

INDUSTRIAL EXTENSION SERVICE <b>IES</b> EP-02	<b>Legal &amp; Other Requirements &amp; Compliance Evaluations</b>	
	<b>Rev. Date: 10/08/2007</b>	<b>Rev. No #2</b>
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## 1.0 Purpose

The purpose of this procedure is to define the process used to identify and access environmental Legal and Other requirements – as well as to determine how these requirements apply to <COMPANY NAME>. Compliance evaluations are also described in this procedure.

## 2.0 Scope

This procedure is applicable <COMPANY NAME> operations as defined in the Scope section of the EMS Manual (Section 2).

## 3.0 Responsibilities

The Environmental Coordinator (EC) in conjunction with Environmental Management Representative (EMR) is responsible for the identifying Legal and Other Requirements, ensuring access to them, determining how they apply to the environmental aspects. The EC is responsible for evaluating compliance with them.

## 4.0 Forms Used

EF-02A          Environmental Legal and Other Requirements Form

## 5.0 Procedure


### 5.1 General

5.1.1 Legal requirements are defined in the EMS Manual, Section 5, as any Local, State or Federal – legal requirements that are applicable to the Environmental Aspects of <COMPANY NAME's> activities, products and services.

These include regulations such as those governing wastewater discharges, hazardous / solid waste storage and disposal, air emissions vented outside the facility, oil spill prevention, emergency planning and response, – and others.

Regulations do not typically include “laws or statutes” such as the Clean Air Act, Clean Water Act. These are mandates originating from congress and directed to other government agencies (such as EPA) calling for them to develop rules specific to industries (i.e., Code of federal regulations or CFR, NC State Administrative Code, etc). However, some statues may have direct applicability to industries (i.e., definitions of certain regulatory terms, NC General Statutes, etc).

5.1.2 Other requirements are defined in the EMS Manual as some type of environmental requirement – that is not legally mandated. Typically these requirements are called for by corporate headquarters, trade associations, customers, etc. They include requirements such as becoming ISO 14001 certified (i.e., mandated from customers),

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adherence to corporate policy statements, customer requirements for prohibiting the use of certain materials in the construction of a product, and others.

**5.2 Initial Listing:** The list of Legal and Other requirements will be identified through any of a number of mechanisms such as an internal review of historical records, internal discussions and meetings, external consultants, regulatory personnel assistance, compliance assessments etc. The resulting legal and other requirements list will be recorded on Form EF-02A by documenting the following information:

- Environmental Requirement: Common name of the regulation. Also, list whether is a Legal requirement (L) or Other requirement (O)
- Regulatory agency (EPA, NC DENR, City of Statesville, etc). This maybe electronically input as a hyperlink to that regulatory agency or to a web page offering guidance.
- Citation – the location of the code (i.e., 40 CFR part 63, 15A NCAC 2Q.0100, etc). This too should be entered as a hyper link to the code (i.e., [www.gpoaccess.gov/CFR](http://www.gpoaccess.gov/CFR) for CFR citations)
- Environmental Aspect(s): List which environmental aspects are associated with this Legal or Other Requirement
- Applicability Trigger: Description of why the regulation is applicable to <COMPANY NAME>
- General Description of Requirements: A brief overview of the requirements

**5.3 Accessing the Regulations:** The regulation can be accessed by clicking on the citation listed in the above form – which will take the reader to an internet site displaying the requirement code. For items that this is not possible (especially for Other requirements), a hardcopy of the code must be available to access the requirement


## 5.4 Compliance Evaluations

The EC will determine compliance with ATI's Environmental Legal and Other requirements every 2 years - using any of the methods listed below:

- Hire a compliance consultant to perform a **External Compliance Evaluation**, or
- Using qualified internal or corporate personnel, conduct an **Internal Compliance Evaluation**, or
- Evaluate compliance against applicable Legislation listed in EF-02A using **Compliance Evaluation Checklist** (Form EF-02B), or
- Any combination of the above

Some type of record such as a Compliance Evaluation Report will retained by the EC to indicate completion of the Compliance Evaluation

## 6.0 References

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ISO 14001:2004; 4.3.2, 4.5.2

**7.0 Related Procedures**

**8.0 Records**

ER-02A      **(Appendix C)** Legal and Other Requirements

**9.0 REVISION HISTORY:**

<b>Revision No.</b>	<b>Description of Change</b>	<b>Page #</b>	<b>Date</b>
1	Title Changes	1	1/10/2005
2	Minor Changes	All	10/8/2007