

# **Environmental Management System Manual (EM-01)**

**Clark County Department of Aviation**



**Environmental, Safety & Risk Management Office**

**Document Owner: Michael Nelson (CCDOA Environmental Specialist)**

**Version – 1.0**

**Date: August 1, 2018**

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## SECTION 1: INTRODUCTION



Photos by: James Dodson, McCarran International Airport.

The Clark County Department of Aviation (CCDOA) recognizes that the responsible management of the environment for our employees, tenants, customers, and the community is a key element of a successful business strategy. As such, the CCDOA has committed to implementing policies and procedures that ensure compliance with applicable laws and regulations in conducting our operations.

One of the missions of the CCDOA is to assist each tenant, contractor, and employee in complying with County, State, and Federal environmental regulations and to ensure their conduct is in concert with the rules, regulations, and operating procedures of the CCDOA Environmental Management System (EMS) described herein.

The CCDOA's Environmental Management System ensures the further advancement and expansion of all airport facilities through detailed guidance in relation to environmental systems and procedures. The EMS provides guidance for managing any daily obligations, risk assessment, environmental impacts, incident and hazard reporting and staff and tenant training throughout CCDOA facilities. Offering support to any employee or tenant, the EMS helps maintain a safe and secure work environment.

Sound environmental principles drive many operations at all CCDOA facilities and properties.

Figure 1.1 below illustrates the essence of what the Environmental Management System entails and ensures the CCDOA. The phases of preparation, planning, implementation and execution as demonstrated in the figure, allow the EMS to provide feedback for any changing or unsatisfactory situation, ensuring that the policies and procedures will remain efficient and effective.

This manual covers the general EMS requirements with respect to various environmental legislative and regulatory requirements and guiding documents (Section 3), the CCDOA's Environmental Policy (Section 4), those responsible for ensuring the EMS is followed (Section 6), the processes by which the EMS is monitored for environmental compliance (Section 7), and management review of the results of implementing the EMS (Section 8).

In addition, the CCDOA actively embraces its roles in social responsibility, maximizing safe and secure operational efficiencies, ensuring economic viability, and minimizing the environmental impacts of airport operations. In that regard, airport environmental sustainability practices include, but are not limited to waste

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minimization, recycling, energy use and conservation, water conservation, materials procurement, ground transportation vehicle movements, and maintenance activities. The CCDOA continually generates ideas and implements process improvements that helps its facilities become more sustainable engages its employees and tenants, alike, to spread the message of sustainability. As a significant driver to the economy in the southern Nevada region, which hosts many large events and meetings, the airport facilities are not only a large employer, but a gateway to visiting domestic and international businesspeople and tourists as well as serving over two million residents.

The CCDOA facilities provide the high level of customer service the public has come to expect, with improvements in design, delivery and maintenance from funding that is generated through operational revenues, passenger fees and grant funding. Sustainability is not just an abstract concept; it's the way to do efficient airport business that benefits everyone.



Figure 1.1: Environmental Management System- Continual Feedback/Implementation

## SECTION 2: DISTRIBUTION LIST

COPY	TITLE
1	Director’s Office
2	Airside Operations Office
3	Landside Operations Office
4	Airport Business Office
5	Construction/Engineering Office
6	Airport ES & RM Manager – Manual Controller
7	Airport Environmental Office
8	Airport Sustainability Office
9	Copy for contractor and tenant review (kept online at “Doing Business at McCarran” web page)

Unless otherwise specified at the beginning of the document, printed copies of this Environmental Management System (EMS) are UNCONTROLLED. Always refer to the online Clark County Department of Aviation (CCDOA) EMS document library prior to use to ensure you are using the most current version.

## Environmental Management System Revision Control

Documents referenced to in the Environmental Management System are controlled separately to this document.

DATE	AMENDED PAGES	BRIEF DESCRIPTION OF AMENDMENTS
June 25, 2009	All	Initial release of EMS Document - Environmental Guidelines
August 1, 2018	Various	Release of EMS Manual & Updates to Environmental Guidelines

## **SECTION 3: GENERAL REQUIREMENTS**

The Clark County Department of Aviation (CCDOA) commits to comply with all applicable laws covering protection of the environment, public health, and safety. The EMS manages the CCDOA's environmental impacts as well as, continual conservational improvements.

Maintaining an overall framework of different measures to achieve a safe and secure work environment, the EMS provides all employees and tenants with the tools necessary to handle any arising impacts from facility operations and upgrades.

To ensure all future development and operations follow industry best practices, the EMS identifies objectives to meet legislative and regulatory requirements illustrated in the following documents:

- 40 CFR Protection of the Environment
- 14 CFR Part 150/161 Generation of Noise
- 14 CFR Part 139 Wildlife Management
- NEPA Air Emissions, Ecological/Cultural Disturbance, Noise
- Federal Water Pollution Control Act (Clean Water Act)
- Resource Conservation and Recovery Act (RCRA)
- US Code Title 33, Chapter 26 – Water Pollution Prevention and Control
- US Code Title 15, Chapter 53 – Toxic Substances Control Act
- US Code Title 16, Chapter 35 - Endangered Species
- US Code Title 42, Chapter 85 - Clean Air Act
- US Code Title 42, Chapter 103 - Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
- US Code Title 42, Chapter 116 – Emergency Planning and Community Right-to-Know Act



The EMS outline also relies on other important guidelines, documents, and reports frequently referenced by the CCDOA. Reference guidelines, documents, and reports are demonstrated below:



- ✈ EMS Environmental Guidelines
- ✈ Operational Procedures and Training
- ✈ Spill Prevention Control & Countermeasures (SPCC) plans
- ✈ Storm Water Pollution Prevention Plans (SWPPP)
- ✈ CCDOA Spill Reporting System
- ✈ CCDOA Incident Reports
- ✈ Uniform Fire Codes / NFPA requirements
- ✈ Wildlife Hazard Management Plans

The CCDOA will implement a consistent EMS approach throughout the organizational structure, based on a model that will serve as the standard for EMS activities. However, the CCDOA will allow for flexibility in implementing this approach by:

- ✈ Recognizing the wide variations in the properties managed, and the need for site-specific management of operations and the affected environmental resources.
- ✈ Allowing appropriate facility staff, tenants, and airlines to make adjustments to the CCDOA EMS model to take into account site-specific operations and environmental conditions.
- ✈ Allowing tenants, and airlines to implement their own nationally recognized EMS model if the model and its implementation are consistent with the intent of this EMS. (Specific minimum requirements must be incorporated into any EMS to ensure it will return the expected and desired benefits. These minimum requirements are detailed in the guidance documents referenced above.

## SECTION 4: ENVIRONMENTAL POLICY



The Clark County Department of Aviation’s (CCDOA’s) Environmental Policy provides the structure necessary to establish positive environmental goals and objectives. Endorsed by the Director of Aviation, the policy encourages employees and tenants to continuously improve the environmental quality of their operations.

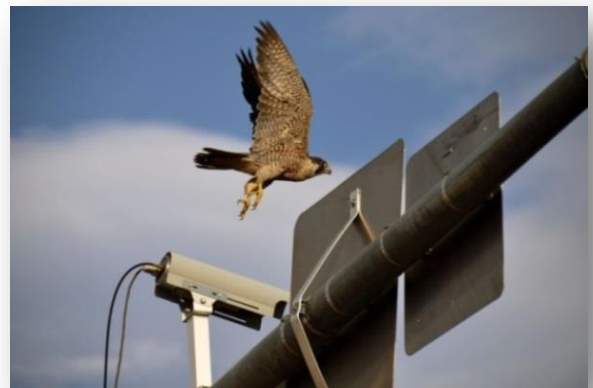
The CCDOA is dedicated to promoting sustainability operations in all aspects, which is easily demonstrated within the Environmental Policy, available to the public on the McCarran International Airport website.

This policy is executed through the Environmental Management System along with other functional processes in place. The Environmental Policy institutes the following procedures:

- Compliance with environmental legislation and regulations
- Continual improvement of environmental management
- Monitoring, reporting, and initiating the appropriate action for any environmental impacts that may arise during airport operations
- Viable organization and management of resources for environmental impacts
- Prevention of pollution or any contaminant spills or discharges into the environment
- Minimal waste generation and resource consumption
- Conservation of equipment through preventive scheduled maintenance and purchasing
- Prompt reporting of any practice or condition that is noncompliant with environmental regulations

All CCDOA employees and all tenants are required to understand the environmental policy as part of their introductory orientation and ongoing employment within the airport. On the job training should include discussion of EMS Guidelines, Standard Operating Procedures as well as pertinent forms and records.

Legal and other requirements, applicable to the EMS will be reviewed by the Clark County District Attorney, as needed, and as instructed by the Director’s Office.





## SECTION 5: PLANNING

### 5.1 Environmental Aspects

An environmental aspect is an element of an organization's activities, products, or services that has or may have an impact on the environment. Environmental aspects that have been identified as being relevant to the Clark County Department of Aviation (CCDOA) include:

- Noise Management
- Waste Management
- Air Quality
- Water Quality
- Effects of Construction
- Natural resources management
- Discharges or spills to soil, surface water or groundwater



The CCDOA management, with assistance from the Environmental, Safety & Risk Management (ES & RM) staff, shall be responsible for identifying new environmental aspects and potential impacts to the environment.

Evaluation criteria	Conditions
Legal requirement	The aspect is legally and contract regulated
Environmental consequence	The unexpected release of pollutants is of severe environmental consequence
	An unexpected situation such as emergency may cause uncontrolled release of pollutants, or serious damage to flora, fauna or historical heritage
Use of materials	Large consumption of materials with a significant potential to reduce, reuse and recycle
	The consumption of materials that are hazardous in nature and can be replaced by more environmentally benign alternatives
	Consumption of materials that originate from environmentally sensitive sources
Corporate concerns	The CCDOA or tenant company has previously received valid, justifiable complaints for similar situations
	The environmental aspect concerns suppliers' and/or contractors' activities and can potentially be influenced by the CCDOA or tenant company
	Consumption of materials that are hazardous in nature and can be replaced by more environmentally benign alternatives
	The aspect is a CCDOA or tenant company concern reflected in the corporate policy

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## **5.2 Legal and Other Requirements**

The CCDOA, in consultation with legal counsel, shall keep track of changes to legal, regulatory and other requirements that are applicable to airport activities, products or services. On an annual or otherwise appropriate basis, the Airport Environmental Specialist shall review the previously identified legal and other requirements applicable to the EMS and update and communicate this information as necessary.

## **5.3 Objectives and Targets**

The CCDOA's objectives focus on implementing the Environmental Management System into all divisions and functional groups. Being committed to maintaining an environmental outlook, the airport strives to provide a safe and secure working environment for all employees and tenants. Also dedicated to managing environmental impacts that may arise; the CCDOA encourages prevention and preparedness for any situation. Collaboration from all responders is necessary to ensure the preservation of the working environment and maintain an effective, systematic method to provide efficient environmental management throughout the airport. The CCDOA management, with assistance from the ES & RM staff, shall be responsible for ensuring that objectives and targets are met and recommend appropriate action to be taken whenever target measurable are not met Spill Prevention, Control and Countermeasure. Objectives and targets should conform to the S.M.A.R.T. criteria: Specific, Measurable, Attainable, Relevant and Timely.

### **5.3.1 Objective Definition**

- The Objective is the Environmental Goal. The Overall Environmental Change You Want to Achieve

### **5.3.2 Target Definition**

- Detailed Performance Requirement
- Specific Outcome of the Objective
- Targets are Necessary for Achieving the Stated Objectives
- Targets are a Measureable Outcome of the Change

### **5.3.3 Examples**

- Strategy: Reduce facility contributions to climate change
  - Objective/Target: Reduce Greenhouse Gases by 5% by December, 31, 2018
  - Objective/Target: Reduce Water Consumption by 5% per Year every year through 2020
- Strategy: Educate tenants and airlines concerning individual ability to improve our local environment
  - Objective/Target: Increase recycling rates by 10% by December 31, 2018
  - Objective/Target: Develop environmental educational program concerning proper e-waste management by March 1, 2018

## SECTION 6: IMPLEMENTATION AND OPERATION

### 6.1 Resources, Roles, Responsibility and Authority

In this section, the Clark County Department of Aviation (CCDOA) has defined, documented and communicated the roles, responsibility and authority of personnel in order to facilitate effective environmental management. The following management structure illustrates the order of responsibility the CCDOA has created with respect to environmental management and the environmental management system.

#### 6.1.1 Director’s Office

The Director’s Office represents the upper management of the CCDOA and consists of; The Director of Aviation, Deputy Directors of Aviation as well as Assistant Directors of Aviation and is responsible for:

- Providing financial, personnel and management backing to support and enforce the Environmental Strategy
- Providing leadership in all aspects, including promoting the EMS and the implementation of Environmental Awareness and Sustainability in all departments
- Management review of EMS and approval
- Communicating the importance of environmental management and support

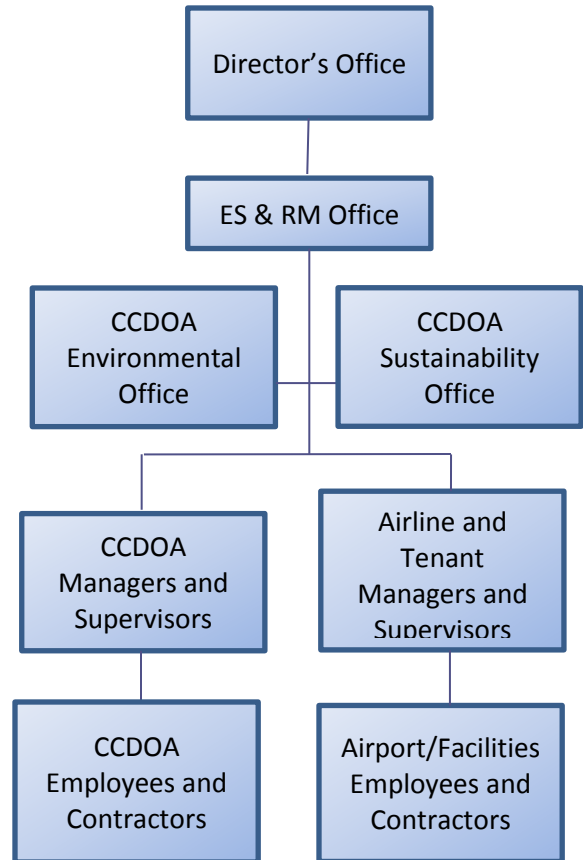


Figure 6-1: Environmental Management Structure

#### 6.1.2 Environmental, Safety & Risk Management Office

The Environmental, Safety & Risk Management (ES & RM) office is responsible for:

- Monitoring and reporting any environmental changes throughout the airport
- An annual review and audit of the objectives and targets, as well as environmental management’s impact on the airport
- Education and training as needed
- Promoting and coordinating airport sustainability activities and program development

Follow up and enforcement actions in response to performance deficiencies

### 6.1.3 CCDOA Environmental Office

The CCDOA Environmental Office is responsible for:

- Ensuring compliance with environmental regulations and environmental targets by monitoring conformance and working with airlines, tenants and CCDOA functional groups' supervisors and managers
- Review new or modified developments, activities, products, or services to ensure environmental management if applicable
- Preparation of reports and inspection forms detailing the facilities' environmental performance
- Developing, implementing and monitoring compliance with the Environment Management System (EMS) by maintaining and/or implementing various guidance documents and permits including:
  - CCDOA EMS Environmental Guidelines
  - Storm Water Pollution Prevention Plans (SWPPP)
  - Spill Prevention Control and Countermeasure Plans (SPCC)
  - Municipal Separate Storm Sewer System Storm Water Management Plan (MS4 SWMP)
  - Asbestos Operations and Maintenance Plan (Asbestos O&M Plan)
  - McCarran Airfield Detention Dam - Emergency Action Plan
  - Clark County Department of Air Quality (CCDAQ) Dust Permits
  - CCDAQ Stationary Source Air Emissions Permits
  - Clark County Department of Development Services – Fire Prevention Permits
  - Nevada State Fire Marshal Hazardous Materials Permits
  - National Pollution Discharge Elimination System (NPDES) permits
  - Nevada Division of Environmental Protection (NDEP) Industrial Storm Water Permits
  - Southern Nevada Health District (SNHD) Underground Storage Tank (UST) Permits
  - SNHD Restricted Waste Management Permits
  - Clark County Water Reclamation District (CCWRD) – Sand/Oil Interceptor Monitoring
  - Nevada Division of Water Resources (NDWR) Detention Dam Permit



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- General Aviation Airport Operating Directives
- CCDOA's Operation Regulations

#### 6.1.4 CCDOA Sustainability Office

The CCDOA Sustainability Manager focuses on a holistic approach to sustainability through a commitment to enhancing the department's economic viability, operational efficiency, natural resource conservation, and social responsibility (EONS).

The Airport Sustainability Manager is responsible for:

- ✈ Monitoring and reporting on the overall sustainability program's performance
- ✈ Providing the tools necessary to evaluate, implement, and track sustainability initiatives
- ✈ Identify potential opportunities, challenges, partnerships, and resources
- ✈ Review and recommendation of new or enhanced sustainability initiatives
- ✈ Education and training on sustainability principles, legislation, risks and projections
- ✈ Promoting and coordinating airport sustainability activities and program development

#### 6.1.5 Managers and Supervisors

Managers and supervisors from all organizations share the same responsibilities associated with the EMS. Managers and supervisors are responsible for

- ✈ Coordinating emergency response efforts
- ✈ Training employees
- ✈ Maintaining records
- ✈ Conformance with EMS Environmental Guidelines
- ✈ Compliance with applicable regulatory requirements
- ✈ Communicating with employees and contractors on environmental expectations



### **6.1.6 Airport/Facility Employees and Contractors**

Employees include all CCDOA personnel as well as tenants, airlines and contractors. All employees are responsible for

- ✈ Identifying the environmental issue and reporting it to the proper authorities (Supervisor and CCDOA Environmental Office)
- ✈ Following applicable guidelines, directives and standard operating procedures
- ✈ It is generally accepted that employees who are consulted, involved, and informed are more responsive and productive than those who are not. All employees, managers, supervisors, tenants, contractors and airlines are encouraged to be involved in the EMS and its functions – from objective setting to process mapping to improvement of environmental aspects

### **6.2 Competence, Training and Awareness**

Yearly performance reviews are used to determine the applicable training requirements for each CCDOA employee. Training is documented through a third-party online system which provides tracking and analyzing of training activities, including the training history of employees. Activities performed by airline and tenant employees, and the corresponding training responsibilities should be derived from the Environmental Guidelines Training Matrix document. Determining the necessary training the employees require to maintain an adequate understanding of environmental safety and management. Airlines and tenants are responsible to keeping accurate training records for all of their employees. All employees must be made aware of the environmental impacts and procedures relevant to their position.

### **6.3 Communication**

The most current version of the Environmental Management System will be available on the online CCDOA EMS document library. Printed copies may be made available. However, unless otherwise specified at the beginning of the document, printed copies of the EMS should be considered UNCONTROLLED.

Internal communication regarding the EMS between the various levels and functions of the CCDOA shall be in writing.

Updates, notifications and other correspondence to tenants, airlines and other parties will be made by Tenant Bulletin, emails, newsletters, and any other means the CCDOA determines to be appropriate.

Each CCDOA Business Partner shall designate a person or persons who will be the point of contact for environmental issues to the CCDOA ES & RM Office. The name, phone number, and email address of the designated local and corporate environmental person(s) shall be submitted to the CCDOA Business Office. This information will be forwarded to and maintained by the CCDOA ES & RM Office. This person(s) shall be able to represent the CCDOA Business Partner in providing information as may be requested by CCDOA, and should be knowledgeable about the business's environmental aspects and impacts. Any personnel changes in this area shall be followed by a written notification to the CCDOA Business Office and the CCDOA ES & RM Office. Upon request from the CCDOA ES & RM Office, Business Partners shall provide requested information about that Business Partner's Significant Environmental Aspects or Environmental Impacts at applicable CCDOA facilities.

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## **6.4 Documentation**

The CCDOA Environmental Management System documentation encompasses three levels as described below:

- The first level is the Environmental Management System Manual (this document) which includes the CCDOA's environmental policy (specifying the principal objectives and environmental commitments of the CCDOA). An individual document of Objectives, Targets and Programs is developed based on the company's environmental policy and in coordination with the CCDOA Sustainability Department. It demonstrates the company's commitment on continual improvement in environmental performance.
- The second level is the Environmental Guidelines (EGs), which are operational control procedures or instructions, with defined responsibilities, to control the identified significant environmental aspects associated with CCDOA facilities' operations and activities.
- The third level is Environmental Records which arise from the implementation of the Environmental Management System Manual and Environmental Guidelines. Environmental Records include various checklists, reports and meeting records, etc., as defined in the above-referenced documents.

## **6.5 Control of Documents**

The Airport Environmental Specialist is responsible for the monitoring and control of the EMS document. All documents pertinent to the EMS must be readily available for employee and management viewing. Any additions, updates or revisions to the EMS will be initiated, completed and implemented by the Airport Environmental Specialist, or another from the ES & RM Office, following Director's Office approval of any changes to the document.

### **6.5.1 Labelling and Numbering System of EMS Documents**

To indicate the status of each document, and to prevent the use of obsolete or outdated documents, the following information shall be stated on each CCDOA environmental document or guideline:

- Title (subject)
- Document number
- Revision number (which starts from 1.0, 2.0, 3.0.....)
- Date
- Document owner

### **6.5.2 Numbering of EMS Forms and Documents**

The numbering system of EMS forms and documents is as follows:

- EMS Manual: EM-01

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- ✈ EMS Environmental Guideline: EMS EG-xx
- ✈ EMS Acronyms: EMS A-1
- ✈ EMS Regulations, Laws, Codes & Statutes: EMS R-1
- ✈ Objectives, Targets and Programs: O&T-yyyy
- ✈ EMS Review Checklist: ERC-yyyy
- ✈ Revision number for documents: Version x.x (which starts from 1.0, 2.0, 3.0.....)

### **6.5.3 Operational Controls**

The CCDOA shall identify those operations and activities that are associated with the identified significant environmental aspects in line with its policy, objectives and targets. The CCDOA has developed Environmental Guidelines for McCarran International Airport, and Environmental Directives for the General Aviation (GA) airports, in order to ensure that activities are carried out under specified conditions to cover situations where their absence could lead to deviations from the environmental policy as well as environmental objectives and targets.

### **6.6 Emergency Preparedness and Response**

The CCDOA's Airport Emergency Plan covers the detailed procedures to be implemented in the event of accidents and emergencies.

The CCDOA maintains procedures to identify potential accidents and emergency situations including proper response procedures. Emergency response procedures may include actions to be taken for preventing and/or mitigating associated environmental impacts.

Although human safety is the primary concern during an emergency situation, the ES & RM Office's on-call representative will report any relevant environmental hazards, risks and incidents to airport operations staff and emergency responders. The ES & RM Office's on-call representative will also coordinate any environmental remediation activities necessary resulting from emergency response activities. Regular meetings are held with airport operators and the emergency services staff to ensure procedures are always relevant and up to date.





## SECTION 7: MONITORING

### 7.1 Monitoring and Measurement

Environmental monitoring equipment shall be calibrated and maintained and records of these processes shall be retained according to manufacturers' recommendations.

The ES & RM Office tracks performance, relevant operational controls and conformance with airport environmental objectives and targets.

The Airport Environmental Specialist will periodically evaluate compliance with relevant environmental legislation and regulations as needed.

### 7.2 Evaluation of Compliance

The ES & RM Office has the responsibility and authority for handling and investigating nonconformance, taking action to mitigate any impacts caused, and initiating and completing corrective and preventive actions.

### 7.3 Corrective Action and Preventative Action

Any non-compliance circumstances will be identified and managed accordingly by the ES & RM Office. Corrective action and prevention action will be taken, if necessary. Corrective or preventative action procedures are outlined in the Clark County Department of Aviation's (CCDOA's) Rules and Regulations document and shall be appropriate to the magnitude of problems and commensurate with the environmental impact encountered. Any changes will be implemented and recorded in the documented procedures resulting from corrective and preventive action.

### 7.4 Control of Records

Environmental records shall be legible, identifiable and traceable to the activity, product or service involved. Environmental records shall be stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss. Their retention times shall be established and recorded.

All environmental records are maintained on file managed by the Airport Environmental Specialist. The ES & RM Office should be contacted when any of these records are needed.

Training records are maintained in staff personal files, which are kept for the duration of staff employment with the CCDOA. Tenants and airlines are responsible for maintaining procedures for the identification, maintenance and disposition of their internal environmental records. These records shall include training records and the results of audits and reviews.

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### 7.5 Internal Audit

Auditing of the Environment Management System will be conducted as needed, and will include procedures to be carried out, in order to:

- Determine whether or not the environmental management system
  - Conforms to planned arrangements for environmental management including the requirements of applicable standards; and
  - Has been properly implemented and maintained
- Provide information on the results of audits to the Director's Office



The audit program, including any timelines/schedules, shall be based on the environmental importance of the activity concerned and the results of previous audits. In order to be comprehensive, the audit procedures shall cover the audit scope and methodologies, as well as the responsibilities and requirements for conducting audits and reporting results.

## SECTION 8: MANAGEMENT REVIEW

The management review process is the final phase of review portion of the EMS. Its purpose is to evaluate and analyze the entire EMS and its relevance to the overall airport operations to ensure its continuing suitability, adequacy and effectiveness. The Airport Environmental Specialist is responsible for ensuring that the necessary information is collected to allow Clark County Department of Aviation (CCDOA) management to carry out this evaluation. This review shall be documented.



The management review shall address the possible need for changes to policy, objectives and other elements of the environmental management system resulting from environmental management system audit results, changing circumstances, and the commitment to continual improvement. As part of this review, the Director's Office will:

- Review the environmental performance of the facilities
- Consider the extent to which objectives and targets have been met
- Address the status of corrective and preventative actions
- Review the results of internal audits
- Evaluate compliance with legal requirements
- Recommend plans to achieve ongoing best environmental practice through continual improvement.