



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

DEC 28 2003

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

MEMORANDUM

SUBJECT: Providing EMS-Related Compliance Assistance During  
Federal Facility Inspections

FROM: David J. Kling, Director  
Federal Facilities Enforcement Office

Michael M. Stahl, Director  
Office of Compliance

TO: Addressees

This memorandum transmits recommended practices for Providing EMS-Related Compliance Assistance During Federal Facility Inspections. These recommendations were prepared in consultation with staff from the Compliance Assessment and Media Programs Division within OECA's Office of Compliance as well as EPA regional Federal Facility Program Managers. Please note that this document supports the June 25, 2003, OECA national policy document on The Role of the EPA Inspector in Providing Compliance Assistance During Inspections and does not change the existing practice of providing appropriate compliance assistance during inspections.

These recommendations are intended to promote the development, implementation and maintenance of Environmental Management Systems (EMS) at federal facilities and support federal facility compliance with Executive Order 13148, Greening the Government Through Leadership in Environmental Management. EPA actively promotes the development of EMSs and has issued a statement of support from the EPA Administrator encouraging their development and use among the regulated community. EMSs can also improve environmental compliance and reduce environmental impairment if properly implemented. Therefore, we are asking inspectors to provide a brochure to facility management during the conduct of a federal facility inspection to promote EMSs. The brochure provides basic information on EMSs and provides a list of contacts in the regions and other resources for facility management and staff. OECA will post these recommendations and the EMS brochure on the EPA Inspector Website

(Intranet) and at FedCenter the Federal Facility Environmental Stewardship and Compliance Assistance Center ([www.fedcenter.gov](http://www.fedcenter.gov)).

Please distribute this document widely throughout the organization to all EPA employees and contractors who conduct federal facility inspections. If you have any questions, please call the Federal Facility Enforcement Office at 202- 564-2510.

**Attachments:** Providing EMS-Related Compliance Assistance During Federal Facility Inspections - Recommended Practices for EPA Staff during Federal Facility Inspections

**Addressees:** Regional Federal Facilities Senior Managers  
Regional Enforcement Division Directors, Regions 1-10  
Regional Media Division Directors, Regions 1-10  
Regional Enforcement Coordinators, Regions 1-10  
Lisa Lund, Deputy Director, Office of Compliance  
OC Division Directors  
Walker Smith, Director, Office of Civil Enforcement  
Randolph Hill, Deputy Director, Office of Civil Enforcement  
OCE Division Directors  
Peter Murtha, Director, Office of Criminal Forensics and Training  
OCEFT Division Directors  
Caroline Peti, Director, Office of Planning, Policy Analysis and Communications  
Diana Love, Director, National Enforcement Investigations Center

**cc:** Kenneth Gigliello, OECA/OC  
Phyllis E. Flaherty, OECA/OC  
Julie Tankersley, OECA/OC  
Sandra Connors, OECA/FFEO  
Greg Snyder, OECA/FFEO  
Bernadette Rappold, OECA/FFEO  
Richard Satterfield, OECA/FFEO  
Mike Shields, OECA/FFEO  
Will Garvey, OECA/FFEO  
Regional Federal Facilities Program Managers  
FFEO Liaisons