



Division of Operations Environmental Implementation Procedure

Date: 10/31/11

Bureau: Highway Maintenance

Procedure EIP-6

Revision: 3.2

Organization, Personnel, Accountability, and Responsibility

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PURPOSE:

The purpose of this Environmental Implementation Procedure (EIP) is to define, document, and communicate the roles, responsibilities, accountabilities, and organizational structure of NHDOT personnel involved in activities related to environmental performance, legal and regulatory compliance, and EMS development and implementation.

RESPONSIBILITY:

Office of Stewardship and Compliance (OSC):

- Develop NHDOT and Division-level environmental organization chart(s).
- Provide oversight and assist Bureaus in defining environmental roles and responsibilities within Bureaus.

Director/Bureau Administrator:

- Advocate that adequate resources are available to effectively delineate roles, responsibilities, and authorities within the Bureau.
- Develop roles, responsibilities, and authority for environmental matters and regulatory compliance for Bureau staff as appropriate to the organization.
- Administer EMS disciplinary actions for all levels of Bureau employees consistent with state and department disciplinary protocols.
- Advocate incorporation of environmental performance standards and expectations into position descriptions and performance appraisals for all Bureau staff.
- Lead Bureau efforts to define, communicate, and periodically assess the environmental performance responsibilities of contractors within the Bureau's purview, onsite service providers within the Bureau's purview, and non-Bureau staff.
- Lead Bureau efforts to develop and maintain the environmental organizational chart.
- Appoint EMS Coordinator.

Bureau EMS Coordinator:

- Coordinate with OSC and Bureau Administrator to define specific environmental roles, responsibilities, and authority within the Bureau organization.



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Bureau Employees:

- Understand and comply with assigned environmental roles and responsibilities in EMS.
- Understand the consequences of non-compliance with the Department's and Bureau's policies, procedures, and work instructions as it pertains to environmental compliance.
- Understand that non-compliance issues will be addressed by the Bureau Administrator or District Engineer.

Contractors and Suppliers:

- Contractors and suppliers shall abide by all federal, state, and local regulations while conducting business at Bureau facilities and job sites.
- Contractors and suppliers are responsible for their employees' safety and assure that its employees wear appropriate personal protective equipment while working or conducting business at Bureau facilities and job sites.
- Contractors and suppliers must strive to manage their activities so as to reduce or eliminate negative impacts upon the environment.
- Contractors on site will review the Bureau's Contractor Safety and Environmental Checklist with a Bureau representative in order to comply with the Department's Environmental Policy 501.01.
- Contractors will be under the supervision of a Bureau representative. If a contractor or supplier is found to have compliance issues that arise out of their scope of work, the Bureau representative may remove them from service or the project until the contractor takes corrective action to eliminate or minimize the environmental impact.
- Contractors and suppliers will be familiar with language included in Bureau Statewide contracts under specification compliance as it pertains to environmental compliance.

DOCUMENTS AND RECORDS:

- EIP-6-Form 6a Environmental Organizational Chart and Summary of Environmental Roles, Responsibilities, and Accountabilities.
- EIP-6-Form 6b Contractor and Supplier Safety and Environmental Checklist.
- Supplemental Job Descriptions (as appropriate).

PROCEDURE:

1. The Division Administrator, Bureau Administrator, and OSC will define and describe the specific environmental roles and responsibilities at each level of the NHDOT organization, in accordance with the NHDOT organizational structure and mission, and within each individual's position and management level.



2. Using the following typical lists as a starting point, the Bureau EMS Team and OSC will develop detailed roles and responsibilities, as appropriate, for each level of NHDOT organizational management and structure:

Commissioners and Directors and/or Division Management:

- Assumes overall responsibility and accountability for all NHDOT environmental activities and performance.
- Provides the resources needed to create and implement the EMS, including availability of staff at various levels.
- Approves and communicates NHDOT's Environmental Policy.
- Appoints a coordinator within OSC who is responsible for leading Bureau-wide implementation and maintenance of the EMS.
- Reviews and approves the Bureau's EMS Manual.
- Commits resources needed to maintain the EMS.
- Commits resources needed to maintain compliance with legal and regulatory requirements.
- Participates in annual management reviews of each Bureau's EMS.
- Incorporates EMS, regulatory compliance, and environmental performance expectations into employee performance appraisals and position descriptions.

OSC:

- Communicates and reviews implementation of NHDOT's Environmental Policy.
- Coordinates the development of EMS documentation including the EMS Manual, EIPs, templates, worksheets and the like for use by Bureaus.
- Confirms that the EMS meets the requirements of the Administrative Order of Consent (AOC), the Environmental Policy, the EMS Manual, EMS documentation, and legal and regulatory requirements.
- Provides leadership, guidance, and assistance to Bureaus in development, implementation, and maintenance of the EMS.
- Reviews and communicates legal and regulatory requirements, changes in those requirements, and the potential consequences of regulatory non-compliance.
- Reviews and compares the Organizational Charts and Summaries of Roles, Responsibilities and Accountabilities throughout the organization to confirm that all EMS and regulatory responsibilities are assigned appropriately and that no EMS elements lack assignment.
- Participates in the annual management reviews of the EMS.



Bureau Management:

- Assumes overall responsibility and accountability for all EMS elements and activities, legal and regulatory compliance, and environmental performance within the Bureau.
- Provides resources needed within the Bureau to create, implement, and maintain the EMS, including availability of staff at various levels.
- Advocates that employees under their direction are adequately trained in environmental protection, legal and regulatory compliance, and the potential consequences of regulatory non-compliance.
- Implements disciplinary actions for non-compliance with EMS related procedures and work instructions for all levels of Bureau employees.
- Requires corrective actions of vendors and contractors that are not compliant with EMS procedures and work instructions.
- Advocates that contractors, onsite service providers and non-Bureau staff are aware of and abide by environmental performance expectations and regulatory requirements.
- Develops EMS Coordinator roles and responsibilities for Bureau EMS implementation and EMS Team leadership.
- Establishes the Bureau's EMS Team and advocates that the members receive the resources and support necessary for them to fulfill their EMS responsibilities.
- Assists the EMS Team in defining Objectives and Targets and providing the resources needed to accomplish them.
- Develops roles and responsibilities, and provides support to all Bureau employees in support of the EMS.
- Provides ongoing management support and commitment, and participates in annual management reviews of the EMS.



Bureau EMS Coordinator

- Plans and schedules EMS development and implementation process.
- Leads the Bureau's EMS Team.
- Leads the Bureau's activities related to legal and regulatory compliance.
- Oversees and documents progress toward implementing EMS.
- Develops strategies for EMS communication, training, and document control, within the Bureau.
- Coordinates with OSC on overall EMS strategy and implementation.
- Conducts annual management reviews with Bureau and senior management.

Bureau EMS Team:

- Participates in EMS team meetings.
- Provides input to, and assist the EMS Coordinator in developing and implementing EMS, including delineating roles and responsibilities.
- Identifies significant aspects and impacts; develop objectives, targets, and Environmental Action Plans (EAPs); and monitor the progress of EMS implementation.
- As assigned, team members serve as leader for one or more EAPs, developing strategies and action plans, and assuring that action plans are implemented to meet the targets and objectives.
- Assists the EMS Coordinator in EMS-related tasks, including writing and reviewing documents and implementing EIPs.
- Contributes to ongoing promotion of EMS and training and education of Bureau staff, vendors, and contractors.
- Participates in annual management reviews of the EMS.

Bureau Staff:

- Have a working knowledge of EMS commensurate with their position and function.
- Adhere to the principles of the Environmental Policy.
- Are aware of how EMS elements, goals, objectives, and targets apply to assigned duties and responsibilities.
- Adhere to all legal and regulatory requirements.



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- 3. The Bureau EMS Coordinator and OSC will create an Environmental Organizational Chart and Summary of Environmental Roles, Responsibilities and Accountabilities. This information should be summarized in EIP-6-Form 6a.
- 4. The Bureau EMS Coordinator submits the Bureau's Organizational Chart and Summary to OSC and the Division Director.
- 5. The Bureau EMS Coordinator and OSC will review the Organizational Chart and Summary at least annually for changes in personnel, position titles, position descriptions, and other changes in the organization and in the EMS itself. The EMS Coordinator and OSC will revise those documents for their levels of management as needed; and will communicate any changes to all affected individuals and management levels.
- 6. The Bureau EMS Coordinator and OSC 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>3.2</u>
Name _____	Revision Date: <u>10/31/11</u>
Title <u>STATE MAINTENANCE ENGINEER</u>	Supersedes Revision #: <u>3.1</u>
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