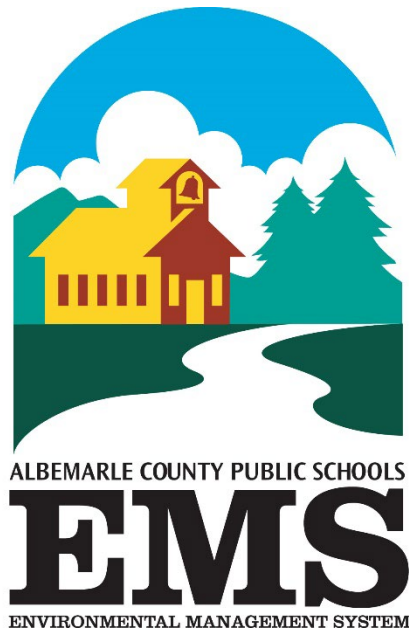


# Virginia Environmental Excellence Program

## E3 Renewal Application

June 30, 2022

Albemarle County Public Schools



#### A. Virginia Environmental Excellence Program (VEEP) Renewal Application

The VEEP Renewal Application for Albemarle County Public Schools (ACPS) is attached. During the previous 3-year VEEP membership, environmental efforts have become more integrated into the school Division's strategic planning. ACPS is actively developing action items related to the Albemarle County Climate Action Plan. Climate action planning as it relates schools it being led by the newly formed Advisory Committee for Environmental Sustainability (ACES). The strategies developed as part of this process will take the Division's environmental and sustainability goals to the next level.

This application applies to the following facilities. Changes since the last application include the change of names for the schools in bold.

- Albemarle High School (2775 Hydraulic Rd., Charlottesville, VA 22901)
- Monticello High School (1400 Independence Way, Charlottesville, VA 22902)
- Western Albemarle High School (5941 Rockfish Gap Tpk., Crozet, VA 22932)
- **Community Lab School** (1200 Forest St., Charlottesville, VA 22903) – formerly Murray High
- Burley Middle School (901 Rose Hill Dr., Charlottesville, VA 22903)
- Henley Middle School (5880 Rockfish Gap Tpk, Crozet, VA 22932)
- High School Center I (1180 Seminole Trail, Charlottesville, VA 22901)
- **Journey Middle School** (210 Lambs Lane, Charlottesville, VA 22901) – formerly Jouett
- **Lakeside Middle School** (2801 Powell Creek Dr., Ch'ville, VA 22911) – formerly Sutherland
- Walton Middle School (4217 Red Hill Rd., Charlottesville, VA 22903)
- Agnor-Hurt Elementary School (3201 Berkmar Dr., Charlottesville, VA 22901)
- Baker-Butler Elementary School (2740 Proffit Road, Charlottesville, VA 22911)
- Broadus Wood Elementary School (185 Buck Mountain Rd., Charlottesville, VA 22936)
- Brownsville Elementary School (5870 Rockfish Gap Tpk, Crozet, VA 22932)
- **Mountain View Elementary School** (1757 Avon St. Ext., Charlottesville, VA 22902) – Formerly Cale
- Crozet Elementary School (1407 Crozet Ave., Crozet, VA 22932)
- Greer Elementary School (190 Lambs Lane, Charlottesville, VA 22901)
- Hollymead Elementary School (2775 Powell Creek Dr., Charlottesville, VA 22911)
- Meriwether Lewis Elementary School (1610 Owensville Rd., Charlottesville, VA 22901)
- Murray Elementary School (3251 Morgantown Rd., Ivy, VA 22945)
- Red Hill Elementary School (3901 Red Hill Sch. Rd., North Garden, VA 22959)
- Scottsville Elementary School (7868 Scottsville Rd., Scottsville, VA 24590)
- Stone-Robinson Elementary School (958 N. Milton Rd., Charlottesville, VA 22901)
- Stony Point Elementary School (3893 Stony Point Rd., Keswick, VA 22947)
- Woodbrook Elementary School (100 Woodbrook Dr., Charlottesville, VA 22901)
- Vehicular Maintenance Facility (110 Lambs Lane, Charlottesville, VA 22901)
- Building Services Department (2751 Hydraulic Rd, Charlottesville, VA 22901)

**B. Policy Statement**

The Policy Statement outlining Albemarle County Public Schools' (ACPS) commitment to the environment includes compliance, pollution prevention, training, communication and continuous improvement.

Attachment:  
Environmental Management Policy

## **ENVIRONMENTAL MANAGEMENT POLICY**

Albemarle County Public Schools (“Division”) is committed to protecting human health and the environment. This commitment includes meeting or exceeding federal, state, local and other applicable environmental requirements; instituting pollution prevention initiatives where practicable and feasible; developing and implementing an Environmental Management System (EMS); continually improving the EMS by setting environmental objectives and targets; and developing management programs to ensure the environmental objectives and targets are met.

ACPS is committed to protecting the indoor air quality of its campuses for the safety, health and comfort of students, staff and visitors. Strong scents and fragrances can contribute to poor indoor air quality that can be unhealthy to building occupants. The use of air fresheners can trigger asthma and migraines, and these products may contain chemicals that can cause adverse health effects, especially in children. Due to these concerns plus the reported adverse effects on people with scent sensitivity, the use of fragrance-emitting products (including, but not limited to, plug-in air fresheners, candles, essential oils, scent warmers, wax melters, diffusers, spray air fresheners, etc.) in classrooms, common areas and student restrooms is not allowed in ACPS buildings. ACPS requests that employees working with students or colleagues who are sensitive to fragrances refrain from using perfumes and colognes prior to work or during the workday. In the event that a staff member or student has severe allergies or sensitivities to scents, the individual should give prior notification to an administrator, to the extent that is practicable.

This environmental management policy shall be communicated to all employees of the Division, and shall be made available to the public upon request.

Approved: January 26, 2006  
Amended: April 11, 2019; November 7, 2019  
Reviewed: April 10, 2014

## ENVIRONMENTAL MANAGEMENT

An Environmental Management System (EMS) will be developed and implemented for Albemarle County Public Schools. The main purpose of the EMS is to track and manage all environmental and sustainability aspects of the Division. These areas include, but are not limited to, chemical management, indoor air quality, solid and hazardous waste disposal, asbestos management, drinking water management, water usage, electricity usage, renewable energy, and other sustainability initiatives.

The foundation of the EMS will be the Environmental Management Policy, which will include a commitment to pollution prevention, continuous improvement, as well as a commitment to meet or exceed federal, state and local environmental requirements.

The Division's EMS shall include, but not be limited to, a series of written procedures for:

1. Identifying significant environmental aspects and impacts;
2. Setting and meeting environmental objectives and targets;
3. Roles and responsibilities for individuals responsible for implementing the EMS;
4. EMS awareness training and environmental training;
5. Internal and external communication regarding environmental issues;
6. Environmental recordkeeping;
7. Compliance with federal, state, and local environmental requirements; and
8. Periodic management review of the EMS to include necessary changes.

EMS development will generate numerous standard operating procedures (SOPs), which shall establish detailed procedures for various Division operations and activities, i.e. medical waste handling, recycling, chemical disposal, etc. These SOPs shall be fully implemented by all designated responsible persons in order to ensure the success of the EMS.

The Deputy Director of Building Services, in conjunction with the EMS Steering Committee, is responsible for developing the EMS procedures, and for conducting the employee training necessary for proper implementation of the EMS. The EMS Steering Committee shall consist of the Division Chief Operating Officer, the Director of Building Services, the Deputy Director of Building Services, and the Environmental, Health & Safety Coordinator.

The Superintendent has ultimate authority over the EMS, and shall review, sign and approve all EMS procedures before they are officially issued.

Approved: January 26, 2006  
Amended: April 10, 2014; April 11, 2019

**C. Identification of Environmental Impacts**

ACPS identifies and evaluates environmental impacts using Procedure EMS-01-Environmental Aspects and Impacts. All environmental aspects and impacts are included in A1-EMS-01: Aspect & Impact Matrix, and the most significant are highlighted.

Attachments:

EMS-01-Aspects-Impacts

A1-EMS-01: Aspect-Impact-Matrix



Albemarle County Public Schools

**Subject:**

**Environmental Aspects and Impacts**

Document No.: EMS-01	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/29/2022	Page: 1 of 5	Prepared By: LCS	Approved By: JPL, JT, JD, GS
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## 1.0 PURPOSE

The purpose of this procedure is to formalize and document the process used to identify the environmental aspects and impacts of Albemarle County Public Schools' activities, products, and services. More specifically, this procedure will establish and document a process for determining the activities, products, and services that can have significant impacts on the environment. These significant impacts will be considered when developing, implementing, and maintaining the Albemarle County Public Schools' EMS.

## 2.0 SCOPE

This procedure applies to all operations within Albemarle County Public Schools, over which the County Schools can have an influence with respect to environmental impacts.

## 3.0 DEFINITIONS

**Environmental Aspects** -- Elements of Albemarle County Public Schools activities, products, and services that can adversely or positively affect the natural environment or health of employees/students. Example: *Fuel storage at the Vehicle Maintenance Facility.*

**Significant Environmental Aspects** -- Environmental aspects that can have a **substantial** environmental **impact** based on a series of designated significance criteria.

**Environmental Impacts** -- Any potential change to the environment, whether positive (beneficial) or negative (adverse), resulting from Albemarle County Public Schools' environmental aspects. An impact is essentially the "effect" of any aspect with respect to the environment. Example: *Soil or groundwater pollution from a fuel spill (negative impact).*

**Significance Criteria** -- The set of measures used to quantify the importance of the identified environmental aspects of Albemarle County Public Schools.

**Activities, products, and services** -- The entire spectrum of operations, routine and otherwise, that Albemarle County Public Schools undertakes in its administration, instruction, etc.



**Albemarle County Public Schools**

**Subject:**

**Environmental Aspects and Impacts**

Document No.: EMS-01	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/29/2022	Page: 2 of 5	Prepared By: LCS	Approved By: JPL, JT, JD, GS
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## 4.0 RESPONSIBILITY

4.1 The Environmental Project Manager, or designee, shall:

- Develop draft of environmental Aspects and Impacts and ranking criteria (Aspects/Impacts Matrix, Document # A1-EMS-01)
- Collaborate with the EMS Steering Committee to finalize ranking criteria used to rank aspects for significance and to review Aspect/Impacts Matrix
- Elicit feedback from EMS Steering Committee and EMS Core Team members on Aspects, Impacts, and Significant Impacts. Incorporate this feedback, as necessary
- Collaborate with EMS Steering Committee and EMS Core Team members to conduct an annual review (EMS Management Review) of the Aspects/Impacts Matrix, and update/add to the matrix and associated significance rankings, as necessary
- Communicate any significant changes made to this procedure and related documents to EMS Steering Committee, EMS Core Team, and all appropriate personnel

4.2 The EMS Steering Committee members shall:

- Review and approve this procedure, the Aspect/Impact Matrix draft, and any other updated procedure/matrix drafts resulting from periodic EMS Management Review meetings
- Prepare an annual report for the School Board and Division Superintendent summarizing all School Division environmental activities undertaken by or at the direction of the EMS Steering Committee and EMS Core Team. The Virginia Environmental Excellence Program (VEEP) Annual Report can serve as the basis for the Annual Environmental Report.

4.3 The EMS Core Team members shall:

- Provide feedback (additions, edits, deletions) to Environmental Compliance Manager regarding the Aspects/Impacts Matrix and significance ranking
- Collaborate annually with EMS Core Team to review and update Aspects/Impacts matrix and significance rankings





**Albemarle County Public Schools**

**Subject:**  
**Environmental Aspects and Impacts**

Document No.: EMS-01	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/29/2022	Page: 3 of 5	Prepared By: LCS	Approved By: JPL, JT, JD, GS
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## 5.0 PROCEDURE

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### 5.1 Identifying Key Activities

The Environmental Project Manager will compile an initial list of all major activities and operations performed within Albemarle County Public Schools that could have an associated environmental aspect and impact. Feedback from knowledgeable personnel in key areas may be obtained to ensure this list is complete. The EMS Steering Committee, and, subsequently, the EMS Core Team, will review this list of activities and provide feedback to the Environmental Compliance Manager. The Environmental Project Manager will update the list of activities as necessary. These activities are listed in the Aspect/Impact Matrix under “Activities”.

### 5.2 Environmental Aspects and Impacts Identification

The Environmental Project Manager will list all environmental Aspects and associated Impacts for each identified activity in the Aspect/Impact Matrix. Some activities may have multiple corresponding Aspects and Impacts.

### 5.3 Significance Criteria

The Environmental Project Manager will select significance criteria used to rank the Aspects for level of importance and priority. The EMS Steering Committee will review the significance criteria and provide feedback to the Environmental Project Manager. Updates will be made as necessary. The same significance criteria will be applied to each key activity listed in the Aspect/Impact Matrix. The significance criteria may be changed periodically, as long as the same set of criteria is applied to all identified Aspects/Impacts when re-evaluating and re-ranking Aspects and Impacts. The significance criteria should reflect the current significance of the activity and should take into consideration any implemented SOPs or activities that lower the significance rating.

### 5.4 Positive / Negative Aspect Distinction

While most aspects identified will likely be “negative” (meaning they result in an *adverse* change to the environment), some may be positive (meaning they result in a *beneficial* change). This distinction will be noted with “Positive” or “Negative” in the designated column on the Aspects/Impacts Matrix.



**Albemarle County Public Schools**

**Subject:**

**Environmental Aspects and Impacts**

Document No.: <b>EMS-01</b>	Issue Date: <b>5/29/2022</b>	Expiration Date: <b>5/29/2023</b>	Last Revised: <b>5/29/2022</b>	Page: <b>4 of 5</b>	Prepared By: <b>LCS</b>	Approved By: <b>JPL, JT, JD, GS</b>
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## 5.5 Environmental Aspect Significance Ranking

The Environmental Project Manager will review each Aspect in relation to the selected significance criterion. A rating on a scale from zero (0) to five (5) – with zero representing no Impact and five a major Impact – will be assigned to each significance criterion as it relates to each Aspect. The Environmental Project Manager will initially assign this rating to each Aspect using professional judgment and input of additional knowledgeable personnel. The EMS Steering Committee and the EMS Core Team members will subsequently review these assigned ratings and provide feedback to the Environmental Project Manager; changes will be made as necessary.

## 5.6 Determining Significance

Once the ranking of Aspects is complete, the significance scores are totaled in the last column of the Aspect/Impact Matrix. The Environmental Project Manager will select a “threshold value”, at or above which the aspects are considered to be “Significant.” This threshold value is selected after thoroughly reviewing the significance scores of the aspects, and considering such factors as regulatory status of the aspects, all ranking criteria, and the possibility of improving “negative aspects” within the technical, financial and organizational constraints of Albemarle County Public Schools. The EMS Steering Committee will review the threshold value and provide feedback to the Environmental Project Manager regarding the value. The Environmental Project Manager may adjust the threshold value based on these feedback/comments.

## 5.7 Management of Significant Aspects

Management of Significant Aspects is important due to the potential severity of negative (adverse) impacts on the environment and human health. In association with the Significant Aspects identified, the following will be developed:

- Standard Operating Procedures (SOPs) will be developed and implemented for the activities associated with the identified significant aspects, as deemed appropriate by the Environmental Project Manager, EMS Core Team, and EMS Steering Committee
- Objectives & Targets – Significant Aspects will be highly considered when setting Objectives and Targets

## 5.8 Reviewing and Updating Significant Aspects



**Albemarle County Public Schools**

**Subject:**

**Environmental Aspects and Impacts**

Document No.: EMS-01	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/29/2022	Page: 5 of 5	Prepared By: LCS	Approved By: JPL, JT, JD, GS
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The EMS Steering Committee will meet at least annually to conduct an EMS Management Review. This review will include evaluation of planned or new developments (i.e. construction/demolition projects), modified activities, and any resulting associated Aspects and Impacts. The steps in Section 5.6 of this procedure will be followed to rank any new Aspects for significance. This will be documented in the most up-to-date version of the Aspect/Impact Matrix. The results of this review will be presented to the School Board and Division Superintendent as part of the annual report described in Section 4.2 above.

## **6.0 RELATED DOCUMENTS**

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- 6.1 ISO 14001:2004(E), Section 4.3.1, Environmental Aspects
- 6.2 A1-EMS-01, Aspect/Impact Matrix



Department	Activity / Process / Input	Aspect	Impact	Positive / Negative	Econ / Tech Feasible	Severity	Legal	Frequency	Scale	Exposure	Public / Social Concern	Total	Significant (Y / N)	Reference
BLD / VMF / WAHS / WAL	ANTIFREEZE STORAGE/DISPOSAL (RECYCLED)	RESOURCE MANAGEMENT	RECYCLE/REUSE	POSITIVE	Y	2	4	2	5	2	1	16	N	Outdoor storage replaced with 55-gallon drums to be recycled
BLD / VMF / WAHS / WAL	ANTIFREEZE USE	MULTIMEDIA QUALITY	MULTIMEDIA RELEASE	NEGATIVE	Y	2	4	2	2	3	3	16	N	Best Management Practices by Technicians
BLD / VMF / WAHS / WAL	BATTERY ACID STORAGE/USE	MULTIMEDIA QUALITY	MULTIMEDIA RELEASE	NEGATIVE	Y	3	4	2	3	5	1	18	Y	Returned to vendor or Recyclable Battery SOP
BLD / VMF / WAHS / WAL	BATTERY ACID DISPOSAL	MULTIMEDIA QUALITY	MULTIMEDIA RELEASE	NEGATIVE	Y	1	4	3	4	2	1	15	N	Returned to vendor or Recyclable Battery SOP
BLD / VMF / WAHS / WAL	CAR BATTERIES (USED)	SOLID WASTE MNGMT	LANDFILL SPACE	NEGATIVE	N	2	4	4	3	1	1	15	N	Picked up by vendor
BLD / VMF / WAHS / WAL	GAS CYLINDER STORAGE/USE	SOLID WASTE MNGMT	RECYCLE/REUSE	POSITIVE	Y	1	4	3	4	2	1	15	N	Best Management Practices by Technicians
BLD / VMF / WAHS / WAL	CAULKING TUBES (USED/EMPTY)	SOLID WASTE GENERATION	LANDFILL SPACE	NEGATIVE	N	2	2	5	3	1	1	14	N	Best Management Practices by Technicians
BLD / VMF / WAHS / WAL	CUTTING OIL USE/STORAGE	MULTIMEDIA QUALITY	MULTIMEDIA RELEASE	NEGATIVE	Y	4	4	1	2	4	3	18	Y	Best Management Practices by Technicians
BLD / VMF / WAHS / WAL	CUTTING OIL CONTAINER DISPOSAL	SOLID WASTE GENERATION	LANDFILL SPACE	NEGATIVE	Y	2	2	2	3	1	1	11	N	Best Management Practices by Technicians
BLD / VMF / WAHS / WAL	HYDRAULIC FLUID DISPOSAL	HAZ WASTE MGMT	RECYCLE/REUSE	POSITIVE	Y	1	4	3	4	2	1	15	N	Best Management Practices by Technicians
BLD / VMF / WAHS / WAL	HYDRAULIC FLUID USE/STORAGE	MULTIMEDIA QUALITY	MULTIMEDIA RELEASE	NEGATIVE	Y	3	4	3	2	3	3	18	Y	Fluid stored in 55-gallon drums
BLD / VMF / WAHS / WAL	FERTILIZER STORAGE/USE	MULTIMEDIA QUALITY	MULTIMEDIA RELEASE	NEGATIVE	Y	3	4	1	2	3	1	14	N	Stored in covered shelter above ground level
BLD / VMF / WAHS / WAL	FERTILIZER STORAGE/USE	STORM WATER MNGMT	NON-POINT SOURCE POLLUTION	NEGATIVE	Y	4	4	2	4	2	3	19	Y	Fertilizer applied only as needed
BLD / VMF / WAHS / WAL	FERTILIZER STORAGE/USE	STUDENT/EMPLOYEE HEALTH	NEGATIVE HEALTH EFFECTS	NEGATIVE	Y	1	2	1	4	4	1	10	N	Fertilizer applied only as needed
BLD / VMF / WAHS / WAL	FERTILIZER BAGS DISPOSAL	SOLID WASTE GENERATION	LANDFILL SPACE	NEGATIVE	N	2	1	3	3	2	1	11	N	No change anticipated
BLD / VMF / WAHS / WAL	FLAMMABLE CHEMICAL USE/STORAGE	FIRE/EXPLOSIVE HAZARD	NEGATIVE SAFETY IMPACT	NEGATIVE	Y	2	4	2	2	3	4	17	Y	Chemical Hygiene Plan
BLD / VMF / WAHS / WAL	FLAMMABLE CHEMICAL USE/STORAGE	FIRE/EXPLOSIVE HAZARD	NEGATIVE ENVIRONMENTAL IMPACT	NEGATIVE	Y	3	4	2	3	3	4	19	Y	Chemical Hygiene Plan
BLD / VMF / WAHS / WAL	GLUE (MAINTENANCE) USE/STORAGE	MULTIMEDIA QUALITY	MULTIMEDIA RELEASE	NEGATIVE	Y	2	2	1	2	3	1	11	N	Not exposed to stormwater
BLD / VMF / WAHS / WAL	GLUE (MAINTENANCE) CONTAINER DISPOSAL	SOLID WASTE GENERATION	LANDFILL SPACE	NEGATIVE	N	2	2	2	3	1	1	11	N	No change anticipated
BLD / VMF / WAHS / WAL	MOTOR OIL DISPOSAL	RESOURCE MANAGEMENT	RECYCLE/REUSE	POSITIVE	Y	1	4	3	4	2	3	17	Y	UST Tank Removal for AST (7/2007)
BLD / VMF / WAHS / WAL	MOTOR OIL USE/STORAGE	MULTIMEDIA QUALITY	MULTIMEDIA RELEASE	NEGATIVE	Y	2	4	3	3	2	2	16	Y	UST Tank Removal for AST (7/2007)
BLD / VMF / WAHS / WAL	OIL FILTER DISPOSAL	HAZ WASTE MNGMT	RECYCLE/REUSE	POSITIVE	Y	2	4	2	4	3	2	19	Y	Crushed and recycled by Safety Kleen
BLD / VMF / WAHS / WAL	OIL FILTER USE/STORAGE	MULTIMEDIA QUALITY	MULTIMEDIA RELEASE	NEGATIVE	Y	2	4	2	3	2	1	17	Y	Crushed and recycled by Safety Kleen
BLD / VMF / WAHS / WAL	PARTS WASHER - CHEMICAL DISPOSAL	RESOURCE MANAGEMENT	RECYCLE/REUSE	POSITIVE	Y	3	4	2	2	3	3	17	Y	Recycled by Safety Kleen
BLD / VMF / WAHS / WAL	PARTS WASHER - USE	MULTIMEDIA QUALITY	MULTIMEDIA RELEASE	NEGATIVE	Y	3	4	2	2	3	3	17	Y	Parts washers in closed system indoors
BLD / VMF / WAHS / WAL	REFRIGERANT STORAGE/USE	AIR EMISSIONS	AIR POLLUTION	NEGATIVE	Y	3	4	3	4	2	3	19	Y	Refrigerant Management SOP / LEED No CFCs
BLD / VMF / WAHS / WAL	REFRIGERANT STORAGE/USE	EMPLOYEE EXPOSURE	NEGATIVE HEALTH EFFECTS	NEGATIVE	Y	1	4	5	1	4	3	18	Y	Refrigerant Management SOP
BLD / VMF / WAHS / WAL	REFRIGERANT CONTAINER DISPOSAL	RECYCLING	RECYCLE/REUSE	POSITIVE	Y	2	2	4	4	3	2	17	Y	Refrigerant Management SOP
BLD / VMF / WAHS / WAL	SCRAP METAL	SOLID WASTE MNGMT	RECYCLE/REUSE	POSITIVE	Y	2	2	4	4	3	2	17	Y	Natural Resource Management SOP
BLD / VMF / WAHS / WAL	SPILL CONTAINMENT MATERIALS - STORAGE	MULTIMEDIA QUALITY	SPILL PREVENTION	POSITIVE	Y	4	4	3	4	1	19	Y	Y	Fuel Site Requirements and Spill SOP
BLD / VMF / WAHS / WAL	TIRES (USED)	SOLID WASTE GENERATION	LANDFILL SPACE	NEGATIVE	N	2	1	3	3	1	1	11	N	No change anticipated
BLD / VMF / WAHS / WAL	TRANSMISSION FLUID USE/STORAGE	MULTIMEDIA QUALITY	MULTIMEDIA RELEASE	NEGATIVE	Y	1	4	3	3	4	3	18	Y	1000-gallon tank replaced with 500-gallon double-walled tanks
BLD / VMF / WAHS / WAL	TRANSMISSION FLUID CONTAINER DISPOSAL	SOLID WASTE GENERATION	LANDFILL SPACE	NEGATIVE	N	2	2	2	3	1	1	11	N	1000-gallon tank replaced with 500-gallon double-walled tanks
BLD / VMF / WAHS / WAL	BUS & VEHICLE MAINTENANCE	MULTIMEDIA QUALITY	MULTIMEDIA RELEASE	NEGATIVE	Y	2	4	5	2	2	3	18	Y	Best Management Practices by Technicians/Biodiesel
BLD / VMF / WAHS / WAL	OIL-WATER SEPARATOR MAINTENANCE	STORM WATER MNGMT	WATER POLLUTION PREVENTION	POSITIVE	Y	4	5	3	3	2	2	19	Y	VPDES Permit
SCHOOL BUILDING	LIVING AND PRESERVED ORGANISMS IN CLASSROOM	STUDENT/EMPLOYEE HEALTH	NEGATIVE HEALTH EFFECTS	NEGATIVE	Y	2	2	5	2	4	4	19	Y	Animals in Classrooms SOP
SCHOOL BUILDING	ASBESTOS IN BUILDINGS	STUDENT/EMPLOYEE HEALTH	NEGATIVE HEALTH EFFECTS	NEGATIVE	Y	1	5	5	2	2	4	19	Y	Asbestos Management Plan; Asbestos SOP
SCHOOL BUILDING	ASBESTOS REMOVAL/DISPOSAL	STUDENT/EMPLOYEE HEALTH	NEGATIVE HEALTH EFFECTS	NEGATIVE	Y	1	4	3	2	2	5	17	Y	Asbestos Management Plan; Asbestos SOP
SCHOOL BUILDING	CLASSROOM CHEMICAL DISPOSAL - CONTRACTOR	HAZ WASTE MNGMT	RECYCLE/REUSE	POSITIVE	Y	3	4	2	3	2	5	19	Y	Contracted with ChemSavers every 2-3 years
SCHOOL BUILDING	CLASSROOM CHEMICAL STORAGE/USE	STUDENT/EMPLOYEE HEALTH	NEGATIVE HEALTH EFFECTS	NEGATIVE	Y	1	4	5	2	4	3	19	Y	Chemical Hygiene Plan
SCHOOL BUILDING	LEAD PAINT IN BUILDINGS	STUDENT/EMPLOYEE HEALTH	NEGATIVE HEALTH EFFECTS	NEGATIVE	Y	1	5	2	1	5	5	19	Y	Lead Based Paint Testing Report
SCHOOL BUILDING	LEAD PAINT REMOVAL/DISPOSAL	STUDENT/EMPLOYEE HEALTH	NEGATIVE HEALTH EFFECTS	NEGATIVE	Y	1	4	2	2	5	5	19	Y	Use Lead Based Paint Testing Report as guidance
SCHOOL BUILDING	DRINKING WATER/SEPTIC SYSTEM/WEW MANAGEMENT	STUDENT/EMPLOYEE HEALTH	NEGATIVE HEALTH EFFECTS	NEGATIVE	Y	2	5	3	3	3	3	19	Y	Class VI Waterworks Operator for well maintenance; Septic/Well Spreadsheet
SCHOOL BUILDING	FOOD PREPARATION AND CAFETERIA OPERATIONS	SOLID WASTE GENERATION	LANDFILL SPACE	NEGATIVE	Y	3	1	5	3	1	4	17	Y	Commercial Composting SOP
SCHOOL BUILDING	MEDICAL WASTE COLLECTION/DISPOSAL	STUDENT/EMPLOYEE HEALTH	NEGATIVE HEALTH EFFECTS	NEGATIVE	Y	1	4	4	3	4	4	20	Y	Medical Waste SOP
SITE-WIDE	CONFINED SPACE MAINTENANCE	STUDENT/EMPLOYEE HEALTH	NEGATIVE HEALTH EFFECTS	NEGATIVE	Y	2	4	3	2	2	3	16	N	Confined Space SOP
SITE-WIDE	ELECTRICAL EQUIPMENT MAINTENANCE	STUDENT/EMPLOYEE HEALTH	NEGATIVE HEALTH EFFECTS	NEGATIVE	Y	4	5	3	4	5	4	25	Y	Lockout/Tagout SOP
BLD / VMF / WAHS / WAL	CHEMICAL USAGE	STUDENT/EMPLOYEE HEALTH	NEGATIVE HEALTH EFFECTS	NEGATIVE	Y	2	4	4	3	2	4	19	Y	Safer Chemical Management SOP
SITE-WIDE	ALUMINUM CANS DISPOSAL	RECYCLING	RECYCLE/REUSE	POSITIVE	Y	2	2	4	4	3	2	17	Y	Informal collection
SITE-WIDE	BATTERY DISPOSAL (ALKALINE)	UNIVERSAL WASTE DISPOSAL	LANDFILL SPACE	NEGATIVE	Y	3	2	5	3	2	3	18	Y	Battery Recycling SOP
SITE-WIDE	BATTERY DISPOSAL (RECHARGEABLE)	RECYCLING	RECYCLE/REUSE	POSITIVE	Y	4	4	4	4	3	1	19	Y	Battery Recycling SOP
SITE-WIDE	BOILERS / GENERATOR OPERATION	AIR EMISSIONS	AIR POLLUTION	NEGATIVE	N	2	4	5	3	1	2	17	Y	Boilers registered with DEQ - Boiler MACT Requirements (SOP for required tuneups)
SITE-WIDE	BUS & VEHICLE USE	VOC EMISSIONS	AIR POLLUTION	NEGATIVE	Y	3	2	5	5	3	3	21	Y	Clean Diesel Grant - Virginia Clean Cities
SITE-WIDE	BUS & VEHICLE USE	FUEL USE/DEPLETION	NON-RENEWABLE RESOURCE	NEGATIVE	N	3	1	5	5	1	3	18	Y	Clean Diesel Grant - Virginia Clean Cities
SITE-WIDE	CARDBOARD (USED) DISPOSAL	SOLID WASTE MNGMT	LANDFILL SPACE	POSITIVE	Y	3	2	5	4	1	3	18	Y	Recycled by van der Linde
SITE-WIDE	CARDBOARD (USED) DISPOSAL	RECYCLING	RECYCLE/REUSE	POSITIVE	Y	2	2	4	4	3	2	17	Y	Recycled by van der Linde
SITE-WIDE	COMPUTER USE	RESOURCE MANAGEMENT	ENERGY USE/DEPLETION	NEGATIVE	Y	4	2	5	5	1	4	21	Y	Energy Management as Objective & Target for 2013-2014
SITE-WIDE	COMPUTER PARTS/ELECTRONICS DISPOSAL	SOLID WASTE GENERATION	LANDFILL SPACE	NEGATIVE	N	3	4	4	3	2	1	17	Y	Recycled by Computer Recycling of Virginia
SITE-WIDE	CUSTODIAL CHEMICAL DISPOSAL	HAZ WASTE GENERATION	MULTIMEDIA RELEASE	NEGATIVE	N	3	4	3	3	2	4	18	Y	Green Cleaning - Safer Chemical Management SOP Audit
SITE-WIDE	CUSTODIAL CHEMICAL STORAGE/USE	MULTIMEDIA QUALITY	MULTIMEDIA RELEASE	NEGATIVE	Y	4	4	5	3	2	1	19	Y	Safer Chemical Management SOP
SITE-WIDE	CUSTODIAL CHEMICAL STORAGE/USE	STUDENT/EMPLOYEE HEALTH	NEGATIVE HEALTH EFFECTS	NEGATIVE	Y	1	4	2	2	4	3	16	N	MSDSOnline Database
SITE-WIDE	ELECTRICITY USE	RESOURCE MANAGEMENT	NON-RENEWABLE RESOURCE	NEGATIVE	Y	4	2	5	5	1	5	22	Y	Energy Management as Objective & Target for 2022-2023
SITE-WIDE	NATURAL GAS USE	RESOURCE MANAGEMENT	NON-RENEWABLE RESOURCE	NEGATIVE	Y	2	2	5	4	2	4	21	Y	Energy Management as Objective & Target for 2022-2023
SITE-WIDE	EQUIPMENT USE - FOOD SERVICES	RESOURCE MANAGEMENT	NON-RENEWABLE RESOURCE	NEGATIVE	Y	3	2	5	3	1	3	17	Y	Energy Management as Objective & Target for 2022-2023
SITE-WIDE	FLUORESCENT BULB DISPOSAL	HAZ MAT MANAGEMENT	RECYCLE/REUSE	POSITIVE	Y	3	4	3	3	2	3	18	Y	Fluorescent Bulb Recycling SOP
SITE-WIDE</														


**D. Setting Objectives and Targets**

A list of the Division's goals for reducing environmental impacts and targets are included in the attached A1-EMS-02: Objective and Target Action Plans. The procedure for determining objectives and targets is EMS-02: Objectives and Targets.

Attachments:

EMS-02-Objectives-Targets

A1-EMS-02: Objective and Target Action Plans

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Environmental Objectives, Targets, and Objective &amp; Target Action Plans</b>		
Document No.: EMS-02	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/29/2022	Page: 1 of 4	Prepared By: LCS	Approved By: JPL, JT, JD, GS

## 1.0 PURPOSE

The purpose of this procedure is to describe the methods and processes by which Albemarle County Public Schools establishes, tracks, and implements the Objectives and Targets of its Environmental Management System (EMS).

## 2.0 SCOPE

This procedure applies to the establishment and review of environmental Objectives and Targets within Albemarle County Public Schools.

## 3.0 DEFINITIONS

**Objective** - An overall/general environmental goal, consistent with the Environmental Management Policy, which Albemarle County Public Schools sets for itself to achieve, and which is measurable where practicable. (e.g. Reduce cardboard waste).

**Target** - A specific goal, measurable where practicable, applicable to the organization or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives. (e.g. Reduce cardboard waste by 30%, before FY2007).

**Action Plan** - A detailed plan involving timeframes, action items, and persons responsible for carrying out set Objectives and Targets.


## 4.0 RESPONSIBILITY

4.1 The EMS Steering Committee members shall:

- Review the Objectives and Targets proposed by the Environmental Compliance Manager and provide feedback
- Approve the Objectives and Targets. The scope, timeline, and associated budgets/costs of the proposed Objectives and Targets shall be considered

4.2 The Environmental Project Manager shall:

- Develop first draft of Objectives & Targets and associated Action Plans
- Present Objectives, Targets and Action Plans to EMS Steering Committee and EMS Core Team for review and feedback

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Environmental Objectives, Targets, and Objective &amp; Target Action Plans</b>		
Document No.: EMS-02	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/29/2022	Page: 2 of 4	Prepared By: LCS	Approved By: JPL, JT, JD, GS

- Implement changes, if any, to Objectives, Targets, and Action Plans
- Continually track the progress of Objectives and Targets using the Objectives, Targets, and Action Plans appendix, A1-EMS-02 or through quarterly reporting on Key Performance Indicators (KPIs).
- Periodically update the EMS Steering Committee regarding progress towards achieving Objectives and Targets via Annual Environmental Reports (AERs)

#### 4.3 The EMS Core Team shall:

- Review Objectives, Targets and Action Plans presented by Environmental Project Manager and provide feedback


## 5.0 PROCEDURE

### 5.1 Consideration of Significant Aspects in Establishing Objectives and Targets

The Environmental Project Manager shall evaluate each significant aspect in order to determine if it is appropriate to establish Objectives, Targets, and Action Plans related to these significant aspects. The opportunity, need for improvement, and level of control with respect to associated cost/budget, will be considered during this evaluation.

### 5.2 Establishing Objectives and Targets

- The Environmental Project Manager will develop a draft list of Objectives, Targets and Action Plans, and present this draft to the EMS Steering Committee and to the EMS Core Team, for review.
- The EMS Steering Committee and EMS Core Team members shall review draft list of Objectives, Targets, and Action Plans, and provide feedback to Environmental Project Manager.
- Objectives, Targets and Action Plans will be maintained and documented as an appendix to this procedure, titled "Objectives, Targets, and Action Plans", Document # A-1-EMS-02.
- Objectives and Targets must be consistent with Albemarle County Public Schools' Environmental Management Policy, including the commitments to pollution prevention, compliance with applicable legal and other requirements, and continual improvement. Objectives and Targets shall take into account:

 <b>EMS Albemarle County Public Schools</b>				<b>Subject:</b> <b>Environmental Objectives, Targets, and Objective &amp; Target Action Plans</b>		
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- Applicable legal and other requirements;
  - Significant Aspects;
  - Financial and operational requirements/restrictions
- Where practicable, Objectives and Targets shall be measurable and/or quantifiable.
  - Objectives and Targets may be set for environmental Aspects that were *not* identified as Significant, as long as all Significant Aspects have been considered in the process.

### 5.3 Action Plans


Action Plans are extremely valuable with respect to the success of the set Objectives and Targets. These plans ensure that the progress of Objectives and Targets is tracked by outlining responsibility, specific action items, and timeframes for achieving the Objectives & Targets.

- The Environmental Project Manager will develop Action Plans for each Objective/Target
- These Action Plans shall consist of specific timeframes and responsible parties required to achieve the Objectives and Targets.
- The EMS Core Team may assist the Environmental Project Manager in developing the Action Plans, and provide feedback to the first draft of Action Plans presented by the Environmental Project Manager.
- The following questions/ideas will be considered when setting/developing Action Plans:
  - What activities and operations will be affected?
  - Who is responsible?
  - How will improvement be measured?
  - What will the timeline be for completion?
  - Who do the Action Plans need to be communicated to?

### 5.4 Periodic Review and Update

- As part of the annual EMS Management Review, each of the established Objectives, Targets and Action Plans will be reviewed to ensure their continued applicability and implementation. Objectives, Targets, and Action



 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Environmental Objectives, Targets, and Objective &amp; Target Action Plans</b>		
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Plans may be reviewed and updated more frequently than annually, if deemed necessary by the Environmental Project Manager and/or EMS Steering Committee.

- Any changes in Albemarle County Public Schools' legal and "other" requirements, Significant Aspects, technological options and financial and operational requirements, or views of interested parties, will be assessed to determine their effect on the Objectives, Targets and Action Plans.

## 6.0 RELATED DOCUMENTS

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- 6.1 ISO 14001:2004(E), Section 4.3.3 – Objectives, Targets, and Programme(s)
- 6.2 EMS-01, Environmental Aspects and Impacts Procedure
- 6.3 A1-EMS-02, Objectives, Targets, and Action Plans



Albemarle County Public Schools

**Subject:**  
**Objectives, Targets, & Action Plans**

Document No.:  
A1-EMS-02

Issue Date:

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05/10/22

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1 of 1

Prepared By:  
LCS

Approved By:

**Objectives, Targets, and Action Plans**  
**2022 - 2023**

**1) Climate Action Plan**

Objective: Reduce Greenhouse Gas Emissions from Division Operations

Target: Continue to Develop and Implement Climate Action Plan for Municipal Building Operations and Outreach

Action Plan:

- Align Advisory Committee for Environmental Sustainability SMART goals with the larger goals of the Climate Action Plan that relate to schools and the community.
- Plan for net-zero school designs for new construction.
- Apply for additional grant funding for electric buses and charging infrastructure for vehicles

**2) Resource Conservation**

Objective: Conserve resources by increasing recycling rates and source reduction

Target: Expand recycling program and composting programs

Action Plan:

- Recycling program communications were revisited to reset expectations after COVID changes.
- Expand commercial composting program to 50% of school cafeterias for collection of student food waste

**3) Develop Board's Sustainability Advisory Committee**

Objective: Identify, Advance and Highlight ACPS Goals

Target: Update EMS Procedures to include the Advisory Committee for Environmental Sustainability structure

**4) Enhanced Indoor Air Quality**

Objective: Plan and install equipment that allows for enhanced indoor air quality at all schools

Target: Achieve LEED Enhanced Indoor Air Quality credit requirements at all schools

Action Plan:

- Implement HVAC indoor air quality improvements through the American Rescue Plan Act Coronavirus State and Local Fiscal Recover Fund (CSLFRF) funding

#### **E. EMS Procedures**

All remaining procedures that are part of the Environmental Management System have been attached for completeness, and they include:

- EMS-03: Legal and Other Requirements
- EMS-04: Communication
- EMS-05: Training
- EMS-06: Structure and Responsibility
- EMS-07: Document Control and Recordkeeping
- EMS-08: Monitoring and Measurement
- EMS-09: Management Review
- EMS-10: Nonconformance, Corrective and Preventive Action Procedure
- EMS-11: Audit Procedure
- EMS-12: Emergency Preparedness and Response Procedure
- A1-EMS-03: Legal Sources

## **F. Pollution Prevention**

Following are descriptions of environmental projects that are ongoing or planned.

### **1. Pollution Prevention Standard Operating Procedures**

As part of the EMS, the following Standard Operating Procedures have been created to support our pollution prevention efforts:

- Rechargeable Battery Recycling SOP
- Refrigerant Management SOP
- Battery Recycling SOP
- Green Renovation SOP
- Safer Chemical Management SOP
- PCB Ballast SOP
- Well Maintenance SOP
- Water Outage SOP
- Fluorescent Bulb Recycling SOP
- Integrated Pest Management SOP
- Transportation SOP
- Animals in Classroom SOP
- Fuel Site Requirements and Spills SOP
- Natural Resource Management SOP
- Commercial Composting SOP

### **2. Climate Action**

Albemarle County is in the implementation phase for the [County's Climate Action Plan](#), and the School Board recently appointed members to the newly formed Advisory Committee for Environmental Sustainability (ACES). Many of the Climate Action Plan's strategies directly relate to school operations, education, and facilities. ACES is working in subgroups to develop SMART goals related to the following sectors:

- Buildings & Renewable energy
- Sustainable materials management
- Landscape, natural resources & agriculture
- Transportation
- Curriculum

The ACES committee charter is linked below:

<https://drive.google.com/file/d/1sELemPDRM-d2OFNiv9u4KTzY2aZWx1N7/view?usp=sharing>

### **3. Energy Conservation and Management Policy**

ACPS implemented the Energy Conservation and Management Policy in April 2009. ACPS strives to continually reduce energy consumption. However, changes in building operations during COVID have increased energy consumption. Changes included longer hours of building operation for flushing, conditioning of increased levels of outside air, and increased plug loads from HEPA purifiers in every learning space.

#### **4. Recycling program**

The following items have been recycled from 2019-2022:

- Oil-water separator debris and waste fuel mixtures
- Used oil and antifreeze
- PCB-containing ballasts
- Scrap metal delivered to Cycle Systems
- Fluorescent, HID and sodium bulbs
- Electronic waste (computers, cell phones, chargers, printers, keyboards, etc.)
- Household batteries
- Construction & demolition debris
- Cardboard, plastics, metal, paper

Cost savings resulted from avoiding landfill fees for all recycled and reused materials.

#### **5. Composting**

In February 2012, we started our first commercial composting operation at Sutherland Middle School. The program has expanded to include composting of kitchen organic waste in all school locations. The goal for the program is to expand into cafeteria collection once we return to pre-COVID cafeteria operations.

#### **6. Energy and Water Efficiency**

ACPS contracted with Ameresco to replace aging energy infrastructure and to improve the efficiency of these systems at numerous facilities. An Energy Services Agreement between ACPS and Ameresco was executed on September 21, 2017. Construction began the fall of 2017 and final project acceptance was achieved on June 13, 2019. The Year One guarantee period spanned from July 1, 2019 through June 30, 2020. The Measurement and Verification Report for Year Two performance found that projected annual utility savings of \$734,014 were realized.

The project included the following Energy Conservation Measures (ECMs):

- ECM 1: Interior Lighting System Improvements  
LED lighting retrofit kits installed in all building areas. Project did not include Red Hill Elementary and Woodbrook Elementary, as they had recent construction upgrades that included LED lighting.
- ECM 2: Exterior Lighting System Improvements  
Exterior pole and wall pack fixtures were replaced with LED fixtures.
- ECM 3: Lighting Controls  
Occupancy sensors installed in classrooms, conference rooms, labs, lounges, offices and storage areas as appropriate.
- ECM 4: Domestic Water Conversion  
Upgraded toilets, urinals and faucet aerators with new, lower flow counterparts. Ameresco installed 1.28 gallons per flush (gpf) HET fixtures and manual piston flush valves to replace the existing 3.5 gpf and 1.6 gpf china and

diaphragm valves. High flow urinals, ranging in flow from 0.5 gpf to 1.5 gpf were replaced with new pint china and piston flush valves. The retrofits reduced the water consumption to 0.125 gpf. Water conservation projects were not completed at schools that are on ACPS-operated well systems (Broadus Wood, Murray Elementary, Scottsville Elementary, Stony Point Elementary, and Walton Middle).

In support of the Division's sustainability goals, the environmental benefits from this project include greenhouse gas (GHG) emission reductions of 3,500 tons of carbon annually.

## 7. Renewable Energy

ACPS collectively has over 1 megawatt (MW) of solar photovoltaic (PV) systems installed at seven schools (Albemarle HS, Baker-Butler ES, Brownsville ES, Greer ES, Henley MS, Monticello HS, and Sutherland MS). The solar panels provide approximately 23% of the electricity needs for these schools and reduces our carbon footprint by over 2,109,000 pounds CO<sub>2</sub>/year.

<b>Solar Statistics on Albemarle County Public Schools</b>			
<b>School</b>	<b>System size kW (DC)</b>	<b>Number of Solar Panels</b>	<b>Equivalent to Average American homes</b>
Greer Elementary	75	216	9
Albemarle High	124	360	14
Brownsville Elementary	130	378	15
Baker-Butler Elementary	224	648	25
Monticello High	267	774	30
Sutherland Middle	279	809	32
<b>Total</b>	<b>1099</b>	<b>3185</b>	<b>125</b>

Henley's installation was funded through an ARRA grant through the Department of Mines, Minerals and Energy. The remainder of the installations were completed through a Power Purchase Agreement (PPA). A PPA does not require a capital investment, but ACPS is committed to pay a contracted rate for the electricity produced by each system for a period of 20 years in our current agreement. Pricing for electricity through the PPA has been slightly below the amount charged by Dominion.

A video and PPA project overview are available at the following link:

<https://securefutures.solar/projects/schools/albemarle-county-public-schools/>

An alternative to a PPA is to purchase the solar PV systems as a capital expense. ACPS just completed installing ACPS-owned PV systems for Scottsville Elementary (200 kW) and Red Hill Elementary (73 kW).



**G. Source Reduction**

The Child Nutrition Department has been researching cost-effective alternatives to Styrofoam service containers. In mid-March 2019, our Division initiated a compostable tray pilot at Western Albemarle High School. All foam service products have been replaced division-wide by a recyclable or compostable product, and reusable trays are the standard for elementary and middle schools. With this change, we will be eliminating approximately 500,000 foam trays per year. COVID temporarily changed the food service operations and increased usage of non-compostable items. For the next school year, compostable service ware will once again be a priority.

**H. Voluntary Self-Assessments**

ACPS has started a self-assessment with reviewing additional SOP needs. We have added a Commercial Composting SOP. An assessment of the current EMS structure revealed that updates will be needed with the addition of the Advisory Committee for Environmental Sustainability (ACES). As ACES will be creating many SMART goals (objectives and targets) related to ACPS environmental aspects, a deep review and integration of all procedures is required and will be completed for the next annual report.

**I. Communicating With and Informing External and Internal Audiences**


The website includes all SOPs that are part of the EMS and program information. The website for the environmental program can be accessed at:  
<https://www.k12albemarle.org/our-departments/building-services/environmental-management-system>

**J. Environmental Compliance Update**

As defined by Section 10.1-1187.1 of the Code of Virginia, record of sustained compliance means that "the person or facility (i) has no judgment or conviction entered against it, or against any key personnel of the person or facility or any person with an ownership interest in the facility for a criminal violation of the environmental protection laws of the United States, the Commonwealth, or any state in the previous five years; (ii) has been neither the cause of, nor liable for, more than two significant environmental violations in the previous three years; (iii) has no unresolved notices of violations or potential violations of environmental requirements with Department or one of the Boards; (iv) is in compliance with the terms of any order or decree, executive compliance agreement, or related enforcement measure issued by the Department, one of the Boards, or the U.S. Environmental Protection Agency; and (v) has not demonstrated in any other way an unwillingness or inability to comply with environmental protection requirements".

ACPS has a record of sustained compliance.



 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Legal and Other Requirements</b>		
Document No.: EMS-03	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/24/2022	Page: 1 of 3	Prepared By: LCS	Approved By: JPL, JT, JD, GS

## 1.0 PURPOSE

The purpose of this procedure is to establish the method by which Albemarle County Public Schools reviews, remains aware of, and ensures access to all applicable legal and “other” requirements that are related to the identified environmental aspects.

## 2.0 SCOPE

This procedure addresses the legal and other requirements to which Albemarle County Public Schools is subject, that are applicable to the environmental aspects of Albemarle County Public Schools’ EMS, including, but not limited to:

### 2.1 Federal Requirements:

- United States Environmental Protection Agency (USEPA) regulations
- United States Department of Transportation (DOT) regulations
- Uniform Fire Code (UFC)
- Occupational Safety and Health Administration (OSHA) regulations

### 2.2 State Requirements:


- Virginia Department of Environmental Quality (VDEQ) regulations
- Virginia Department of Health (VDH) regulations
- Virginia Department of Agriculture and Consumer Services (VDACS) regulations
- Virginia Department of Labor and Industry (DOLI), Virginia Occupational Safety and Health (VOSH) Program regulations
- Virginia Department of Education (VDOE) requirements

### 2.3 Local Requirements:

- County of Albemarle Ordinances

### 2.4 Albemarle County Public Schools Requirements:

- Albemarle County School Board Policies, regulations and administrative procedures

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Legal and Other Requirements</b>		
Document No.: EMS-03	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/24/2022	Page: 2 of 3	Prepared By: LCS	Approved By: JPL, JT, JD, GS

### 3.0 DEFINITIONS

Regulations -- The set of rules and legal requirements that apply to the environmental aspects of Albemarle County Public Schools' EMS.

Other Requirements -- Rules and guidelines to which Albemarle County Public Schools subscribes, but which are not legally binding under existing laws. Other requirements may include voluntary initiatives to which Albemarle County Public Schools is committed (e.g., Best Management Practices or guidelines).


### 4.0 RESPONSIBILITY

#### 4.1 The Environmental Project Manager shall:

- Identify, track, and maintain access to legal and other requirements related to the environmental aspects identified in the Albemarle County Public Schools' EMS.
- Ensure that all identified potential legal and other requirements related to the environmental aspects of the County Schools' EMS are communicated to and understood by the appropriate Albemarle County Public Schools' staff via the use of memos, emails, meetings, and other compliance mechanisms, as needed.
- Consult with the EMS Core Team, Steering Committee and Albemarle County Attorney's Office to review all applicable legal and other requirements, as needed, on an ongoing basis.

#### 4.2 Knowledgeable staff within various Departments of the County Schools shall:

- Work with the Environmental Project Manager and the EMS Core Team to evaluate operations and activities, as needed.
- Inform the Environmental Project Manager when any new activities or operations will be initiated or evaluated.

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Legal and Other Requirements</b>		
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## 5.0 PROCEDURE

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### 5.1 Determining Legal and Other Requirements

- The Environmental Project Manager will use a variety of methods and information sources to regularly track, identify, and evaluate applicable laws and regulations. This will include periodic reviews of regulatory documents, both hard copy and on the Internet, and subscriptions sent to e-mail that include pertinent regulatory updates.
  - The first appendix to this procedure (A1-EMS-03) lists sources of legal and other requirements. The information in this appendix shall be used as a reference for applicable requirements.

### 5.2 The Environmental Project Manager and EMS Steering Committee will consult with the Albemarle County Attorney's Office as needed, as part of the on-going compliance effort.

## 6.0 RELATED DOCUMENTS

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- 6.1 ISO 14001:2004(E), Section 4.3.2, Legal and Other Requirements
- 6.2 A1-EMS-03, Sources of Legal and Other Requirements



**Albemarle County Public Schools**

**Subject:**

**Source List - Legal and Other Requirements**

Document No.: A1-EMS-03	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/1/2013	Page: 1 of 1	Prepared By: LCS	Approved By: JPL
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### **List of Sources of Legal and Other Requirements**

➤ Regulatory Agencies (Program and Website Location)

- United States Environmental Protection Agency (USEPA)  
<http://www.epa.gov/>
- Virginia Department of Environmental Quality (VDEQ)  
<http://www.deq.state.va.us/>
- Occupational Safety and Health Administration (OSHA)  
<http://www.osha.gov/>
- United States Department of Transportation  
<http://www.dot.gov/>
- Virginia Department of Health (VDH)  
<http://www.vdh.state.va.us/>
- Virginia Department of Agriculture and Consumer Services (VDACS)  
<http://www.vdacs.state.va.us/>
- Virginia Department of Labor and Industry (DOLI)  
<http://www.doli.virginia.gov/>

➤ Regulatory Internet Sites

- Federal Register  
<https://www.federalregister.gov/>
- Virginia General Assembly, Legislative Information System  
<http://leg1.state.va.us/lis.htm>
- Local Government Environmental Assistance Network (LGEAN)  
<http://lgean.org/index.cfm>
- Virginia Energy Purchasing Governmental Association (VEPGA)  
<http://www.vepga.org/>


➤ Electronic Newsletters

- Non-Point Source News Notes  
<http://www.epa.gov/owow/info/NewsNotes/>
- Pollution Prevention News  
<http://www.epa.gov/p2/pubs/pubs.htm#newsletters>
- Water News  
<http://www.epa.gov/ow/waternews/>

Other

Public Entity Environmental Management System Resource Center (PEER)  
<http://www.peercenter.net/index.cfm>

Virginia Environmental Excellence Program (VEEP)  
<http://www.deq.state.va.us/veep/>

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Environmental Communication</b>		
Document No.: EMS-04	Issue Date: 5/23/2022	Expiration Date: 5/23/2023	Last Revised: 5/23/2022	Page: 1 of 4	Prepared By: LCS	Approved By: JPL, JT, JD, GS

## 1.0 PURPOSE

The purpose of this procedure is to describe how Albemarle County Public Schools distributes, documents, and responds to internal and external communications regarding its environmental activities, issues and concerns.

## 2.0 SCOPE

This procedure applies to:


- Albemarle County Public Schools employees within all various levels and functions of the school system, when engaging in internal communication relevant to the school system's environmental activities.
- Select employees of Albemarle County Public Schools (outlined below) who communicate with external entities regarding environmental issues or concerns; these external entities may include, but are not limited to various members of the public, concerned parents of students, regulatory agencies, and the media.

## 3.0 RESPONSIBILITY

### 3.1 The Environmental Project Manager shall:

- Be the primary contact for receiving and responding to internal and external communication regarding the EMS and other environmental issues
- Collaborate with the EMS Steering Committee and EMS Core Team to develop and implement internal communication ideas and efforts
- Coordinate requests for public records or other information under the Virginia Freedom of Information Act (FOIA)
- Consult with the County Attorney's Office regarding appropriate responses under FOIA
- Notify the Division Superintendent/designee of all FOIA requests that seek sensitive or confidential records or information from the School Division regarding environmental matters, as well as complaints or concerns of a serious nature regarding environmental issues from members of the public

### 3.2 The EMS Core Team shall:

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Environmental Communication</b>		
Document No.: EMS-04	Issue Date: 5/23/2022	Expiration Date: 5/23/2023	Last Revised: 5/23/2022	Page: 2 of 4	Prepared By: LCS	Approved By: JPL, JT, JD, GS

- Collaborate with the Environmental Project Manager to develop and implement internal communication ideas and efforts.

### 3.3 All Albemarle County Public Schools Employees shall:

- Relay environmental or EMS-related questions, concerns, problems, and suggestions to the Environmental Project Manager, or their Division Manager or Supervisor, as appropriate.

### 3.4 Division Managers and Supervisors shall:


- Receive and respond to internal and external communication regarding the EMS and other environmental issues, as appropriate.
- Communicate external and internal EMS or environmental-related questions, concerns, problems, and suggestions to the Environmental Project Manager

## 4.0 PROCEDURE

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### 4.1 Internal Communication

- Internal Communication regarding Albemarle County Public Schools' EMS and other environmental issues and concerns will travel through the many levels and functions of the school system by various means, and may include:
  - Internal Division Compass
  - Albemarle County Public Schools EMS Website
  - E-mails and memos
  - Posted bulletins
  - Staff meetings
  - On-the-job training
  - Videos
  - Standard Operating Procedures (SOPs)
- Information to be Communicated Internally
  - The Environmental Project Manager and/or EMS Steering Committee will determine on a case-by-case basis whether a specific type or piece of information is to be distributed to all

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Environmental Communication</b>		
Document No.: EMS-04	Issue Date: 5/23/2022	Expiration Date: 5/23/2023	Last Revised: 5/23/2022	Page: 3 of 4	Prepared By: LCS	Approved By: JPL, JT, JD, GS

Albemarle County Public Schools employees or only to those affected.

➤ Examples of items to be communicated internally:

- Existence of the Albemarle County Public Schools' Environmental Management System (To be communicated to all employees)
- Albemarle County Public Schools' Environmental Management Policy (To be communicated to all employees)
- Standard Operating Procedures (SOPs), and work instructions (To be communicated to affected employees only)
- EMS Roles and responsibilities (Affected employees only)
- Significant Aspects (Affected employees only)
- Objectives and Targets (Affected employees only)
- EMS progress and success, periodically (All employees)

➤ Annual Review

- At least once annually the EMS Steering Committee will meet during the EMS Management Review to discuss the effectiveness and potential necessary changes/additions to these internal communication procedures.


#### 4.2 External Communication

➤ Significant Aspects

- Albemarle County Public Schools' Significant Aspects and Objectives and Targets will be made available to the public upon request

➤ Public Requests for Information (FOIA)

- In appropriate situations involving non-routine requests for information under the FOIA, the Environmental Compliance Manager will notify at least one member of the EMS Steering Committee and will consult with the County Attorney's Office before responding to such FOIA request for information from any member of the public.
- Requests for documents or records from the public under FOIA will be responded to in writing and within established time limits as required by law.


 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Environmental Communication</b>		
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- Requests for general information from the public (e.g. a parent requesting information regarding general asbestos procedures) may be responded to via phone, e-mail or in writing.
- Contact with the Media
  - The primary contact(s) with the media regarding environmental-related complaints, concerns, and information are any members of the EMS Steering Committee and/or Superintendent/designee. If deemed appropriate by the EMS Steering Committee, the Environmental Project Manager or designee(s) may act as contact person or resource to/for the media.
  - Department Supervisors may need to communicate with the public and/or media regarding environmental activities in the event that the Environmental Project Manager is not available, or in the event that they are contacted first. This should be communicated to the Environmental Project Manager so that the external communication is documented and maintained as a record and kept in the Environmental Project Manager's files.
  - All complaints and concerns from parents of students and members of the public, regarding environmental activities, shall be documented and maintained by the Environmental Project in appropriate project files.
- Communication with Regulatory Agencies
  - The Environmental Project Manager shall be the primary contact for communicating and corresponding with environmental regulatory agencies such as the Virginia Department of Environmental Quality, the Virginia Department of Health, and the Environmental Protection Agency.
  - The Environmental Project Manager will save all electronic (e-mail) and other correspondence with regulatory agencies and maintain these records per state and/or federal record retention requirements.

## 5.0 RELATED DOCUMENTS

### 5.1 ISO 14001 Standard Excerpt 4.4.3, Communication



 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Environmental Training, Awareness, and Competence</b>		
Document No.: EMS-05	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/24/2022	Page: 1 of 2	Prepared By: LCS	Approved By: JPL, JT, JD, GS

## 1.0 PURPOSE

The purpose of this procedure is to describe the methods by which Albemarle County Public Schools will:

- Identify training needs associated with its environmental Aspects/Impacts and EMS, and how this training shall be provided
- Provide general EMS Awareness Training to appropriate, designated employees
- Ensure that employees performing tasks that could cause adverse significant impacts as identified by the EMS are competent, based on appropriate education, training, and experience

## 2.0 SCOPE

This procedure applies to all employees of Albemarle County Public Schools performing tasks that have the potential to cause an adverse significant environmental impact identified by the EMS.


## 3.0 RESPONSIBILITY

### 3.1 The Environmental Project Manager shall:

- Collaborate with appropriate staff to develop training material and programs in identified needed areas (e.g. asbestos awareness training, pesticide training, SOP training, etc.)
- Provide periodic environmental training for staff as needed
- Develop and carry out general EMS awareness training for all appropriate staff
- Maintain all records of environmental-related training

### 3.2 Directors, Managers, and Supervisors:

- Support Environmental Project Manager in identifying training needs for their employees' tasks as they relate to identified environmental aspects

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Environmental Training, Awareness, and Competence</b>		
Document No.: EMS-05	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/24/2022	Page: 2 of 2	Prepared By: LCS	Approved By: JPL, JT, JD, GS

## 4.0 PROCEDURE

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### 4.1 Compliance-related and Significant Aspect-related Training

- The Environmental Project Manager will identify training needs based on compliance with legal and other requirements (i.e. Pesticide Applicator Certification), and develop training programs to meet these requirements
- Training programs will also be developed for job functions related to identified Significant Aspects, where appropriate

### 4.2 General Environmental Awareness Training

- All new employees of Albemarle County Public Schools should receive General Environmental Awareness Training through the annual OATS training.
- The Environmental Project Manager, in collaboration with the EMS Steering Committee, will develop a plan for carrying out General Environmental Awareness Training for all employees


### 4.3 Training Records

- The Environmental Project Manager will maintain records of all environmental training provided to employees
- Required Individual Certifications should be maintained by employees or by the appropriate administrative office in the employees' file

## 5.0 RELATED DOCUMENTS

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### 5.1 ISO 14001:2004 Standard Excerpt 4.4.2 – Competence, Training, and Awareness

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>EMS Structure &amp; Responsibility</b>		
Document No.: EMS-06	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/29/2022	Page: 1 of 2	Prepared By: LCS	Approved By: JPL, JT, JD, GS

## 1.0 PURPOSE

This procedure defines and documents the roles, responsibilities, and authorities of the Environmental Management System (EMS) Steering Committee, Environmental Project Manager, and Core Team, in order to facilitate effective environmental management for Albemarle County Public Schools.

## 2.0 SCOPE

This procedure applies to the Environmental Project Manager, EMS Core Team, EMS Steering Committee, and anyone else involved in activities related to the EMS.


## 3.0 RESPONSIBILITY & PROCEDURE

### 3.1 The Environmental Project Manager shall:

- Establish the first drafts of all EMS procedures
- Elicit feedback from the EMS Steering Committee and EMS Core Team on the content of all EMS procedures, and make changes as necessary. EMS Core Team input can be elicited on an as-needed basis.
- Manage and facilitate all EMS-related projects, meetings, Objective and Target action items, and associated, required training
- Report on the performance of the EMS to the EMS Steering Committee at least annually

### 3.2 The EMS Steering Committee shall be an Albemarle County Public Schools administrator-level committee, and shall include the Chief Operating Officer, the Director of Building Services, and the Deputy Director of Building Services. EMS Steering Committee membership may be subject to change at the discretion of the Division Superintendent. Responsibilities of the EMS Steering Committee include:

- Review and approve all written EMS procedures
- Review all components of the EMS periodically during EMS Management Review meetings and recommend improvements
- Maintain responsibility for providing resources (human, technological and financial) essential to the implementation of the EMS Objectives and Targets
- Other responsibilities may be added as necessary.

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>EMS Structure &amp; Responsibility</b>		
Document No.: EMS-06	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/29/2022	Page: 2 of 2	Prepared By: LCS	Approved By: JPL, JT, JD, GS


3.3 The EMS Core Team shall be an Albemarle County Public Schools staff-level committee, chosen by the Environmental Project Manager, and approved by the Steering Committee. The EMS Core Team members shall:

- Review EMS documents, procedures and plans as necessary, and provide feedback to Environmental Compliance Manager
- Participate in implementation of EMS Objectives and Targets as needed
- Actively participate in and attend all EMS Core Team meetings

## 4.0 RELATED DOCUMENTS

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4.1 ISO 14001: 1996, 4.4.1

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Document Control and Records Management</b>		
Document No.: EMS-07	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/24/2022	Page: 1 of 5	Prepared By: LCS	Approved By: JPL, JT, JD, GS

## 1.0 PURPOSE

The purpose of this procedure is to establish and document the methods by which Albemarle County Public Schools will control and maintain all of its Environmental Management System (EMS) documents and records. This procedure will help ensure that critical EMS documents and records are kept current and readily available when/where needed.

## 2.0 SCOPE


This procedure outlines the methods to be used for the control and management of Albemarle County Public Schools EMS documents, including:

- Environmental Management Policy
- EMS System Procedures
- EMS-related Manuals and Plans
- Standard Operating Procedures (SOPs)
- EMS Records (i.e. training records, tables, inspection logs, forms, etc.)
- Compliance documents (i.e. permits, discharge monitoring reports, etc.)

## 3.0 DEFINITIONS

**Documents** – EMS information and its supporting medium (electronic or other). The control of documents refers to a system of managing critical EMS documents to ensure they are current and available as necessary. Controlled documents require periodic review and may require periodic revision.

**Records** – EMS documents that contain achieved results or provide evidence of activities performed. Records provide objective evidence of the completion of environmental management actions, or of any other actions required to implement the EMS and its supporting plans or procedures. Records are a history of an event that has occurred (i.e., an inspection checklist or log) and cannot be changed, but may be added to.

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Document Control and Records Management</b>		
Document No.: EMS-07	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/24/2022	Page: 2 of 5	Prepared By: LCS	Approved By: JPL, JT, JD, GS

## 4.0 RESPONSIBILITY

### 4.1 The Environmental Project Manager shall:

- Maintain responsibility for EMS Document Control in accordance with this procedure
- Ensure that employees involved with the preparation (review, editing, etc.) of EMS documents are aware of the details of this procedure
- Maintain all EMS and environmental-related documents and records in a centralized, accessible location
- Ensure compliance with all recordkeeping requirements under state and federal laws and regulations, and compliance with all requirements regarding access to public records under the Virginia Freedom of Information Act (FOIA)

### 4.2 The EMS Steering Committee members shall:

- Review and provide final approval for EMS System Procedure and Environmental Policy proposed changes
- Review and provide final approval for Standard Operating Procedures (SOPs), as needed. One or more Steering Committee members may officially approve SOPs, including periodic edits made to the procedures.


### 4.3 The EMS Core Team members shall:

- Support the Environmental Project Manager in reviewing, revising and distributing updated EMS-related documents and records as necessary

## 5.0 PROCEDURE

### 5.1 EMS Documents and Records Location


- An electronic version of all official EMS documents shall be kept in the Albemarle County Public Schools Building Services' shared S:/ drive, under a folder named "EMS".
- A hard copy of documents, forms and records critical to daily/weekly operations shall be maintained and accessible to employees whose jobs depend on the documents to accomplish various tasks (e.g. gasoline and diesel tank weekly status reports)

 <b>EMS</b> Albemarle County Public Schools				<b>Subject:</b> <b>Document Control and Records Management</b>		
Document No.: EMS-07	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/24/2022	Page: 3 of 5	Prepared By: LCS	Approved By: JPL, JT, JD, GS

## 5.2 Document Identification and Numbering

- EMS System Procedures, such as this one, are identified by the word “EMS” followed by a number assigned to the procedure. For example, this procedure is “EMS-07” (See above in Header).
- Appendices to EMS System Procedures will be labeled “A” for “Appendix”, followed by a number (such as 1), then followed by the Document I.D. for that procedure. For example, the Aspect/Impact Matrix, an appendix to procedure EMS-01, is “A1-EMS-01”.
- Standard Operating Procedures (SOPs) are identified by the word “SOP” and a number assigned to the SOP. An additional abbreviation may be included to further identify the SOP in a list of documents for quick reference. For example, “SOP-Rec-01” identifies that particular SOP as one that is related to recycling.
- Records and Forms are identified with “R” and “F” and assigned numbers, respectively.
- Each EMS System Procedure and SOP contains a standard header consisting of the following information:
  - Subject
  - Document Number
  - Issue Date
  - Expiration Date
  - Last Revised Date
  - Number of Pages
  - “Prepared By” initials
  - Approval Authority initials

Other EMS-related documents may contain this standard header when deemed appropriate by the Environmental Project Manager.

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Document Control and Records Management</b>		
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### 5.3 Document Format

- All EMS System Procedures follow the following standard format:
  - Purpose
  - Scope
  - Definitions (if any)
  - Responsibilities
  - Procedure(s)
  - References and/or Related Documents (if any)

### 5.4 Document Approval

- EMS System Procedures shall be reviewed and approved by the EMS Steering Committee members. The official approval of the procedures shall come from the Steering Committee members to the Environmental Project Manager electronically via e-mail or via signature approval at Annual EMS Management Review Meeting. Once this is done, the initials of the Steering Committee Members will appear in the “Approved By” section of the Header.
- Standard Operating Procedures (SOPs) will be approved by Department Heads/Division Managers, or may go to one or more EMS Steering Committee members for final approval. The Environmental Project Manager will decide, based on the contents of the SOP, which authorities should issue final approval.
- Once a document has been approved by the appropriate authority, it shall be released and considered to be an active component of the County Schools’ EMS. The Environmental Project Manager will make the document available to the appropriate personnel.


### 5.5 Document Review, Revision and Approval

- Documents receive an issue and expiration date, as needed.
- All EMS System Procedures are reviewed annually and given a new issue and expiration date.
- Other EMS documents may not require a periodic revision; these documents will have an “N/A” in the Expiration Date section on the header.

### 5.6 Obsolete Documents

- Documents may be made obsolete by replacement of another document, or a change in procedure(s). In this case, the original document will be labeled “Obsolete” and maintained for a minimum of one (1) year (or other applicable record retention period) in the Environmental Project Manager’s EMS files.



 <b>EMS Albemarle County Public Schools</b>				<b>Subject:</b> <b>Document Control and Records Management</b>		
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## 5.7 EMS Records

- The Environmental Project Manager is responsible for the maintenance and retention of EMS-related records.
- EMS-related records shall be stored in a manner that protects them from damage, deterioration, or loss to the extent practicable.
- EMS records shall be retained for a minimum of three (3) years, except where legal and other requirements dictate a different retention period.


5.8 All EMS documents and other records that are not exempt from disclosure under the FOIA shall be made available as required by law.

## 6.0 RELATED DOCUMENTS

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6.1 ISO 14001:2004(E) Standard Excerpt 4.4.5 – Control of Documents

6.2 ISO 14001:2004(E) Standard Excerpt 4.5.4 – Control of Records

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Monitoring and Measurement</b>		
Document No.: EMS-08	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/24/2022	Page: 1 of 2	Prepared By: LCS	Approved By: JPL, JT, JD, GS

## 1.0 PURPOSE

The purpose of this procedure is to describe the methods used by Albemarle County Public Schools for regularly monitoring/measuring the key characteristics of its activities that can have a significant impact on the environment.

## 2.0 SCOPE

This procedure addresses the monitoring/measuring of environmental performance. Specifically, it includes procedures for the tracking of progress toward achieving Objectives and Targets and the calibration and maintenance of equipment used for environmental monitoring and measurement.

## 3.0 DEFINITIONS


**Calibration** – The periodic comparison of an instrument, piece of equipment, or measurement device to a standard of known or greater accuracy, in order to ensure the continuity and accuracy of measurements or data.

**Key Characteristic** – An element of an operation or activity that includes a measurement or an inspection process which supports the evaluation of environmental performance, including progress in achieving objectives and targets.

**Monitoring/Measuring** – A systematic method/process for estimating, testing, checking, observing, inspecting or otherwise evaluating key parameters and characteristics of Albemarle County Public Schools' environmental management activities to determine conformance with a specific standard and/or other performance requirements, or to measure progress toward its environmental Objectives and Targets.

## 4.0 RESPONSIBILITY

- 4.1 The EMS Steering Committee members shall:
  - Review Annual Environmental Reports (AERs) to assure continuing suitability and effectiveness of Albemarle County Public Schools' EMS
  - Provide feedback on AERs to the Environmental Project Manager
- 4.2 The Environmental Project Manager shall:
  - Track, document, and update progress toward achieving Objectives and Targets in the "Action Plans" section of the Objectives, Targets, and Action Plans document (A1-EMS-02).

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Monitoring and Measurement</b>		
Document No.: EMS-08	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/24/2022	Page: 2 of 2	Prepared By: LCS	Approved By: JPL, JT, JD, GS

- Draft an Annual Environmental Report (AER) using all applicable environmental monitoring/measurement data available, including Objective and Target progress, development of SOPs, training progress, and miscellaneous environmental issues. The Virginia Environmental Excellence Program (VEEP) Annual Report can serve as the basis for the AER.
- Work with appropriate employees to compile a list of equipment, instruments, and measurement devices that need to be periodically calibrated and maintained.
- Identify and assign responsibility to appropriate personnel for monitoring requirements, as necessary (e.g. gasoline and diesel tank weekly status reports).
- Ensure necessary calibration records are maintained.

## 5.0 PROCEDURE


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- 5.1 The Environmental Project Manager will track progress toward achieving Objectives and Targets using the “Action Plan” portion of A1-EMS-02
- 5.2 The Environmental Project Manager is responsible for monitoring compliance with legal and other requirements
- 5.3 Standard Operating Procedures (SOPs) will contain specific instructions on monitoring and measuring procedures, if applicable
- 5.4 The Environmental Project Manager will compile an Annual Environmental Report (AER) and submit this to the EMS Steering Committee on an annual basis. The intention of the AER is to keep the Steering Committee and School Board members informed of EMS progress.
- 5.5 All calibration procedures shall be based on the manufacturer’s recommendations or Owner’s Manual for particular pieces of equipment or instruments being serviced.

## 6.0 RELATED DOCUMENTS

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- 6.1 ISO 14001 Standard Excerpt 4.5.1 – Monitoring and Measurement
- 6.2 EMS-02, EMS Objectives and Targets Procedure

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>EMS Management Review</b>		
Document No.: EMS-09	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/29/2022	Page: 1 of 2	Prepared By: LCS	Approved By: JPL, JT, JD, GS

## 1.0 PURPOSE

The purpose of this procedure is to outline the requirements for conducting periodic Management Reviews in support of Albemarle County Public Schools' Environmental Management System (EMS). The main purpose for a periodic Management Review is to ensure the continuing adequacy, effectiveness, appropriate scope and improvement of the EMS.

## 2.0 SCOPE

This procedure applies to all Management Review participants and Management Review activities conducted as part of Albemarle County Public Schools' EMS.

## 3.0 DEFINITIONS

**Management** – Individuals on the Albemarle County Public Schools' EMS Steering Committee

**Management Review** – The process of conducting an evaluation of the EMS and developing any necessary changes to the EMS to continuously improve its effectiveness.


## 4.0 RESPONSIBILITY

4.1 The EMS Steering Committee will:

- Participate in periodic EMS Management Review feedback

4.2 The Environmental Compliance Manager will:

- Lead and coordinate feedback from EMS Steering Committee members, including the presentation of new issues and summary of progress
- Incorporate feedback from EMS Steering Committee in consideration of environmental goals as part of the Division's Key Performance Indicators (KPIs)
- KPI performance is reported to the School Board on a quarterly basis

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>EMS Management Review</b>		
Document No.: EMS-09	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/29/2022	Page: 2 of 2	Prepared By: LCS	Approved By: JPL, JT, JD, GS

## 5.0 PROCEDURES

- 5.1 A minimum of one (1) Management Review Meeting will be held annually. This meeting will include the Environmental Project Manager and EMS Steering Committee members.
- 5.2 The content of Management Review Meetings will include, at a minimum:
- Potential inclusion of new Activities, Aspects/Impacts, and development of new Objectives and Targets
  - Progress towards current Objectives, Targets, and related Action Plans
  - Progress related to environmental training and standard operating procedure (SOP) development
  - The possible need for changes to EMS-related procedures and the Environmental Management Policy and Administrative Procedure



Albemarle County Public Schools

**Subject:**

**Nonconformance, Corrective and Preventive Action**

Document No.: EMS-10	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/29/2022	Page: 1 of 3	Prepared By: LCS	Approved By: JPL, JT, JD, GS
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## 1.0 PURPOSE

The purpose of this procedure is to establish and outline the process for identifying, and documenting EMS nonconformances, and for implementing corrective and preventive actions to mitigate their environmental impacts and prevent their recurrence.

## 2.0 SCOPE

This procedure applies to nonconformances and corrective and preventive action activities associated with Albemarle County Public School Division's EMS.

## 3.0 DEFINITIONS

nonconformance - non-fulfillment of an EMS system procedure (such as this one).

Nonconformances are typically identified during internal EMS audits and are classified into two categories: major and minor. **Major nonconformances** reflect a complete breakdown or absence of following an EMS system procedure; a number of minor nonconformances against the same EMS procedure; or a minor nonconformance from a previous audit that has not been addressed. **Minor nonconformances** reflect that a given component of an EMS written procedure is not being implemented according to the procedure.

corrective action - action to eliminate the cause of a detected nonconformance. It is generally a reactive process used to address problems after they have occurred and been identified.

Corrective actions may be triggered by a variety of events, including:

- EMS audits;
- EMS Management Reviews;
- Monitoring and measurement results;
- Communication with regulators;
- Complaints (internal or external); or
- Deficiencies from compliance audits.

deficiency - a finding that appears to represent an incomplete requirement relating to an environmental aspect, and triggers the need for a corrective action.

observations – an observed weakness of the EMS and an opportunity for improvement – usually identified during an EMS audit.

preventive action - action to eliminate the cause of a potential nonconformance. It is generally a proactive process intended to prevent potential problems before they occur or become more severe. Preventive action focuses on identifying negative trends and addressing them before they become significant. Events that might trigger a preventive action include:

- monitoring and measurement results;



Albemarle County Public Schools

**Subject:**

**Nonconformance, Corrective and Preventive Action**

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- trends analysis;
- objectives and targets status;
- response to emergencies and close calls; or
- anticipated changes in laws or regulations.

#### 4.0 RESPONSIBILITY AND AUTHORITY

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##### 4.1 EMS Steering Committee

- Review the status of any existing/identified nonconformances and corrective and preventive actions as part of EMS Management Review (see EMS-09, Management Review)

##### 4.2 Environmental Project Manager (EPM), or designee

- Track and record all identified nonconformances in Nonconformance Log, EMS-10-R-01
- Coordinate corrective and preventive actions related to nonconformances
- Communicate nonconformances to EMS Steering Committee during Management Review process

#### 5.0 REQUIREMENTS AND PROCEDURES

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##### 5.1 Nonconformances, corrective/preventive actions, and observations are logged and tracked by the EPM using the Nonconformance Log. The log includes the following required information:

- The source of or circumstance under which the nonconformance was identified (e.g., EMS audit, compliance assessment, individual observation);
- The type of citation (nonconformance, corrective action, observation) and its classification (major, minor, or simply observation);
- A summary of the finding and a description of the issue;
- A notation of whether a timely resolution occurred;
- A description of the suspected cause and a recommended solution;
- A timeframe expected for the resolution to be implemented;
- An update as to whether/when the nonconformance has been addressed

##### 5.2 The EPM evaluates any identified nonconformances and the need for corrective or preventive action(s).



**Albemarle County Public Schools**

**Subject:**

**Nonconformance, Corrective and Preventive Action**

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- 5.3 Once the corrective/preventive action(s) have been completed, the EPM will log the investigation/correction details into the Nonconformance Log.

NOTE: Corrective and prevention actions can be initiated without an associated nonconformance.





Albemarle County Public Schools

**Subject:**  
**Nonconformance Log**

Document No.:

EMS-10-R-01

Issue Date:

5/29/2022

Expiration Date:

5/29/2023

Last Revised:

7/01/2009

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Prepared By:


LCS

Approved By:

JPL, JT, JD, GS

**Environmental Management System (EMS)**  
**Nonconformance Log**

Source of Nonconformance (include Date)	Applicable Facilities	Type of citation	Summary of Finding	Cause of Nonconformance	Summary of Corrective Actions needed	Deadline	Person(s) Responsible for Corrective Action(s)

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Audit Procedure</b>		
Document No.: EMS-11	Issue Date: 5/29/2022	Expiration Date: 5/29/2023	Last Revised: 5/29/2022	Page: 1 of 4	Prepared By: LCS	Approved By: JPL, JT, JD, GS

## 1.0 PURPOSE

The purpose of this procedure is to describe the process for planning, performing, documenting, and reporting the results of periodic internal audits of the Albemarle County Public School Division's EMS in order to evaluate the EMS' comprehensiveness and effectiveness.

## 2.0 SCOPE

This procedure applies to all internal audits conducted in the Albemarle County Public School Division.

## 3.0 DEFINITIONS

audit findings - results from EMS audits that are classified into two (2) categories: nonconformances and observations.

nonconformances - typically identified during EMS audits and are classified into two (2) categories, major and minor.

major nonconformances - reflect a complete breakdown or absence of an EMS element (e.g. environmental aspects or document control), a number of minor nonconformances against the same element or a minor nonconformance from a previous audit that has not been addressed.

minor nonconformances - reflect that a given component of an EMS written procedure is not being implemented according to the procedure.

observations - an observed weakness in the EMS and an opportunity for improvement.


EMS audit - a planned and documented investigation performed in accordance with this system procedure for the purpose of verifying, by examination and evaluation of objective evidence, that the EMS has been implemented according to all written EMS system procedures.

EMS auditor - a qualified and trained individual who is authorized to perform specific EMS Audit functions under the direction of a Lead EMS Auditor.


lead EMS auditor - a qualified and trained individual who is authorized to plan, organize, and direct EMS Audits of the Division's EMS, to report findings and observations, and to evaluate the adequacy of corrective and preventive action(s).

## 4.0 RESPONSIBILITY AND AUTHORITY

### 4.1 EMS Steering Committee

 <b>Albemarle County Public Schools</b>				<b>Subject:</b> <b>Audit Procedure</b>		
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- Review EMS audit results and provide feedback if appropriate.
- 4.2 Department Directors and Division Managers
- Provide time, work space, and personnel as necessary to support the performance of EMS audits.
- 4.3 Environmental Project Manager (EPM), or designee
- Coordinate audit activities with the EMS Core Team(s)
  - Designate or select a Lead EMS Auditor and coordinate with the lead auditor to formulate an audit team. Both the Lead Auditor and audit team must be “third party”, insofar as they are independent of the day-to-day management.
  - Coordinate with the Lead Auditor in developing and planning individual audits.
  - Review and approve EMS audit reports.
  - Present audit reports to the EMS Steering Committee.
  - Coordinate follow-up procedures for audit findings in accordance with EMS-10, Nonconformance, Corrective and Preventive Action.
- 4.4 EMS Core Team
- Support the ECM in the scheduling, planning and coordination of the EMS audit.
  - Help prepare for the audit.
- 4.5 Lead Auditor
- Coordinate with the ECM the organization, planning, and direction of the EMS audit, as well as the selection, training, and supervision of the audit team.
  - Prepare audit plans and reports in coordination with the ECM.
- 4.6 Auditors
- Participate in conducting audit investigations and reporting results in accordance with this procedure, under the direction of the Lead Auditor.

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## 5.0 REQUIREMENTS AND PROCEDURES

- 5.1 **Audit Scheduling:** EMS Audits shall be conducted at planned intervals, including at least one audit following a full EMS implementation cycle, and audits every third year thereafter. Additional audits may be conducted at the discretion of the ECM, or when specifically requested by upper management.
- 5.2 **Audit Notification:** The ECM shall notify the EMS Core Team and EMS Steering Committee of audit plans at least two weeks (14 calendar days) prior to the projected audit date. The notification shall set the date, time, location, and method of the audit, and shall request that appropriate facility personnel participate.
- 5.3 **Audit Plan:** The Lead EMS Auditor shall coordinate with the ECM in the preparation of an audit plan. Plans shall be submitted to the affected EMS Core Team and facility managers prior to the audit. At a minimum, the audit plan shall include the following:
  - a statement of the audit objectives and audit scope;
  - an identification of the specific EMS elements being audited;
  - the date(s) of the audit; and an identification of the audit team and the members' assigned roles.

**NOTE:** Previous audit results and corrective and preventive action requests shall be reviewed by the audit team **prior to** preparation of the audit plan. Trends or repeated problems identified during past audits shall be reflected in the scope of the audit, as appropriate. The ECM shall provide this information to the audit team.
- 5.4 **Audit Team Selection:** The EPM and the Lead EMS Auditor shall select audit team members based on a consideration of the audit scope, the qualifications and capabilities of the prospective auditors, and the sufficient independence of the individuals from the day-to-day management/operations of the fenceline to be audited in order to minimize potential conflicts of interest.
- 5.5 **Audit Checklist Preparation:** The Lead EMS Auditor shall coordinate the preparation of an audit checklist to use during the audit based on the Division's *Environmental Management Policy* and the Division's EMS system procedures and related records.
- 5.6 **Opening Meeting:** A pre-audit opening meeting shall be conducted by the Lead EMS Auditor and shall be attended by the audit team members and appropriate representatives. The scope of the audit and duties of the auditors shall be briefly presented, questions from the audited facilities shall be answered, proper lines of communication shall be established, and a time for the audit closing meeting shall be set.

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- 5.7 Conducting the Audit: Audit methods may include EMS system procedure and related documents/records review, interviews with staff members, and direct observation of site activities.
- Observed conditions that require *immediate* corrective action shall be promptly reported to the ECM by the Lead Auditor.
  - When the checklist activities have been completed, the audit team shall meet and discuss their potential findings with the Lead EMS Auditor. The Lead EMS Auditor shall review the auditors' input, obtain additional clarification where required, and begin preparation of an audit report, which will include a list of potential findings (nonconformances or observations).
- 5.8 Closing Meeting: A list of potential findings shall be presented to representatives in a post-audit closing meeting.
- 5.9 Audit Report: The Lead EMS Auditor shall coordinate with the audit team, as needed, and prepare a formal written audit report, to include the following items:
- a brief description of the audit scope;
  - the identification of the audit team and key personnel involved;
  - a general statement summarizing the effectiveness of the EMS; and
  - a listing and brief discussion of any findings along with recommended corrective or preventive actions.
- 5.10 Management Review: Management Review of the EMS Audit will be conducted in accordance with EMS-09, Management Review.
- 5.11 Audit Documentation:
- The **occurrence** of all EMS audits shall be documented in the EMS Audit Log (EMS-11-R-01), including the facilities audited, date of the audit, name of lead auditor and number of audit findings.
  - The **details of audit findings**, however, shall be recorded in the Nonconformance Log (EMS-10-R-01) by the ECM.
  - These findings will subsequently be handled in accordance with EMS-10, Nonconformance, Corrective and Preventive Action Procedure.
  - The EPM, or designee, will retain all documentation associated with the audit (notification memos, audit plan, report, etc.) in an "EMS Audit" file on the Building Services Department shared server.



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**Emergency Preparedness and Response**

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## 1.0 PURPOSE

The purpose of this procedure is to establish, implement and maintain a procedure for the identification of potential emergency situations and accidents that can have an adverse impact on the environment, and to establish a response plan in order to prevent, mitigate, or limit any potential adverse environmental impacts associated with such an incident.

## 2.0 SCOPE

This procedure applies to all operations within the Albemarle County Public School Division.

## 3.0 DEFINITIONS

emergency – any potential problem, accident, spill, fire, or any other situation which requires immediate, effective response in order to mitigate or prevent adverse impacts on the environment, human life or the facility and its operations.

## 4.0 RESPONSIBILITY AND AUTHORITY

4.1 The Environmental Project Manager (EPM) or designee:

- Collaborate with the EMS Core Team in identifying a comprehensive list of all potential emergencies, and in developing response plans for identified emergencies.

4.2 EMS Core Team:

- Collaborate with the EPM in identifying potential emergencies and developing appropriate response plans for identified emergencies (response plans can take the form of SOPs, manuals, diagrams, etc.)
- Evaluate Emergency Response Plans with EPM annually at a minimum.
- Communicate any changes in facility or equipment that could lead to an emergency to EPM immediately.

## 5.0 REQUIREMENTS AND PROCEDURE

The following procedure will be implemented as it is incorporated into the Albemarle County Public School Division's EMS process:



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### 5.1 Existing Emergency Response Plans

If the facility has existing emergency response procedures, the EMS Core Team will review these to ensure they are adequate. The team shall ensure the plans cover all facility impacts and equipment that may potentially cause an emergency. These procedures may be modified as necessary by the team, or used "as is."

### 5.2 Creating a Comprehensive List

The EMS Core Team and EPM will meet to create a list of potential emergency situations within the Division. This list will be maintained (and updated) in the "Emergency Response Log", EMS-12-R-01.

- Significant Aspects/Impacts should be considered to ensure any potential situations associated with these are addressed.
- Previous accidents/emergencies at the facility should be considered.
- The EMS Core Team should evaluate any emergency situations that could be associated with equipment usage or any situations that may negatively impact the environment.

### 5.3 Developing Response Procedures and Plans

Once the list of potential emergency situations is finalized, the EMS Core Team will work to develop appropriate response plans and procedures to address each potential identified emergency situation.

### 5.4 Communicating Emergency Response Plans

Appropriate staff members will be informed of the Emergency Response Plans and Procedures. Staff members who are involved in day-to-day activities that could cause or observe an identified emergency shall receive appropriate training. If deemed appropriate by the EPM, local emergency responders shall be made aware of the Emergency Response Plan(s).

### 5.5 Periodic Evaluation

The Emergency Response Plans shall be routinely evaluated annually at a minimum by the EMS Core Team. The Emergency Response Plans will also be evaluated after any major change in facility operations or installation of new equipment that may affect the facility's potential for emergency situations to occur. It is the responsibility of the EMS Core Team to notify the EPM when such a change occurs or is planned.

The EMS Core Team will also evaluate the effectiveness of the response procedures after the occurrence of an incident or emergency situation. Changes to the response procedures to improve the timeliness and effectiveness of the response should be made as necessary.

### 5.6 Recording Emergency Incidents

All emergency incidents should be recorded in the Emergency Response Log (EMS-12-R-01).



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## Environmental Management System (EMS) Emergency Response Log

### Potential Emergency Situations

Potential Emergency	Possible/Needed Response Plan	Existing Response Plan	Description
Oil / Fuel Spill	n/a	SOP-UST-01	
Blood-borne Pathogen-related incident	Medical waste / blood borne pathogen response SOP	n/a	
PCB leak		SOP-PCB-01	
Chemical Spill	General chemical spill SOP	n/a	
Asbestos Exposure			

### Documented Emergencies

Description of Incident	Date	Description of Response	Follow-up Actions
Hydraulic oil spill at Vehicle Maintenance Facility at fueling station	8/5/2011	VMF personnel cleaned up spill created by contractor; Montie Breeden, project manager, followed up with contractor and documented response.	Cleanup charges will be billed to contractor.
Fuel oil release at Crozet Elementary	12/15/2019	Emergency response by cleanup crew and report submitted to VA Department of Environmental Quality	Design changed for day tank controls to boiler; Abatement and Site Characterization Report submitted to DEQ
Gasoline spill at Vehicle Maintenance Facility at fueling station	8/2/2021	Fire & Rescue responded to the scene after fuel delivery driver overfilled	Overfill protection evaluated and corrected; spill





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		the tank. Cleanup crews in place quickly and onsite absorbent used to contain the spill.	response procedures reviewed by fuel contractor