

EMS Albemarle County Public Schools

Subject:

Environmental Aspects and Impacts

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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 <u>significant</u> 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

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

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

<u>Environmental Impacts</u> -- 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. <u>Example</u>: Soil or groundwater pollution <u>from</u> a fuel spill (negative impact).

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

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



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4.0 RESPONSIBILITY

- 4.1 The Environmental Compliance 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



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5.0 PROCEDURE

5.1 Identifying Key Activities

The Environmental Compliance 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 knowledgable 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 Compliance 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 Compliance 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 Compliance 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 Compliance 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.



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5.5 Environmental Aspect Significance Ranking

The Environmental Compliance 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 Compliance 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 Compliance Manager; changes will be made as necessary.

Any aspect receiving a ranking of "3" or higher for the "employee/student exposure" criterion will automatically be communicated by the Environmental Compliance Manager to the Loss Control Manager for review. If the Loss Control Manager determines that action is required to address the hazard, the Loss Control Manager must respond to the Environmental Compliance Manager with a recommendation or plan to address the issue within 60 days of being notified of the ranking, or sooner if appropriate based on the hazard identified. If the Environmental Compliance Manager and/or Loss Control Manager determine there is a safety hazard requiring *immediate* attention, the Environmental Compliance Manager and Loss Control Manager will address and work to resolve the situation immediately.

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 Compliance 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 Compliance Manager regarding the value. The Environmental Compliance 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



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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 Compliance 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

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

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