Manassas, is responsible for maintenance, custodial services mail and courier operations, printing services and grounds maintenance at County buildings. The Peabody Street location includes administrative offices, the Grounds Maintenance Branch, the Custodial Branch,

Division supply operations, and the Manassas Maintenance Hub, with a total of 71 employees. The Central Supply Branch and the Print Shop have a combined program within Buildings & Grounds. Buildings & Grounds have an established EMS program.

Fleet Management

The Fleet Management operation, located at 14809 Dumfries Road, Manassas, is adjacent to the PWC Landfill and has 43 employees. The Heavy Fleet Vehicle Maintenance Shop (Heavy Fleet Shop) is located in the same building as the Landfill Administrative offices. This shop provides maintenance for large landfill equipment, e.g. compactors, graders, and dozers.

The Light Fleet Vehicle Maintenance Shop (Light Fleet Shop) is located in the building adjacent to the Heavy Fleet Shop. The Light Fleet Shop provides preparation of new vehicles and maintenance and repair for existing county vehicles used by police, fire and rescue, and other county divisions. Fleet Management is responsible for the purchase, maintenance and fueling of vehicles, as well as bikes and small engine equipment for County government use.

Fleet had a strong EMS program for many years and will continue under the new FFM E3 certification.

Facilities Construction Management

Facilities Construction Management operates out of 5 County Complex Court at the Main Government Center in Woodbridge and has 10 employees. FCM supports the Capital Improvement Program (CIP) by developing budgets and managing the design and construction of County facilities. The majority of expenditure costs in this activity are recovered from capital projects. FCM plans and executes capital improvement projects, as directed by the County Board of Supervisors in the County's Capital Improvement Program (CIP), from "cradle to grave" (planning, design, construction, occupancy, close out). FCM also ensures compliance with all applicable federal, state, and local codes, standards, and specifications. FCM will begin the design process on (4) four new County buildings that are scheduled for occupancy in **2025-2026**.

Property Management

Property Management is responsible for office space configuration, management of leases, and energy management for County properties. They manage two warehouses, one for office furniture and supplies and one for records management. They are new to the EMS program,

but have participated in the Sustainability Partners program for many years. They are located at 9517 Innovation Drive in Manassas and has 22 employees.

SHARED DOCUMENTS

This section of the application will include all shared documents that were discussed in previous sections, along with procedures for each section of the EMS Program.

POLICY STATEMENT

Prince William County's Board of County Supervisors (BOCS) developed and adopted an Environmental Policy Statement in 2003. In 2012, the EMS Council created a working group to update and improve the Policy Statement to better reflect the advances to the program and program goals. The BOCS adopted this new policy in 2012. The Council developed posters for all member sites that featured photos taken by County employees of scenes in the County with an environmental component. Standard 8.5x11 size documents were created for new employees, with one side featuring a beautiful photo and one line of the policy statement that it represented, and the other side featuring the entire policy statement.

Procedure: 01-00

Worksheets: 01-01

EMS 01-00: Environmental Policy Statement Procedure

Organization: Prince William County

Completed by EMS Council

1. Purpose

The purpose of this environmental policy is to help ensure a shared vision, commitment and direction of Prince William County's top management, supervisors and all other County employees. The responsibility for setting the Prince William County Environmental Policy rests with the County's top officials, which includes the County Board of Supervisors and the County Executive. This management group is responsible for ensuring the implementation of the policy throughout all County agencies.

Prince William County's top management has recognized its responsibility for setting the overall environmental policy for the County. The following Environmental Policy Statement demonstrates the commitment of top management toward conducting all County activities and business in an environmentally responsible manner while balancing and integrating environmental and economic values. Prince William County's Environmental Policy establishes an overall sense of direction and sets the principles of action. It sets the goal as to the level of environmental responsibility and performance required of the County and its employees.

Prince William County's Policy Statement shows the County's commitment to its citizens by sharing environmental best practices with the public and encouraging the implementation of these practices at their work places.

2. Definitions

Definitions for terms in this document can be found in the EMS Glossary of Terms.

3. References/Supporting Documents

EMS 01-01 Environmental Policy Statement

4. Procedure

4.1. An Environmental Policy Statement will be developed by the County's top officials to include a commitment to continual improvement, pollution prevention, compliance, and setting and reviewing environmental objectives and targets.

4.2. The County's Environmental Policy Statement will be given to all new County employees during their required new employee orientation and will be posted at all County facilities with an Environmental Management System.

4.3 The County's Environmental Policy Statement will be made available to any individual or organization that requests it.

4.4 The Environmental Policy Statement will be periodically reviewed to ensure it meets Prince William County's environmental ambitions, including a commitment to continual improvement, pollution prevention, compliance, and setting and reviewing environmental objectives and targets. If it is decided that revisions to the Environmental Policy Statement are necessary, the suggested changes will be brought before the County's top officials.

5. Records

EMS 01-01 Environmental Policy Statement

6. Document Revision Tracking

DOCUMENT REVISIONS			
REVISION NO.	EFFECTIVE DATE	SUMMARY OF CHANGES	NAME
0	March 29, 2010	Initial Release of Document	EMS Council
1	February 3, 2012	Applicability of procedure changed to be inclusive of all EMS Council members	EMS Council
2	February 3, 2012	Formatted for Documentum software (synchronizing of "revision" and "version" numbers)	EMS Council
3	July 15, 2013	Footers with dates removed	EMS Council
4	February 14, 2014	Last paragraph of "purpose" section updated to reflect new Policy Statement component	EMS Council

ENVIRONMENTAL POLICY STATEMENT

Adopted on February 19, 2013
by the Board of County Supervisors

Prince William County is dedicated to serving as environmental stewards to our community through the use of an Environmental Management System that we promote throughout the organization.

Prince William County's Environmental Management System (EMS) will meet the following goals:

Meet and exceed regulatory compliance in County owned/leased facilities and operations through continuous program improvement and annual reviews of local, state, and federal regulations.

Educate County employees on EMS goals, best management practices, and environmental stewardship. Support the Green Guiding Committee in their mission to share green tips and practices, inspire employee action and seek ways to reduce the impact of County government operations on our local natural environment.

Reduce the potential impact of the County organization's activities on the environment. Seek to integrate pollution prevention, waste minimization, and natural resource conservation into all County planning and decision making.

Protect our natural resources by promoting the purchase of goods that are reusable instead of disposable, made of recycled or recyclable materials, biodegradable, and/or safer for the environment. Identify cost saving efficiencies that reduce waste.

Continue to design, develop, construct, and maintain County facilities to encourage resource efficiency and follow LEED silver standards for new facilities and major renovations of existing facilities.

Share environmental best practices with the public and encourage the implementation of these practices at their work places.

Continuously work to improve the County organization's environmental goals and policies to ensure the highest quality of life for our citizens.

An Employee Environmental Management System Council, made up of facility representatives, will work to advance and promote these goals.

Document Revision Tracking

DOCUMENT REVISIONS			
REVISION NO.	EFFECTIVE DATE	SUMMARY OF CHANGES	NAME

EMS 01-01: Environmental Policy Statement

0	July 23, 2003	Initial Release of Document	BOCS
1	February 19, 2013	Board of County Supervisors adopted a new environmental policy statement	BOCS

IDENTIFICATION OF SIGNIFICANT ENVIRONMENTAL IMPACTS

EMS procedure 02-00, Identifying Environmental Aspects/Impacts & Significance, outlines the method for identifying organizations activities that can interact with and change the environment. After attending a workshop that focused on creating and updating EMS documents, divisions worked together to create a combined list of aspects and associated environmental impacts and ranks them using the PWC EMS Significance Matrix (EMS 02-01). The EMS Council reviewed the ranking to ensure they were appropriate.

Procedure: 02-00

Worksheets: 02-01

EMS 02-00: Identifying Environmental Aspects/Impacts & Significance Procedure

Organization: Prince William County

Completed by EMS Council

1. Purpose

This procedure will describe how to identify the environmental aspects and impacts of department activities and services and the method used for rating significant environmental aspects/impacts.

2. Definitions

Definitions for terms in this document can be found in the EMS Glossary of Terms.

3. References/Supporting Documents

EMS 01-00 Environmental Policy Statement Procedure

EMS 03-00 Environmental Legal and Other Requirements Procedure

EMS 03-01 Environmental Legal and Other Requirements Matrix

4. Procedure

- 4.1. Determination of Aspects and Impacts – The Division/Facility EMS Coordinators will draft a list of operations and potential environmental aspects and impacts. Legal and other requirements will also be reviewed to ensure that any new/modified requirements are addressed. The list will be reviewed annually and revised as appropriate.
 - 4.2. Determination of Ranking System – The EMS Council will develop significance criteria to be used to rank the listed aspects/impacts. The criteria will be documented as EMS 02-01 Significance Criteria Matrix and will include:
 - Control or influence of the organization over the aspect;
 - Level of regulations;
 - Probability of impact and frequency of activities;
 - Severity of negative impact;
 - Level of community interest.
 - 4.3. Ranking of Aspects and Impacts – The Departmental EMS Coordinators will, if applicable, meet with Division/Facility EMS Coordinators to review the draft listing of aspects and impacts. Based on staff input, including any recent operational changes and anticipated changes over the next 12 months, the aspects and impact list will be revised as appropriate. Significant rankings will be determined during this meeting using the criteria developed under 4.2 (EMS 02-01 Significance Criteria Matrix).
 - 4.4. Determination of Significant Aspects and Impacts – The Division or Facility EMS Team will review the ranked aspects and impacts of their program annually. The EMS
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Program Coordinator and the Audit Team will review each division or facilities' document during regular program audits.

4.4.1 Once all the ranking of aspects/impacts is complete, significant aspects should be chosen. The aspects/impacts with the highest ranking should be considered first. Occasionally situations arise where options to mitigate environmental impacts of highly ranked aspects are unavailable, due to budget constraints, have already been put in place, or do not adequately address community concerns, in which case other aspects can be considered significant.

4.4.2 Significant aspects will be clearly identified in EMS 02-02 and recorded in EMS 04-01 as part of the development of objectives and targets set for each significant aspect.

4.4.3 The number of significant aspects can be determined by the EMS Council based on their current resources. They should include Department-wide aspects as well as those that may be specific to a Division. Note: Between two and five significant aspects should be selected. Two of these should be quantifiable to conform to the VEEP requirements for E2 and E3 certification and three should be quantifiable for E4 certification.

4.5 Review of Aspects and Impacts – The Division/Facility and Departmental Coordinators will review the aspects and impacts annually to account for any changes to facility procedures and/or operations. This draft list and significance criteria will be discussed with staff and revised as necessary.

5. Records

EMS 02-01 Significance Criteria Matrix

EMS 02-02 Environmental Aspects and Impacts Worksheet

6. Document Revision Tracking

DOCUMENT REVISIONS			
REVISION NO.	EFFECTIVE DATE	SUMMARY OF CHANGES	NAME
0	March 29, 2010	Initial Release of Document	EMS Council
1	February 3, 2012	Applicability of procedure changed to be inclusive of all EMS Council members; specification of number of significant aspects (4.4.3); addition of Departmental Coordinator responsibility (4.5)	EMS Council
2	February 3, 2012	Formatted for Documentum software (synchronizing of "revision" and "version" numbers)	EMS Council

EMS 02-00: Identifying Environmental Aspects/Impacts & Significance Procedure

3	March 11, 2013	Significance criteria and review process were better defined	EMS Council
4	July 15, 2013	Footer with date removed	EMS Council
5	August 2, 2016	4.2 Edited and updated; 4.4 Updated to reflect Program Coordinator's roles accurately; 4.4.3 E2 requirements added; 4.6 Removed because purpose and intent was unclear and not needed.	EMS Council
6	November 13, 2017	4.2: reassigned development of significance criteria to the Council instead of Coordinators 4,4,3: changed number of significant aspects from "up to six" to "between two to five"	EMS Council

EMS 02-02: Environmental Aspects/Impacts Worksheet, Prince William County

Division/Facility: Public Work's Director's Office

Activities, Products, & Services	Potential Environmental Aspect	Impact									
		Impact Categories (a)	Regulated (b)	Severity (c)	Probability of Occurrence (d)	Frequency (e)	Controllable (f)	Community Interest (g)	Total Rank	Significant - Y/N	IF SIGNIFICANT, BUT NOT FEASIBLE, WHY?
Lighting and Energy	Energy Consumption, Fluorescent and other bulbs (new and used)	4	3	3	4	4	3	3	24.0	n	
Battery Use	Recycling, storage	4	4	3	3	3	3	3	23.0	n	
Chemical Use	hazardous waste, illicit discharge	3	4	4	3	5	4	4	27.0		
Snow Removal	Ice Melt, Brining, Vehicle use	5	2	3	3	2	2	4	21.0	n	
Vehicle Use/ maintenance	Fossil Fuel Consumption, leaks, exhaust, used oil/liquids, aerosols	5	3	3	4	5	4	3	27.0	y	
Outdoor Storage of materials	Stormwater runoff, loose material	3	4	3	4	4	4	5	27.0	y	
Fuel tanks/Generators	Fuel Leaks, exhaust	5	5	3	4	3	4	3	27.0	y	
Metal Waste	Recycling, storage	2	3	3	4	3	4	4	23.0	n	
Building Maintenance	Chemical Use, Equipment leaks, a/c coil cleaning	3	4	3	4	4	3	4	25.0	n	
Admin Work	Paper usage/recycling, energy use, water bottles	2	1	1	4	5	5	4	22.0	n	
Vehicle washing	Discharge/spills/leaks	4	4	3	3	3	4	3	24.0	n	
Vehicle Fueling	Leaks/spills	4	4	4	3	4	3	5	27.0	y	
Furniture turnover	Waste	2	1	1	2	3	4	4	17.0	n	
									0.0		

Note: See 2.1 Significance Matrix for footnotes

** Examples: raw materials & energy consumption & other P2 considerations

LEGAL REQUIREMENTS

This 03-01 worksheet is maintained by the EMS Department Coordinator and is reviewed at least once annually with the EMS Council during a regular meeting. Two outside vendors are used to keep the Council updated on regulatory changes: Aegis Environmental and Veolia Environmental Services.

At a minimum, all Council member facility personnel must attend an Environmental Regulatory Overview training course annually to review and discuss legal requirements. This course gives an overview of regulations that may apply to the facility, with special focus on Hazardous/Universal Waste, illicit discharge prevention, spill response and reporting, chemical disposal, and recycling (County ordinance).

In addition, appropriate personnel are required to attend RCRA, SPCC/Spill Prevention, Illicit Discharge Prevention training.

In preparation for this application, 14 on-site and 3 virtual training sessions were conducted for FFM staff to ensure personnel could be active and engaged in the program.

Procedure: 03-00

Worksheets: 03-01

EMS 03-00: Environmental Legal & Other Requirements Procedure

Organization: Prince William County

Completed by EMS Council

1. Purpose

This procedure will determine and maintain currency with environmental laws and regulations and other requirements applicable to our activities and services.

2. Definitions

Definitions for terms in this document can be found in the EMS Glossary of Terms.

3. References/Supporting Documents

EMS 01-01 Environmental Policy Statement

EMS 02-00 Identifying Environmental Aspects/Impacts & Significance Procedure

Applicable Environmental Laws & Regulations

Copies of Memoranda/guidance documents

Environmental Permits

4. Procedure

- 4.1. EMS Coordinators will be responsible for tracking environmental requirements (state and federal laws and regulations) applicable to their operations/services at least annually. The techniques used to track, identify, and evaluate these requirements include information from commercial databases and trade publications, direct communication with national and state regulatory agencies, and periodic refresher training on environmental laws. The Coordinators may also utilize off-site resources such as consultants and attorneys.
- 4.2. The EMS Program Coordinator will monitor local, state and federal regulatory changes and notify EMS Council members of potential impacts.
- 4.3. The EMS Program Coordinator will compile a list of applicable environmental laws and regulations and other requirements and will share this information with the EMS Council at meetings, who will in turn communicate new and/or modified requirements to the appropriate staff within the Department/Division. The Audit Team will ensure that the requirements are included in the annual review of the facility's environmental aspects and impacts.

5. Records

EMS 03-01 Environmental Legal and Other Requirements

6. Document Revision Tracking

DOCUMENT REVISIONS			
REVISION NO.	EFFECTIVE DATE	SUMMARY OF CHANGES	NAME
0	March 29, 2010	Initial Release of Document	EMS Council
1	February 3, 2012	Applicability of procedure changed to be inclusive of all EMS Council members; 4.1 changed from quarterly to annually	EMS Council
2	February 3, 2012	Formatted for Documentum software (synchronizing of “revision” and “version” numbers)	EMS Council
3	March 13, 2013	Section 4.3: responsibilities of EMS Coordinators versus EMS Council better defined	EMS Council
4	July 15, 2013	Removed footers with dates	EMS Council
5	February 28, 2014	Modified 4.3, remove requirement for copies of laws.	EMS Council
6	August 2, 2016	4.3 Updated to reflect role of Program Coordinator vs. Division Coordinator	EMS Council
7	November 13, 2017	4.2 Updated to reflect role of Program Coordinator vs. Division Coordinator	EMS Council

EMS 03-01: Environmental Legal and Other Requirements Matrix
PWC Department of Facilities and Fleet Management

Environmental Aspect	Legal or Other Requirement	Citation/Source
AIR EMISSIONS	AIR QUALITY REQUIREMENTS	
	Primary & Secondary National Ambient Air Quality Standards	40 CFR Part 65
	State Implementation Plan	40 CFR 51
	Prevention of Significant Deterioration of Air Quality and Nonattainment New Source Review	40 CFR 52
	New Source Performance Standards	40 CFR 60
	National Emission Standards for Hazardous Air Pollutants	40 CFR 63
	State & Federal Operating Permit Program/ Title V Operating Permit-NVRO72340	40 CFR 70, 71
	Protection of Stratospheric Ozone (CFC Containing Equipment)	40 CFR Part 82
	State Permitting Program - minor sources	9 VAC 5-80
WATER DISCHARGES	WATER QUALITY REQUIREMENTS	
	Discharge of Oil	40 CFR Part 110
	Spill Prevention Control and Countermeasures	40 CFR Part 112
	State Wetlands	9 VAC 25-210
	State Stormwater Permit/ VPDES General Permit for Stormwater Industrial Discharges Permit No. VAR530118	9 VAC 25-151
SOLID & LIQUID WASTE	WASTE REQUIREMENTS	
	Hazardous Waste (Resource Conservation & Recovery Act: RCRA - Subtitle C)	40 CFR Parts 261-262
	Universal Waste	40 CFR Part 273
	Used Oil Management Standards	40 CFR Part 279
	Solid Waste (Resource Conservation & Recovery Act: RCRA - Subtitle D)	40 CFR Part 257
	Toxic Substances Control Act (PCBs)	40 CFR 700
	PCB Waste Management	40 CFR Part 761
	State Solid Waste Management/ Solid Waste Management Permit No. 29	9 VAC 20-81
	State Used Oil Management	9 VAC 20-60-273
	State Universal Waste	9 VAC 20-60-279
	OTHER REQUIREMENTS	
	County MS4 Permit and Illicit Discharge Prevention Policy	25-RSK-400-030

SETTING OBJECTIVES AND TARGETS

FFM Assistant Directors reviewed the Aspects & Impacts worksheet and recognized that the biggest impacts fall within two groups: Pollution Prevention and Stormwater Protection. Using these two general goals, each division and, in some cases, site, identified at least one goal for their group to actively engage in to further the overall objective. Target dates were selected based on site specific needs and available resources.

Procedure: 04-00

Worksheets: 04-01, 04-02

EMS 04-00: Environmental Objectives & Targets Procedure

Organization: Prince William County

Completed by EMS Council

1. Purpose

This procedure describes the process for developing and reviewing environmental objectives and targets and implementing programs to achieve them to fulfill the commitments of the environmental policy.

2. Definitions

Definitions for terms in this document can be found in the EMS Glossary of Terms.

3. References/Supporting Documents

EMS 01-01: Environmental Policy Statement

EMS 02-00: Identifying Environmental Aspects/Impacts and Significance Procedure

EMS 02-01: Significance Criteria Matrix

EMS 02-02: Environmental Aspects and Impacts Worksheet

EMS 03-01: Environmental Legal and Other Requirements Matrix

4. Procedure

- 4.1. The Division/Facility EMS Coordinator will review the final list of ranked Aspects and Impacts ranked as significant in EMS 02-02 Environmental Aspects and Impacts Worksheet, developed under EMS 02-00 Identifying Environmental Aspects/Impacts and Significance Procedure. The Division/Facility EMS Coordinator, with the assistance of the Departmental EMS Coordinator and the EMS Council, if needed, will evaluate potential actions/remedies to mitigate the identified significant aspects and associated impacts.

The evaluation of the significant aspects should include: options to mitigate environmental impacts including actions completed, in progress or planned and any plans to research additional method. The staff, time, and budget resources necessary for tasks should be addressed. Methods to quantifiably measure the goals should be discussed.

- 4.2. The Division/Facility EMS Coordinator will record the objectives and targets for the significant aspects in EMS 04-01. For those significant Aspects and Impacts that are not being developed into Objectives and Targets, division/facility EMS Coordinators will note the reason for this in EMS 02-02.
 - 4.3. Additional objectives and targets may be developed to address non-compliance findings from the preceding year's EMS audits, and/or to meet a County-wide environmental goals set by the EMS Council.
 - 4.4. The Division/Facility EMS Coordinator will develop brief plans of actions to be taken to reach the objectives and targets based on previous discussions with the EMS Council. These plans
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EMS 04-00: Environmental Objectives & Targets Procedure

will include both long and short term activities, the responsible party, measurable targets when possible, and will be recorded on EMS 04-02 Objectives and Targets Action Plans.

4.5. The Division/Facility EMS Coordinator will present the objectives, targets, and actions plans to the Departmental EMS Coordinator and Department Directors for review and approval.

4.6. A written summary of the activities under the Procedure will be maintained in a County-approved document control system.

5. Records

EMS 04-01: Environmental Objectives and Targets Matrix

EMS 04-02: Objectives and Targets Action Plans

6. Document Revision Tracking

DOCUMENT REVISIONS			
REVISION NO.	EFFECTIVE DATE	SUMMARY OF CHANGES	NAME
0	March 29, 2010	Initial Release of Document	EMS Council
1	February 3, 2012	Applicability of procedure changed to be inclusive of all EMS Council members	EMS Council
2	February 3, 2012	Formatted for Documentum software (synchronizing of “revision” and “version” numbers)	EMS Council
3	July 15, 2013	Removed footers with dates	EMS Council
4	May 20, 2014	4.4.1 and 4.4.2 updated to explain procedure for A&I’s that are significant, but not being developed	EMS Council
5	November 13, 2017	4.3 added to provide for O&Ts resulting from audit findings or EMS County-wide goal 4.5 added requirement for Dept Directors to review and approve goals annually	EMS Council



EMS 04-01 Objectives & Targets: Pollution Prevention

[illegible]



EMS 04-01 Objectives & Targets: Stormwater Protection

[illegible]

ROLES, RESPONSIBILITIES, AND AUTHORITIES

This 05-01 is maintained by the EMS Department Coordinator and is reviewed at least once annually. The document clearly lists the responsibilities of all personnel in each division participating in the EMS program.

Procedure: 05-00

Worksheets: 05-01

EMS 05-00: Roles, Responsibilities and Authorities Procedure

Organization: Prince William County

Completed by EMS Council

1. Purpose

This procedure describes the process for defining the necessary roles and responsibilities for effective implementation of the Environmental Management System (EMS).

2. Definitions

Definitions for terms in this document can be found in the EMS Glossary of Terms.

3. References/Supporting Documents

EMS 01-01 Environmental Policy Statement

4. Procedure

- 4.1. EMS Program Coordinator – The EMS Program Coordinator will schedule and chair EMS Council meetings, track progress of tasks, provide support to the Division/Facility EMS Coordinators, and provide progress reports to the EMS Council. The position will be filled by Risk Management’s Environmental Program Manager. Should the position become vacant, a Council member will be elected by the EMS Council to fill the EMS Coordinator position.
 - 4.2. Division/ Facility EMS Coordinators – The Division/Facility EMS Coordinators will have the responsibility and authority to implement the EMS within the Division/facility that they represent. With the guidance of the EMS Council, a Division/Facility EMS Coordinator may assemble a Division/Facility EMS Team.
 - 4.3. Division/Facility Managers and Supervisors– Managers/Supervisors will be responsible for implementation of objectives and targets, contractor environmental performance, and assisting the Division/Facility Coordinators, particularly with documentation and recordkeeping associated with the EMS.
 - 4.4. Department Director – Departmental Directors are responsible for assigning appropriate personnel to the EMS Council; annually reviewing program progress, training needs, and goals; ensuring division/facility coordinators are given support to accomplish tasks and goals; meeting with Risk Management annually to review the Departments EMS program’s progress.
 - 4.5. EMS Council
 - 4.5.1. The EMS Council will be comprised of Division/Facility EMS Coordinators lead by the EMS Coordinator. Other divisions, groups or personnel can participate as the EMS Council deems fit. EMS Council members are identified in EMS 05-01, Roles, Responsibilities, and Authorities Matrix.
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4.5.2. The EMS Council will meet a minimum of four times throughout the year to track the current status of Prince William County's EMS. The members will also discuss regulatory requirements and updates, review any non-compliance incidents, and plan for future developments for the EMS program.

- 4.6. EMS 05-01 Roles, Responsibilities, and Authorities Matrix will be used to identify staff responsible for components of the EMS program.

5. Records

EMS 05-01 .Roles, Responsibilities, and Authorities Matrix

6. Document Revision Tracking

DOCUMENT REVISIONS			
REVISION NO.	EFFECTIVE DATE	SUMMARY OF CHANGES	NAME
0	March 29, 2010	Initial Release of Document	EMS Council
1	February 17, 2012	Applicability of procedure changed to be inclusive of all EMS Council members; makes summaries to departmental directors optional.	EMS Council
2	February 17, 2012	Formatted for Documentum software (synchronizing of "revision" and "version" numbers)	EMS Council
3	March 13, 2013	Defined EMS Program Coordinator to be Env. Specialist; defined how vacant position would be filled	EMS Council
4	July 15, 2013	Removed footers with dates	EMS Council
5	November 13, 2017	4.1: updated Risk Management's position title 4.3: specification of "managers" as division/facility level 4.4 Added new position of Department Directors; re-number procedural steps that followed 4.5.2 specified the Council will meet a minimum of 4 times a year, and specific activities of the group	EMS Council

EMS 05-01: Roles, Responsibilities, and Authorities Matrix, Prince William County

Department of Facilities & Fleet

	Department Deputy Director (Mark Kitta)	Department Assistant Directors	Facility EMS Coordinator (Andrew Germain)	Dept EMS Team (Detailed Below)	Supervisors	Employees
EMS oversight	X	X				
Identify environmental aspects/impacts & significance		X	X	X	X	
Identify & track regulatory requirements			X			
Establish objectives and targets		X	X	X	X	
Implement objectives and targets			X	X	X	X
Maintain regulatory compliance		X	X	X	X	X
Coordinate regulatory and EMS training			X	X	X	
Coordinate emergency response planning			X	X	X	
Maintain environmental and EMS reports and records			X	X	X	X
Establish and implement EMS audit program			X			
Contractor environmental performance		X	X	X	X	X
Management Review	X	X	X			
Program oversight during probationary status	X	X	X			

Dept EMS Team:

Billy Davis

Fleet

Scott Painter

Fleet

Jens Kjar

B&G

Curtis Brenner

B&G

TRAINING

The Department EMS Coordinator identifies training requirements for all FFM personnel based on site activities, regulatory requirements, and County policies. The Program Coordinator from Risk & Wellness ensures that training opportunities are provided, and participating groups are responsible for ensuring their staff attends training.

All training records are kept in the County's online training system, and some divisions keep duplicate records with their personnel files.

Procedure: 06-00

Worksheets: 06-01

EMS 06-00: Environmental Training and Awareness Procedure

Organization: Prince William County

Completed by EMS Council

1. Purpose

This procedure describes the process for identifying and planning environmental training and awareness for all PWC personnel whose work may create a significant impact upon the environment and to ensure that those training needs have been met.

2. Definitions

Definitions for terms in this document can be found in the EMS Glossary of Terms.

3. References/Supporting Documents

EMS 01-01 Environmental Policy Statement

EMS 02-00 Identifying Environmental Aspects/Impacts & Significance Procedure

EMS 03-00 Environmental Legal and Other Requirements Procedure

EMS 04-00 Environmental Objectives and Targets Procedure

EMS 05-00 Roles, Responsibilities, and Authorities Matrix

EMS 09-00 Environmental Communication Procedure

4. Procedure

- 4.1. The Division/Facility EMS Coordinators, with the assistance of the EMS Council will, identify, in general, the employee positions within their divisions/operations that perform tasks with the potential to cause a significant environmental impact. Training needs for these positions and any others that may impact the EMS will be identified.
- 4.2. The Division/Facility EMS Coordinators will advise the facility management/supervisory staff of the training or competence level needed by staff to ensure awareness of the PWC Environmental Policy, potential environmental aspects/impacts of their activities, regulatory requirements, and of their roles and responsibilities regarding the requirements of the EMS.
- 4.3. The facility management/supervisory staff will ensure that personnel receive appropriate training as necessary and that records of this training are maintained and accessible during EMS audits.

5. Records

Training Course Contents (agendas, handouts, tests, etc.).

Records of Attendees

EMS 06-01: Environmental Training Matrix

6. Document Revision Tracking

DOCUMENT REVISIONS			
REVISION NO.	EFFECTIVE DATE	SUMMARY OF CHANGES	NAME
0	March 29, 2010	Initial Release of Document	EMS Council
1	February 3, 2012	Applicability of procedure changed to be inclusive of all EMS Council members	EMS Council
2	February 3, 2012	Formatted for Documentum software (synchronizing of “revision” and “version” numbers)	EMS Council
3	July 15, 2013	Removed footers with dates	EMS Council
4	November 13, 2017	Grammatical updates: “DPW” (department of public works) in two locations, but this procedure is used for all EMS Council member groups so it was removed	EMS Council

EMS 06-01 EMS TRAINING MATRIX, Prince William County

Training Required/ Description	Part of Environmental Regulatory	Type of Training ^(a)	Attendance Required	Frequency	Last Date Completed	Location of Records
EMS Awareness	x	Class, Online, or W/S	All	Initial & Yearly	02/2022	PWC University
RCRA hazardous waste management - basics	x	Class, Online, or W/S	All	Initial & Yearly	02/2022	PWC University
HAZCOM		Class, Online, or W/S	Appropriate employees	Initial & Every other year	03/2022	PWC University
Emergency response plans and awareness		Class or W/S	All	Yearly	10/2022	PWC University
Spill Plan (SPCC) Stormwater(SWPPP)	x	Class, W/S, OJT	Appropriate employees	Yearly	02/2022	PWC University
Illicit Discharge, Detection & Elimination	x	Class, Online	All	Every other year	02/2022	PWC University
AC Service Technician Certification		Class	Appropriate employees	Initial	complete	PWC University
DOT Hazardous Materials		Class	Managers/Supervisors/Operational personnel responsible for transportation of hazardous materials/waste (packaging, labeling, shipping papers, receiving, etc.)	3 years	01/2021	PWC University

(a) Type of Training Key:

Class = classroom

OJT = on the job

W/S = weekly safety updates

Ind. = 1 on 1 or interactive computerized

EMERGENCY RESPONSE

The Department EMS Coordinator identifies documents required by FFM's EMS member groups. During audits, staff is asked to show required plans to the audit team. General emergency response training is required annually for all staff in the EMS program, and spill response is provided to all groups with a high risk for spills, mainly those with fuel tanks.

Procedure: 07-00

Worksheets: 07-01

EMS 07-00: Emergency Preparedness and Response Procedure

Organization: Prince William County

Completed by EMS Council

1. Purpose

To identify the potential for accidents and emergency situations, to establish and maintain procedures to respond to such situations, and to prevent and mitigate the environmental impacts that may be associated with them. Emergency plans and procedures have been developed and maintained to ensure that there will be an appropriate response to abnormal operating conditions, accidents and potential emergency incidents. These identify the potential for, and procedures for prevention of, such incidents (to the extent reasonably possible). They comply with applicable regulatory requirements and define procedures for minimizing and mitigating environmental impacts that may be associated with the incidents.

2. Definitions

Definitions for terms in this document can be found in the EMS Glossary of Terms.

3. References/Supporting Documents

EMS 02-00: Identifying Environmental Aspects/Impacts & Significance Procedure

EMS 03-00: Environmental Legal and Other Requirements Procedure

EMS 04-00: Environmental Objectives and Targets Procedure

Prince William County Environmental Compliance and Emergency Response Procedures

4. Procedure

- 4.1. The Division/Facility EMS Coordinators will identify emergency plans required for facility operations (e.g., SPCC), pertinent portion of the PWC Emergency Operations Plan (EOP) and any department/division specific emergency response plan. EMS 07-01 Emergency Preparedness Plan Review will be used to document the plans and their locations.
- 4.2. The Division/Facility EMS Coordinators will annually review the plan(s) noted under 4.1 to ensure that they adequately cover the current operations and they will make revisions as appropriate.
- 4.3. Emergency action to potential environmental releases/incidents will be implemented as described in the plans.
- 4.4. Training will be developed under EMS 06-00 Environmental Training and Awareness Procedure and will include necessary emergency action training and training covering facility emergency response plans.

5. Records

EMS 07-00 Emergency Preparedness Plan Review

6. Document Revision Tracking

DOCUMENT REVISIONS			
REVISION NO.	EFFECTIVE DATE	SUMMARY OF CHANGES	NAME
0	March 29, 2010	Initial Release of Document	EMS Council
1	February 3, 2012	Applicability of procedure changed to be inclusive of all EMS Council members	EMS Council
2	February 3, 2012	Formatted for Documentum software (synchronizing of “revision” and “version” numbers)	EMS Council
3	July 15, 2013	Removed footers with dates	EMS Council
4	November 13, 2017	“ERP”, the Emergency Response Plan, is now called the “EOP”, the Emergency Operations Plan; some departments/divisions have their own ERP, so that was added as well	EMS Council

EMS 07-01 Emergency Preparedness Plan Review PWC FFM

EMS 07-01 Emergency Preparedness Plan Review compiles a list of plans dealing with emergency preparedness as required by EMS 07-00 Emergency Preparedness and Response Procedure. The following is a list of Emergency Action Plans that cover FFM.

Completed by: PWC Solid Waste Division

Emergency Plans	Location
Spill Prevention Control and Countermeasure Plan	Environmental Sharedrive
Storm Water Pollution Protection Plan	Environmental Sharedrive
Employee Emergency Preparedness Response Guide	On-site, intranet
Fire Prevention and Response Plan (in Operations Manual per permit requirements)	Operations Manual at all locations
COOP	Sharedrive, on-site at Director's Office

NON-CONFORMITY & CORRECTIVE ACTIONS

Most noncompliance issues are identified during the audit process. Many groups identify issues themselves when preparing for their annual audit, the rest are found by the audit team.

In the past few years, most non-compliances have been related to constraints and delays resulting from the pandemic.

Procedure: 08-00

Worksheets: 08-01

EMS 08-00: Nonconformance and Corrective/Preventive Action Procedure

Organization: Prince William County

Completed by EMS Council

1. Purpose

This procedure defines the responsibilities and process for identifying and investigating non-conformances with the EMS, for taking action to mitigate any negative impacts caused, and for applying corrective and preventive measures.

2. Definitions

Definitions for terms in this document can be found in the EMS Glossary of Terms.

3. References/Supporting Documents

EMS 03-00 Environmental Legal and Other Requirements Procedure

EMS 04-00 Environmental Objectives and Targets Procedure

EMS 09-00 Environmental Communication Procedure

EMS 10-00 Audits and Self Assessments Procedure

4. Procedure

- 4.1. Performance indicators and internal and external EMS compliance audits will be used to detect non-conformance with the EMS.
 - 4.2. Whenever non-conformance with the EMS is detected, the Division/Facility EMS Coordinator shall be notified about the non-conformance.
 - 4.3. The Division/Facility EMS Coordinator shall confer with the affected managers/supervisors on actions needed to mitigate any impacts caused by the non-conformance and for initiating and completing corrective action. EMS 08-01 will be used for this purpose.
 - 4.4. If corrective actions are not taken by the appropriate managers/supervisors and staff within a reasonable period of time, as defined by the EMS Coordinator, the EMS Coordinator will report non-conformance issues to Departmental Management.
 - 4.5. The affected managers/supervisors are responsible for ensuring that the corrective action is completed as agreed.
 - 4.6. The outcome of the corrective action will be assessed during internal EMS annual audits by the audit team to determine if it resolved the problem, if not, further actions will be taken until the problem is resolved.
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EMS 08-00: Nonconformity and Corrective Action Procedure

- 4.7 The Division/Facility EMS Coordinator and affected managers/supervisors will use EMS 08-02 Non-Conformance Resolution Form to detail the causes of non-conformance and to document actions to ensure that the non-conformance does not recur.
- 4.8 The Division/Facility EMS Coordinator shall record any changes to the documented procedure for preventive action if that is warranted.

5. Records

EMS 08-01 Nonconformity and Corrective/Preventive Action

EMS 08-02 Prince William County Non-Conformance Resolution Form

EMS 11-01 Audit Checklist

6. Document Revision Tracking

DOCUMENT REVISIONS			
REVISION NO.	EFFECTIVE DATE	SUMMARY OF CHANGES	NAME
0	March 29, 2010	Initial Release of Document	EMS Council
1	February 3, 2012	Applicability of procedure changed to be inclusive of all EMS Council members	EMS Council
2	February 3, 2012	Formatted for Documentum software (synchronizing of “revision” and “version” numbers)	EMS Council
3	March 13, 2013	Section 4.4: defined consequences if corrective actions are not taken	EMS Council
4	July 15, 2013	Removed footers with date	EMS Council
5	May 20, 2014	“assessed during internal EMS annual audits by the audit team” added to 4.6	EMS Council

COMMUNICATION PROCEDURES

Communication procedure outlines the requirement to record communications with external regulatory bodies so that information can be retained and reviewed by other groups now, and in the future. Copies of the communications are kept in the online document control system.

Additionally, the policy sets requirements for environmental and sustainability outreach to employees and the public. In recent years, the pandemic has altered the scope and means of programming communications but has also resulted in more versatile offerings.

The EMS Council sponsors Earth Day programming in the 3rd week of April. In 2021 the focus was “Connect with the Outdoors” and outdoor walks with trash collection were held all over the County, and many teleworkers participated from home, sending in pictures to share.

For 2022, locations are being offered “Earth Day Kits” which will contain soil, an herb plant plug, and an aluminum Solo cup. The message with it will be to promote the mental and physical health benefits of planting a vegetable garden, as well as the environmental advantages. It will also promote the idea of using recycled aluminum in place of traditional plastic pots and plastic Solo cups.

For public outreach, the EMS Council traditionally sponsored programming at public events, but it is unclear if those will take place in 2022. Instead, the Council is working with the Libraries and their VEEP group to participate with environmental outreach programming they have.

Procedure: 09-00

EMS 09-00: Environmental Communication Procedure

Organization: Prince William County

Completed by EMS Council

1. Purpose

This procedure defines the process for internal and external environmental communication and awareness.

2. Definitions

Definitions for terms in this document can be found in the EMS Glossary of Terms.

3. References/Supporting Documents

EMS 01-01 Environmental Policy Statement
EMS 02-00 Identifying Environmental Aspects/Impacts & Significance Procedure
EMS 03-00 Environmental Legal and Other Requirements Procedure
EMS 04-00 Environmental Objectives and Targets Procedure
EMS 06-00 Environmental Training and Awareness Procedure
EMS 08-00 Emergency Preparedness and Response Procedure
EMS 10-00 Recordkeeping and Reporting Procedure
EMS 11-00 Audits and Self Assessments Procedure

4. Procedure

4.1. Internal environmental communications should ensure that personnel at all relevant levels and functions are aware of:

- PWC's environmental policy,
- Operational control procedures identified for objectives and targets or for general compliance with environmental requirements, and
- Individual responsibilities for achieving objectives and targets.

In addition to employee training, information regarding the EMS program, including changes/revision to policies and procedures, will be distributed through memos and emails from the EMS Council either directly or via the website.

4.2. Suggestions, recommendations, issues, concerns, or ideas associated with environmental issues raised by the employees will be directed to the Departmental and/or Division/Facility EMS Coordinators for consideration.

4.3. External environmental communications should ensure that:

EMS 09-00: Environmental Communication Procedure

- Issues concerning environmental aspects within the EMS are directed to the designated person, such as the Division/Facility EMS Coordinators.
- Reports and/or notifications to regulatory agencies are prepared by appropriate personnel.

Records of external environmental communication should be documented using EMS 09-01 Environmental Communications, or by saving a copy of the entire written communication (letter, email, memo) into the EMS document control system.

- 4.4 The Division/Facility EMS Coordinator should periodically evaluate and determine the effectiveness of the communication process and discuss this with the EMS Council.
- 4.5 The EMS Council should periodically evaluate the effectiveness of County-wide communication of the program's goals and successes.
- 4.6 Records of all external environmental communication should be maintained as per EMS 10-00 Recordkeeping and Reporting Procedure.

5. Document Revision Tracking

DOCUMENT REVISIONS			
REVISION NO.	EFFECTIVE DATE	SUMMARY OF CHANGES	NAME
0	March 29, 2010	Initial Release of Document	EMS Council
1	February 3, 2012	Applicability of procedure changed to be inclusive of all EMS Council members; change to define use of 09-01 for external communication only	EMS Council
2	February 3, 2012	Formatted for Documentum software (synchronizing of "revision" and "version" numbers)	EMS Council
3	July 15, 2013	Removed footers with dates	EMS Council
4	May 20, 2014	Removed Customer Service Form and renumbered accordingly	EMS Council
5	November 13, 2017	4.3: Added option of saving entire document or email into the system instead of EMS 09-01 being the only option 4.5: This was added, requiring	EMS Council

EMS 09-00: Environmental Communication Procedure

		EMS Council to periodically review communications	
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REPORTING AND RECORDKEEPING

In 2012, the EMS Council adopted a document control system that houses all EMS program documents. Besides procedures and worksheets, the system houses meeting minutes, training presentations, regulatory records, and photos from outreach events.

In order to ensure group's review procedures annually, the EMS Council dedicates one meeting a year to review each procedure. If a Council member misses that meeting, they must meet with the Program Coordinator or the Department EMS Coordinator to review the procedures and demonstrate their knowledge of them. For worksheets, annual updates are required, and the document control system records that date. Worksheet 10-01 is maintained by the Department EMS Coordinator.

Procedure: 10-00

Worksheets: 10-01

EMS 10-00: Recordkeeping and Reporting Procedure

Organization: Prince William County

Completed by EMS Council

1. Purpose

This procedure defines the mechanism for the management of environmental and EMS records and documents.

2. Definitions

Definitions for terms in this document can be found in the EMS Glossary of Terms.

3. References/Supporting Documents

All EMS Procedures and documents

4. Procedure

- 4.1. The Division/Facility EMS Coordinators will annually review the EMS 03-01 Environmental Legal and Other Requirements and facility permits and plans to determine what regulatory records and reports are required. Examples include:
 - Documents demonstrating compliance with permits and regulatory requirements, including notifications, reports, and plans,
 - Results of audits and management reviews,
 - Training documentation,
 - Results of operational controls (maintenance, design, manufacture),
 - Corrective and preventive actions.
- 4.2 A County-approved document control system will be used to house EMS procedures, audit results, corrective actions, and other documents related to the EMS program. This system will track and save all versions of documents and subsequent edits.
- 4.3 Training records may be maintained using a County-designated online training system.
- 4.4 Environment records will be maintained for easy retrieval as required by regulation or for five years if there is no regulatory required retention. Subsequent to this time they will be archived for up to an additional five years.
- 4.3 EMS records will be maintained for easy retrieval for five years prior to archiving.

5. Records

All EMS related records. See EMS 10-01 Environmental / EMS Recordkeeping.

6. Document Revision Tracking

DOCUMENT REVISIONS			
REVISION NO.	EFFECTIVE DATE	SUMMARY OF CHANGES	NAME
0	March 29, 2010	Initial Release of Document	EMS Council
1	February 3, 2012	Applicability of procedure changed to be inclusive of all EMS Council members; elimination of 10-02 which was incorporated into 10-01.	EMS Council
2	February 3, 2012	Formatted for Documentum software (synchronizing of “revision” and “version” numbers)	EMS Council
3	July 15, 2013	Removed footers with dates	EMS Council
4	May 20, 2014	“annually” added to 4.4.1	EMS Council
5	November 13, 2017	Sections 4.2 and 4.3 added to specify document control system and online training record retention; rest of procedure re-numbered accordingly	EMS Council

EMS 10-01 ENVIRONMENTAL/EMS RECORDKEEPING FFM

This document provides a description of all recordkeeping and reporting required by the EMS or applicable environmental regulations.

Document Number - Reference number associated with document name

Document Name - Description of record or report

Responsible Party - The person responsible for the completion, submittal, and retention of the record or report.

Last Review Date - Date that the document was last reviewed by the Department/Facility EMS Coordinator

			Last Review Date
Document Number	Document Name	Responsible Party	FFM
PWC Environmental Policy			
01-00	Environmental Policy Statement Procedure	EMS Council	3/14/2022
01-01	PWC Environmental Policy Statement	Board of Supervisors	3/24/2022
Environmental Aspects/Impacts and Significance			
02-00	Identifying Environmental Aspects/Impacts & Significance	EMS Council	3/14/2022
02-01	Significance Matrix	EMS Council	3/14/2022
02-02	Environmental Aspects/Impacts Worksheet	Department EMS Coordinator	3/24/2022
Environmental Legal and Other Requirements			
03-00	Environmental Legal and Other Requirements Procedure	EMS Council	3/14/2022
03-01	Environmental Legal and Other Requirements	Department EMS Coordinator	3/24/2022
Environmental Objectives and Targets			
04-00	Environmental Objectives and Targets Procedure	EMS Council	3/14/2022
04-01,04-02	Environmental Objectives and Targets	Department EMS Coordinator	3/24/2022
Roles, Responsibilities and Authorities			
05-00	Roles, Responsibilities and Authorities Procedure	EMS Council	3/14/2022
05-01	Roles, Responsibilities and Authorities	Department EMS Coordinator	3/24/2022
Environmental Training and Awareness			
06-00	Environmental Training and Awareness Procedure	EMS Council	3/14/2022
06-01	Training Matrix	Department EMS Coordinator	3/24/2022
Emergency Preparedness and Response			
07-00	Emergency Preparedness and Response Procedure	EMS Council	3/14/2022
07-01	List of Emergency Response Plans	Department EMS Coordinator	3/24/2022
Nonconformance and Corrective/Preventive Action			
08-00	Nonconformity and Corrective/Preventive Action Procedure	EMS Council	3/14/2022
08-01	Nonconformity and Corrective/Preventive Action	Division/Facility EMS Coordinator	3/24/2022
08-02	Non-Conformance Resolution	Division/Facility EMS Coordinator	3/24/2022
Environmental Communication			
09-00	Environmental Communication Procedure	EMS Team	3/14/2022
09-01	Environmental Communication	Department EMS Coordinator	3/24/2022
Recordkeeping and Reporting			
10-00	Recordkeeping and Reporting Procedure	EMS Council	3/14/2022

			Last Review Date
Document Number	Document Name	Responsible Party	FFM
10-01	Environmental/EMS Recordkeeping	EMS Council	3/24/2022
Audits and Self Assessments			
11-00	Audits and Self Assessments Procedure	EMS Council	3/14/2022
11-01	Environmental/EMS Internal Audit/Assessment	EMS Council	3/24/2022
Operational Control			
12-00	Operational Control Procedure	EMS Council	3/14/2022
12-01	Operational Control Summary	Department EMS Coordinator	3/24/2022
Management Review			
13-00	Management Review Procedure	EMS Council	3/14/2022
13-01	Management Review Summary	EMS Council	3/24/2022

AUDITS (SELF-ASSESSMENTS)

The PWC EMS Council has a strong internal audit program, with all FFM VEEP participating divisions taking turns serving on the audit team.

The procedure describes how to schedule an audit, the method used to conduct the audit, and actions to take on items of concern. The audit process includes a full facility inspection, along with the EMS paperwork review. The procedure defines consequences for not scoring well on the audit. If a low score is received in a specific category, such as fuel tank compliance, the group must set a new Target & Objective to address that issue. If they continue to score low in that category, they will be placed on probation in the EMS program or will be removed from it.

Procedure: 11-00

Worksheets: 11-01

EMS 11-00: Audits and Self Assessments Procedure

Organization: Prince William County

Completed by EMS Council

1. Purpose

This procedure defines the process for conducting internal audits. The procedure describes how to arrange an audit, the method used to conduct the audit, and actions to take on items of concern, if any, and the procedure for third party audits.

2. Definitions

Definitions for terms in this document can be found in the EMS Glossary of Terms.

3. References/Supporting Documents

All EMS Documentation

4. Procedure

4.1. Internal Audits

4.1.1. The EMS Coordinators will be responsible for ensuring that their facility has an Internal EMS Audit conducted on an annual basis. Each quarter one or more Divisions/facilities will be audited. Table 4.1.1 shows anticipated internal audits to be conducted each quarter during the fiscal year. This schedule may be altered at the discretion of the Audit Team.

Table 4.1.1
Annual Internal Audit Schedule

Facility	Audit Quarter
Environmental Services (CS and MFPM) Fire and Rescue	Q1
B&G Parks & Recreation	Q2
Fleet Management Historic Preservation	Q3
Solid Waste Libraries Police	Q4

4.1.2. An Audit Team will be chosen by the EMS Council for each fiscal year. The Audit Team will consist of at least three members, each from a different division, and may also include Department Coordinators and the EMS Coordinator.

4.1.3. The Audit Team will contact the facility EMS Coordinator to set a date for the audit to take place when the EMS Coordinator is available.

4.1.4. A Lead Auditor will be chosen from the audit team by the EMS Council. The Lead Auditor may not be the Division/Facility EMS Coordinator or a member of an EMS Team for the facility being audited. Should this situation arise, the Council will appoint a temporary alternative Lead Auditor. The Lead Auditor will be responsible for compiling the comments of the Audit Team in the audit report.

4.1.5. The Audit Team will use EMS 11-01, Facility Audit Checklist, while conducting the audit. This checklist will be developed and approved by the EMS Council to address evaluate record-keeping and paper-work aspects of the EMS program, as well as a full facility audit that includes evaluations of 5 critical areas of compliance: EMS Awareness, Tanks, Chemicals, Universal Waste, and General Disposal and Discharge. The audit will result in a numerical score for each critical area of compliance.

The Facility Audit Checklist will also contain and clearly identify high priority compliance issues that pose a significant risk to the County's overall compliance program and/or are identified by the EMS Council as to being critical to a facility's successful EMS program.

4.1.6 Each member of the Audit Team will be given a copy of EMS 11-01 for notes during the audit. The audit team may divide into smaller groups to complete the audit in a timely manner, with a minimum of two audit team members being present for each aspect evaluated.

4.1.7. Subsequent to the conclusion of the audit, the Audit Team will convey its preliminary findings to facility management/operational staff and the Division/Facility EMS Coordinator to ensure the accuracy of the information reviewed and to clarify any misunderstandings.

4.1.8. The Lead Auditor will compile comments, suggestions, and recommendations from the Audit Team. The Lead Auditor will finalize 11-01 and include a list of follow-up actions, as needed (EMS 08-01 Nonconformity and Corrective/Preventive Action).

4.1.9 Should a facility/group receive a score of less than 70% on high priority items identified by the EMS Council in EMS 11-01, the Lead Auditor will notify EMS Coordinators and the Department Director that the facility will be placed on probation in the EMS program for one year. If the facility/group scores <70% on these high priority items two years in a row, they will be removed from the EMS program and may reapply in the future.

4.1.8. The facility EMS Coordinator will complete EMS 08-02 Non-Conformance Resolution for each non-conformance and will track follow-up actions with this document. In addition, if a score of less than 70% was received in one or more of the 5 critical areas of compliance, the EMS Coordinator will create and record an action plan in document 04-02,

Objectives and Targets Action Plan, to improve compliance in this area(s). The facility must improve their audit score by at least 10% in this area(s) in the following year's audit or that group will be placed on probation.

4.1.9. Should a facility/group be placed on probation, the EMS Coordinator and Department Director will schedule and meet with Risk Management on a quarterly basis to report on the progress made and on future plans in addressing nonconformities. Should the facility/group fail to do this, or fail to make adequate progress, they will be removed from the EMS program and may reapply in the future.

After four successful quarters of program improvement and a successful audit, the facility/group will be removed from probation.

4.1.10 Documents from the audit including EMS 11-01 Audit Checklist, EMS 08-01 Nonconformity and Corrective/Preventive Action, EMS 08-02 Non-Conformance Resolution Form, and any other applicable documents will be kept in the EMS files in a County-approved document control system.

4.2. Third Party Audits

4.2.1. The EMS Council and the Division/Facility EMS Coordinators can arrange to have a Third Party conduct an EMS and/or regulatory compliance audit of their facility.

4.2.2. The Auditor will provide the EMS Council and the Division/Facility EMS Coordinators with an audit plan and schedule prior to the site visit. At the conclusion of the audit, the Auditor will convey preliminary findings to the management/operational staff and the Division/Facility EMS Coordinators to ensure the accuracy of the information reviewed and to clarify any misunderstandings. The Auditor will also provide an anticipated schedule for the audit report.

4.2.3. The Auditor will submit a final report of the audit findings, including any instances of non-conformance with the EMS and recommended actions.

4.2.4. Any necessary facility actions will be documented on EMS 08-01 Nonconformity and Corrective/Preventive Action and EMS 08-02 Non-Conformance Resolution Forms.

4.2.5. The EMS Coordinator and EMS Council will track follow-up actions documented on EMS 08-01 Nonconformity and Corrective/Preventive Action and EMS 08-02 Non-Conformance Resolution Form.

4.2.6 The final audit report and any documents including EMS 08-01 and EMS 08-02 will be retained in a County-approved document control system.

5. *Records*

EMS 08-01 Nonconformity and Corrective/Preventive Action

EMS 08-02 Non-Conformance Resolution Form

EMS 11-01 Audit Checklist

6. Document Revision Tracking

DOCUMENT REVISIONS			
REVISION NO.	EFFECTIVE DATE	SUMMARY OF CHANGES	NAME
0	March 29, 2010	Initial Release of Document	EMS Council
1	February 3, 2012	<ul style="list-style-type: none">• Applicability of procedure changed to be inclusive of all EMS Council members• Eliminated requirement of 11-02 and 11-03• Specified consequences of 10 or more nonconformance issues• Redefined authorities of audit team.	EMS Council
2	February 3, 2012	Formatted for Documentum software (synchronizing of “revision” and “version” numbers)	EMS Council
3	February 15, 2013	Deleted footers with dates	EMS Council
4	November 13, 2017	Significant changes made throughout the procedure to reflect the Council’s new approach to audits that expands it from a paperwork review to a full facility compliance audit, with the ability to place groups on probation and/or remove them from the program for continued non-compliance	EMS Council

EMS Audit Overview Overview

(for more information, see procedure EMS11-00)

The Facility Audit Checklist will be used by the audit team to conduct a facility and program audit. The form clearly identifies high priority compliance issues in red. These are issues that pose a significant risk to the County's overall compliance program and/or are identified by the EMS Council as to being critical to a facility's successful EMS program

Should a facility/group receive a score of less than 70% in one or more of the 5 critical areas of compliance, the EMS Coordinator will create and record an action plan in document 04-02, Objectives and Targets Action Plan, to improve compliance in this area(s).

Should a facility/group receive a score of less than 70% on high priority items identified by the EMS Council in EMS 11-01, the Lead Auditor will notify EMS Coordinators and the Department Director that the facility will be placed on probation in the EMS program for one year. If the facility/group scores <70% on these high priority items two years in a row, they will be removed from the EMS program and may reapply in the future.

Please Note: Critical Areas are noted on the checklist with red font

Some activities may result in both the "yes" and "no" columns being marked on the checklist. This can occur when there is more than one incident of an activity with different compliance levels or conflicting information is provided by personnel. For example, if bulbs are stored in two areas, one area might be compliant and one not, so both the "yes" and "no" column would be checked with more details provided in the comments section.

Group/Facility Name:

Fleet

Auditor/Audit Team:

Jennifer Boeder, Kyle Leas, Yancee McLemore, Kurt Russell, Joe Hopper,
Trent Magill, Jens Kjar

Facility Checklist: Score Card

Categories	Yes	No	Score	Comments
EMS Program Elements	7	5	58	All EMS Groups will be low in this area because it was a low priority during COVID response. Plans are in place to bring worksheets up to date, and Fleet continues to do an excellent job with their environmental programming.
AST	18	0	100	
Chemicals	10	1	91	
Universal Waste	19	1	95	
General	25	1	96	
High Priority Compliance Issues (red font)	20	2	91	

The audit showed a strong EMS program. A potential goal identified for the coming year is the piloting of solar lighting inside of sheds to reduce slip/trip hazard. Risk & Wellness will follow up with support on changing out aerosol puncture drum. Plans already in place to update goals, training, and other elements of the program that were low priority for the EMS Council during COVID response. Fleet will contact Risk & Wellness if they would like support for obtaining secondary containment for drums storage inside of tank room, if that plan proceeds (note, this is not a requirement, just a best practice)

OPERATIONAL CONTROL PROCEDURE

This procedure describes the use and development of operational controls intended to mitigate and control, to the extent possible, the environmental impacts associated with the significant environmental aspects. Operational controls may be in the form of a standard operating procedure, a policy, a memorandum, or any other management directive.

Procedure: 12-00

Worksheet: 12-01

EMS 12-00: Procedure for Operational Controls

Organization: Prince William County

Completed by EMS Council

1. Purpose

This procedure will describe the use and development of operational controls intended to mitigate and control, to the extent possible, the environmental impacts associated with the significant environmental aspects.

2. Definitions

Definitions for terms in this document can be found in the EMS Glossary of Terms.

3. References / Supporting Documents

EMS 02-00 Identifying Environmental Aspects/Impacts and Significance
EMS 02-01 Environmental Aspects/Impacts Worksheet
EMS 03-00 Environmental Legal and Other Requirements
EMS 03-01 Environmental Legal and Other Requirements
EMS 04-00 Environmental Objectives and Targets
EMS 04-01 Environmental Objectives and Targets
EMS 04-02 Action Plans

4. Procedure

- 4.1. The Division/Facility EMS Coordinators will be responsible for evaluating operations involving significant aspects identified under EMS 02-00: Identifying Environmental Aspects/Impacts & Significance Procedure. Operational controls will be established to provide for the proper management of significant aspects and will be developed where their absence could lead to a deviation from the environmental policy or the objectives and targets. Coordinators will strive to create Standard Operating Procedures (SOPs) and engineered controls as the preferred form of operational controls.
 - 4.2. Processes and activities related to significant aspects will be identified by the Division/Facility EMS Coordinators. These activities will be assessed to determine the need for written work instructions.
 - 4.3. If the operation is currently controlled under an SOP, this SOP will be reviewed by the Division/Facility EMS Coordinators to ensure that the current procedure takes proactive steps in preventing negative environmental impacts. The SOP should provide instruction to complete the task to get the desired outcome while controlling for potential environmental issues.
 - 4.2. If the operation is not currently controlled by an SOP, an instructional document will be developed that provides detail on how to complete the task/operation and get the desired outcome while controlling for potential environmental issue. This
-

EMS 12-00: Procedure of Operational Controls

document will be posted in a common area and/or annually reviewed with personnel as part a training session or a staff meeting.

- 4.3. Supervisors, with the assistance of the Division/Facility EMS Coordinators, will ensure that affected employees are made aware of revisions to or development of SOPs and instructional documents. This can be done as a training session, on-the-job training, or as part of a staff meeting.
- 4.4. Operational controls will be documented using EMS 12-01. This document will list significant environmental aspects/impacts, related operations, and identify the SOP or instructional document used as a method of control.

5. Records

EMS 12-01 Operational Control Summary

6. Document Revision Tracking

DOCUMENT REVISIONS			
REVISION NO.	EFFECTIVE DATE	SUMMARY OF CHANGES	NAME
0	March 29, 2010	Initial Release of Document	EMS Council
1	February 17, 2012	Applicability of procedure changed to be inclusive of all EMS Council members; allow for instructional document to be used in place of a SOP	EMS Council
2	February 17, 2012	Formatted for Documentum software (synchronizing of “revision” and “version” numbers)	EMS Council
3	July 15, 2013	Footers with dates removed	EMS Council
4	November 13, 2017	4.1: Last sentence was added to specific SOPs and engineered controls as the most preferred	EMS Council

EMS 12-01: Operational Control Matrix

FFM

The following table documents operations that have the potential to impact environmental aspects and the operational control procedures in place to prevent negative environmental impacts.

Aspect / Impact - Describe an element of the activities, products, or services that are performed

SOP or OG - Reference a specific SOP or Operating Guideline

Description / Comments - Briefly describe the purpose or note any other comments

Person Responsible - Cite the issuer or other responsible party for the SOP

Status - Note if the SOP is still being developed, in draft form, awaiting approval, or is currently in place.

Target Date- If the SOP is currently not in place, suggest a date.

Training - Type of training necessary and where records can be found.

Aspect / Impact	SOP/OG - Name & Number	Description / Comments	Person Responsible	Status	Training*
Stormdrain protection	SWPPP, SPCC, IDDE County Policy	IDDE sets requirements, SPCC and SWPPP set site-specific procedures	FFM Staff	In place	Annual training
Pollution Prevention - Plastic	Environmental Policy Statement	Contains language on pollution prevention and single-use plastics	FFM Staff	In place	Annual training
Pollution Prevention - EV Stations	Direction from the Board	New sustainability program directive expected in 2022	Property Management Staff	In process	TBD
Pollution Prevention- Reuse of Landfill Gas	Direction from the Board	New sustainability program directive expected in 2022	B&G Staff	In process	TBD
Pollution Prevention - Solar Lighting	Environmental Policy Statement	Contains language on identifying renewable energy sources	B&G Staff	In place	none

PROGRAM REVIEW PROCEDURE

This procedure is written to ensure the effectiveness of the Prince William County EMS program and its continual improvement. EMS program reviews periodically and cover the important elements and outcomes of the EMS. The review is intended to provide a forum for discussion and improvement of the EMS and to provide management with a vehicle for making any changes to the EMS necessary to achieve the organization's goals.

Procedure: 13-00

EMS 13-00: EMS Council - Program Review

Organization: Prince William County

Completed by EMS Council

1. Purpose

This procedure will ensure the effectiveness of the Prince William County EMS program and its continual improvement. EMS program reviews should occur periodically and cover the important elements and outcomes of the EMS. The review is intended to provide a forum for discussion and improvement of the EMS and to provide management with a vehicle for making any changes to the EMS necessary to achieve the organization's goals.

2. Definitions

Definitions for terms in this document can be found in the EMS Glossary of Terms.

3. References/Supporting Documents

All EMS Documents

4. Procedure

4.1. EMS Council members will meet at least four times a year to review the program.

4.2 The EMS Coordinator, with input from the EMS Council, is responsible for scheduling the meeting and preparing an agenda. The agenda will be distributed to attendees prior to the meeting to allow time to review and formulate questions and/or comments. *(The agenda should be detailed enough to allow those not familiar with the EMS to gather a general understanding of it prior to the meeting and prepare questions.)*

4.3. The EMS Coordinator and the EMS Council will review and discuss each of the following program aspects at least once annually:

- PWC Environmental policy,
- List of individuals responsible for the major parts of the EMS,
- List of the significant environmental aspects and the significance criteria,
- Current compliance status of facility operations and any potential environmental requirements that may require near-term action,
- List of objectives and targets and current status,
- Brief description of other accomplishments of the EMS, and
- Results of most recent internal EMS and/or compliance audits, any corrective actions required, and the current status of those actions.

4.4 After reviewing the information provided in Section 4.3, the Council may direct specific and/or significant changes in the scale and direction of the EMS program in order to improve its effectiveness and ensure that the program supports the Environmental Policy and any environmental initiatives of the Board of Supervisors.

4.5 The EMS Coordinator will prepare meeting minutes. These minutes will be retained and made available to all Council members, along with a copy of the agenda and the sign-in sheet, which is used to document attendees.

4.6 An annual report of EMS program status and progress will be provided annually by Risk Management and the EMS Coordinator to Department Directors, either as an in-person presentation or as a written report.

5. Records

Meeting Agenda

Sign-in sheet

Meeting Minutes

6. Document Revision Tracking

DOCUMENT REVISIONS			
REVISION NO.	EFFECTIVE DATE	SUMMARY OF CHANGES	NAME
0	March 29, 2010	Initial Release of Document	EMS Council
1	February 17, 2012	<ul style="list-style-type: none">• Applicability of procedure changed to be inclusive of all EMS Council members• Alters procedure from “management review” to “EMS Council – Program Review”• Removes specified forms for agenda and sign-in, 13-01 and 13-02, leaving the format to the discretion of the Council• Responsibility assigned to EMS Coordinator	EMS Council
2	February 17, 2012	Formatted for Documentum software (synchronizing of “revision” and “version” numbers)	EMS Council
3	July 15, 2013	Deleted footers with dates	EMS Council
4	July 15, 2013	Changed title of document from management review to program review	EMS Council
5	July 15, 2012	Sections 4.3 and 4.4 updated to better reflect the role of the Coordinator and Council in	EMS Council

EMS 13-00 Management Review Procedure

		reviewing the EMS program	
6	November 13, 2017	4.6 was added, specifying an annual report to dept directors	EMS Council

POLLUTION PREVENTION

At a minimum, one Council meeting a year is dedicated to the discussion of Pollution Prevention and activities the participating members can undertake to support this goal. The Council has found the most effective means to drive Pollution Prevention efforts is to work as a group and implement programs and policies that apply to all County personnel and facilities. In recent years, the focus of Pollution Prevention efforts have been on safer chemicals and illicit discharge prevention.

Safer chemicals became a focus of the Council as costs for disposing of unused, hazardous cleaning products kept increasing. The Council formed a sub-committee, the Smarter Chemical Workgroup, to identify affordable, effective and safer cleaning products with a goal of reducing waste and the hazard level of waste, as part of the Pollution Prevention goal. This program became even more critical during the pandemic, and allowed for expansion of safer disinfection practices including electrostatic spraying and the use of AirPHx systems that utilize a hydrogen peroxide chemistry to purify the air.

The Illicit Discharge Prevention policy was created by the EMS Council to address risks associated with activities that cover all VEEP participating groups: outdoor storage, ice/snow management, vehicle fueling, tank management, landscaping activities, and vehicle and equipment washing.

VISION

Clear, efficient, and defined Environmental program championed by management that drives compliance for all employees and facilities, with dedicated resources and employee awareness at all levels.

Vision Components

Compliance for facilities and employees

Management who is educated in regulatory requirements and drives the program forward

A general awareness of environmental compliance at all levels and ownership, accountability, and engagement at needed levels

Dedicated resources, both money and personnel

Essential Elements

Department managed EMS programs with support and oversight from an independent office

Executive management directive in support of vision and/or policy

Efficient policy and record keeping system(s) that connects stakeholders throughout the County government

Dedicated environmental personnel that can work in conjunction to safety personnel, but not in combined positions or with combined resources

Accountability for purchase partners and vendors

Strengths

- Established EMS program that facilitates compliance
- Active Council with a history of successful projects achieved through unity and strong working relationships
- Environmentally knowledgeable allies in various positions and departments throughout the County government
- Generational and agency specific interest and zealousness for environmental issues

Weaknesses

- Mistaken perception that environmental initiatives are superfluous, voluntary, and not applicable to most employees
- Inconsistent levels of management support arising from lack of regulatory knowledge and associated risks
- Facilities that do not inherently meet regulatory requirements due to age, maintenance, and/or design
- Personnel and vendors that are unaware and/or not compliant with regulatory requirements

SWOT Analysis

Opportunities

- Unify internal and external compliance programs across departments to reduce resource needs
- Create program efficiencies that generate cost savings and reduce risk exposure
- Use innovative solutions and local partner organizations to achieve beyond-compliance program
- Be recognized by public and regulatory bodies as environmental stewards

Threats

- Resource needs remain unmet and/or resources are combined with safety resources
- Aggressive regional enforcement could force activities that delay long-term planning
- No BOCS, Communication support for overall program
- Current focus on environmental compliance fades over time

Photos

FFM hosted its first Snow Rodeo for County staff in October 2021 that included educational information on appropriate amounts of salt use and using snow clearing methods effectively (plowing/shoveling/blowing/sweeping) to reduce need for chemical additives.



The EMS Council hosted an Earthday event in April 2021 to clean up trash around County facilities with lunchtime wellness walks, picking up over 200-lbs of trash.



Training on environmental topics was conducted on-site at over 10 FFM sites in late 2021, and environmental audits were conducted by the EMS audit team.

