



Managing Environmental Risk at the Plant

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EMS Tools for Risk Management at the Plant

KEY EMS COMPONENTS:

- Listing all applicable regulations and permit conditions
- Demonstrate methods of receiving current updates and changes in regulations
- Training all plant personnel
- Product (Chemical) Review
- Contractor Management Program
- Internal Audit Program
- Corrective Action Requests
- Sr. Mgmt. Review of CAR 'Scorecard'
- Periodic Facility Compliance Audits



EMS Tools for Risk Management at the Plant

Benefits of an EMS for Risk Management:

- Distribution of Environmental Responsibility from Sr. Mgmt. to Floor Personnel
 - Responsibility at the task level, area of work performance
 - Identification of personal responsibility as appropriate
 - Formal methods of feedback / communication
- Identification of potential issues:
 - E-recycling
 - Drum Recycling – Contract Mgmt.



Other Key Considerations for Risk Management

MANAGING LIABILITY:

- Managing TSDFs and restricting new additions to reduce future liabilities
 - Corporate participation to examine addition of risk
 - Careful consideration of Risks vs. Pricing
- Obtain or Maintain participation of legal counsel in the regulatory review process, i.e. annual T-V compliance certifications
- GHG Emissions Reporting/Energy Management Systems
 - Monitor Regulatory Development and Determine Applicability

