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ENVIRONMENTAL ASPECTS MANAGEMENT

POLICY

St. Elizabeth Medical Center shall have a defined process for the identification and evaluation of environmental aspects, establishment of environmental objectives and targets and, for achieving the established environmental objectives and targets.

PROCEDURE

1) PURPOSE

The purpose of this procedure is to define the process for the identification and evaluation of environmental aspects, establishment of environmental objectives and targets and, for achieving the established environmental objectives and targets at St. Elizabeth Medical Center.

2) ABBREVIATIONS

CEO: Chief Executive Officer
EHSO: Environmental, Health & Safety Officer
EOC: Environment of Care
SEMC: St. Elizabeth Medical Center

3) DEFINITIONS

Environment – Surroundings in which the Medical Center operates including air, water, land, natural resources, flora, fauna, humans and their interrelation.

Environmental Aspects - Elements of the Medical Center’s activities, products or services that can interact with the environment.

NOTE: A significant environmental aspect is an environmental aspect that has or can have a significant environmental impact.

Environmental Impact – Any change to the environment, whether adverse or beneficial, wholly or partially resulting from the Medical Center’s environmental aspects.

Environmental Objectives - The overall environmental goal, arising from the environmental policy, that the Medical Center sets itself to achieve, and to which is quantified where practicable.

Environmental Targets - The detailed performance requirement, quantified where practicable, applicable to the Medical Center or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.

Environmental Management Program - The plan, activities, measurements and documentation requirements required eliminating, avoiding, reducing or responding to the environmental impact from an identified significant environmental aspect.



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4) PROCEDURE ELEMENTS

4.1 Environment of Care Team – CEO

A multidisciplinary team shall be responsible for the identification and evaluation of environmental aspects, establishing objectives and targets, and achieving the established objectives and targets. This team is identified as the Environment of Care (EOC) Team.

4.2 Aspects Identification – EHSO

The Environment of Care Team shall use all relevant information in identifying environmental aspects, such as:

- Legal, regulatory and other requirements,
- Examination of existing practices and procedures,
- Historical data and information,
- Observations of activities and physical facilities inspections to document relevant products and services, processes and activities in which to identify environmental aspects.

In identifying environmental aspects, the Environment of Care Team shall obtain input, as appropriate, from department personnel in areas with potential environmental aspects, as well as regulatory agencies, health care industry groups, associations, local entities and other interested parties.

4.3 Environmental Aspects List – EHSO

Environmental aspects shall be documented and maintained on a table by the Environmental, Health & Safety Officer (EHSO). At a minimum, this list shall specify for each aspect identified:

- Processes or activities involving the aspect
- Impact category of the aspect
- Whether or not the aspect is significant and the priority (see section 4.6 below)

The list shall be reviewed and approved by the Environment of Care Team members. When approved by the Environment of Care Team, the EHSO shall sign, date, and retain the list. If a department has a significant environmental aspect to add to the list or an environmental aspect that needs to be evaluated for significance, the Department Manager, or designee shall complete form ECF002, *Environmental Aspect Identification* and submit it to the EHSO.

4.4 Impact Categories – EHSO

Identified aspects shall be assigned to general categories. These shall include, but not be limited to:

- Emissions to air
- Release to water
- Waste management
- Hazardous material storage, handling or use
- Energy consumption
- Use of natural resources
- Land usage/contamination



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4.5 Aspects Significance – EHSO

Identified aspects shall be evaluated to determine their significance. An aspect shall be considered “Significant” when it can be controlled or influenced by the Medical Center and is:

- Subject to environmental legislation, regulation, permit and/or other environmental requirements directly applicable to SEMC
- Subject to a potential accidental release that is regulated or has an environmental impact
- Involved with significant energy or natural resource usage
- Subject to high environmental (air, water, land) loading due to one or more of the following:
 - Toxicity
 - Quantity
 - Consumption
 - Frequency and severity
- Is a significant local environmental community issue

4.6 Aspects Priority – EHSO

Priority shall be assigned to aspects as follows:

- 1 – All aspects covered by environmental regulations or permits and established as significant.
- 2 – All aspects that are not priority 1 but deemed significant enough to have an environmental management program.
- 3 – Aspects that are established as not significant. These aspects shall not have an environmental management program.

4.7 Aspects Summary

A Significant Environmental Aspect Summary will be completed and maintained by the EHSO for each of the identified significant environmental aspects. The summary will identify the following information:

- Name and number of the aspect
- Environmental Impact
- Applicable legal and other requirements
- Method of compliance evaluation
- Operational controls in place
- Recordkeeping Requirements

The review of each Significant Environmental Aspect will consider legal requirements, technological options, financial impact, operational impact, and potentially interested parties. An Environmental Aspect Review Summary shall be generated and maintained by the EHSO to document and summarize these considerations.

4.8 Review of the Aspects List – EHSO

The Environment of Care Team shall review and update, as necessary, the Environmental Aspects List at least once a year. Revision status of the list shall be maintained as well as a review record. Actions that may result in the need to change aspect information include, but are not limited to, the following:

- Installation of new or expanded processes or equipment
- Modifications of processes of equipment
- Use of new or modified products/chemicals
- Discovery of new aspects from existing activities not previously documented



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4.9 Aspects Communication

The Medical Center will not communicate its routine significant environmental aspects (e.g. activities related to air pollution control, regulated waste management, water discharge management) to external parties.

Note: Isolated environmental incidents or other non-routine environmental activities that could impact external parties will be communicated to those parties, as appropriate, with approval from the CEO. Any environmental activities/incidents that have regulatory reporting requirements will be communicated to the appropriate agencies, as required.

4.10 Change In Products/Services, Processes or Activities

The EHSO shall be notified of all changes in products/services, processes and activities that could result in identification of a new aspect or change in status of an existing aspect. Notification shall be as follows:

- New Chemical Products – The EHSO shall be notified of all new chemical and pharmaceutical products in accordance with ECI014, New Chemical/Pharmaceutical Acquisition
- New or Revised Product/Service – The EHSO shall review and approve all New/Revised projects in accordance with Projects Management Procedure SPP026.
- Capital Projects – The EHSO shall review and approve all Capitol Projects that could have an environmental aspect in accordance with Capitol Projects procedure SPP030.
- All Other – Employees shall notify the EHSO when changes to processes or activities have a potential environmental impact or when previously undocumented environmental aspects are discovered. Employees shall be made aware of this responsibility through employee education and training and through regular employee communications.

If, in any of these situations, the EHSO determines that the Environmental Aspects Lists may be impacted, an Environment of Care Team review of the change shall be conducted and if necessary, the list shall be revised.

4.11 Establishing Objectives and Targets – EHSO

The Environment of Care Team shall establish, maintain, track, and update environmental objectives and targets for the Medical. Objectives shall be consistent with the SEMC environmental policy and be one of three types: control, improve or investigate. The EHSO has the responsibility for maintaining and updating the list of the objectives and targets.

4.12 Establishing and Maintaining Environmental Management Programs – EHSO

The Environment of Care Team shall establish and maintain a written environmental management program for each established environmental objective and target. The environmental management programs shall identify the tasks, responsibilities, measurements/monitoring activities and schedules for achieving the associated objectives and targets. Tasks should include any controls required to achieve the objective and any regulatory activity or reporting required on a regular basis. The Environment of Care Team shall review status and update, if necessary, each of the environmental management programs on a regular basis.

4.13 Reporting on Performance – EHSO

Status of the environmental objectives and targets shall be reported and reviewed at the Management Reviews specified in procedure SPP004. Reports shall be documented in the meeting minutes or in attachments to the minutes.



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5) REFERENCES

SPP030, Capitol Project Management Procedure
SPP004, Management Reviews Procedure
SPP026, Project Management Procedure
ECI014, New Chemical/Pharmaceutical Acquisition
ECF003, Environmental Management Program form
Environmental Objectives and Targets Summary

6) RECORDS

Environmental Aspects List
Completed Environmental Management Program forms (ECF003)
Management Review Meeting Minutes
Environmental Aspect Review Summary

7) AUTHORIZING DOCUMENT

ECP005, Environmental Management System Manual

COORDINATED WITH: Environment of Care Team

APPROVED BY: Tom Corp 4/21/06
Environmental, Health & Safety Officer Date