ISO 14001 Element 4.4.4

FORT BENNING SUSTAINABILITY MANAGEMENT SYSTEM MANUAL

SIGNATURE/APPROVAL

The signature and date below indicate approval of the procedure for implementation at Fort Benning

Hard Copy Signed by Brandon Cockrell
and is kept in PAIO Office Garrison Command

SUSTAINABILITY MANAGEMENT SYSTEM MANAGEMENT REPRESENTATIVE

03 REVISION NUMBER

June 24, 2014 DATE

All hardcopy documents with respect to Fort Benning’s ISO 14001 Sustainability Management System (SMS) including the EMS Manual, are controlled and kept in the Plans, Analysis, and Integration Office/Garrison Command, MCOE Headquarters BLDG 4 One Karker Street, Fort Benning, GA. With respect to digital access, appropriate documentation, including the EMS Manual and EMS Training, are located at http://www.benning.army.mil/garrison/sustainability
Sustainability Management System Manual

Prepared for:
Ft. Benning, GA

Strategic Sustainability Support LLC (S-3)
Under Federal Contract W911SF13C0012

Table of Contents (elements)
- Forward Drivers
- Section 1.0 General Requirements
- Section 2.0 Purpose and Scope
- Section 3.0 Environmental Policy
- Section 4.0 Aspects and Impacts
- Section 5.0 Legal and other Requirements
- Section 6.0 Objectives, Targets and Programs
- Section 7.0 Resources, Roles Responsibilities, and Authority
- Section 8.0 Competence Training and Awareness
- Section 9.0 Communication
- Section 10.0 Documentation
- Section 11.0 Control of Documents
- Section 12.0 Operational Control
- Section 13.0 Emergency Preparedness and response
- Section 14.0 Monitoring and Measurement
- Section 15.0 Evaluation of Compliance
- Section 16.0 Non Conformity, Corrective Action and Preventative Action
- Section 17.0 Control of Records
- Section 18.0 Internal Audit
- Section 19.0 Nonconformance and Corrective Action
- Section 20.0 Management Review
Background and Drivers: This manual documents the structure and function of the Sustainability Management System (SMS) developed by the Fort Benning. A SMS addresses and manages the mission, environmental, and social impacts of organizational activities, services, and processes. A SMS is very similar to an Environmental Management System (EMS), but the scope of a SMS is expanded to consider mission and community concerns in addition to environmental concerns. The SMS at Fort Benning involves continual improvement in managing impacts, and seeks opportunities to improve integration of the mission activities with environmental performance. Fort Benning is committed to a policy of sustainable operations through the ongoing operation of an SMS. The SMS is anticipated to strengthen mission readiness in an economically beneficial manner, while preserving the natural resources necessary to support current and future missions. Optimally, the SMS will be integrated into all planning, design, construction, environmental management, operations, maintenance, purchasing, and disposal activities to support the Post as an environmental leader in military and civilian communities. This SMS Manual was developed based on the International Organization for Standardization’s (ISO’s) 14001 Standard and the Army’s Environmental Management System Implementers Guide. ISO is a worldwide professional group that promotes uniform standards among nations. The ISO 14001 standards are voluntary guidelines that provide a consistent program for managing the environmental impacts of business operations. There are no regulatory requirements in ISO 14001; rather, the major focus is the development of performance measures with feedback loops to identify problems or opportunities for improvement, and to implement corrective actions.

This manual serves as the primary source of guidance for the Fort Benning SMS. It provides guidance for planning elements, implementation and operation elements, checking and corrective actions elements, and management review elements that are outlined in the ISO 14001 standard. This manual presents the major requirements described under the various ISO 14001 elements. This manual also includes many of the procedures Ft. Benning will utilize for meeting the required elements of ISO 14001 and managing the environmental impact of routine activities. It is intended that the implementation of an ISO 14001-based SMS will improve environmental performance and mission support, contribute to overall efficiency, and clarify roles and responsibilities within the organization. Success of the SMS is dependent on a commitment to regular reviews and evaluations designed to identify opportunities for further improvement.
1.0 General Requirements

ISO 14001 Requirement: 4.1 General requirements
An organization must establish, document, implement, and continually improve their environmental management system and show how they meet all the requirements of this standard. The organization defines the scope of the EMS, i.e. the boundaries of the organization to which the EMS applies.

This Sustainability Management System or SMS Manual (Environmental Management System) documents the structure, function, and scope of the Fort Benning SMS Program. The manual applies to the entire Post where applicable (see scope) and all its associated activities.

The SMS Management Team, Management Representative (SMS MR) and SMS Coordinator are responsible for the maintenance and implementation of the manual. The SMS Management Representative and the SMS Coordinator facilitate and manage scheduling of the EMS Cross Functional Team or CFT.

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<thead>
<tr>
<th>Document Revision Summary</th>
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<tr>
<td><strong>Revision Number</strong></td>
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<th>Final Sustainability Management System Manual</th>
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| **SMS Coordinator** | **SMS Management** | **Original Date:** 31 October |
Manual Distribution and Control

The Sustainability Management System (SMS) Manual is located and kept in the Plans, Analysis, and Integration Office/Garrison Command, MCOE Headquarters/BLDG 4 One Karker Street, Fort Benning, GA. With respect to digital access, appropriate documentation, including the manual, is located at the MCOE Benning web site below [http://www.benning.army.mil/garrison/sustainability](http://www.benning.army.mil/garrison/sustainability). Copies can also be obtained from the SMS Program Coordinator at the Plans, Analysis, and Integration Office/Garrison Command, MCOE Headquarters/BLDG 4 One Karker Street, Fort Benning, GA. The SMS Coordinator or appropriate designee is responsible for maintaining the SMS Manual under the direction of the SMS Management Representative (SMS MR). Revisions to the SMS Manual shall be routed to, authorized by, and distributed from the SMS Coordinator in accordance with the SMS Document and Record Control Procedure.

All hardcopy documents with respect to Fort Benning’s ISO 14001 Sustainability Management System (SMS) including the EMS Manual, are controlled and kept in the Plans, Analysis, and Integration Office/Garrison Command, MCOE Headquarters BLDG 4 One Karker Street, Fort Benning, GA. With respect to digital access, appropriate documentation, including the EMS Manual and EMS Training, are located at [http://www.benning.army.mil/garrison/sustainability](http://www.benning.army.mil/garrison/sustainability).
2.0 Purpose and Scope

"The Organization shall establish, document, implement, maintain and continually improve an environmental management system in accordance with the requirement of this Internal Standard and determine how it will fulfill these requirements.

Fort Benning is committed to the implementation of an ISO 14001-based Sustainability/Environmental Management System (SMS). The SMS addresses and manages the mission, environmental, and social impacts of Fort Benning’s activities, services, and processes. The SMS at Fort Benning also seeks to continually improve the management of environmental impacts and improve the integration of mission activities and environmental performance. Fort Benning’s SMS complies with the following general requirements established by ISO 14001, Section 4.1:

“The organization shall define and document the scope of its Environmental Management System”

Fort Benning’s scope is fence-line to fence-line applies to all activities, services, operations, facilities, and all personnel assigned to Fort Benning installation where Fort Benning Garrison Command has Operational Control. Where Fort Benning has influence but not operational control there is an expectation that Fort Benning Garrison exercises its influence to achieve the most desirable environmental outcomes for the SMS Program.
3.0 Environmental Policy

ISO 14001 Requirement: 4.2 Environmental Policy

The organization must have a policy, or commitment statement, developed by top management relative to the scope of the EMS that conforms to the standard. This is generally a short statement that drives the remainder of the SMS. There are specific items that must be committed to in the policy, such as compliance with legal and other requirements, prevention of pollution, and continual improvement. In addition, the policy must be communicated to all employees, and others working on behalf of the organization, and be available to the public. The policy provides a framework for reviewing objectives and targets and must be appropriate to the nature and scale of the entity included in the scope. This policy must be documented, implemented, and maintained. This means that it is kept current through the SMS review and continual improvement process, and is implemented through the remainder of the EMS elements.

The Fort Benning environmental policy helps to give direction to the Post’s environmental program and those operations that have the potential to impact the environment.

The purpose of this procedure is to provide a prescribed method for identifying and communicating environmental requirements and policies applicable to the environmental aspects and impacts associated with Fort Benning processes, activities, and services. Implementation of this procedure will ensure that applicable Federal, state, local laws and regulations and Army policies are identified for existing and future Fort Benning processes, activities, and services, and that the requirements are communicated to pertinent Fort Benning organizations and employees.

The environmental policy is reviewed annually by the CFT for conformance to ISO 14001. Typically, the annual review occurs after the Management Review. Any changes recommended by CFT must be approved by the SMS MR and the SMS Coordinator. The Garrison Commander will have final approval noted by his signature and date on the SMS Policy if in fact changes are made.
Environmental Policy

The current environmental policy for Fort Benning is as follows:

1. Fort Benning and the Maneuver Center of Excellence provide trained, agile, adaptive and ready Soldiers and leaders for an Army at war, while developing future requirements for the individual Soldier and the Maneuver Force, and providing a world-class quality of life for our Soldiers and their Families.

2. In order to execute the mission and achieve our environmental goals, Fort Benning implements programs that ensure environmental compliance, pollution prevention and, sustain natural and cultural resources that promote continuous improvement using an Environmental Management System (EMS) focus. The EMS complies with all applicable environmental policies, laws and regulations.

3. Fort Benning will continually assess its Directorate activities, missions, and services to determine their environmental impact. The EMS will identify significant environmental impacts and ensure they are considered when establishing objectives and targets in our environmental management programs. Fort Benning will meet or exceed Army goals to prevent pollution and comply with policies that sustain the environment. The Fort Benning EMS will actively seek opportunities to continuously improve our environmental management system.

The following acronym is used at Fort Benning to help inform soldiers and others about the EMS/SMS and the environmental policy:

HOOAH

H Help implement and perform programs that ensure environmental compliance
O Observe practices that prevent pollution
O Obey policies that sustain natural
A and cultural resources
H Hold up ideas that promote continual improvement in environmental performance
4.0 Aspect and Impacts

**ISO 14001 Requirement: Planning- 4.3.1 Environmental Aspects**

This element requires a procedure to identify environmental aspects and related impacts that the organization can control or have influence over, and determine those which are significant to the organization. ISO 14001 does not prescribe what aspects should be significant, or even how to determine significance. However, it is expected that a consistent and verifiable process is used to determine significance. Aspects are defined as how an organization’s activities, products and/or services interact with the environment. An impact is how an aspect changes the environment. The intent of this element is to help the organization identify how it affects the environment, prioritize aspects, and use the EMS to manage, control, and improve upon the aspects. So, the organization must ensure that the significant aspects are taken into account in the EMS. In order to ensure that the system is continually improving and current, this information must be kept up to date.

The purpose of this procedure is to provide a standard method for identifying the environmental aspects and impacts associated with Fort Benning’s activities, processes, and services. Implementation of this procedure will ensure that only the environmental aspects and impacts that can be controlled or influenced are identified. The procedure also ensures that identified environmental aspects and impacts are evaluated for their significance to the mission, community and environment. The significant aspects and impacts will be used to develop environmental objectives and targets established in the environmental management program and the environmental policy where necessary.

The identification of environmental aspects and impacts resulting from Fort Benning’s activities is essential to the development and continual improvement of the SMS. The CFT uses this information in the development and modification of the policy, objectives, and targets. It is also important for civilian and military personnel to know the significant environmental aspects for their area, so that they can perform their duties in a way that minimizes any potential negative impacts on the environment. The underlying purpose for this guidance is to develop a systematic approach to identifying and ranking aspects.

**NOTE:** This procedure describes the recurring activities for periodically reviewing and updating the Fort Benning functions and corollary environmental aspects and impacts. For new and proposed projects, an environmental review to identify the environmental aspects and potential environmental impacts is conducted in accordance with National Environmental Policy Act (NEPA) requirements. The NEPA review is conducted as outlined in AR 200-2 Environmental Analysis of Army Procedures and AR 200-1, Environmental Protection, and Enhancement.
Environmental Aspects and Impacts Procedure

The SMS Cross Functional Team and Subject Matter Experts (SME) from mostly the DPW Environmental Staff must first identify the environmental aspects that the installation controls and over which the installation may be expected to have an influence for all processes, activities and services. After their identification, each member of the CFT with coordinating direction from the SMS MR and SMS Coordinator contributes to the creation of detail analysis of installation processes and activities. From this list, the CFT developed a preliminary list of aspects/impacts.

The processes/activities that affect the environmental aspect were chosen by their severity

- 5 – Severe, Very High, Adverse Publicity, Public Concern, or Continuous
- 4 – Serious, High, or Serious Community Concern
- 3 – Moderate, Medium high, or Community Concern
- 2 – Minor, Minimal, or Occasional
- 1 – Insignificant, Little Community Concern, or Rare

Current Environmental Aspects and Impacts

In early 2014 the SMS CFT held three separate meetings with appropriate environmental program managers and environmental subject matter experts as well as visits to installation units to determine and identify Fort Benning’s current significant aspects and impacts. The impacts are in relation to areas of Land and Soil, Surface Water and Air Quality, encroachment issues and the overall mission on Fort Benning.

Fort Benning’s 2014 Prioritized Significant Impacts according to significance are in descending order

1. a. Storm Water Discharge  (ranked as the most significant)
2. b. Waste Discharge
3. c. Air Pollutant
4. d. Encroachment
5. e. Land Disturbance
6. f. Energy Usage
7. g. Water Usage
8. h. Cultural / Historical
9. Noise Discharge

http://www.benning.army.mil/garrison/sustainability/
5.0 Legal and Other Requirements

ISO 14001 Requirement: 4.3.2 Legal and Other Requirements

This is a requirement for a procedure that explains how the organization obtains information regarding its legal and other requirements, and makes that information known to key functions within the organization. The intent of this element is to identify the environmental legal and other requirements that pertain to its operations and activities so that the organization can ensure that they are taken into account in the EMS. In doing so, the organization must also determine how these requirements apply to the significant aspects.

Fort Benning complies with all directives of the Department of Defense (DoD) and Army regulations as well as applicable federal, state and local environmental regulations. The Environmental Department under the direction of the Directorate of Public Works is responsible for monitoring all applicable environmental legislation, regulations, legal and other requirements related to specific program areas.

DPW Environmental Staff as well as the Assigned Environmental Attorney/SJA monitors and identifies legal requirements through the facility permits; associated reporting requirements; the Code of Federal Regulations (CFR); GA Codes; Federal Register; GA State Register; local governmental agencies notifications; official communications with DoD and Army sources; commercial regulatory compliance reporting services and other applicable sources to include Fort Benning goals and policies.

Changes in legal or other requirements are evaluated by the appropriate DPW environmental Attorney/Staff Judge Advocate. Revisions will be made to existing Fort Benning policies and procedures, if necessary. Changes will be reported by the most effective means to the affected personnel. The Environmental Attorney/Staff Judge Advocate related to that particular process retains hard copies and appropriate electronic copies /

6.0 Objectives, Targets, and Programs

ISO 14001 Requirement: 4.3.3 Objectives, Targets, and Programs

There is no requirement for a procedure in this element. However, there must be some process that ensures that the objectives and targets are consistent with the policy, which includes the commitments to compliance with legal and other requirements, continual improvement, and prevention of pollution. Also, the organization must take into consideration significant aspects, legal and other requirements, views of interested
parties, and technological, financial, and business issues when deciding what it wishes to accomplish as an objective. The objectives and targets need to exist at whatever functions and levels of the organization, and be measurable, where practicable. Management programs (MPs) are the detailed plans and programs explaining how the objectives and targets will be accomplished. These MPs usually note responsible personnel, milestones and dates, and measurements of success. Noting monitoring and measurement parameters directly in the MP facilitates conforming to 4.5.1 on Monitoring and Measurement discussed below. MP’s are required for the objectives and targets in an EMS.

In accordance with ISO 14001, Fort Benning has developed Environmental Management Programs (EMPs) to achieve its objectives and targets. EMPs are detailed action plans for each objective that include the designation of responsibility, time-frames for implementation, and allocation of resources. Properly designed and implemented, the EMPs achieve set objectives and targets while improving environmental performance.

The “relevant function and level” for objectives, targets, and EMPs was determined to be the Post level and not organization-specific. Individual organizations are not individually responsible for achieving the targets, but they must ensure they are following the SMS policy, programs, procedures, and requirements and actively working to help the Fort Benning achieve the identified objectives and targets. The CFT, EMP Work Groups, SMS MR, and the SMS Coordinator are responsible for tracking and achieving progress on the objective and targets.

The objectives, targets, and EMPs for Fort Benning are reviewed and revised annually during the SMS planning phase. The planning phase follows the annual Management Review. The environmental policy, the views of interested parties, mission concerns, community issues, and progress towards the existing objectives, targets, and EMPs are considered during the annual review. Also considered are Fort Benning’s significant aspects, regulatory requirements, technological options, and financial/business constraints. Work Groups are formed for each objective to create detailed EMPs and monitor the progress.

Objective and Targets

The Army's vision is to appropriately manage our natural resources with a goal of net zero installations, Fort Benning’s Objectives and Targets run parallel to that vision. Addressing energy security and water and waste conservation is not only sustainable but operationally necessary, financially prudent, and essential to mission accomplishment at Fort Benning.

Fort Benning’s Net Zero Energy objective and target is to produce as much energy on site as it uses over the course of a year. To achieve this goal Fort Benning must implement conservation and efficiency efforts while benchmarking energy consumption to identify all opportunities. Fort Benning’s completion target date is December 2020 and runs parallel to the Army’s 2020 Vision, tracking the Net Zero Energy Goal will be done by the SMSSMS Coordinator with the help of the Cross Functional Team and the
Fort Benning measures its Net Zero Energy Progress through a yearly published report The Net Zero Tracking Report

(Though Energy Usage is listed as (f) or significant impact number 6, the cumulative effect of energy conservation on the other significant impacts is substantial when considering fiscal resources involved.)

Fort Benning measures its Net Zero Waste Progress through a yearly published report The Net Zero Tracking Report

Fort Benning’s Net Zero Waste objective and target is to reduce, reuse, and recover waste streams, converting them to resource values with zero landfill over the course of a year. The components of net zero solid waste start with reducing the amount of waste generated, re-purposing waste, maximizing recycling of waste stream to reclaim recyclable and compostable materials, recovery to generate energy as a by-product of waste reduction, with disposal being non-existent. Fort Benning’s completion target date is December 2020 and runs parallel to the Army’s 2020 Vision, tracking the Net Zero Waste Goal will be done by the SMSSMSSSM Coordinator with the help of the Cross Functional Team and the SMSSMSSMS MR. (Waste Discharge is listed as (b) or a significant impact number 2 but should be considered as having great relevance when reviewing significant impact number 1 Storm Water.)

Fort Benning measures its Net Zero Waste Progress through a yearly published report The Net Zero Tracking Report

Fort Benning’s Net Zero Water objective and target is to limit the consumption of freshwater resources and returns water back to the same watershed so not to deplete the groundwater and surface water resources of that region in quantity and quality over the course of a year. The net zero water strategy balances water availability and use to ensure sustainable water supply for years to come. Fort Benning’s completion target date is December 2020 and runs parallel to the Army’s 2020 Vision, tracking the Net Zero Waste Goal will be done by the SMSSMSSMS Coordinator with the help of the Cross Functional Team and the SMSSMS MR. (Water Usage is listed as (g) or a significant impact number 7 but should be also considered as having great relevance when reviewing significant impact numbers 1 Storm Water and number 2 Waste Discharge) Fort Benning measures its Net Zero Water Progress through a yearly published report The Net Zero Tracking Report

7.0 Resources, Roles, Responsibility, and Authority

The organizational structure, roles, and responsibilities established for Fort Benning’s SMS comply with the following requirements established by ISO 14001, Section 4.4.1:

“Management shall ensure the availability of resources essential to establish, implement, maintain and improve the environmental management system. Resources include human resources and specialized skills, organizational infrastructure, technology, and financial resources.

Roles, responsibilities, and authorities shall be defined, documented and communicated in order to facilitate effective environmental management.
The organization’s top management shall appoint (a) specific management representative(s) who, irrespective of other responsibilities, shall have defined roles, responsibilities and authority for:

- Ensuring that an environmental management system is established, implemented, and maintained in accordance with the requirements of the ISO 14001 standard; and
- Reporting to top management on the performance of the environmental management system for review, including recommendations for improvement.”

Many levels of responsibility are needed for the efficient and effective operation of a SMS. At the top of the structure are the Garrison Commander and the Environmental Quality Control Committee. They provide the SMS and environmental programs with guidelines, policies, resources, and support. The SMS Coordinator manages day-to-day operations of the SMS with the assistance of the SMS Management Representative (SMS MR). Individuals from various Fort Benning Directorates serve on the CFT, which is the primary body leading the development and implementation of the SMS. (the designated SJA Environmental Attorney to review when deemed judicial or statutory in nature)

<table>
<thead>
<tr>
<th>Position Responsible</th>
<th>General SMS Roles and Responsibilities</th>
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<tbody>
<tr>
<td>Garrison Commander</td>
<td>Delegate overall responsibility for the design and implementation of the SMS to SMS MR and SMS Coordinator.</td>
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<tr>
<td>(the designated SJA Environmental Attorney to review when deemed judicial or statutory in nature)</td>
<td>Review, approve, and sign the environmental policy and implementation plan. Each time the plan is altered or updated, a signature is required for approval.</td>
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Ensure that the necessary resources are available for the effective implementation of the SMS.
<table>
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<tr>
<th>Position Responsible</th>
<th>General SMS Roles and Responsibilities</th>
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<tbody>
<tr>
<td></td>
<td>Meet with the EQCC at least annually to discuss the audit results and overall progress and status of the SMS.</td>
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<td></td>
<td>Provide continued support and emphasis to the SMS.</td>
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<tr>
<td>EQCC</td>
<td>Review the environmental policy</td>
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<td></td>
<td>Review the significant environmental aspects and impacts for Fort. Benning.</td>
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<td></td>
<td>Provide resources and support needed to implement and operate the SMS.</td>
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<tr>
<td></td>
<td>Review audit results, progress toward established objectives and targets, and general status of the SMS at least annually to ensure continuing suitability, adequacy, and effectiveness of the program.</td>
</tr>
<tr>
<td>CFT, SMS MR, and SMS Coordinator (the designated SJA Environmental Attorney to review when deemed judicial or statutory in nature)</td>
<td>Write a Fort Benning environmental policy that meets ISO 14001 requirements.</td>
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<td></td>
<td>Review the environmental policy annually and make necessary changes.</td>
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<td></td>
<td>Ensure that the policy is maintained and communicated to all employees and it is available to the public.</td>
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<td></td>
<td>Establish, implement, and maintain procedures for the identification of aspects and impacts that could have significant impact on the environment.</td>
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<td></td>
<td>Determine which operations are capable of significant</td>
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environmental impacts.

Establish, implement, and maintain ISO 14001 conformant environmental objectives, targets, and environmental management programs (EMPs) to address Fort. Benning’s significant aspects and impacts.

Ensure that necessary resources are dedicated toward achieving the objectives, targets, and EMPs.

Ensure information pertaining to significant aspects and impacts is up to date.

Establish, implement, and maintain procedures to identify and access environmental requirements and policies that are directly applicable to environmental impacts.

Ensure that the SMS takes into consideration new programs, new organizations, and modified activities.

Ensure that appropriate training is provided to those personnel who perform tasks that may cause significant environmental impacts.

Establish, implement, and maintain procedures for making personnel aware of:

- The importance of conformance with the environmental policy and SMS requirements;
- Actual or potential significant impacts from their work;
- Environmental benefits of improved personal performance;
- Role in achieving objectives and targets; and
- Consequences of not adhering to operating procedures.

Establish, implement, and maintain an SMS manual describing the core elements of the SMS.

Establish, implement, and maintain procedures for identifying document locations, maintaining current versions, eliminating or marking obsolete versions, and ensuring revisions by appropriate personnel.

Ensure that procedures stipulating operating criteria are
<table>
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<tr>
<th>Position Responsible</th>
<th>General SMS Roles and Responsibilities</th>
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<tr>
<td></td>
<td>maintained for significant aspects and impacts. Establish, implement, and maintain procedures to monitor and measure the key characteristics of the operations and activities that can have a significant impact on the environment. Establish, implement, and maintain a records management program. Establish, implement, and maintain procedures for an annual SMS internal audit to determine if the SMS is meeting ISO 14001 standards. Establish, implement, and maintain procedures to handle and investigate nonconformance with SMS requirements.</td>
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| Military and Civilian Personnel | To any reasonable extent know the environmental policy and ensure work actions are consistent with it. To any reasonable extent know the significant environmental aspects in their operational area. To any reasonable extent if applicable to the area, support the achievement of objectives and targets. To any reasonable extent understand the importance of conformance with the environmental policy. Be familiar with emergency procedures for prevention of, potential for, and response to accidents and emergency situations within work area. |

8.0 Competence Training and Awareness

*ISO 14001 Requirement: 4.4.2 Competence, Training, and Awareness*

The key point in this element is to ensure that persons performing tasks that have or can
have significant impact on the environment and/or relate to the legal and other requirements are competent to do those tasks. Competence is ensured through appropriate education, training, and/or experience. The organization needs to identify training needs as they relate to the SMS, the significant aspects, and the legal and other requirements and make sure this training is provided (records of such are to be maintained). A procedure is needed that makes sure such persons are: aware of the need to conform with all SMS procedures and requirements and what they specifically need to do to do so; the significant aspects and the legal and other requirements associated with their respective responsibilities and why improved performance is beneficial; and the consequences of not following these procedures and requirements. In addition to job-specific knowledge, it is expected that all personnel within the SMS (including contractors) have general awareness on items such as the policy and emergency response.

The purpose of this procedure is to ensure that Fort Benning establishes and maintains effective training procedures. This procedure specifically outlines the incorporation of Sustainability Management System (SMS) training and education into the existing environmental, health, and safety training. Personnel whose work may create a significant impact upon the environment or who fall under the operational control of Fort Benning Garrison Commander are required to have SMS training. Other tenant missions on the installation that do not fall under the Garrison Command; the Garrison Command will use its influence to persuade their attendance to the SMS training, and will distribute SMS awareness materials to these tenants on an ongoing basis. This procedure also considers Fort Benning’s products, processes, and services, as well as the need to provide specific and general awareness training for personnel at each relevant function and level of the organization. The SMS general awareness training must include the following concepts:

- Basic understanding of a SMS and the International Organization for Standardization (ISO) 14001
- Comprehension of the environmental policy, procedures and requirements of the SMS
- The significant environmental impacts, actual or potential, of the employee’s work activities, and the environmental benefits of improved personal performance
- Avenues of communication in the event that questions or concerns arise
- The employee’s roles and responsibilities in creating a successful SMS
- The importance of conforming with SMS policy, procedures, and operational requirements, as well as the potential consequences of departure from the SMS
- Recognition of the benefits of improved environmental performance

Basic SMS Training Plan
<table>
<thead>
<tr>
<th>Audience</th>
<th>Type of Training</th>
<th>Purpose for Training</th>
<th>Training Curriculum</th>
<th>Training Requirements</th>
<th>Training Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>Senior Management (including GC, SMS MR, and Environmental Quality Control Council [EQCC] members)</td>
<td>SMS EQCC Training</td>
<td>To gain commitment and alignment to the organization’s environmental policy, SMS goals and path forward</td>
<td>15-minute briefing; annual management reviews</td>
<td>Initial; ongoing briefings on SMS changes and enhancements as needed</td>
<td>Informal lecture; guided discussion</td>
</tr>
<tr>
<td>SMS Coordinator, SMS MR, SMS CFT</td>
<td>SMS Awareness Training</td>
<td>To gain commitment and alignment to the organization’s environmental policy, defining Fort Benning’s significant aspects, and develop a foundation for Fort Benning’s SMS, as well as knowledge of leadership role</td>
<td>15-minute briefing; meetings; on an as-needed basis</td>
<td>Initial; At regularly scheduled meetings; as needed</td>
<td>Informal lecture; guided discussion</td>
</tr>
<tr>
<td>SECOs, ECOs, Hazardous Waste Managers (HWMs)</td>
<td>SMS Awareness Training</td>
<td>To gain commitment to the environmental policy, objectives and targets of the organization, and to instill a sense of individual responsibility</td>
<td>SMS added to current block training requirements; posters; posting in Post newspaper, posting information on Post's closed-circuit television, and any additional Post media.</td>
<td>Initial; ongoing awareness can be enhanced by distributing information (flyers and handouts) in Informational packets, displaying SMS posters throughout the Post including housing areas.</td>
<td>Formal lecture; visual aids; internal media</td>
</tr>
<tr>
<td>Other Environmental Operational Training</td>
<td></td>
<td>To improve performance and to ensure regulatory and internal requirements are met, particularly for training that</td>
<td>NEPA, Hazardous Waste Managers Course, Maintenance Training Course</td>
<td>Annual training required for government certifications; At regularly scheduled meetings; as</td>
<td>Informal lecture; guided discussion; visual aids; internal</td>
</tr>
<tr>
<td>Audience</td>
<td>Type of Training</td>
<td>Purpose for Training</td>
<td>Training Curriculum</td>
<td>Training Requirements</td>
<td>Training Method</td>
</tr>
<tr>
<td>------------------</td>
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<td>--------------------------------</td>
</tr>
<tr>
<td>General Fort Benning Public</td>
<td>SMS Awareness</td>
<td>To raise awareness of the SMS program</td>
<td>Posters, logos, SMS internet, .</td>
<td>Ongoing awareness</td>
<td>Informal via existing Fort Benning media (closed-circuit television, <em>The Bayonet</em>, etc)</td>
</tr>
</tbody>
</table>

| 9.0 Communication |

ISO 14001 Requirement: 4.4.3 Communications

Procedures are required for both internal and external communications. Note that ISO 14001 only requires procedures, and allows the organization to decide for itself the degree of openness and disclosure of information. Whatever the decision is in terms of disclosure, the decision process must be recorded. There is a specific requirement that the organization consider external communications about its significant environmental aspects and record its decision. For internal communications, the procedure needs to describe how it is done among the levels of the organization. For external communications, it has to describe how external communications are received, documented, and a response provided.

This procedure facilitates communication among the various levels and functions of the Post, and is used to:

- Explain the environmental policy, significant aspects, objectives and targets, and the SMS operations;
- Provide civilian and military personnel with the ability to raise their concerns about environmental issues to management; and
- Provide management a reporting mechanism for relaying monitoring and audit results and other information.
Fort Benning has an extensive internal communication system that includes Post publications, bulletin boards, and the Fort Benning Intranet. External communications with the general public are maintained by the Public Affairs Office (PAO). Environmental regulatory comments and concerns are forwarded to the appropriate EMD Program Manager. The procedures for internal and external communication observed by Fort Benning comply with the following requirements established by ISO 14001, Section 4.4.3:

*The organization shall decide whether to communicate externally about its significant environmental aspects, and shall document its decision. If the decision is to communicate, the organization shall establish and implement as method(s) for this external communication.*

The purpose of this procedure is to establish formal guidelines for internal and external communication regarding the Sustainability Management System (SMS) and environmental practices. Specific purposes as they relate to internal and external communication are as follows:

**Internal Communication**

Installation personnel should take any question, inquiry, observation, suggestion for improvement or concern regarding Fort Benning’s SMS or environmental practices directly to their immediate supervisor or the appropriate environmental personnel. Communication on these matters does not require any further documentation by the SMS Program Staff or Coordinator.

Communication regarding the SMS to senior management which requires signature or subsequent action will be staffed in accordance with Fort Benning’s procedures. No log of communication is maintained.

Communication between DPW Environmental functions regarding changes to regulations effecting legal and other requirements; findings of compliance and conformance audits; changes to operational controls effecting significant aspects; management program required metrics, among others, will be communicated by email, verbally, or other appropriate method to affected individuals and the SMS Coordinator

All other communication that is general in nature, such as proposed schedules for EQCC or CFT meetings, will be communicated in the most effective manner with no retention of records.

**External Communications:** Fort Benning will communicate externally regarding its significant environmental aspects. All communications of this nature will be handled through the following procedure:

**External Communications:**

1) All requests for information regarding significant aspects will be handled through DPW and/or PAO. Any individual outside these directorates
who receives a request for information will not respond directly to the external party, but forward the request to DPW and/or PAO as soon as possible.

2) If PAO and DPW decide to respond to the request, The Environmental Division of Public Works will determine who is best qualified to prepare and coordinate the response, track the response coordination process, and ensure the response is provided to the requestor.

3) Information requests from external stakeholders shall be managed as much as possible through procedures established for specific categories of requests such as the Freedom of Information Act, congressional correspondence, and other controlled correspondence.

Non-regulatory Communications - Requests for information from non-regulatory or media entities concerning Fort Benning relevant to environmental issues should be referred to the Public Affairs Office (PAO) for receipt and to coordinate a response. Records of such communications are maintained by the receiving party.

Regulatory Communications - Requests for information from federal, state and local regulatory agencies will be referred to the DPW Environmental Chief. The DPW Environmental Chief is responsible for notifying Senior Management, when necessary, to include the SJA office and PAO. Records of such communications are maintained by the receiving party. The SMSSMS MR will review inquiries/complaints as an agenda item at the EQCC meeting.

All hardcopy documents with respect to Fort Benning’s ISO 14001 Sustainability Management System (SMS) including the EMS Manual, are controlled and kept in the Plans, Analysis, and Integration Office/Garrison Command, MCOE Headquarters BLDG 4 One Karker Street, Fort Benning, GA. With respect to digital access, appropriate documentation, including the EMS Manual and EMS Training, are located at http://www.benning.army.mil/garrison/sustainability

10.0 Documentation

ISO 14001 Requirement: 4.4.4 EMS Documentation

This requirement ensures that the organization has documented the system in either electronic or paper form such that it addresses the elements of the standard, describes how the organization conforms to each element, and provides direction to related
documentation. Not all ISO 14001-required procedures need to be documented, as long as the system requirements can be verified. However, documentation must be provided such that enough is available to ensure the effective planning, operation, and control of processes related to the significant aspects, and to demonstrate conformance to ISO 14001. Such documentation at a minimum includes policy, objectives and targets, a definition of the scope of the EMS, and other main elements.

At a minimum, this SMS Manual will be reviewed annually during the SMS audit by the SMS MR, SMS Coordinator, or the Audit Team. Additional reviews may be prompted by nonconformances or changes in the operation of the SMS. The SMS Coordinator will be responsible for maintaining the SMS Manual. The SMS MR has the final approval over any proposed changes to the SMS Manual.

- Environmental Policy, significant aspects, training, scope, and objectives Electronic copy is maintained on the MCOE website http://www.benning.army.mil/garrison/sustainability
- Operational Procedures associated with Significant Aspects – hard copies are maintained in specific work area.
- Regulatory Permits – Specific Program Manager maintained files.
- Regulatory Required Plans - Specific Program Manager maintained files.
- Training Records – Maintained in accordance with Section 4.2 of this manual.
- SMS deemed appropriate records - Electronic copy is maintained on the MCOE website, or in accordance with proponent directorate. Hard copy(s) are maintained by the Garrison PAI Office and/or other appropriate personnel
- Aspect Spreadsheet – Hard copy is maintained at the Garrison PAIO.

Electronic copies of SMS and applicable environmental documentation will be organized into a prescribed SMS file structure on the MCOE Web site http://www.benning.army.mil/garrison/sustainability/.

The directory will be managed by the SMS

11.0 Control of Documents

ISO 14001 Requirement: 4.4.5 Control of Documents
The organization is required to control documents, such as system procedures and work instructions, to ensure that current versions are distributed and obsolete versions are
There is a requirement for a document control procedure that ensures documents are approved prior to use, are reviewed and updated as necessary, changes to versions are identified, that the current versions are available at points of use, that they are legible, identifiable, and that obsolete ones are so noted to avoid unintended use. It is acceptable to use documents of internal origin in the EMS, but those must be identified as being essential to the EMS and their distribution controlled.

Fort Benning maintains required documentation through these manual, related operational procedures, forms, and records used to support the system. Documentation associated with the SMS includes, but is not limited to:

- Environmental Policy – Electronic copy is maintained on the MCOE website.
- Operational Procedures associated with Significant Aspects – are maintained in specific work area.
- Regulatory Permits – Specific Program Manager maintained files.
- Regulatory Required Plans - Specific Program Manager maintained files.
- Training Records – Maintained at Environmental Department Training Office.
- SMS Required Records - Electronic copy is maintained on the MCOE website, Hard copy(s) are maintained by the SMS Coordinator at the PAIO Office MCOE headquarters
- SMS Forms – Electronic copy is maintained on the MCOE website.
- EQCC and CFT Briefings - Electronic copy is maintained on the MCOE website. Hard copy(s) is maintained in the MCOE PAIO Office.
- Solid Waste Management Plan Fort Benning Env. Dept DPW
- Installation Internal Assessment Plan Env. Dept DPW

Documents and records created directly through implementation of the SMS are generated only by the SMS MR or SMS Coordinator. The SMS coordinator maintains the electronic files, hard copy of the controlled documents. Operational Control and other documents necessary to support the SMS specific environmental program such as the Spill Prevention, Control, and Countermeasure Plan (SPCC), Storage Tank Management Plan, Standard Operating Procedures (SOPs), and/or specific work instructions are controlled as per regulatory requirements or directorate document control procedures and maintained in the appropriate work area. These documents may or may not be electronically maintained as required. Control and updating is the responsibility of the SME who must communicate changes to the SMS Program Manager if the change affects the SMS.

Directorate personnel are responsible for including information regarding date and revision status if documents remain under their control. The SMS manual will be reviewed as required for continuing suitability and applicability. The review/revision date shall be recorded on the documents.
In addition the ARIM System is the method by which Army personnel capture, preserve, and manage environmental hardcopy/electronic records more efficiently and effectively. ARIMS uses web-based tools and technology to provide enhanced capabilities for the identification of records, the indexing and storage of long-term and permanent records, and the tracking and retrieval of records stored in Army Records Holding Areas (RHAs) or in the Army Electronic Archive (AEA).

All hardcopy documents with respect to Fort Benning’s ISO 14001 Sustainability Management System (SMS) including the EMS Manual, are controlled and kept in the Plans, Analysis, and Integration Office/Garrison Command, MCOE Headquarters BLDG 4 One Karker Street, Fort Benning, GA. With respect to digital access, appropriate documentation, including the EMS Manual and EMS Training, are located at http://www.benning.army.mil/garrison/sustainability.

12.0 Operational Control

ISO 14001 Requirement: 4.4.6 Operational Control

For this element, critical functions related to the policy, significant aspects, the legal and other requirements, and objectives and targets are identified and procedures and work instructions are required to ensure proper execution of activities. Requirements for communicating applicable system requirements to contractors also need to be addressed in these procedures. The required procedures need to provide instruction such that the organization conforms to the policy, objectives and targets, the legal and other requirements, and addresses any impacts from significant aspects. Which procedures are needed can be determined by review of the significant aspects, objects and targets, the legal and other requirements, and policy and then deciding what must be proceduralized and documented to ensure that deviations from planned arrangements do not occur. In regard to the contractors, the organization will need to establish procedures related to the significant aspects the legal and other requirements, of the goods and services it uses, and communicating the relevant elements of those procedures to the suppliers and contractors.

Operational controls ensure that Fort Benning achieves their SMS objectives and targets and is in compliance with their environmental requirements and policies. Fort Benning’s procedure for controlling operations with significant environmental aspects and impacts complies with the following requirements established by ISO 14001, Section 4.4.6: Operational controls for processes and their potential environmental impacts includes Defense Federal Acquisition Regulations (DFAR), Federal Acquisition Regulations (FAR), AR 200-1, regulatory operating permit conditions, hazard communication program, the SPCC and/or SOPs and specific work instructions in addition to all other management plans maintained by DPW-EMD. The associated operations and activities are conducted under conditions that follow environmental policy and contribute to attaining objectives and targets and comply with specified environmental permits, procedures, or requirements.
CFT members and SMEs will identify current or emerging operations/procedures associated with the significant aspects, objectives and targets and reviews/prepares appropriate documents to ensure activities are carried out under specified conditions. SMS Coordinator is notified as necessary.

Where Garrison Command has operational control over contracts, or can influence, the specific language that addresses SMSS requirements will be added. Contracts include procurement of all goods, services, products, and materials. Suggested contracting language:

*Fort Benning has implemented an Environmental Management System (SMS to proactively deal with the environmental impacts of its processes, activities, and services. Fort Benning uses the ISO 14001:2004 as the standard for its SMS. All personnel performing work for or on behalf of Fort Benning must be aware of and understand Fort Benning Environmental Policy. Fort Benning offers SMS General Awareness Training in through the internet at [http://www.benning.army.mil/garrison/sustainability](http://www.benning.army.mil/garrison/sustainability). All contractors and their employees are required to be made aware of SMS General Awareness Training and will post SMS handout in the workplace that are available to all employees. Contractors are also responsible for ensuring all subcontractors hired on their behalf receive SMS General Awareness Training handouts and that they are posted at the subcontractors site. The contractor is also responsible to ensure that all goods and services used by the contractor or any of its subcontractors do not deviate from the installation Environmental Policy, and objectives and targets of the SMS.*

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13.0 Emergency Preparedness and Response

*ISO 14001 Requirement: 4.4.7 Emergency Preparedness and Response
Although typically addressed through conventional emergency response plans, this element also requires that a process exist for actually identifying the potential*
emergencies, in addition to planning and mitigating them. Emergency incidents include those that may not be regulated, but may still cause significant impact as defined by the organization. As part of continual improvement, it is required that the organization not only responds to emergency situations, but also reviews the emergency procedures and make improvements as necessary. This may involve periodic testing of emergency procedures, if practicable.

The purpose of this procedure is to ensure that Fort Benning establishes, periodically reviews, and maintains an effective procedure for emergency preparedness and response. Effective emergency response actions are contingent upon a cohesive and current emergency preparedness plan and program. A properly managed program will minimize adverse environmental, health and safety impacts in the event of an actual accident or emergency. Certain activities are required by local, state, or Federal agencies to maintain emergency plans. These activities include, but are not limited to, hazardous waste handling, hazardous waste accumulation, petroleum storage, and chemical storage.

In the event of an emergency, all installation personnel should immediately dial 911. This will connect to the installation's emergency response service. Once the operator understands the type of emergency occurring, proper procedures will be instituted to resolve the emergency in the most effective manner. All instructions from the emergency response operator should be followed.

Fort Benning maintains emergency preparedness and response procedures to:

- Identify potential emergency preparedness and emergency situations;
- Respond to accidents and emergency situations; and
- Prevent and mitigate the environmental impacts that may be associated with accidents and emergency situations.

The Fort Benning Fire Department is a first response agency for hazardous spills and releases. The primary type of emergency at Fort Benning with the potential to cause environmental impacts is a hazardous substance spill and/or release. Currently, Fort Benning practices for preventing spills or leaks of hazardous substances potentially having a substantial environmental or human health impact are described in planning documents including the Fort Benning SPCC Plan, the Force Protection Anti-terrorist Response Plan, and the Pest Management Plan.

An installation-wide Force Protection, Anti-Terrorism, Mass Casualty exercise, which includes the SPCC Plan to test the plan, is conducted annually. An after action report is generated to continually improve emergency preparedness and response. More frequent drills and training are conducted at the Division level. Facilities housing hazardous materials report the amounts and types to Fire and Emergency Services. In actual emergency cases, circumstances, and response actions associated with significant
spills and releases on Fort Benning are documented, investigated, and the appropriate corrective actions and preventive actions are implemented

All training and exercise records are maintained by Fort Benning’s Directorate of Emergency Services.

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14.0 Monitoring and Measurement

**ISO 14001 Requirement: 4.5.1 Monitoring and Measurement**

*In order to properly manage the system, measurements must be taken of its performance to provide data for action. Procedures are required describing how the organization will monitor and measure key parameters of operations. These parameters relate to the operations that can have significant impacts, to monitor performance towards the objectives and targets, and to monitor conformance to the legal and other requirements and other SMS requirements. Equipment related to environmental measurements, such as temperature and pH meters and pressure gauges, must be calibrated according to procedures, and records maintained.*

The calibration of monitoring equipment ensures the equipment is maintained in proper working order. Maintenance records are maintained to verify that monitoring and measurement data are reliable and accurate.

The purpose of this procedure is to provide a prescribed method to monitor and measure the key characteristics of Fort Benning operations that may have significant environmental impacts. Key characteristics to be tracked include but are not limited to:

- Recording information to track performance
- Relevant operational controls and conformance with the environmental objectives
- Periodically evaluating compliance with relevant environmental requirements and policies

Fort Benning maintains procedures to monitor and measure the key characteristics of its operations and activities that can have a significant impact on the environment. Monitoring and measurement is necessary to verify the exercise of operational control, to evaluate performance in achieving objectives and targets, and to provide input for management decisions. Metrics are reported by the CFT to the EQCC as part of the means in which Fort Benning monitors and measures compliance. In addition, regulatory operating permits provide information and conditions established by regulatory agencies to assist in execution of operational controls at the organizational level. At the DPW Environmental Program Management level, operations are monitored to assess and report to adherence to policy.

**Calibration - Externally Calibrated Equipment:** If equipment is calibrated by outside vendors, record(s) of calibration will be maintained by the equipment owner. A log of monitoring and test equipment is maintained at each applicable organization. The responsibility of maintaining the calibrated equipment and calibration records lie with the equipment owner.
Internally Calibrated Equipment: All equipment that is internally calibrated utilizes the manufacturer’s technical manual for procedures on frequency and method. A log will be maintained by the equipment owner. The responsibility of maintaining the calibrated equipment and calibration records lies with the equipment owner.

15.0 Evaluation of Compliance

ISO 14001 Requirement: 4.5.2 Evaluation of Compliance

The first part of this element (4.5.2.1) requires the organization to have a procedure(s) to periodically evaluate its compliance with applicable legal requirements as defined in 4.3.2. The organization will need to keep records of these periodic evaluations. ISO 14001 in 4.5.2.2 also requires a similar evaluation for compliance with other requirements. Again these are defined in 4.3.2 and the procedure can be the same as, and even part of, 4.5.2.1.

Fort Benning utilizes the Environmental Performance Assessment System (EPAS) on a routine schedule to ensure a thorough review of compliance with applicable environmental rules and regulations. EPAS is an internal compliance evaluation process that documents successes and areas in need of improvement. EPAS is an important program that assists Fort Benning in achieving conformance with this ISO 14001 requirement. DPW Environmental Program Managers are provided with a written report with recommended corrective actions identified. An Installation Corrective Action Plan (ICAP) is developed and the report is maintained as a historical record in the PW-E central file system. The findings and ICAP are also maintained on the Army Environmental Reporting Online (AERO) database.

(The new internal assessment plan - The Active Army Supplement for Environmental Assessment Management or “TEAM Guide” which is maintained by the EPAS Program Manager)

Compliance auditing can also be performed on an ongoing basis during the conduct of yearly internal audits of the SMS. Areas to be audited for compliance will be chosen prior to the SMS audits and will take into account the results of previous audits and the status and importance of the regulatory area. In addition, local, state, and federal regulatory agencies can make announced and unannounced inspections of Fort Benning.

Results of internal assessments and external EPAS inspections are briefed to senior management, incorporated into automated environmental reporting data bases, and are used to create corrective action plans.
16.0 Non-conformances, Corrective and Preventive Action

ISO 14001 Requirement: 4.5.3 Non-conformances, Corrective and Preventive Action

This element requires procedures for acting on non-conformances identified in the system, including corrective and preventive action. A non-conformance is a situation where the actual condition is not in accordance with planned conditions. Someone not following a procedure, a regulatory non-compliance, or an incident, is all examples of possible systemic non-conformances. Non-conformances may be identified through audits, monitoring and measurement, and communications. The intent is to correct the system flaws by addressing root causes, rather than just fixing the immediate incident only. The standard also requires that trends in corrective actions be evaluated to see if deeper-rooted preventive actions can also be implemented.

The procedure needs to make sure the non-conformances are not only first addressed to mitigate environmental impact; but that further investigation occurs to determine their cause, and action taken to avoid it happening again. Preventive actions would then be those actions resulting from an evaluation as to why nonconformities are occurring and taking action to prevent their recurrence. The standard states that the corrective action is appropriate to the magnitude of the problem and the impacts encountered; to avoid either over-compensating or under-compensating for a problem. The organization must record the results of corrective actions taken, and must also review the effectiveness of actions taken.

There are a variety of ways in which a nonconformance is identified. Sources may include SMS audits, EPAS audits, accidents, results of monitoring, or employee suggestions. When nonconformances are identified by any of these means, the SMS MR, SMS Coordinator, the CFT, or designees are required to identify and implement a corrective action program using root cause analysis. It ensures that the actions taken to address nonconformance’s result in permanent positive changes and continual improvement in the SMS.

Procedures used to handle nonconformance shall include the following steps:

- Identify the nonconformance;
- Determine the cause (tracing the nonconformance to its root cause);
- Develop a solution;
- Document and implement the solution;
- Record the documentation and implementation of the solution; and
- Communicate the solution to the responsible authority.

The DPW Environmental Program Manager, Unit Commanders, Internal Auditors, SECOs/ECOs or any installation personnel identify and document any condition determined to be non-conformant or potentially non-conformant. Preventive/Corrective Action Report SMS template listed below can be used for Fort Benning initiated activity.

In the event of a Notice of Violation (NOV) or non-compliance, the NOVs are tracked through the Army Environmental Database.
At a minimum, the following issues shall be considered a nonconformance:

- Findings from external sources (i.e., Regulators), if applicable.
- Incidents that can result in negative environmental impacts.
- Findings from internal environmental audits.

The SMS Coordinator shall maintain copies of Preventive/Corrective Action Reports. On a regular basis, the SMS MR will review Preventive/Corrective Action Report issues to assure that all nonconformance reports are closed per the required dates. When past due, Preventive/Corrective Action Report is noted and will be elevated up the chain of command. Information contained within the Preventive/Corrective Action Report shall be reviewed at an CFT meeting.

The Preventive/Corrective Action Report can be used to identify and document any condition determined to be potentially non-conformant to the requirements of the SMS.

17.0 Control of Records

ISO 14001 Requirement: 4.5.4 Control of Records

Records are expected to exist to serve as verification of the system operating and the organization’s conformance to the standard and its own EMS requirements. Procedures in this element are required for the maintenance of records, and specifically require that records are identifiable, retrievable, safely stored, and legible, retained as appropriate, and traceable.

Fort Benning is required to establish a procedure for identification, maintenance, and disposition of environmental records, including training and audit records. Records are defined as documents that furnish objective evidence of activities performed or results achieved.

The differences between a document and a record are subtle but important. A record records the outcome or result of a specific activity, task, or event. Records are descriptive and capture historic environmental information. A document provides guidance on how to conduct a task or activity or the basis for an operation. Documents govern day-to-day operations.

The specific records maintenance requirements established by ISO 14001, Section 4.5.4 include:

- Listing of environmental aspects and their associated impacts;
- Environmental conformance and SMS audit reports;
- Records of required training;
- Information on emergency preparedness and response;
- Regulatory required submittals, inspection logs; and monitoring logs;
• Management briefings and reviews;
• Meeting minutes;
• Internal and external communication records; and
• Incident reports.

These records of environmental activities are essential to regulatory and SMS operations at Fort Benning. Such information provides a record of the Fort Benning’s efforts to comply with environmental regulations, reduce environmental impacts, and track progress toward achieving environmental targets and objectives.

The SMS Coordinator has overall responsibility for the maintenance of SMS records. SMS-related records may include, but are not limited to:

• Inventories of environmental aspects and impacts and their associated ranking.
• Environmental training records.
• Regulatory required submittals, inspection logs, and monitoring data.
• SMS audit reports and action plans.
• Management briefings, reviews, and meeting minutes.
• Internal Audit reports.
• Internal and external communication records.
• PCAR.
• EMPs related to objectives and targets.

SMS-related EMP records are maintained in electronic format by the SMS Coordinator whenever possible. The SMS records which are maintained must be legible, identifiable, and traceable to the activity, product or service involved. They will at all times be stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration, or loss.

Identification of Records - Official records include, but are not limited to all SMS-related submittals, data, reports, minutes, completed forms, and communication records. All records will be uniquely identifiable by a unique and precise title. The title will be accompanied by the date of completion.

Saving and Maintenance - When possible, records will be saved electronically. If an electronic version of the file cannot be saved, a paper copy should be maintained in the appropriate division, unit or organizational file system.

Hard Copy Records - The following requirements are specific to the maintenance of hard copy records:

• Handwritten entries shall be screened for legibility by document owners and/or reviewers during normal record processing. If illegible entries are identified, the occurrence will be corrected as needed.
• Records are maintained in a manner that they are protected against damage, deterioration or loss (folders, binders, etc., provide minimum required storage...
Electronic Records - The following requirements are specific to the maintenance of electronic records:

- Electronic records that are under the control of the installation's SMS Coordinator are found at http://www.benning.army.mil/garrison/sustainability.

Retention of Records - The following requirements are specific to the retention of records:

- Record retention requirements may be established by regulatory agencies, the installation, customer contracts, etc. At a minimum, the installation ensures that applicable regulatory-required retention times are met. The installation periodically assesses record retention requirements during internal audits.
- Records retained beyond the assigned retention requirement are not considered to be SMS records. Records retained beyond the assigned retention requirement will be considered “Historic Records” and will no longer be managed under the requirements of this system.

Disposition of Records - The following requirements are specific to the disposition of records:

- Records should be periodically evaluated for applicable retention times. If records can be disposed of, care is taken to ensure that potentially sensitive records, such as personnel-related or legal records, are shredded prior to their disposal. Non-sensitive records are managed with other waste office papers.
- The SMS MR, along with the CFT/SME(s), will periodically review the listing of records and the records themselves.

Any records found to be no longer valid will be documented and processed accordingly.

18.0 Internal Audit

ISO 14001 Requirement: 4.5.5 Internal Audit

ISO 14001 requires that the system provide for internal audits. This procedure could include methodologies, schedules, checklists and forms, and processes used to conduct the audits. The purpose of this audit is to determine whether the system conforms to the requirements of ISO 14001 and the organization’s own EMS detailed requirements, and if the EMS has been properly implemented and maintained. The procedure for internal audits has to address responsibilities and requirements for planning and executing the
The purpose of this procedure is to provide the method for planning, performing, and reporting internal audits to verify Fort Benning’s conformance with the requirements of the Sustainability Management System (SMS) elements.

Management has the responsibility to evaluate the audit results to determine the continued relevance of and the overall environmental performance of the SMS. It is important to note that this is an audit of the SMS environmental performance.

In defining the audit scope, the extent and boundaries of the audit, in terms of physical location and SMS organizational elements, should be clearly established. The ISO 14001 Standard also indicates the schedule of audits shall be based on the environmental importance of the activity concerned and the results of previous audits. The development of audit methodologies results in consistent and reliable information collected during the audits.

Auditors may be external or internal; however, they should be in a position to be knowledgeable, impartial, and objective. It is an auditor’s responsibility to look for objective evidence that the SMS is actually being implemented.

The Fort Benning SMS Coordinator shall coordinate with Internal Review to plan, schedule, implement, and document internal audits. The audit schedule will be used to identify the date/time and location of internal audits and will be revised as necessary. Revisions to the audit schedule shall be based on the results of prior audits. Findings of the audit will be documented.

It has been determined that the SMS internal audits will be performed in conjunction with the internal EPAS audits; these are performed yearly by the environmental management division. The SMS audit will consist of one dedicated SMS Auditor appointed by the CFT to perform audit separate to the EPAS but running parallel with EPAS Auditor’s schedule.

The SMS Auditor/Team will be independent of the area or department to be audited. The organization to which the auditors belong will be documented on the audit report or other audit record. (Note: An audit team can consist of one individual.)

All members of the audit team shall have an awareness and understanding of the requirements of the SMS. Each member will receive formal auditor training and have completed the minimum qualification requirements defined below:

- Internal auditors will have successfully completed the Army Environmental Command (AEC) Internal Auditor training or equivalent course of a minimum
duration of twelve hours and participate in one internal audit under the
supervision of a qualified auditor.

- If the AEC Internal Auditor training is not available, the auditor may
  participate in one internal audit under the supervision of a qualified auditor and
  attend the auditor course as soon as practical.

Audit scope and criteria will be established for each area or department prior to each
audit and will be documented in the Internal Audit Report. During the audit, the audit
team shall record the following information:

- Items checked.
- Individuals interviewed.
- Concerns identified.
- Any corrective or preventive actions completed during the audit.

The audit team shall promptly notify the SMS Coordinator or designee of any possible
regulatory non-compliance.

Upon completion of the internal audit, the audit team will review their findings with the
auditee and/or responsible and accountable area or department representative and
submit their findings to the SMS Program Manager. The team will then initiate a
corrective action for each finding of non-conformance using Preventive/Corrective
Action Report. Corrective and preventive actions will be verified during the next
internal audit.

The SMS Coordinator shall, at a minimum annually, summarize the system audit.
Findings and corrective actions are presented to the GC and the EQCC. Status of
corrective actions will be briefed periodically through the EQCC.

External assessments by independent auditors are conducted at least every three years.
Findings are presented to DPW Environmental program managers and an ICAP is
documented and maintained on the Army’s AERO database as well as in the DPW
Environmental central files.

19.0 Nonconformance and Corrective Action

ISO 14001 Requirement: 4.5.3 Non-conformances, Corrective and Preventive Action
This element requires procedures for acting on non-conformances identified in the
system, including corrective and preventive action. A non-conformance is a situation
where the actual condition is not in accordance with planned conditions. Someone not
following a procedure, a regulatory non-compliance, or an incident, is all examples of
possible systemic non-conformances. Non-conformances may be identified through
audits, monitoring and measurement, and communications. The intent is to correct the
system flaws by addressing root causes, rather than just fixing the immediate incident
only. The standard also requires that trends in corrective actions be evaluated to see if
deeper-rooted preventive actions can also be implemented. The procedure needs to make sure the non-conformances are not only first addressed to mitigate environmental impact; but that further investigation occurs to determine their cause, and action taken to avoid it happening again. Preventive actions would then be those actions resulting from an evaluation as to why nonconformities are occurring and taking action to prevent their recurrence. The standard states that the corrective action is appropriate to the magnitude of the problem and the impacts encountered; to avoid either over-compensating or under-compensating for a problem. The organization must record the results of corrective actions taken, and must also review the effectiveness of actions taken.

The purpose of this procedure is to determine the root causes of actual and potential International Organization for Standardization (ISO) nonconformance’s and to verify that the corrective action implemented is appropriate to the magnitude of the nonconformance.

Two example templates of corrective actions are given at the end of this manual and can be used for both internal and external SMS audits. Template number one is more specific to individual units and directorates and template two is more specific to a full external audit on various non-conformances. For Internal Use – (the SMS Audit Team may change or use a variation of the templates) For the Internal SMS Audit Template. The below checklist is to be used by personnel conducting the audit to collect information about the SMS. It identifies the questions that need to be asked by the auditor.

20.0 Management Review

ISO 14001 Requirement: 4.6 Management Review
This element requires that periodically, top management will review the SMS to ensure it is operating as planned, and is suitable, adequate, and effective. The organization needs to ensure that in the review: results of internal audits (EMS and compliance); external communications; environmental performance; status on objectives and targets; status of corrective and preventive actions; follow up on actions from prior management reviews; and changing conditions or situations; and recommendations for improvement are all discussed. Results and records of management review include: agendas, attendance records, minutes, and documented agreed upon action items.

The final element of the ISO 14001 Standard requires that upper management periodically review the SMS to ensure its continuing suitability, adequacy, and effectiveness. The specific management review procedures required by ISO 14001, Section 4.6 include:

At a minimum, the management review meeting should be held annually following each SMS audit. Alternatively, management review meetings can be held quarterly in conjunction with regularly scheduled Environmental Quality Control Committee (EQCC) meetings.

All management review meetings should be attended by the Garrison Commander’s SMS Management Representative. The SMS MR, SMS Coordinator, or designee should
present the current status of the Fort Benning’s SMS and environmental programs. The following items should be reviewed and discussed as part of the agenda:

- Substantive changes to the SMS;
- General environmental performance data;
- Progress against objectives and targets;
- SMS audit results and overall performance;
- Follow-up actions from previous management reviews;
- Changing circumstances to the mission, community, or environment that affect the SMS;
- EPAS audit findings and any recent Notice of Violations;
- Comments or concerns from external interested parties;
- Status of corrective and preventive actions; and
- Recommendations for improvements.

Top management reviews the performance of the SMS annually through an EQCC meeting to ensure the system’s continuing suitability, adequacy, and effectiveness. The SMSMR reports the progress of the installation toward objectives and targets at a schedule EQCC.

In addition, the SMS management review should evaluate the need to change the environmental policy, significant aspects, objectives and targets, and other elements of the SMS regarding the following:

- Changes in mission.
- Addition of new facilities.
- Changes in the Garrison’s operations/activities.
- Changes in legal requirements.
- Advances in science or technology.
- Lessons learned from environmental incidents or emergency response.
- Changes in reporting and communication structures within the installation.

Management reviews should assess both positive and negative findings.

Management Review will be documented and maintained by SMS Coordinator
All hardcopy documents with respect to Fort Benning’s ISO 14001 Sustainability Management System (SMS) including the EMS Manual, are controlled and kept in the Plans, Analysis, and Integration Office/Garrison Command, MCOE Headquarters BLDG 4 One Karker Street, Fort Benning, GA. With respect to digital access, appropriate documentation, including the EMS Manual and EMS Training, are located at [http://www.benning.army.mil/garrison/sustainability](http://www.benning.army.mil/garrison/sustainability)
This is an example of a corrective action template that can be used for internal SMS audits on major and minor findings. For Internal Use — (the SMS External Audit Team may change or use a variation).

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<thead>
<tr>
<th>Internal Audit Corrective and Preventive Action Report Number  #</th>
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<tbody>
<tr>
<td><strong>A. Initiator:</strong></td>
</tr>
<tr>
<td>Initiation Date:</td>
</tr>
<tr>
<td><strong>B. Action Assigned to:</strong></td>
</tr>
<tr>
<td>Date Assigned</td>
</tr>
<tr>
<td><strong>C. Description of Non-Conformance Finding:</strong> Operational Control</td>
</tr>
<tr>
<td>also see attached:</td>
</tr>
<tr>
<td><strong>D. Completion Due Date:</strong></td>
</tr>
<tr>
<td><strong>E. Immediate Action to Be Taken:</strong></td>
</tr>
<tr>
<td><strong>F. Description of Root Cause and Analysis:</strong></td>
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</tr>
<tr>
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</tr>
<tr>
<td>G. Corrective/Preventive Action to be Taken:</td>
</tr>
<tr>
<td>H. Documentation Updated:</td>
</tr>
<tr>
<td>I. Actual Date of Completion of Actions:</td>
</tr>
<tr>
<td>J. Department Manager</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>K. Effectiveness Verified by:</td>
</tr>
</tbody>
</table>
This is an example of a corrective action template that can be used for shop level SMS audits on various units and directorates. For Internal Use – (the SMS Audit Team may change or use a variation)

<table>
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<tr>
<th>Finding ID</th>
<th>Unit/Activity:</th>
<th>Location: IFS/Building #:</th>
<th>Finding Category:</th>
<th>Law/Regulation:</th>
<th>Facility / Activity Type</th>
<th>Pos/Neg Finding</th>
<th>Point of Contact &amp; Phone #:</th>
<th>Repeat EPAS Finding:</th>
<th>EMD Staff - POC/Assessor:</th>
</tr>
</thead>
<tbody>
<tr>
<td>PA-FY-##: (*)</td>
<td>Date of Finding:</td>
<td>Location: IFS/Building #:</td>
<td>Finding Category:</td>
<td>Law/Regulation:</td>
<td>Facility / Activity Type</td>
<td>Pos/Neg Finding</td>
<td>Point of Contact &amp; Phone #:</td>
<td>Repeat EPAS Finding:</td>
<td>EMD Staff - POC/Assessor:</td>
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<td>General NOTES</td>
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<td>General NOTES</td>
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</table>

Finding Summary:

Finding Description:

Criteria: (*)

Finding Comments:

Corrective Action:
**Shop Level**  
**Corrective Action Plan Form**

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<tr>
<th>Corrective Action Type: (*)</th>
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<tr>
<td>Corrective Action Comments:</td>
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<table>
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<tr>
<th>Estimated. Cost:</th>
<th>EPR or WO #:</th>
<th>Funding NOTES</th>
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<th>Status of Correction:</th>
<th>Funding Year:</th>
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<th>Suspense Date:</th>
<th>Must Fund:</th>
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<tr>
<th>Actual Completion Date:</th>
<th>Signature/Title: EMD Representative:</th>
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</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

Note: Fill shaded areas in electronic version. (*) To be completed by Environmental Management Division.
All hardcopy documents with respect to Fort Benning’s ISO 14001 Sustainability Management System (SMS) including the EMS Manual, are controlled and kept in the Plans, Analysis, and Integration Office/Garrison Command, MCOE Headquarters BLDG 4 One Karker Street, Fort Benning, GA. With respect to digital access, appropriate documentation, including the EMS Manual and EMS Training, are located at http://www.benning.army.mil/garrison/sustainability
### Appendix (Acronyms and Abbreviations)

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>AEC</td>
<td>Army Environmental Center</td>
</tr>
<tr>
<td>BMP</td>
<td>Best Management Practice</td>
</tr>
<tr>
<td>BRAC</td>
<td>Base Realignment and Closure</td>
</tr>
<tr>
<td>CAA</td>
<td>Clean Air Act</td>
</tr>
<tr>
<td>CFT</td>
<td>Cross Functional Team</td>
</tr>
<tr>
<td>CWA</td>
<td>Clean Water Act</td>
</tr>
<tr>
<td>DMWR</td>
<td>Directorate of Morale Welfare &amp; Recreation</td>
</tr>
<tr>
<td>DOIM</td>
<td>Directorate of Information Management</td>
</tr>
<tr>
<td>DOC</td>
<td>Directorate of Contracting</td>
</tr>
<tr>
<td>DOT</td>
<td>Directorate of Operations &amp; Training</td>
</tr>
<tr>
<td>DPW</td>
<td>Directorate of Public Works</td>
</tr>
<tr>
<td>DoD</td>
<td>Department of Defense</td>
</tr>
<tr>
<td>EMD</td>
<td>Environmental Management Division</td>
</tr>
<tr>
<td>EMP</td>
<td>Environmental Management Program</td>
</tr>
<tr>
<td>EMS</td>
<td>Environmental Management System</td>
</tr>
<tr>
<td>EO</td>
<td>Executive Order</td>
</tr>
<tr>
<td>EPAS</td>
<td>Environmental Performance Assessment System</td>
</tr>
<tr>
<td>EPCRA</td>
<td>Emergency Planning and Community Right-to-Know Act</td>
</tr>
<tr>
<td>EQCC</td>
<td>Environmental Quality Control Committee</td>
</tr>
<tr>
<td>FORSCOM</td>
<td>United States Army Forces Command</td>
</tr>
<tr>
<td>Ft.</td>
<td>Fort</td>
</tr>
<tr>
<td>FY</td>
<td>Fiscal Year</td>
</tr>
<tr>
<td>GA EPD</td>
<td>Georgia Environmental Protection Division</td>
</tr>
<tr>
<td>GC</td>
<td>Garrison Commander</td>
</tr>
<tr>
<td>IAP</td>
<td>Internal Assessment Plan</td>
</tr>
<tr>
<td>ICUZ</td>
<td>Installation Compatible Use Zone</td>
</tr>
<tr>
<td>IMA</td>
<td>Installation Management Agency</td>
</tr>
<tr>
<td>INRMP</td>
<td>Integrated Natural Resource Management Plan</td>
</tr>
<tr>
<td>ISO</td>
<td>International Organization for Standardization</td>
</tr>
<tr>
<td>JAG</td>
<td>Judge Advocate General</td>
</tr>
<tr>
<td>NEPA</td>
<td>National Environmental Policy Act</td>
</tr>
<tr>
<td>NPDES</td>
<td>National Pollutant Discharge Elimination System</td>
</tr>
<tr>
<td>OCGA</td>
<td>Official Code of Georgia Annotated</td>
</tr>
<tr>
<td>P2</td>
<td>Pollution Prevention</td>
</tr>
<tr>
<td>PAO</td>
<td>Public Affairs Office</td>
</tr>
<tr>
<td>Acronym</td>
<td>Description</td>
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<tr>
<td>---------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>PPA</td>
<td>Pollution Prevention Act</td>
</tr>
<tr>
<td>RCRA</td>
<td>Resource Conservation and Recovery Act</td>
</tr>
<tr>
<td>RMP</td>
<td>Risk Management Plan</td>
</tr>
<tr>
<td>SDWA</td>
<td>Safe Drinking Water Act</td>
</tr>
<tr>
<td>SERO</td>
<td>Southeast Region Office</td>
</tr>
<tr>
<td>SMS</td>
<td>Sustainability Management System</td>
</tr>
<tr>
<td>SMS MR</td>
<td>SMS Management Representative</td>
</tr>
<tr>
<td>SMS PM</td>
<td>SMS Program Manager</td>
</tr>
<tr>
<td>SOCOM</td>
<td>United States Special Operations Command</td>
</tr>
<tr>
<td>SPCC</td>
<td>Spill Prevention, Control, and Countermeasures Plan</td>
</tr>
<tr>
<td>SREO</td>
<td>Southern Regional Environmental Office</td>
</tr>
<tr>
<td>SOP</td>
<td>Standard Operating Procedure</td>
</tr>
<tr>
<td>TRADOC</td>
<td>United States Training and Doctrine Command</td>
</tr>
<tr>
<td>TSCA</td>
<td>Toxic Substances Control Act</td>
</tr>
<tr>
<td>USEPA</td>
<td>United States Environmental Protection Agency</td>
</tr>
<tr>
<td>WHINSEC</td>
<td>Western Hemisphere Institute for Security Cooperation</td>
</tr>
</tbody>
</table>
Glossary

For the purposes of this Sustainability Management System (SMS) Manual, the following definitions apply:

**Continual improvement**
Continual improvement is the on-going process of examining and enhancing the SMS to achieve sustainability improvements in accordance with the environmental policy.

**Cross Functional Team (CFT)**
The CFT is comprised of key staff members from Fort Benning organizations designated by the Garrison Commander (GC) and Sustainability Management System Management Representative (SMS MR). The CFT is responsible for gathering, organizing, and disseminating SMS information. The team also collects, evaluates, advises, coordinates, and facilitates SMS implementation while representing the various functional areas of the Post.

**Environment**
Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.

**Environmental Aspect**
Quality or outcome of an organization’s activities or services that has the potential to affect the environment if not controlled.

**Environmental Impact**
An environmental impact is the effect that an aspect can have on the environment. An example impact is the degraded air quality in an area with air emissions.

**Environmental Management Division (EMD) Program Manager (PM)**
An individual in the Environmental Management Division (EMD) appointed to manage specific environmental programs in accordance with Army Regulation (AR) 200-1 and the Army Strategy for the Environment. Program managers are responsible for advising the Installation Commander and personnel regarding environmental resource protection and resource conservation. Resource media include natural and cultural resources, such as air, groundwater, surface water, soil, and archeological sites.

**Environmental Management System (EMS/SMS)**
A management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes, and resources for developing, implementing, achieving, reviewing, and maintaining an environmental policy.

**Environmental Objective**
A higher-level, overall environmental, goal, arising from the environmental policy, that an organization sets itself to achieve, and which is quantified where practicable.

**Environmental Policy**
The environmental policy is a statement by the organization of its intentions and principles in relation to its overall environmental performance and a framework for action and for setting objectives and targets.
**Environmental Target**
A detailed performance requirement, quantified where practicable, applicable to the organization or parts thereof, that arises from the environmental objectives and needs to be set and met in order to achieve those objectives.

**Organization**
Company, corporation, firm, enterprise, authority, government agency or institution, or a part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration.

**Prevention of pollution**
Use of processes, practices, materials, or products that avoid, reduce, or control pollution; this may include recycling, treatment, process changes, control mechanisms, efficient use of resources, and/or material substitution.

**Significant Environmental Aspect**
A significant environmental aspect is an aspect that has or can have a major impact to the environment. Based on the ranking results, the SMS CFT determines and documents which aspects are significant.

**Significant Environmental Impact**
Any potential significant change to the environment, wholly or partially resulting from the organization’s activities, products, or services. This term is used for management purposes and differs from decisions regarding significance of potential environmental impacts per the National Environmental Policy Act.

**Sustainability**
Sustainability means focusing on the mission, social, and environmental impacts of Fort Benning’s operations in such a way as to support the capacity of future generations to meet their needs.

**Sustainability Management System (SMS/EMS)**
A management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes, and resources for developing, implementing, achieving, reviewing, and maintaining a sustainable approach to operations.

**Sustainability Management System Audit**
A systematic, documented and independent examination to objectively obtain and evaluate evidence to determine whether an organization’s SMS conforms to the SMS audit criteria set by the organization, and to communicate the results of this process to management.

**SMS Management Representative (SMS MR)**
An individual appointed by the Garrison Commander (GC) of Ft. Benning who, irrespective of other duties, is responsible for the operation of the SMS.

**Sustainability Management System Coordinator (SMS Coordinator)**
The individual from the Garrison Command Staff who is assigned SMS management duties by the SMS MR. This individual is responsible for day-to-day SMS activities, leading the CFT, delegating SMS tasks, establishing deadlines, and arranging training, guidance, and assistance as needed.
**SMS Workgroups** Groups chosen by the Cross Functional Team (CFT) on the basis of knowledge and skills to implement, monitor, and measure operations of the SMS Environmental Management Programs (EMPs).