

# The Mississippi Department of Environmental Quality's Environmental Stewardship Recognition Program

# Membership Application Instructions

Applications are accepted annually from July 1 – September 30

# TABLE OF CONTENTS

I.	Program Overview	1
II.	Application Form	
	Section 1 - General Information	2
	Section 2 - Environmental Stewardship Policy	3
	Section 3 - Type of Membership Requested	3
	Section 4 - Environmental Management Plan or Environmental Management System Requirements	5
	Section 5 - Environmental Project Achievements	9
	Section 6 – Certification	9
III.	Environmental Project Form	10
IV.	Community Service Project or Mentor Form	11
V.	Submission & Contact Information	12



# **PROGRAM OVERVIEW**

enHance is the Mississippi Department of Environmental Quality's environmental stewardship recognition program. The purpose of the program is to recognize organizations that have demonstrated environmental performance excellence in operations. Members must have initiated development of an environmental management plan, be committed to continuous improvement in operating practices, and have implemented one or more environmental projects that benefit the environment. Members of this program must not only meet environmental compliance requirements, but must demonstrate a commitment to "exceed compliance" through sustainable practices.

While it is anticipated that industries will be the primary participants, the enHance program is open to any organization that meets the criteria. This may include regulated and non-regulated businesses, industries, governmental agencies, schools, associations, community groups, and other similar organizations. Municipalities seeking to join the program have a separate application track. Further information on the municipality program can be found on the enHance website (www.enhance.ms).

Through participation in the enHance program, organizations are recognized as the premier environmental leaders in the state of Mississippi.

# I. Application Form

### Section 1. General Information

General applicant information - Please complete all fields.

1. <u>Applicant</u> - Enter the name of the industry, business, organization, governmental unit, or other entity that is applying for membership.

2. <u>Physical Address</u> - Enter the street address of the entity applying for membership.

3. <u>Mailing Address</u> - Enter the mailing address if different than the physical address.

4. <u>Contact</u> - Enter the name of the person responsible for the membership application process, along with correspondence information.

5. <u>SIC Codes</u> - Where applicable, include the Standard Industrial Classification (SIC) Codes used to classify your operations. If multiple codes apply, include all (up to three), with the primary code listed first. A list of SIC codes can be found at <u>www.census.gov/epcd/www/sic.html</u>.

6. <u>NAICS Codes</u> - Where applicable, include the North American Industry Classification System (NAICS) codes used to classify your business. If multiple codes apply, include all (up to three), with the primary code listed first. A list of NAICS codes can be found at <u>www.census.gov/epcd/www/naicstab.htm</u>.

7. <u>Description of Operations</u> - Provide a brief description of the activities and/or products of the organization.

8. <u>Number of Employees</u> - List the number of employees that work for the organization.

9. Environmental Permits/ID Numbers - Where applicable, the applicant should have a master list of all permit and identification numbers related to environmental activities. State permit information from the Office of Pollution Control is available from the Mississippi Department of Environmental Quality website: <u>http://www.mdeq.ms.gov.</u> Current facility permit information for air, water, storm water, solid waste, and hazardous waste can be referenced on this site from enSearch. Additional contact information for DEQ offices includes: 601-961-5171 Office of Pollution Control (Main): Geology: 601-961-5515 Office of Land and Water: 601-961-5642,601-961-5202 Wetlands: 601-961-5171, Water Quality Certification Branch 601-961-5171 Federal TRI:

#### Section 2. Environmental Stewardship Policy

Each applicant is required to have a formal policy addressing environmental commitment and compliance. This policy should be signed by senior management, posted in a prominent location, communicated to all employees and available to the general public. When drafting the pledge consider such items as: commitment to voluntary and required environmental activities, pollution prevention at the source, continuous improvement, and communication methods.

#### Section 3. Type of Membership Requested

There are three membership levels: **Associate, Steward and Leader**. Determine the level of membership being applied for based on the following requirements:

#### **ASSOCIATE:**

The Associate level of membership is the entry level where facilities commit to improving environmental performance, develop an implementation plan, and initiate an environmental improvement project.

#### **STEWARD**

Steward is the intermediate level of membership. Facilities have made progress in stewardship efforts and implemented an additional improvement project.

- 1) **Policy** Has a signed environmental policy addressing environmental commitment. (See Section 2)
- 2) **Compliance** Must demonstrate a History of Meeting All Regulatory Obligations with no previous judgment or conviction for a criminal violation. Must have no unresolved Notice of Violation's (NOV's) and be in compliance with any agreed order. (See Section 6.1)
- 3) **Environmental Management Plan** Has a plan for current and continuing environmental improvement actions; Meets Planning requirements including:
  - Organized an environmental team
  - Conducted an operations audit
  - Identified and prioritized environmental aspects and impacts
  - Established measurable objectives and measurement system to monitor (See Section 4.2)
- 4) Environmental Enhancement Project (1) Has one active or completed voluntary project to reduce environmental impacts. Please note that projects that only meet regulatory requirements are not eligible. (See Section 5)

# Steward meets all Associate Requirements with the following additional requirement:

1) Environmental Enhancement Projects (2) - Has one additional active or completed voluntary project with environmental enhancement results (total of two).

#### **LEADER:**

Leader is the highest level of membership and represents superior environmental performance. Facilities must operate under ISO 14001 or an equivalent **Environmental** Management System. In addition to two environmental projects, Leaders must provide outreach with a community service project or serve as a mentor. Leaders must meet stricter compliance requirements.

- Policy Has a signed environmental policy addressing environmental commitment. (See Section 2)
- 2) **Compliance** Must demonstrate a History of Meeting All Regulatory Obligations and:

- Must have no previous judgment or conviction for a criminal violation.

- Must have no unresolved Notice of Violation's (NOV's) and been issued no more than one (1) NOV in the past three (3) years.

- Must be in compliance with any agreed order.
- Must not have been levied a fine from the MS Dept.

of Environmental Quality or the EPA in the past three (3) years. (See Section 6.1)

3) Environmental Management System – Has implemented an Environmental Management System with the following components: Planning, Implementing, and Checking/Reviewing. (See Section 4) Applicants that have ISO14001 certification meet the requirements of an EMS.

4) **Independent audit** - A self audit must be conducted by each facility applying for membership within one year of the application. An independent audit by a qualified assessor is required for the Leader level and must be conducted by someone who is not directly employed by the applicant.

5) **Environmental Enhancement Projects (2)** - Has two active or completed voluntary projects with environmental enhancement results.

6) **Community Service Project or Mentorship** – Has a community service project that demonstrates a significant community contribution with environmental benefits and involves direct participation from the organization. Alternately, a facility can serve as a mentor. (See Section III)

#### **APPLICATION REVIEW - ALL LEVELS OF MEMBERSHIP**

- A site visit may be conducted for any applicant into the program. The purpose of the site visit will be to review the application and proposed projects and to observe operations with regard to environmental management. The site visit team will consist of MDEQ personnel from the pollution prevention division as well as one representative from the compliance division. The compliance representative will be from a sector group that is not responsible for regulation of the facility. Applicants should expect MDEQ employees to be diligent in responding to observed non-compliance violations during an enHance site visit. Responses could include a follow-up Compliance Evaluation Inspection by compliance personnel.

#### Section 4. Environmental Management Plan (EMP) or Environmental Management System (EMS) Requirements

Each applicant is required to have an Environmental Management Plan (EMP) or have implemented an Environmental Management System (EMS). Key components must be met to fulfill the requirements of an EMP or EMS.

#### Section 4.1 ISO Certification

Applicants that have ISO 14001 certification should meet the qualifications for an Environmental Management System. A copy of certification status should be provided. Skip to Section 5.

#### Section 4.2 EMP and EMS Component Requirements

Key components of an Environmental Management System (EMS) include: Planning, Implementing, and Checking/Reviewing. For the purposes of membership, the definition of an Environmental Management Plan includes meeting the Planning requirements of an Environmental Management System.

When responding yes or no to the application questions, please consider if the following general guidelines are being met. A summary checklist is provided at the end of each section.

#### A. PLANNING

#### A.1 Environmental Aspects and Impacts

An environmental aspect is how your organization, through an activity, product, or service, impacts the environment. An environmental impact is any change in the environment that results from an organization's activities, products, or services.

**Conduct an audit**. Activities, products and services should be reviewed for environmental impacts. Consider known aspects such as:

- Regulated activities and non-regulatory requirements
- Legal and other environmental requirements
- Industry or Operating Standards
- Natural resource usage (materials, water, energy, etc.)
- Normal operations including, but not limited to: Material handling and storage
   Scrap handling and storage
   Waste handling and storage
   Accounting and Purchasing
   Noise

**Identify those aspects with the most significant impacts**. Aspects should be prioritized, based on defined ranking criteria, in order to address those with the greatest potential impacts.

**Set specific goals that are realistic within the framework of the organization and that can be measured.** Progress against these goals should be tracked. Have a procedure for continual review and communication of requirements. This could include periodic checks with regulatory agencies, consultants, applicable publications and training seminars, etc.

#### A.2 Structure

**Use a team approach** with a team leader or "champion" that directs the environmental management process. The size of the team should be reflective of the size of the organization and team members from the following functions, at minimum, should be considered:

- Operations/Production
- o Maintenance
- Engineering
- Safety/Health/Environmental
- Quality Control
- o Purchasing
- o Accounting
- o Shipping/Receiving

Team members should have specific, assigned responsibilities.

# You can answer "yes" to PLANNING if you can answer yes to the following questions:

	IE2
a. Have conducted an operations audit	
b Have organized a team	
c. Have identified environmental aspects, both regulated and non-regulated	
d. Have identified environmental impacts	
e. Have prioritized impacts and established measurable objectives and targets	
f. Have established a measurement system for monitoring progress toward objectives and targets	

#### **B. IMPLEMENTING**

#### **B.1** Responsibilities

Management should provide adequate resources for execution of activities. Responsibilities for specific tasks and the overall program should be designated.

#### **B.2** Documentation

There must be documentation in order to manage and measure environmental activities. There should be procedures in place for managing documents, ensuring that they are current and followed. These procedures should identify responsibility for document control, including issuance, modifications, approval, distribution, and general maintenance. Activities and procedures that have environmental impacts should be documented in order to assure control.

#### **B.3** Communication

Communication must be managed on both an internal and external basis. Documentation of communication should be incorporated into the process. Information can be shared internally through such methods as e-mail, meetings, newsletters, and bulletin boards. External communication should be handled through identified key personnel. Websites, newsletters, and press releases are examples of external communication activities. The commitment to the environment should be shared with the community and other interested parties.

#### **B.4** Training

Any personnel whose responsibilities and activities have the potential to impact the environment should be adequately trained. Topics should include the importance of the company environmental policy, the potential environmental impacts of their activities, procedures to effectively execute their duties to manage these impacts, environmental goals, and emergency preparedness and response.

- a. Have established EMS responsibilities for meeting objectives  $\hfill \square$  and targets
- b. Have established EMS procedures for meeting environmental objectives, including compliance requirements
- c. Have established EMS document control procedures
  d. Have established EMS communication procedures
- e. Have established an environmental training program  $\hfill \square$
- f. Have an EMS that documents the following: policy/pledge, environmental impacts, objectives and targets, compliance

You can answer "yes" to IMPLEMENTING if you can answer yes to the following questions: YES

and audit programs, delegated responsibilities for EMS, emergency preparedness procedures

#### **C. CHECKING & REVIEWING**

An EMS incorporates checking and reviewing progress toward environmental goals. Performance tracking should be an ongoing process, occurring as part of regular operations. Monitoring and measuring will allow a facility to assess its performance against goals and make any necessary adjustments. Process measures and outcome measures are two forms of indicators. Process measures occur within the process and include such things as amount of material used per unit, amount of energy used per unit, and number of employees trained. Outcome measures are the results or byproducts from a process and include such things as hazardous waste generated per unit or air contaminant emissions per unit. It is important to identify the process and outcome measures that are key to environmental performance and accurately measure these. It is important also to determine regulatory compliance status on a regular basis.

You can answer "yes" to CHECKING & REVIEWING if you can answer yes to the following questions:	
yes to the following queetoner	YES
a. Have established an EMS assessment program, including compliance and non-compliance issues	
b. Have established a monitoring method for detecting, preventing, and correcting nonconformances or noncompliances	
c. Have an established method for management review of EMS	

#### Section 4.4 Site Audit

A self audit must be conducted by each facility applying for membership within one year (before or after) of application. An independent audit by a qualified assessor is required for the Leader level and must be conducted by someone who is not directly employed by the applicant.

#### Section 5. Environmental Project Achievements

Complete one project proposal form for each project submitted. The Associate level requires one active or completed voluntary environmental enhancement project.

The Steward level requires two active or completed voluntary environmental enhancement projects. The Leader level requires two active or completed voluntary environmental enhancement projects and one environmental community service project. Agreeing to serve as a Stewardship program mentor may be substituted for the community service project.

A proposed project must result in an environmental benefit. This may be reduced use of materials or natural resources, reduced waste generation, or similar results. Benefits should be quantified.

In order to be eligible for consideration, a project should have been initiated no earlier than the year prior to application submission. Additional project information is included in the following sections:

- II. Environmental Project Form
- III. Community Service Project and Mentor Form

#### Section 6. Certification

Section 6.1 Regulatory Compliance Certification

The applicant should certify their current regulatory compliance status. For the purposes of this application, those applying for the <u>Associate and Steward</u> level must demonstrate a History of Meeting All Regulatory Obligations to environmental compliance.

"History of Meeting All Regulatory Obligations" is defined as exhibiting the ability to meet all regulatory obligations and make all good faith efforts to address questions, instruction and concerns made by MDEQ personnel. The applicant must have no previous judgment or conviction for a criminal violation. The applicant must have no unresolved Notice of Violation's (NOV's) and be in compliance with any agreed order. The applicant must be in compliance with all environmental regulations at the time of application.

For the <u>Leader</u> level, the applicant must have a History of Meeting All Regulatory Obligations (above) and a Record of Sustained Environmental Compliance.

"Record of Sustained Environmental Compliance" is defined as having no previous judgment or conviction for a criminal violation. The applicant must have no more than one NOV in the past three years. The applicant may not have been levied a fine from the MS Department of Environmental Quality or EPA in the past three years.

In addition, MDEQ reserves the right to review current reporting data and certify compliance based on internal records. MDEQ reserves the right to initiate compliance and enforcement investigations resulting from the enHance site inspection.

#### Section 6.2 Certification Statement

Check the box to indicate that all information provided is correct to the best of the applicant's knowledge.

The application should be signed by a Responsible Official of the entity applying for membership. A Responsible Official is defined as follows:

- for a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or the manager of one or more manufacturing, production, or operating facilities
- for a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- for a local, state, federal, or other public agency: either a principal executive officer or ranking elected official

# III. Environmental Project Form

A voluntary project that results in benefits to the environment can be submitted on this form. A voluntary project is one that achieves results beyond compliance requirements. The project must have been initiated within the last two years. The form requires specific project information including:

- 1. Applicant Name and Contact Info
- 2. Project Title

3. A brief description of the activities and environmental benefits associated with the proposed enhancement project and the project implementation dates

4. Documentation of measures or projected results. Typical benefits include waste reduction (hazardous waste, air emissions, water pollutant discharges, and solid waste) or decreased resource consumption (energy usage

reduction, water usage reduction.) Other examples of potential projects include protecting, preserving, or restoring land and reduced material consumption. Any project that can be demonstrated to contribute to the enhancement of the environment is eligible. If the project is complete, actual results should be reported. If the project is a currently active, then the proposed reduction target amount and year should be reported.

#### An applicant for Associate is required to have one environmental enhancement project.

An applicant for Steward or Leader is required to have two environmental enhancement projects.

# **IV. Community Service Project or Mentor Form**

Applicants for the Leader Membership Level must submit this form. Applicants can choose one of two options: implementing an environmental community service project or agreeing to serve as a program mentor for enHance.

Sample environmental community service projects are included on the form; additional types of community service projects will be considered. A community service project should demonstrate a significant community contribution with environmental benefits and involve direct participation from the organization. Adequate documentation of activities should be provided. Project eligibility is determined by MDEQ.

A Leader applicant can alternatively choose to serve as a program mentor. Serving as a program mentor must include one or more of the following activities:

- providing guidance to other applicants on environmental management systems
- assisting in audits at facilities
- successfully recruiting one new member per year
- participating in the enHance Steering Committee

The mentor program will be coordinated through MDEQ.

# V. Submission & Contact Information

Please submit the complete application package to MDEQ. The package should be submitted by:

#### <u>1. E-mail (preferred)</u>

E-mail the completed package to <u>enhance@mdeq.ms.gov</u> and mail the signature page to the address below:

OR

#### <u>2. Fax</u>

Fax the completed package to 601-961-5715; attn: Robbie Wilbur and mail the signature page to the address below:

OR

#### <u>3. Mail</u>

Mail the complete application package to:

enHance Membership Application Attention: Robbie Wilbur Mississippi DEQ P. O. Box 2261 Jackson, MS 39225

For additional information contact Robbie Wilbur at: 601-961-5277.

#### PLEASE NOTE:

- All applicants in the program must agree to share project information for the MDEQ website, newsletter articles, or other venues.
- Upon acceptance, members must agree to submit an annual report by July 31 for each year of membership.
- Information submitted to MDEQ is available for public review. Any exceptions to this must be requested in writing at the time of the submission. The request must describe the information to be treated as confidential and why the information qualifies for confidential treatment. The request must allow disclosure of the confidential information to authorized department employees and/or the United States EPA.

Reference: Mississippi Code Ann. §§ 17-17-27 and 49-17-39.

Further information on public records is available on the MDEQ website under "Freedom of Information Act" or by contacting the FOI Administrator at freedomofinformationcontact@deq.state.ms.us.