



Division of Operations Environmental Implementation Procedure
Bureau: Highway Maintenance

Date: 3/16/16

Procedure EIP-3
Legal and Other Requirements

Revision: 3.3

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PURPOSE:

The purpose of this Environmental Implementation Procedure (EIP) is to identify, track, and maintain compliance with legal and regulatory requirements that pertain to each Bureau's activities at its facilities; and to advocate that appropriate Bureau staff and management are aware of these requirements. These legal and other requirements must be considered in establishing suitable Bureau environmental objectives and targets.

RESPONSIBILITY:

NHDOT Commissioner/Director of Operations:

- Review and Ensure the master list of legal and regulatory requirements and agreements that apply to the Division of Operations is reflective and pertinent.
- Ensure these requirements and agreements are appropriately and clearly communicated to Division Bureaus via directives, internal memos, or established programs.

Office of Stewardship and Compliance (OSC):

- Create and maintain a master list of legal and regulatory requirements and agreements that apply to Division of Operations Bureaus.
- Assist Bureaus in determining their specific legal and regulatory requirements.
- Review legal and regulatory requirements and communicate these requirements and any updates to these requirements that may impact operations to Bureaus.

Director/Bureau Administrator:

- Coordinate with the EMS Coordinator, Safety and Environmental Coordinators and OSC to ensure that personnel under their supervision are aware of legal and other requirements applicable to the work activities and services assigned to them. Coordinate the development and maintenance of work instructions and other forms of communication to ensure employees are trained to perform their job tasks within the rules and regulations and are aware of appropriate bureau procedures.
District Engineer/ Designee
- Lead District efforts in implementation of EMS for all District locations and staff.
- Coordinate with the EMS Coordinator, The District Safety and Environmental Coordinator and OSC to ensure employees are trained on bureau work instructions and other instructional communications to ensure employees are trained to perform their job tasks within the rules and regulations and are aware of appropriate bureau procedures.
- Create and maintain a list of all required environmental permits for their appropriate District.

Bureau EMS Coordinator and EMS Team:



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- Maintain a master list of all required environmental permits for the Bureau based on the lists of permits provided by each district.
- Review changes in legal and regulatory requirements, as provided by OSC
- Communicate changes in legal and regulatory requirements, and their impacts to Operations to bureau employees.
- Review changes in Operations activities against legal and regulatory requirements, and approved NHDOT Programs.

Bureau Employees:

- Be aware of the legal and other requirements applicable to the performance of assigned work tasks and perform the work in accordance with approved practices and work instructions.

DOCUMENTS AND RECORDS:

- EIP-3-Form 3a General Legal and Other Requirements – Linked to Department’s Environmental Activity Master Pick List
- EIP-3-Form 3b Environmental Permits, Licenses, and Authorizations Register

PROCEDURE:

OSC will create and maintain a listing of legal and other requirements that apply to the Bureaus within the Division of Operations in coordination with the Commissioners and Director of Operations. OSC will review this listing: at least annually or when operations change, or when applicable regulatory requirements change. The completed listing (EIP-3-Form 3a: General Legal and Other Requirements – Linked to Department’s Environmental Activity Master Pick List) will be distributed to all Bureaus within the Division of Operations for their use in their compliance and EMS programs. Sources to be searched for regulatory requirements may include:

- Federal statutes in the United States Code (USC).
- Federal regulations in the Code of Federal Regulations (CFR).
- New Hampshire statutes in the Revised Statutes Annotated (NHRSA).
- New Hampshire administrative rules published by state agencies, at the State Library, the state website (www.state.nh.us) under the New Hampshire Legislature, Division of Administrative Rules, or at state agency websites.
- Safety Data Sheets (SDSs) and other documentation (e.g., manufacturer’s information, user manuals) related to specific products or processes.
- Internal or external environmental compliance audits (checklists and corrective action citations).



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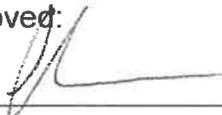
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2. OSC will notify Bureaus in writing of other environmental requirements to which the Department or Division subscribes. These other requirements may include: 1) State of New Hampshire or NHDOT goals and policy directives, 2) commitments to external parties, 3) external environmental initiatives, and 4) input from NHDOT partners and stakeholders.
3. The Bureau EMS Team will review its facilities and operations in light of the list of general legal and other requirements provided to them by OSC, and add any location specific requirements not included on the OSC list, including any municipal environmental requirements as necessary. OSC shall be notified of these added requirements.
4. The Bureau Administrator and the Bureau EMS Team will consider all legal and other requirements when setting their environmental objectives and targets, and when conducting activities that may be subject to these requirements.
5. The Bureau EMS Coordinator and EMS Team will inventory its environmental permits, licenses and authorizations (i.e., currently held and pending), and record this information in EIP-3-Form 3b: Environmental Permits, Licenses, and Authorizations Register. The master list will be reviewed for changes periodically. The District Office List will be reviewed as required when changes are made.
6. The Bureau EMS Coordinator and EMS Team maintain all documentation and key records generated as part of this EIP in accordance with EIP-9: Documentation, Document Control, and Records Management.

Approved: 	Revision #: <u>3.3</u>
Name _____	Revision Date: <u>3/16/16</u>
<u>STATE MAINT ENG</u> Title _____	Supersedes Revision #: <u>3.2</u>
Date <u>10/4/17</u>	

