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National Railroad Passenger Corporation – AMTRAK -
Environmental Management System Manual
Prepared By: Environmental Department
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Guidance Document Number: EMS-M-000

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Freedom of Information Office
60 Massachusetts Avenue, N.E.
Washington, D.C. 20002
Fax: 202-906-2169

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September 9, 2008



Re: Freedom of Information Act Request #

Your February 29, 2008 request for information submitted pursuant to the Freedom of Information Act (FOIA) was received by this office on March 10, 2008.

Your request seeks "a digital copy of each Executive Order 13423 (Environmental) Compliance Management Plan for Amtrak." Your request further states that if Amtrak did not create a Compliance Management Plan, your request is revised and seeks a pre-existing Environment Management System (EMS) Plan.

In response to your request, Amtrak is providing you with a digital copy of Amtrak's Environmental System Manual prepared by Amtrak's Environmental Department, which was issued in September 2001 and revised in March 2004. As information, Amtrak is a private corporation and not a federal agency. It is therefore not subject to E.O. 13423, and the enclosed plan was not developed in response to the aforementioned E.O.

Your request has been classified as category IV – that is, a request other than for commercial use, from a representative of the news media, or from an educational or noncommercial scientific institution. Requesters in this category are charged \$38 per hour after the initial two hours of search time and 25 cents per page for reproduction of documents. There is therefore no charge for processing your request.

If you have any questions regarding the processing of this request, please feel free to contact me at 202/906-2728. Your ease of reference, your request has been assigned tracking number 08-0119.

Yours truly,

A handwritten signature in black ink, appearing to read "Medaris Oliveri". The signature is fluid and cursive, with a large loop at the end of the last name.

Medaris Oliveri
Freedom of Information Officer

Enclosure

IM-51302

EMS Manual



**NATIONAL RAILROAD PASSENGER
CORPORATION**

Amtrak®

Environmental Management System Manual

Prepared By: Environmental Department

Issue Date: September 2001

Revised: March 2004

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Introduction

i.1 Purpose of the EMS Manual

This manual is intended to provide an overview of the Amtrak Environmental Management System (EMS) and describe how the EMS will be implemented across the organization. It is designed to closely follow the U.S. EPA's National Enforcement Investigations Center guidance for a compliance-focused EMS ("NEIC Guidance"). The information contained in this manual is also intended to help reinforce and reiterate the policies, plans and procedures in place throughout the Company that help to support environmental compliance at Amtrak through *accurate, timely, truthful, and ethical* performance by all employees.

i.2 Audience

The EMS manual is located on Amtrak's Intranet site and is available to all Amtrak employees. The primary audience will consist of Amtrak's Environmental Department staff, Environmental Coordinators (ECs), their supervisors, and the Law Department. The primary distribution of the manual is listed below:

- Environmental Department (Washington, DC; Phil., PA; & Division Senior Environmental Coordinators' Offices)
- Law Department (New Haven & Washington, DC)
- ECs
- EC Supervisors
- Intranet
- Environmental Department Share Drive

i.3 Review and Maintenance of the EMS Manual

The EMS manual will be reviewed annually in December and updated as necessary by the Assistant Vice President (AVP) - Environmental in Washington, DC.

Once the AVP Environmental has made appropriate updates, the revised EMS will be re-posted on Amtrak's Intranet and the Environmental Department's share drive. Upon issuance of the revised manual, responsible parties should recycle the previous version of the EMS Manual. Keepers of individual EMS manuals must complete the review sign-off sheet (See - Appendix A) and return it to Amtrak's Environmental Department. All pages of the manual will be dated in the lower right hand corner to indicate the date of the most recent version. Updating the attachments to this manual with the most current versions of applicable documents is extremely important.

Other controlled documents related to the EMS are also subject to a strict review process, where they are reviewed and updated on a regular basis. The review procedures are stated in the individual documents. Unless otherwise specified, EMS related documents (manuals, policies, plans and procedures) must be centrally located and maintained by a designated individual at each Amtrak-audited facility.

i.4 Program Overview

Following the approval of a resolution by Amtrak's Board of Directors on March 8, 1999, Amtrak designed and began the implementation of a corporate-wide EMS. The EMS is designed to enhance environmental compliance and performance, establish management practices that foster the prevention of pollution, conserve energy conservation, and reduce toxic material usage.

The EMS initiative is a comprehensive approach, supported by the visible commitment and support by Amtrak's senior management. Responsibility for facility environmental compliance lies with Amtrak's line management. To make this effective, Amtrak has developed programs to properly train employees at all levels, raise their awareness of environmental issues, and provide them with the resources and tools to do their jobs in an environmentally responsible manner. Through the implementation of the EMS, it is Amtrak's goal to become a leader in the railroad industry in terms of environmental compliance and stewardship.

The core components of Amtrak's EMS are summarized below.

Environmental Policy

Amtrak's Environmental Policy (EMS-P-000) is a key driver behind Amtrak's environmental programs and activities, including the implementation of the EMS. It is based on three themes: compliance, stewardship and leadership. It specifically assigns responsibility for facility implementation to line management and commits the Company to continuous improvement. To see a copy of Amtrak's Environmental Policy, or to learn more about the EMS Program, Amtrak employees can log onto Amtrak's Intranet at <http://internet.nrpc/HowWeWork/Environmental>.

Environmental Information System

Amtrak developed an Environmental Information System ("EIS") to identify and track the environmental requirements that apply to Amtrak facilities and operations. Amtrak's EIS combines all the areas of environmental compliance into a single system of data entry and retrieval. The EIS is able to track environmental operations at each of Amtrak's audited facilities (30 sites) and up to 120 additional facilities system-wide that also have activities with potential environmental impacts. The EIS also contains a geographic information system (GIS) that allows the user to readily retrieve environmental data for any facility through a combination of geographic maps and site drawings. The primary users of the EIS are the Environmental Department (including the Division Senior Environmental Coordinators and the Environmental Coordinators), and Responsible Amtrak Officials at facilities.

Environmental Internal Communication Program

Amtrak developed a formal communications plan for environmental issues at Amtrak in April 2001. This involved reviewing existing communication tools used throughout the Corporation, evaluating the effectiveness of those tools for highlighting environmental issues, and enhancing those tools where necessary to include environmental issues. Amtrak has an Environmental Communications Committee comprised of field and department representatives. This committee works together to build on existing programs within the

Divisions and Shops. The Communication Program helps Amtrak remain in compliance with environmental regulations by increasing employee awareness of new and existing Amtrak policies, programs, and procedures as well as environmental regulatory information.

Environmental Emergency Response Program

Amtrak has integrated Environmental Emergency Response procedures (EMS-P/G-010) to implement preventive and mitigating measures and to provide effective reporting and investigation of all environmental emergency incidents. RAOs, along with the Environmental Department, are responsible for having emergency response procedures communicated and properly followed.

Environmental Goals and Metrics

Amtrak's annual Environmental Goals are based on defined environmental performance goals for each Division, the Corporation, and the Environmental Department. The Environmental Department, EMS Steering Committee, and Executive Environmental Oversight Committee oversee this plan, and it includes compliance and pollution prevention goals and EMS programmatic goals.

Environmental Training Program

Amtrak has developed an Environmental Awareness Training program (EMS-P-004) that identifies and explains the major environmental issues that employees need to understand regarding Amtrak's operations and activities. An environmental training matrix (EMS-G-004 – See - Attachment B) has been developed to assist in identifying mandatory environmental training requirements for employees throughout the organization.

Environmental Committees

Amtrak has a three-tiered committee structure to assist in environmental decision making and championing of Amtrak's environmental initiative at the facility, division and executive levels. The three tiers of internal committees oversee, manage, and implement the EMS initiative. The Environmental Executive Oversight Committee (EEOC) provides the oversight function, and the EMS Steering Committee is the main task force to coordinate and manage the EMS initiative. The Implementation Committees from each of the Divisions and from the Back Shops then tailor and implement the initiative at the Division and facility levels.

A formal charter (establishing organization, objectives etc.) has been developed for both the EEOC and the EMS Steering Committee (EMS-P-006). The organization, goals and objectives of the committees are periodically reviewed and updated.

Environmental Audit and Corrective Action Program

The Environmental Audit and Corrective Action Program's focus is on the state of environmental compliance and conformance at Amtrak's major and medium mechanical, maintenance of way, and signal shops. This program also helps to monitor compliance and

drive continuous improvement by requiring a systematic process to correct deficiencies identified by the audits.

Facility Environmental Compliance Assessments Program

The Facility Environmental Compliance Assessments Program (FACE) (EMS-M-004) drives assessments at approximately 120 facilities not included in the Environmental Auditing Program. At these sites there is limited, non-periodic industrial activity, e.g. electrical substations, minor mechanical facilities, and some passenger stations, and there is limited pollution potential. The FACE program also incorporates a systematic program to correct deficiencies identified in assessments.

Environmental Handbook

The Environmental Handbook (EMS-M-003) is designed for both field environmental staff and facility/operational management employees to assist in their understanding of how environmental laws and regulations impact Amtrak operations and day-to-day work activities. The handbook includes an overview of applicable laws and regulations, and provides the reader with guidance and contact information for obtaining additional assistance if necessary.

Corporate, Division and Facility Environmental Manuals

The Facility and Back Shop Environmental Manuals (FEMs) (EMS-M-006) identify environmental requirements and assign responsibilities at the facility level. The facility, division and corporate Environmental Manuals (EMS-M-005 & 011, respectively) are designed to complement one another – requirements identified in the facility manuals roll up into the Division manuals that also include Division environmental requirements and responsibilities. The Division and Back Shop manuals, in turn, roll up into the corporate Environmental Manual that includes Environmental Department oversight responsibilities.

Amtrak Environmental Policy and Guidance

The Environmental Policy and Guidance documentation (the Environmental Policy and Procedures Log, EMS-G-007, is updated regularly on Amtrak's Intranet) organizes Amtrak-specific policies and guidance on key environmental procedures and best management practices. Policies and guidance documents are developed at the corporate level to promote consistency in the implementation of environmental compliance procedures throughout the organization. Procedures to implement these policies and guidelines may be developed either locally, nationally, or both.

Accountability and Responsibility Policy

The Environmental Accountability and Responsibility Policy and Guidance (EMS-P/G-001) is a core component of Amtrak's EMS. The policy establishes the basis by which Amtrak employees, managers, on-site service providers, and contractors are held accountable for compliance with applicable Federal, state, and local environmental laws and regulations, as well as internal environmental policies and procedures. This policy incorporates an Incentives

and Discipline Policy. The purpose of this policy is to hold accountable the proper department or person for the environmental impacts of their respective areas of responsibility.

Pollution Prevention Policy

Amtrak's Pollution Prevention Policy and Guidance (EMS-P/G-003) establishes a framework for pollution prevention and waste minimization at Amtrak. Amtrak's goal is to recycle paper, cardboard, aluminum, plastic, newspaper, and glass at Amtrak owned and/or operated facilities and operations. This effort will help support Amtrak's environmental stewardship policy of material reuse. Amtrak has developed this policy to incorporate pollution prevention into its day-to-day operations, the start-up of new initiatives, and the modification of existing processes.

Chapter I- Amtrak's EMS and Environmental Policy

1.1 Environmental Policy

The Amtrak Environmental Policy (EMS-P-000) is a key driver for environmental programs and activities, including the implementation of the EMS. The Policy is based on three themes: compliance, stewardship and leadership. It specifically assigns responsibility for implementation to line management, and commits the Company to continuous improvement.

The original policy was issued on March 24, 2000 and distributed throughout Amtrak as part of the rollout of the EMS utilizing the employee newsletter "Amtrak Ink". Framed copies were also distributed system-wide. It is subject to an annual review every December, and was last revised and reissued in January 2004. A copy of Amtrak's Environmental Policy is included in Appendix C. The latest version is also available on Amtrak's Intranet in the Environmental section.

Amtrak's Environmental Policy also provides the framework for its overall EMS initiative. Thus it is referenced in most of Amtrak's environmental policies, guidance documents, procedures, and training programs. The focus of line/staff personnel, however, is on the day-to-day implementation of the EMS program in order to achieve environmental excellence.

1.2 Management's Commitment to the EMS

Amtrak's Board of Directors and its Executive Committee are committed to enhancing Amtrak's environmental compliance resources. This has been demonstrated by the following actions:

- Formation of three tiers of environmental committees – the Executive Environmental Oversight Committee, the EMS steering Committee, and a series of field EMS Implementation Committees to support and drive the implementation of the EMS;
- Adequately staffing the Environmental Department led by an AVP – Environmental to develop and implement Amtrak's EMS initiative;
- Creation of Environmental Coordinator (EC) positions throughout the system to directly assist and support line management in meeting their environmental responsibilities;
- Development of a centralized Environmental Information System ("EIS");
- Retention of PricewaterhouseCoopers, LLP to help guide the EMS program development and implementation for its three year (1999-2002) phased initiation; and
- Continued support of the EMS program and environmental capital program

Chapter II- EMS Organization, Personnel & Oversight

2.1 Overview

Formed in 1971, Amtrak was reorganized in 2002 to create a centralized executive management structure with seven Divisions: New England Division (NED), New York Division (NYD), Mid-Atlantic Division (MAD), Central Division (CEN), Southern Division (SOU), Pacific Division (PAC), and Southwest Division (SWD), and Engineering and Mechanical Departments under the Senior VP Operations.

The company owns and operates approximately 600 facilities in 44 states, comprised of:

- Maintenance of equipment facilities;
- Layover facilities;
- Maintenance of way facilities;
- Heavy maintenance shops;
- Passenger stations; and
- Other facilities, including substations, equipment shops, etc.

In addition to these facilities, Amtrak owns over 700 miles of track primarily in the Northeast Corridor and Michigan. The remainder of the 22,000-mile network is managed through a series of contractual arrangements with other railroad companies. In addition, Amtrak operates several commuter and intercity rail operations under contracts with various states and authorities. These services include:

- Connecticut DOT (Shoreline East);
- New England's Downeaster (Northern New England Passenger Rail Authority)
- Virginia Railway Express (VRE);
- Maryland Rail Commuter Service (MARC);
- Peninsula Corridor Joint Powers Board (CalTrain);
- Southern California's Commuter Rail System (Metrolink); and
- San Diego Northern Railroad (Coaster)

The following page shows a high level picture of Amtrak's operations in the United States.



Amtrak’s corporate headquarters are located at Union Station, Washington, D.C. The Divisional headquarters are located in NED - Boston, NYD - New York City, MAD - Washington, DC, CEN - Chicago, SOU - Jacksonville, FL, PAC - Oakland, and SWD - Los Angeles.

Amtrak employs approximately 20, 000 people throughout the country.

2.2 Amtrak’s Environmental Compliance Personnel

Amtrak has developed a multi-layered environmental organization to complement its operating structure and to help effectively oversee the identification, management, and coordination of environmental compliance issues throughout the Company.

The organization consists of an Environmental Department management group, including Division Senior Environmental Coordinator and Back Shop level support organization, and an operations or facility-level support element comprised of Environmental Coordinators. In addition to the environmental organization, every department and employee has a responsibility to carry out their job functions in a manner that ensures compliance with Amtrak’s environmental permits, policies, programs and procedures.

Personnel throughout all levels of the Amtrak organization have some responsibility for environmental compliance. Where needed, organizational charts can be obtained by contacting the Division or corporate Human Resources (HR) Department. Upper management supports the EMS by participating in the various EMS committees and by providing the resources necessary to ensure environmental compliance and to effectively implement and maintain the EMS. Other organizations,

including the Law Department and the Amtrak Office of Inspector General each serve a role in the EMS, which will be described in detail later in this section.

The Environmental Department, however, is the organization with primary responsibility for guiding the development and implementation of the EMS. The following describes the organization of Amtrak's Environmental Department and individual roles and responsibilities:

Environmental Department

To help Amtrak operate in compliance with environmental laws and regulations, the Environmental Department develops policies, programs and procedures so that company personnel operate in a manner that will comply with those requirements. Specifically, Amtrak's Environmental Department performs the following tasks:

- Identifies the environmental laws and regulations that apply to Amtrak's various operations, activities, and personnel;
- Identifies environmental risks and compliance issues facing the company;
- Reviews changes in regulations and new regulations to identify requirements that may have an impact on the organization;
- Implements the Environmental Auditing & Corrective Action Program to verify Amtrak operations and activities at major facilities are performed in accordance with established policies, programs and procedures;
- Develops and tracks environmental training requirements and programs so employees receive the appropriate environmental training;
- Uses the EIS to help track environmental compliance by identifying facility permitting and reporting requirements, tracking the status of permits and plans, managing report preparation and submission by facilities in a timely manner and tracking facility waste generation and management;
- Plays a vital role in facility emergency response planning and spill reporting by coordinating the development of model integrated contingency plans for Amtrak facilities, and by tracking environmental spills throughout the system
- Communicates environmental issues to affected employees, senior management and the public, including the preparation of the Annual Amtrak Environmental Report;
- Acts as technical advisor/mentor to ECs and Responsible Amtrak Officials as they perform day-to-day activities in support of the EMS; and
- Manages Amtrak's environmental capital program (\$18 million in FY 2003)

The following describes the specific roles and responsibilities of Environmental Department personnel in the implementation and maintenance of the EMS.

AVP Environmental

Provides leadership on environmental issues and represents the company to external audiences on major environmental issues. Directs resources and manages the efforts of the Environmental Department including operational and capital budget planning and implementation. Coordinates with the Law Department and manages coordination among division, field and departmental environmental staff. Directs and manages

Amtrak's Public Health group. Provides ongoing EMS program monitoring, development and continuous improvement. Implements the Environmental Audit and Corrective Action Program.

Senior Director Environmental – Washington, DC

Develops and administers environmental programs including the EMS initiative, the Environmental Auditing and Corrective Action Program, the Facility Assessment Compliance Evaluation (FACE) Program, environmental training, policies, procedures and information systems. Provides technical support on environmental issues and coordinates interdisciplinary cooperation on the compliance, training, policy and procedure development, environmental remediation, pollution prevention, regulatory interpretation and tracking, and the technical aspects of environmental problem solving.

Senior Director Environmental – Philadelphia, PA

Administers the implementation of environmental programs including the EMS initiative, training, policies, procedures and facility assessments systems throughout Amtrak's Divisions. Oversees the environmental operational and capital budget planning and implementation process for the Divisional environmental remediation and pollution prevention initiatives. Manages the Division Senior Environmental Coordinators and provides technical support on environmental issues and interdisciplinary cooperation of compliance, training, policy and procedure development, environmental remediation, pollution prevention, regulatory interpretation and tracking, and technical aspects of environmental problem solving.

Director Environmental (Compliance)

Responsible for developing, planning and implementing a comprehensive environmental audit and corrective action program, and a Facility Assessment Compliance Evaluation (FACE) Program for all Amtrak owned/operated facilities and operations. Develops detailed audit and corrective action policies, protocols and program manuals for all applicable federal, state and local environmental laws and regulations, and Amtrak's EMS policies, programs and procedures. Prepares audit reports and presentations and works with the involved facility or operational management, and Division Senior Environmental Coordinators and ECs to develop and oversee needed corrective action plans, and root cause analyses to address any deficiencies noted in the audits. Coordinates with the Director Environmental (Technical Support) and Director Environmental (Policies and Programs) on root cause analysis of findings from audits.

Director Environmental (Technical Support)

Responsible for providing technical support to environmental staff and field management personnel, including the implementation of corrective action plans. Develops cost-effective environmental control and abatement measures to address environmental compliance issues. Coordinates with the Director Environmental

(Policies & Procedures) and Director (Environmental Compliance) to foster Amtrak environmental policies, programs and training that are technically feasible and cost-effective to achieve Amtrak's goal of "Environmental Excellence." Acts as Senior Environmental Coordinator for the Back Shops, and provides technical support and guidance to the Back Shop ECs and facility management.

Director Environmental (Policy & Programs)

Develops and implements corporate-wide environmental policies and programs for all Amtrak facilities and operations for compliance with applicable Federal, state and local environmental laws and regulations. Develops, modifies, implements, and tracks Amtrak's environmental training courses and plan. Prepares and issues regular progress reports on Amtrak's environmental training implementation progress. Oversees the preparation and delivery of environmental procedure manuals and handbooks. Coordinates policy, procedures, and training with the Director (Environmental Technical Support) and Director (Environmental Compliance) to meet EMS program goals.

Senior Coordinator (Environmental Procedures & Training)

Develops environmental procedure manuals, handbooks, and guidelines as needed for Amtrak management and craft personnel. Also responsible for developing, implementing, and tracking environmental compliance training programs based on Federal, state and local environmental regulations and Amtrak's EMS policies, procedures and programs. Trains responsible management and craft personnel on environmental regulations, policies, programs, procedures, as well as on pollution prevention and emergency response plans. Prepares and maintains training records and reports for Amtrak management and outside agencies, as required.

Senior Environmental Coordinator (Environmental Systems)

Develops and maintains Amtrak's EIS for Amtrak facilities and operations to ensure compliance with applicable federal, state and local environmental laws and regulations and Amtrak's EMS policies, programs and procedures. Responsible for developing and implementing associated environmental record keeping and reporting policies, procedures and forms. Coordinates the preparation and submittal of all environmental CARs including all associated capital and operating budget management and tracking reports. Prepares, updates, and monitors Amtrak's Environmental Reserve Report.

Senior Environmental Coordinator (Compliance Auditing)

Under the direction of the Director Environmental (Compliance), is responsible for planning and implementing comprehensive environmental compliance audits and developing and overseeing the Facility Assessment Compliance Evaluation (FACE) Program for all Amtrak owned/operated facilities and operations. Develops and utilizes detailed audit and environmental assessment checklists, prepares reports and

presentations of audit results and assists in developing and monitoring corrective action plans for audit findings.

Division Level

At the Division level, the environmental staff is organized in a manner to provide support and technical expertise to field environmental and operational staff, and to serve a regional management function for facilities and operations within the various divisions.

Senior Environmental Coordinators

Senior Environmental Coordinators (SECs), as members of the Environmental Department, provide direct technical support and guidance for the facilities and activities within the Divisions. This responsibility includes the coordination, support, and technical guidance needed for environmental training, auditing, planning, and reporting, as well as serving as environmental capital Project Managers. SECs serve as liaisons with line/staff management and field personnel to both communicate and help implement environmental compliance requirements, and environmental policies and programs issued by the Environmental Department. In addition, the SECs provide environmental training support and compile information regarding the state of environmental matters within their specific Divisions. SECs also assist in the implementation of the EMS, the utilization of the EIS and provide technical direction to Environmental Coordinators in their territory. See Appendix D for a summary of the Senior Environmental Coordinators' duties.

Senior Environmental Engineer

Oversees compliance with local, State and Federal environmental, health and safety regulations. Provides the most practical and cost-effective engineering control measures, management systems and abatement or remediation methods to Division environmental and industrial hygiene related problems. Assists the Director Environmental – Philadelphia in the development and implementation of the EMS program and in the management of environmental capital projects.

Field Level

Under the EMS, Facility General Managers, Division Engineers, and the Chief Mechanical Officers [also known as “Responsible Amtrak Officials” or RAOs], are held directly accountable for environmental compliance at their facilities. Amtrak has a number of Environmental Coordinators (ECs) located throughout the country that report directly to RAOs and support day-to-day compliance at each of their assigned facilities or operations. ECs provide technical support and serve as a resource to develop and implement local compliance procedures and responsibilities as identified in facility-specific environmental manuals, compliance plans, and permits. Specifically, these positions have environmental responsibilities as follows:

Responsible Amtrak Officials

The Responsible Amtrak Official ("RAO") is the designated individual at the facility level with responsibility for environmental compliance at their facility. In the event that facility non-compliance with environmental requirements is identified, the RAO will be held accountable for that matter and is responsible for initiating corrective action. The RAO includes, but is not limited to, Facility General Managers, Division Engineers and the Chief Mechanical Officers.

Environmental Coordinators

The ECs serve as the primary support mechanism for facility RAOs and other supervisory personnel. They help them to perform their ongoing environmental responsibilities, to interpret existing and assess the impact of proposed regulatory requirements, and to ensure continuing facility environmental compliance. The ECs also provide support to facilities by working with RAOs and other facility personnel to identify operations and activities with potential environmental impacts and to help implement Amtrak programs and procedures to minimize or eliminate those impacts. These day-to-day activities include guidance in developing and maintaining of Facility Environmental Manuals, identifying compliance needs and responsibilities, identifying training needs, providing training, and assisting with the implementation of facility-specific compliance plans and permits (e.g., monitoring, sampling, reporting). In addition, ECs assist RAOs in identifying and maintaining the documentation and equipment necessary to carry out and record compliance activities.

The ECs report directly to the RAOs, or designees, at the facilities they support, but they also compile information about all the facilities they are responsible for and provide that information to the appropriate Division Senior Environmental Coordinator. In addition, the ECs serve as liaisons between the Division Senior Environmental Coordinators and the facilities. See Appendix E for a summary of the ECs' duties.

Law Department

The Law Department provides legal support and guidance to the Environmental Department by reviewing compliance programs and policies from a legal and regulatory perspective. The Law Department also provides support to the Environmental Department during and after environmental audits, regulatory inspections, environmental incidents or emergencies, environmental notices from regulatory agencies, and for other activities that may have a legal impact on the organization. The Associate General Counsel serves as the primary legal advisor to the Environmental Department, and as one of several attorneys assigned to provide assistance on the Corporation's acquisitions, in particular on environmental and permitting issues. The Law Department also serves as the primary reviewer of projects needing environmental assessment for Amtrak to receive its monthly Federal Railroad Administration (FRA) grants.

2.2 Amtrak's EMS Structure

Corporate-wide support for the EMS has been established and maintained through the formation of several committees: the Executive Environmental Oversight Committee; an EMS Steering Committee; and EMS Implementation Committees that have been established at each of the Back Shops and at the Division management level. While there are specific EMS duties that are involved in each of the jobs described above, Amtrak also utilizes the various EMS committee structures to facilitate its implementation of the EMS at each level in the organization. The charters (EMS-P-006) of the EEOC and EMS Steering Committee are included in Appendix F. The latest versions are posted on Amtrak's Intranet.

Executive Environmental Oversight Committee (EEOC)

The EEOC is comprised of upper level management: Amtrak's General Counsel & Corporate Secretary and the Senior Vice President Operations are co-chairs. Other members are the Vice President Operations, the Chief Engineer, Chief Mechanical Officer, and the AVP Environmental. This committee provides oversight and direction for the EMS, and serves as a reminder to the entire company of the importance of environmental compliance. The EEOC Committee meets approximately four times a year.

EMS Steering Committee

The EMS Steering Committee is the corporate-wide "champion" of the EMS. Division Superintendents, Senior Managers from Engineering, Mechanical, Purchasing, Material Management, and Training, an associate general counsel from the Law Department, Division Environmental Managers, the Chief Safety Officer, along with Amtrak's senior environmental professionals, serve on this committee which meets once a month. The Steering Committee provides leadership, serves as a forum for the different division's and departments to reconcile policies, makes regular reports to the EMS Executive Oversight Committee, makes recommendations to Amtrak's Board of Directors (through the Executive Oversight Committee), and generally drives the implementation of the EMS.

Implementation Committees

The Division and Back Shop EMS Implementation Committees are comprised of the key environmental and operational personnel in each of the Divisions and the Back Shops. The EMS Implementation Committees meet regularly and serve as informational forums and allow for uniform implementation of practices and standards across large territories.

2.3 Internal Environmental Communication Program

Amtrak views timely communication of current environmental requirements and issues as an essential element of its EMS initiative and of environmental performance in general. Amtrak utilizes a number of existing communication channels to share environmental data and information across the organization.

Internal communications tools currently used to communicate environmental requirements to employees include:

- Amtrak Ink – a quarterly newsletter mailed to all employees (current & retired)
- Amtrak Intranet – an internal Website available to all employees
- Employee Advisory – a weekly notice of current events distributed to all employees, either through e-mail or payroll inserts
- Environmental News – a quarterly newsletter prepared by the Environmental Department and distributed to employees by the ECs
- “Environmental Alerts” – mechanism to alert and inform environmental personnel of urgent news
- Environmental Awareness Training Program

Amtrak’s utilization of these communications tools was significantly enhanced with the rollout of the EIS during 2001. To help accomplish this task, an Environmental Communications Committee was created. This cross-functional team meets periodically to evaluate the issues that must be communicated to support the EMS and will help develop strategies and mechanism to ensure the necessary information is communicated to the appropriate audience.

Since 2001, Amtrak has issued an annual environmental report (for year 2000 and on) in an attempt to better communicate Amtrak’s environmental performance progress both inside and outside of Amtrak. This is an initiative to foster open communication on Amtrak’s environmental performance progress.

Chapter III- Accountability and Responsibility

3.1 Roles and Responsibilities

The Accountability and Responsibility Policy and Guidance (EMS-P/G-001) is a core component of Amtrak's EMS. The policy establishes the basis by which Amtrak employees, managers, on-site service providers, and contractors are held accountable for compliance with applicable Federal, state, and local environmental laws and regulations, as well as internal environmental policies and procedures. The purpose of this policy is to help ensure that the proper department or person is held accountable for the environmental impacts of their respective areas of responsibility. The Accountability and Responsibility policy, which incorporates incentives and discipline measures, is included in Amtrak's ongoing environmental awareness training program. The policy establishes three levels of environmental accountability for all Amtrak operations as follows:

Authority and Responsibility

- Typically the Facility Manager (RAO) is the field level responsible manager (although "Authority" is also found at both division and headquarters levels for initiatives administered at those levels). The RAO:
 - Is held accountable for environmental compliance at their operations
 - Administers applicable environmental compliance policies and programs
 - Allocates appropriate resources to relevant activities for compliance

Delegated Responsibility

- The individual to whom the RAO assigns responsibility for executing and maintaining compliance and monitoring mechanisms to meet the requirements, intent, and spirit of regulations, policies and procedures.

Support

- The persons or groups that assist and support the Delegated Responsibility and Authority with the implementation of environmental compliance programs.

3.1 Management of policy

Management at all Amtrak locations shall conform with this policy. The individuals and groups outlined below provide leadership and support on environmental regulatory issues by coordinating, implementing, and overseeing activities that ensure compliance with existing and new environmental laws and regulations.

Division General Superintendent

- Provides guidance and direction to Amtrak facilities/operations

- Oversees the development/implementation of environmental programs for safe, efficient, and compliant operation of railroad operations within his/her area of responsibility

Master Mechanic

- Provides guidance and direction to Amtrak equipment maintenance facilities/operations
- Oversees the development/implementation of environmental programs for safe, efficient, and compliant maintenance/operation of railroad equipment within his/her area of responsibility

Division Senior Environmental Coordinator

- Assists the Division General Superintendents, Master Mechanics, and facility managers with overseeing the development of environmental programs for safe, efficient, and compliant operation of all railroad operations within his/her area of responsibility
- Provides technical leadership/guidance to the ECs
- Oversees regulatory tracking of appropriate environmental compliance requirements

Facility/Department Manager (RAO)

- Responsible for the consistent implementation and management of environmental programs, policies and procedures for compliance with environmental regulations, as detailed by their FEM
- Oversees day-to-day compliance at the facility
- Responsible for data gathering and reporting tasks
- Maintains open channels of communication with various external groups and regulatory agencies
- Tracks environmental costs and prepares budgeting information for environmental compliance
- Records and tracks training for all facility personnel
- Coordinates all requirements related to environmental regulatory reporting, record keeping and document control

Environmental Coordinator (EC)

- Provides support and guidance to the Facility Manager or RAO and/or Department Supervisor in his/her task of implementing compliance programs, recordkeeping, documentation, policies and procedures
- Assists the Facility Manager or RAO in fulfilling environmental responsibilities, including data monitoring and gathering, inspections and reporting
- Assists the RAO in interpreting regulatory requirements and conducts ongoing regulatory tracking

Facility/Department Supervisor

- Individuals who have been delegated supervisory responsibility for various operational activities at the facility
- Works closely with the Facility Manager or RAO to coordinate the safe and effective operation and maintenance of Amtrak equipment on a “first-line” basis
- Assigns responsibilities to individual Amtrak employees and contractors, while communicating the importance of safe and environmentally responsible and compliant practices
- Provides first line response to any abnormal situations and/or emergencies at the facility

3.3 Contractor Environmental Requirements

Environmental requirements for contractors working at Amtrak owned/operated sites are set primarily by a combination of contract responsibilities and applicable Federal, state, and local regulations. This may often be re-enforced through specific contract language that highlights key environmental issues associated with a project. Amtrak’s contract language does not relieve the contractor of any environmental requirements that are directly imposed by applicable laws and regulations; it merely supplements the requirements.

3.4 Environmental Incentive and Discipline Policies

Amtrak has incorporated incentives and discipline within the Accountability and Responsibility Policy and Guidance (EMS-P/G-001). This policy outlines the procedures/framework for RAOs to foster positive performance behavior, or when necessary to take disciplinary steps when behavior is unacceptable for environmental compliance activities. This policy works in conjunction with corporate policies issued by Amtrak’s Human Resources Department.

Chapter IV- Environmental Requirements

4.1 Overview

Amtrak has developed a system to identify, interpret and effectively communicate environmental requirements to affected organization personnel by developing and implementing a system-wide Environmental Information System.

Amtrak's Environmental Information System (EIS) combines all the areas of environmental compliance into a single point of data entry and retrieval. The EIS will track environmental operations at up to approximately 150 facilities system wide that have activities with potential environmental impacts. The EIS also contains a Graphic Interface System (GIS) that allows users to readily retrieve environmental data for any facility through a combination of geographic maps, site drawings, and pull down menus. The system provides easy access to the following types of information:

- Basic facility information
- Hazardous Materials Management
- Air Quality
- Storm water/Wastewater
- Hazardous Waste Management and Disposal
- Storage Tanks Registration and Inspection
- Hazardous Materials Spills
- Plans and Permits
- Environmental Projects
- Oil-Filled Electrical Equipment
- Environmental Training
- Reporting
- Auditing and Corrective Actions
- FACE Assessments
- Compliance Calendar
- Document and Photo Management Module

4.2 Environmental Requirements

Amtrak has developed program specific environmental policies on key environmental requirements. These policies are developed by headquarters and reviewed by the Division Environmental Coordinators for usability. The policies are then submitted to either the EMS Steering Committee, the Senior VP – Operations, and/or the EEOC for final review and approval, where required. After the review process is completed, all comments are incorporated into the policy, as appropriate. The Sr. Director Environmental (Washington), the AVP Environmental, and the Senior VP - Operations sign the final version of the environmental policies. Final policies are distributed to all Environmental Committees, Division and Back Shop managers, environmental staff, ECs, and EC Supervisors by regular mail initially and also on Amtrak's Intranet and the Environmental department's share drive so that everyone has access to electronic and hard copies. Updates are posted on the share drive and Intranet.

Amtrak fosters compliance with applicable regulatory requirements and internal policies, through the use of Facility Environmental Manuals (FEMs) (EMS-M-006) that include Compliance Calendars and an Accountability matrix. The Environmental Audit and Corrective Action Program (EMS-M-001) is the primary processes for monitoring and measuring environmental performance at each Amtrak-audited facility and for reporting the status to specific Amtrak Stakeholders. The Facility Environmental Compliance Assessment (FACE) Program (EMS-M-004) is similarly used to monitor and measure environmental performance at approximately 120 additional Amtrak facilities that have limited or non-periodic industrial activities, and a lower potential for pollution problems. Additionally, Amtrak's Environmental Gap Protocol (EMS-P-005) is utilized to address potential environmental compliance gaps that may be identified by any employee, at any time. If an issue is discovered that poses immediate potential environmental concerns, Amtrak's Environmental "Timeout" Procedure (EMS-S-006) may be invoked to suspend an operation or project while an assessment is made as to what corrective action, if any, must be undertaken to maintain or achieve compliance.

In order to remain current, Amtrak subscribes to environmental periodicals and an on-line regulatory service. As part of this service, Amtrak has access to daily updates of environmental issues and regulatory changes. The Environmental Audit Group reviews these updates, and notices are sent via e-mail, as needed, to the Division Senior Environmental Coordinators and ECs. If necessary, the Environmental Department will incorporate changes in impacted manuals, policies, and procedures. The on-line updates also provide a link to the Federal Register, which is reviewed on a regular basis by the Environmental Audit Group. If there is a particular issue or regulatory change that may effect national or a particular state's compliance, an e-mail alert notice is sent out by the Environmental Department nationally or to the effected environmental personnel with review and action instructions. In addition, the on-line service is used to help identify environmental regulatory changes at the state level. The Environmental Audit Group conducts a weekly review of the various state changes and provides an e-mail notification to the affected environmental personnel as appropriate. Also, in September of every year, the Environmental Audit Protocols are reviewed and updated, if needed, using the on-line regulatory service, and other regulatory databases, as needed. Through this software, quarterly updates are provided. These updates get incorporated into the audit protocols, as needed, and the Environmental Department summarizes the changes and sends a report nationally to all affected personnel.

4.3 Internal and External Environmental Communication

Amtrak currently utilizes a myriad of communication tools and channels, all of which can easily handle the requirements of communicating environmental requirements and information to internal and external stakeholders. The methods used for the communication of environmental information are listed in Section II of this manual.

An Environmental Communications Committee (comprised of Division & Environmental Department employees) works diligently to effectively use the existing tools as a way to communicate environmental issues and requirements to the appropriate audience. An Environmental Theme Program (EMS-ET-001 to 012) was developed to focus on twelve (12) monthly themes:

- Clean Air
- Clean Water
- Hazardous Materials
- Hazardous Waste
- Pollution Prevention
- Recycling
- Spill Prevention and Reporting
- Permits
- Recordkeeping
- Universal Waste
- Training
- Earth Day

Posters and pamphlets were designed and distributed to the Divisions and Back Shops to use on monthly walkabouts and environmental awareness days.

Amtrak has included an environmental module in its new Employee Broadcast System. This allows all Amtrak employees to dial a toll-free number (**1-877-AMTRAK1**) to hear the latest environmental news, contact an environmental professional with a question or concern, or to even leave an anonymous message on environmental issues. The number is reinforced through environmental articles, newsletters, and on the Amtrak Intranet.

4.4 Communication to Regulatory Agencies

As part of the Environmental Audit and Corrective Action Program (EMS-M-001), and Facility Environmental Compliance Assessments Program (FACE) (EMS-M-004), Amtrak has developed a process for communication with regulatory agencies regarding environmental requirements and regulatory compliance. This process provides the mechanisms for timely and accurate communications with the appropriate regulatory agencies. When disclosing compliance information identified through either the above referenced programs, Amtrak follows the applicable Federal or State self-disclosure policy requirements. Amtrak has developed model disclosure letters that provide the required disclosure information. Prior to disclosure each letter is coordinated, reviewed and approved by the Amtrak Law Department to provide consistency and accuracy.

Chapter V- Assessment, Prevention and Control

5.1 Overview

When Amtrak began to develop its EMS, the Environmental Department undertook the process of identifying the facilities and operations, system-wide, which have potential environmental impacts. This effort allowed Amtrak to understand where it needed to focus its attention at developing specific tools, for the purposes of preventing and controlling releases, ensuring environmental protection, and maintaining compliance with statutory and regulatory requirements. Specifically, Amtrak developed the following tools/programs for environmental assessment, prevention and control.

- Environmental Handbook
- Environmental Manuals
- Environmental Policies and Procedures
- Environmental Audit & Corrective Action Program
- Facility Assessment Compliance Evaluations
- Environmental Information System (EIS)

5.2 Interrelationships of the Various EMS Compliance Tools

The Environmental Handbook is intended as a background document for the environmental staff, RAOs, and facility management. The facility, Division, and corporate Environmental Manuals are intended to summarize compliance requirements by facility and Division. The key elements are the compliance calendars and the accountability matrices. The Environmental Department and local policies/procedures are developed to detail the steps needed to achieve and maintain compliance with applicable environmental regulations. The Environmental Audit and Corrective Action Program and the FACE Program are Amtrak's main tools for systematically evaluating the success of Amtrak's environmental compliance efforts at the major and minor facilities, respectively. The primary focus is on preventing and correcting deficiencies rather than targeting non-compliance. Because of the massive amount of data that must be collected and evaluated, Amtrak's EIS plays a vital role in tracking and assessing compliance.

5.3 Environmental Handbook

The Environmental Handbook (EMS-G-003) is designed for both field environmental staff and facility/operational management employees to assist in understanding how environmental laws and regulations impact Amtrak operations and its day-to-day work activities. The handbook includes an overview of applicable laws and regulations and provides the reader with guidance and contact information for obtaining additional assistance.

To provide instructions and Amtrak-specific guidance for complying with environmental laws and regulations, Amtrak developed a series of task-specific environmental guidance documents. These documents supplement the Mechanical, Engineering, Supervisor, and General Awareness Training Programs, and provide specific guidance on issues such as locomotive fueling, battery disposal, waste storage and disposal, spill reporting, pollution prevention, and recycling using the EPA's framework of "reduce, reuse and recycle."

Both the handbook and the guidance documents are intended to enhance, not replace, each employee's regulatory and job-specific training. Handbooks are distributed/communicated to environmental and field management through targeted distribution, new-hire orientation, environmental awareness training, or other defined mechanism, as appropriate. Documents prepared specifically for craft facility personnel also receive wide distribution throughout the corporation.

5.4 Facility Environmental Manuals

In order to identify operations and processes with environmental impacts, Amtrak developed FEMs (EMS-M-006) for each Amtrak-audited facility. These manuals are intended to provide specific information relating to environmental compliance activities at each facility. Chapters are divided by topic area for easy reference, and the data provided directly reflects Amtrak's Environmental Information System (EIS).

All employees of the facility have access to the FEM and they are encouraged to reference it for specific information on facility plans, procedures, and reporting requirements. Each manual includes a monthly compliance calendar and an accountability matrix.

Specifically, the manuals have been prepared to provide:

- An overview of applicable regulations;
- Definitions and assignments of responsibilities and accountabilities to the key personnel and departments that ensure environmental compliance;
- An overview of the operations and activities that are impacted by the various regulations and a description of the permits and permit requirements applicable to the facility; and
- The identification of compliance tools and resources available for facility management and employees to ensure compliance with environmental regulations and permits.

Additional FEMs may be developed, as needed, to address compliance at the remaining facilities.

The FEMs roll up into Division Environmental Manuals (EMS-M-005), which in turn roll up into a Corporate Environmental Manual (EMS-M-011), so that compliance requirements that need additional support and attention at the different levels of the organization are readily identified and addressed.

5.5 Environmental Policy and Procedures Documentation

The Environmental Policy and Procedures documentation includes policies and procedures to be followed in handling environmental issues. Some key documents issued or under development include the following:

- Amtrak Environmental Policy (EMS-P-000)
- Environmental Accountability and Responsibility Policy & Guidance (EMS-P-001 & EMS-G-001)
- Environmental Review Policy & Guidance (EMS-P-002 & EMS-G-002)
- Pollution Prevention Policy & Guidance (EMS-P-003 & EMS-G-003)

- Environmental Training Protocol (EMS-P-004)
- Environmental Gap Protocol (EMS-P-005)
- Environmental “Timeout” Procedure (EMS-S-006)
- Locomotive Fuel tank Plug Kit Policy (EMS-P-007)
- Root Cause Analysis Policy & Guidance (EMS-P-007 & EMS-G-007)
- Universal Waste Management Policy & Guidance (EMS-P-008 & EMS-G-008)
- Integrated Environmental Emergency Response Policy & Guidance (EMS-P-010 & EMS-G-010)
- Storm Water Pollution Prevention Policy & Guidance (EMS-P-011 & EMS-G-011)
- Hazardous Waste Management Policy & Guidance (EMS-P-012 & EMS-G-012)
- Environmental Recordkeeping Policy & Guidance (EMS-P-013 & EMS-G-013)
- Environmental Housekeeping Policy & Guidance (EMS-P-014 & EMS-G-014)
- Pollution Control System Policy & Guidance (EMS-P-015 & EMS-G-015)

The Policy Manual was issued and distributed in FY 2004. Each policy or guidance document is assigned a control number issued by the Environmental Department.

The existing process for approval of site-specific Standard Operating Procedures (SOPs) will be revised and reinforced to better communicate the requirements to facility and field staff. The existing process covers procedures and training courses developed on a facility or local level as follows:

- The developer is required to submit the procedure or training program (including support materials) to the Environmental Department in Washington, DC for approval no later than 30 days prior to dissemination and/or administration.
- The Environmental Department will review the documentation within two weeks following receipt.
- If the SOP or training program meets the requirements set by the Environmental Department, the SOP or training program will be approved and assigned a document control number. Local SOP/training course approvals are valid for one year from the approval date.
- The SOP or course developer will be provided with documentation of the approval. Any further revision to the SOP or course must also be reviewed/approved by the Environmental Department.

Existing site-specific SOPs will be reviewed starting in FY 2004. The Division Senior Environmental Coordinators will work with the Senior Environmental Coordinator (Procedures & Training) to review local SOPs for consistency with corporate policies and programs. A new numbering sequence will be utilized for control of these local documents and courses.

Site-specific SOPs and training courses will be included for tracking purposes in Amtrak’s Environmental Policy and Training Matrices as they are revised and reissued by the Environmental Department.

Current copies of the SOPs and training programs will be maintained in accordance with the EMS guidelines for recordkeeping (see Chapter IX-Maintenance of Records and Documentation).

5.6 Self-Inspections

Amtrak has a system for conducting and documenting routine, objective, self-inspections through its Environmental Audit and Corrective Action Program (EMS-M-001). In FY 2004, Amtrak added its Facility Assessment Compliance Evaluation (FACE) Program (EMS-M-004). Both programs have manuals that document the extent of the programs and the procedures for self-inspection, with a review of each program conducted regularly.

5.7 Environmental Information System

One of the first initiatives began under the EMS implementation was development of an Environmental Information System ("EIS") which would identify and track environmental requirements that apply to Amtrak's facilities. The EIS has complete information on over 45 facilities (30 Amtrak-audited sites, and archived MBTA sites), and the ECs and Division Senior Environmental Coordinators are responsible for compiling and inputting this information for the additional 120 facilities system-wide on an as needed basis. In addition to basic facility information, there are modules for plans, permits, tanks, hazardous materials, spills, waste management and disposal, storm water, wastewater and environmental compliance. The system is also equipped with a document and photo module, site-specific training data and an Environmental Audit and Corrective Action Module.

Chapter VI- Incident and Noncompliance Investigations

Amtrak has developed standard procedures and requirements for internal and external reporting of potential violations and release incidents through the following mechanisms:

- Environmental Emergency Response Program
- Environmental Audit and Corrective Action Program
- Facility Assessment Compliance Evaluation Programs
- GAP Protocol
- Time Out Procedure
- EIS Environmental Compliance Module

6.1 Environmental Emergency Response Program

Amtrak has developed an Integrated Environmental Emergency Response Policy and Guidance (EMS-P/G-010) to facilitate the achievement of the following objectives:

- Provide prompt incident notification to regulatory agencies, and information for Amtrak's evaluation to prevent and/or provide assistance in risk reduction for potential environmental incidents;
- Improve the EMS by effectively reporting and investigating all environmental emergency incidents, and by implementing preventive or mitigating measures; and
- Control the costs related to these environmental incidents.

In order to meet these objectives, Amtrak's has developed:

- A system-wide uniform spill reporting policy
- A model environmental emergency plan for all facilities
- Planning, reporting, and contracts (for responders) through the Environmental Department
- Emphasis on spill response by incorporating applicable topics in the Environmental Awareness courses and other site-specific and job-specific training, as applicable.

6.2 Noncompliance Investigations

Amtrak's Environmental Audit & Corrective Action Program (CAP) (EMS-M-001) and the FACE Program (EMS-M-004) involve procedures for the investigation, and prompt and appropriate, correction of potential violations.

The CAP process begins at the audit/assessment exit interview. The audit/assessment is discussed generally between the attending parties and then a point of contact and time frame for correction is established for each finding. The RAO is responsible for remedying all audit findings, including both potential violations and best management practices, within the designated time frames. EPA guidance for self-disclosure requires notification of a potential violation within 21 days of discovery, although some states have different notification time frames and requirements. The Environmental Department in consultation with Amtrak's Law Department will coordinate all audit self-disclosures.

Level of Finding	Time Frame for Correction	Definition
Potential Violation	Immediate Action – Within 1 to 60 days	This level of finding is based on an environmental regulatory requirement (regulatory references provided in the audit report.)
	Long-term Action - As Agreed Upon	
Best Management Practice	Within 6 months	This level of finding is not based on a regulatory requirement; however, it is a common operating practice.

“Immediate action” corrects the finding to a satisfactory level for environmental compliance. “Long-Term action” involves a permanent resolution to the finding and its root cause. Immediate action to remedy a potential violation will begin on the day of the finding’s identification, in order to assure remedy within 60 days. If there is a finding dispute, the lead auditor/assessor is responsible for following up on the dispute with the RAO and finalizing the finding’s status. If needed, final dispute resolution rests with the AVP Environmental in consultation with the Law Department. Regardless of any finding disputes, in all cases the time frame for corrective action begins on the day of the exit interview.

Information on findings and corrective actions are entered into the Environmental Information System (EIS) as described in the Environmental Audit and Corrective Action Program and FACE Manuals (EMS-M-001 & EMS-M-004, respectively). The EIS will incorporate the information so that it can send ticklers as dates for the completion of action items are reached.

In addition, Amtrak has issued a formal Environmental Gap Protocol Policy (EMS-P-005) to guide the proper evaluation, handling and reporting of potential environmental compliance issues that may be uncovered during the course of normal business practices at Amtrak-owned or operated facilities. This policy is designed to quickly bring potential compliance issues to the attention of line/staff Division/Back Shop management, Division/Environmental Department staff, and Amtrak’s Law Department.

Where potential environmental compliance gaps are identified in the field, environmental personnel may also utilize Amtrak’s Environmental “Timeout” Procedure (EMS-S-006) to suspend actions or projects to assess the situation and apply the needed resources to correct any deficiencies.

6.3 Environmental Audit Program Development, Tracking and Verification of Findings

Amtrak’s Environmental Audit Program incorporates a system of tracking and verification for findings as follows:

The RAO sends a status report of each finding to the Director of Environmental Compliance within 60 days of the audit and regularly thereafter until all findings are closed. Copies are sent to the RAO’s immediate supervisor, Division Senior Environmental Coordinator, and the EC for the audited facility.

If an item is identified in a monthly report as having been closed out, the Division Senior Environmental Coordinator validates its correction and then issues a standard Close-Out Memo for the finding. Additional follow up validation is made through the facility’s next audit. The Division

Senior Environmental Coordinator and the RAO at the audited facility both sign the Close-Out Memo. The responsible Division SEC sends the memo to the Senior Environmental Coordinator (Auditing), the Director Environmental (Compliance), and the AVP Environmental with a copy to the Senior Coordinator (Environmental Information Systems) and the Law Department. The EIS is updated to reflect a finding's closed status.

The Director Environmental (Compliance) prepares Quarterly Audit Reports if there are systemic issues that need to be addressed at all Amtrak-audited facilities. These reports summarize the audit findings during the prior quarter including positive findings, potential violations and best management practices. This report is distributed to the RAOs at all Amtrak-audited facilities as well as Amtrak's environmental staff, system wide. If systemic issues are noted then each facility must report their current status on those issues to Amtrak's Law Department so that a corrective course of action can be developed and appropriate self-disclosure made, if applicable. The AVP Environmental reports quarterly to the EEOC and EMS Steering Committee on the Quarterly Audit Report findings.

The AVP Environmental issues a yearly summary report on Amtrak audit findings. Examples of excellence in addressing audit findings are highlighted. Unresolved findings, if any, are also identified. This report is sent to the EEOC with copies to Amtrak Environmental employees, RAOs and their supervisors, and the Law Department.

As part of the EMS Program program, instances of potential environmental non-compliance issues may also be brought to the attention of Amtrak environmental and line/staff personnel through the use of promptly issued "Environmental Alerts". These may be issued as the result of an audit, facility assessment, or even for an issue discovered in the normal course of business.

The organizational relationships among Amtrak's departmental functions in response to the Environmental Audit and Corrective Action Program (EMS-M-001) is best shown by the flow diagram in Attachment H.

6.4 Facility Assessment Compliance Evaluation (FACE) - Development, Tracking and Verification of Findings

Amtrak's FACE Program (EMS-M-004) is fully implemented. A FACE manual and the associated checklists have been issued. These simplified environmental compliance checklists are being utilized to regularly evaluate environmental compliance at Amtrak facilities such as substations that have activity types and levels that pose limited potential environmental impact.

6.5 EIS Environmental Compliance Module

In addition to the Environmental Audit and Corrective Action tracking module described above, Amtrak's EIS tracks all incidents of non-compliance through the Environmental Compliance module of the database.

The Environmental Compliance module tracks enforcement orders, notices of violation, plan/permit deficiencies, complaints and GAP protocol items. The system will track persons responsible for follow-up and action, current status, fines, and have direct links to related documents. This module is also directly linked to the due dates and responsibility. The Environmental Department is responsible for tracking the information in the EIS, including initiating action to respond to reminders, due dates, and responses.

Chapter VII- Training, Awareness and Competence

7.1 Amtrak Environmental Awareness Training Program

Amtrak has developed an Environmental Awareness Training program that identifies and explains the major environmental issues employees need to understand in relation to Amtrak's operations and activities. An environmental training matrix (EMS-G-004) has been issued to assist in identifying mandatory and recommended environmental training. Contractors who work on or at Amtrak owned/operated sites are directly and contractually required to comply with applicable environmental regulations. Those contractors that provide facility services similar to Amtrak's own mechanical or engineering facility activities will also receive Amtrak's environmental awareness training and/or site-specific environmental training, as needed.

Amtrak's Environmental Department works closely with the Engineering Department and incorporates an Environmental Awareness training module into the annual Engineering Department Training Camps. A "Train-the-Trainer" program was conducted so that the individuals providing the Engineering Department training could include Environmental Awareness in the FY 2001 camp schedule, and beyond. Several environmental refresher modules have been delivered in addition to the original course.

The Environmental Department also works closely with the Mechanical Department and other appropriate departments to develop and deliver the Mechanical and Supervisor Environmental Awareness training courses. Initial delivery of these courses, system wide, was from FY2002 through December 2003. Refresher modules will also be available for future use in both categories.

A General Environmental Awareness training program was developed for Amtrak personnel who have less direct environmental responsibility. This last group includes such diverse employees as clerical staff, financial staff, train conductors, locomotive engineers, reservation center personnel, and on-board service personnel. The General Awareness training is available in three formats—classroom, on-line (Intranet), and self-guided. Initial delivery of the General Awareness training courses was carried out from the fall of 2002 through December 2003.

Training records for all environmental training are collected and entered into Amtrak's SAP human resources database.

To complement the Environmental Awareness Training Program, an environmental awareness videotape highlighting Amtrak-specific and general environmental issues was also produced and was distributed for use throughout the organization. It should be noted that viewing the Amtrak Environmental Awareness video, and receiving a list of local environmental personnel who will coordinate their work activities while on Amtrak property accomplishes the required environmental training for some employees or contractors.

7.2 Amtrak Job Specific Competency Training Program

The environmental training matrix identifies mandatory environmental site-specific environmental training. The site-specific training is implemented using Division Senior Environmental Coordinators, and ECs. In addition to the Environmental Awareness Training courses, Amtrak has

developed and delivered a number of site-specific environmental training modules. These courses include RCRA Hazardous Waste; Air Emission Control; Wastewater Treatment, Stormwater Pollution Prevention; PCB Management; and Spill Prevention Control & Countermeasures. A Spill Prevention and Response interactive, CD-ROM training program was also developed and distribution to the target audience started in February 2003. Some technical training, such as Wastewater Treatment, DOT Training or HAZWOPER training utilizes outside vendors or Amtrak Environmental Department staff with subject matter expertise in that area.

7.3 Contractor Training

Each contractor working at an Amtrak owned/operated site is required to train its own employees on environmental management and compliance. Situations arise, however, where environmental training responsibilities need clarification. For example, at some sites Amtrak has insufficient work to justify full-time railroad operations staff, so Amtrak has contracted for local people/firms for mechanical servicing of Amtrak trains. In such cases, it may be in Amtrak's interest to supplement the training for these personnel, since they carry out similar functions to Amtrak employees, and Amtrak is concerned about environmental liability as owner/operator of the facility.

Mechanical Contractors

Rather than having the ECs deliver this training, it is recommended that the ECs or SECs furnish these contractors either with a copy of Amtrak's Environmental Awareness Video, the self-guided General Awareness course, or the Mechanical Environmental Awareness Course, along with a cover letter (See draft version – Appendix G) that indicates that it is the contractor's primary responsibility to provide appropriate environmental training. The contractors should be required to train all of their employees who work at the site using either the General Environmental Awareness program or the Mechanical Environmental Awareness program. The training they receive depends on the nature of the work they do and their best management judgment. For example:

- 1) If they simply perform interior car cleaning, the General Environmental Awareness Course (video only, or self-guided versions) would normally suffice.
- 2) If they perform maintenance activities such as general mechanical servicing, including fueling, sanding, changing fluids, or train washing, then they should use the complete Mechanical Environmental Awareness course.

The contractor must also document the training by supplying the EC or SEC with a list of the employees trained, the dates that they were trained and which training course was completed.

High Speed Rail Facilities

The Amtrak High Speed Rail (HSR) Facilities may need the assistance of the local EC or SEC to deliver the Environmental Awareness training for their employees. Since Amtrak employees may transfer between regular Amtrak assignments and HSR assignments, it is important that this group of employees receive the appropriate Amtrak Environmental Awareness course. This training can be done directly or through an employee trained to deliver this training course at the HSR sites.

If there are site-specific issues such as SPCC, SWPPP, or RCRA, at any HSR facilities, they also need the appropriate site-specific training. Since HSR has its own environmental permits, this

training is their responsibility. Amtrak can, however make its training materials available for the HSR site's use after they site-adapt it to their facility. Responsibility for this training, including its content, remains the HSR facility's contractual liability, even if they utilize our training materials.

Contractors who are not conducting Amtrak work, but are on site to do specific projects are covered by the terms of their contract with Amtrak. However, there may still need to be coordination so that their operations don't adversely impact Amtrak's environmental compliance. Such issues as their hazardous material/waste storage and disposal must be clearly addressed. In such cases Amtrak's Environmental Awareness video can be made available to such contractors to supplement their own training program. Additionally, a point of contact for the contractor and for Amtrak should be established to address any environmental issues that may arise during the contract period.

Amtrak cannot take responsibility for the contractor's environmental training or compliance responsibilities, but some supplemental training steps may be advisable to prevent incidents that might impact Amtrak's facility permits/plans.

7.4 Other Training Programs

The following activities and events supplement Amtrak's organized internal environmental training programs described above.

- Environmental Department personnel mentor eCs informally. The mentoring program involves regular contact to help the ECs in their environmental duties. This includes regular conference calls to assist in the training and professional development of the ECs.
- In 2000 & 2003, Environmental Summits were held to provide professional development training for Amtrak ECs and SECs, as well as allowing the opportunity for networking and to describe the Amtrak's on-going environmental objectives. Additional summits will be scheduled periodically.
- The ECS and SECs are encouraged to attend the Association of American Railroads' Railroad Environmental Conference on alternate years.
- Additional professional environmental training is also recommended annually for environmental personnel through workshops, license refresher courses, or formal classroom training.

7.5 Quality Control of Training Program

The following steps are taken to ensure a quality training program:

- Instructors for environmental courses are required to participate in a train-the-trainer program and be evaluated by representatives of the Environmental Department. Some instructors may be required to take a formal instructor-development course.
- Approved instructors for Environmental Awareness courses and site/job-specific environmental courses include Environmental Department personnel, ECs, Certified Network Instructors, Safety, OBS, and T&E trainers certified by the Environmental Department.

- ECs, certified contractors, and SECs also function as technical content experts for environmental courses being delivered by others.
- Training materials are reviewed and approved by the Environmental Department and the Law Department.
- Environmental course numbers are issued by the Environmental Department and all environmental courses are tracked using Amtrak's SAP system. Amtrak has established an SAP interface that allows the daily up-load of records from the Intranet of General Awareness Course participants. Monthly and quarterly reports of environmental awareness training progress are generated and reviewed by the Senior Environmental Coordinator (Environmental Training and Procedures).
- The environmental training plan is reviewed each fiscal year and approved by the AVP Environmental.
- Division Senior Environmental Coordinators and ECs support environmental courses by regularly attending classes and being available answer to questions.
- Environmental courses include a participant competency assessment to evaluate the knowledge attained during the course.

Chapter VIII- Planning and Organizational Decision-Making

8.1 Overview

Amtrak has developed an Environmental Review Policy and Guidance (EMS-P/G-002) and associated checklists to assist with the identification, analysis, and resolution of potential environmental impacts resulting from project development, process implementation, acquisition or sale of property, procurement of equipment, and purchase of goods and services. This policy and supporting checklists provide a practical tool for identifying environmental impacts during the planning stages of newly proposed activities. This proactive approach allows Project Managers and field environmental personnel to identify and address potential environmental impacts before they become potential liabilities.

The review process consists of six major steps: 1) identification of activity category; 2) selection and completion of checklist; 3) submittal of checklist; 4) evaluation of checklist; 5) review of recommendations; and 6) implementation follow-up.

Currently proposed activity categories that should be subject to this review process are listed below.

Category I	Property Sales and Acquisitions – purchase, lease, transfer, or sale of property
Category II	Purchase of Good and Services – procurement equipment, products, or good and services or Materials and Equipment Requisitions
Category III	Equipment Disposition – disposal or transfer of equipment or materials
Category IV	Railroad Maintenance and Operations – implementation and operations of railroad maintenance equipment and facilities
Category V	Railroad Engineering and Construction – construction, installation, or demolition of railroad facilities, equipment, and property
Category VI	Pollution Control Systems – implementation (including design, construction, and upgrades) to air and water pollution control equipment
Category VII	Remediation, Sampling, and Investigations – remediation, sampling, and investigation of hazardous sites

The review process gives Amtrak personnel and contractors a better understanding of environmental risks and potential costs associated with start-up of new initiatives and modification of existing processes. The process also assists the Company in proactively meeting environmental compliance goals and pollution prevention performance objectives.

Amtrak re-emphasizes its review process on a regular basis in departmental staff meetings and strives to continuously improve the early use of environmental review for Amtrak projects. An electronic version of the process review forms was made available in FY 2004. As environmental training programs are updated, references to the review process will be expanded to foster the environmental review process. A separate training module will also be developed to cover guidelines for the review process and its associated forms.

8.2 FY Environmental Goals Program

Each year, Amtrak establishes written targets, objectives and action plans. The program is based on defined environmental performance goals for each Division and for the Corporation as a whole. This plan is overseen by the Environmental Department and includes compliance and pollution prevention goals, as well as EMS programmatic goals. Environmental goals are incorporated into the Corporation's management evaluation process and an "environmental" goals section has been incorporated into the Amtrak Management Performance Goals form. The process for developing and implementing this plan is through the EEOC and EMS Steering committee, as well as through the Division and Back Shop Implementation Committees. The Environmental Department's monthly performance goals are reviewed by the Senior Vice President - Operations, and the President and CEO of Amtrak. Targets and objectives include achieving and maintaining compliance with all environmental regulations.

Chapter IX- Maintenance of Records and Documentation

9.1 Overview

Amtrak maintains a number of environmental records and documents throughout the organization at local facilities, Division headquarters offices and corporate headquarters. Both Federal and state regulations, require Amtrak to maintain certain information for several years, and to maintain an approved, records-retention schedule. Amtrak's approved environmental records-retention schedule is on file with the Amtrak Law Department and corporate Records Retention Office.

9.2 EMS Records Management

Unless otherwise specified, EMS related documents (manuals, policies, plans and procedures) must be centrally located and maintained by a designated individual at each Amtrak-audited facility.

Amtrak's environmental records can be grouped into the following three (3) categories:

Compliance Records: These records include documentation necessary to verify compliance with Federal, state and local regulations. Records include plans, permits, manifests, inspection logs, audit records, spill records, and notices of violation. These records are maintained at designated sites both at the local facility and, in some cases, at the Division SEC's, and/or the EC's office. This information is also maintained in Amtrak's EIS database as either a record of compliance or an electronic file. Compilation, control, review and update of the originals of these records are the responsibility of the Division SECs and ECs. They are also responsible to ensure that the most updated information is loaded into the EIS database.

Training Records: ECS and Division SECs maintain the originals of all training rosters of environmental training. The Environmental Department maintains copies of rosters of environmental compliance training. This information is loaded into Amtrak's Human Resources SAP system for tracking. In addition, a summary of the job-specific environmental training info is maintained in the EIS system

The Environmental Department maintains copies of all approved environmental training program materials, along with letters of certification for such training. This information is maintained at the Environmental Department office in Washington, DC. The Director Environmental (Policies and Programs) is responsible for the review of all training programs, prior to certification, to ensure compliance with Amtrak policies and standards.

Policies and Procedures: The Environmental Department is responsible for developing Environmental Policies and Procedures as guidance for the field environmental staff, as well as line/staff management. These documents include Guidance Documents, Programs, Facility and Division Environmental Manuals, and Environmental Alerts. The information is maintained at the Environmental Department office and copies, as necessary, at the local facilities. Current versions of Amtrak's environmental policies and procedures are posted quarterly on Amtrak's Intranet and the Environmental Department's share drive for access and downloading by field personnel and others, as needed. Field personnel are required to update their local copy and destroy the out-dated copy. These documents will be reviewed by the Environmental Department annually and updated, as

needed. Copies may also be maintained in Amtrak's EIS. Each Amtrak-audited facility must maintain environmental policy & procedure documentation along with its FEM (EMS-M-006) and Amtrak's Environmental Handbook (EMS-M-003) at a designated location at the facility. The FEM and the policies and procedures should be accessible to all employees upon request.

9.3 Environmental Information Control

All environmental records must be maintained according to the official Records Retention Schedule developed by the Environmental Department and reviewed and approved by Amtrak Law. The retention schedule is reviewed annually and is maintained by Amtrak's Records and Information Management Office. Copies can also be obtained by contacting the Environmental Department. Amtrak's Records and Information Management Office provides precise instructions for the destruction and off-site storage of all documentation included on the retention schedule. Excluding the Environmental Department's Policy and Procedures group, both hard-copies and electronic copies of out-of-date or draft policy, guidance & procedure documentation should be deleted from all computers and removed from all Amtrak locations upon issuance of revised or final versions.

9.4 Release of Information

Requestors using the Freedom of Information Act (FOIA) may seek Amtrak information through the FOIA Coordinator in the Law Department. These requests are reviewed by Counsel, and are tracked by Amtrak's Law Department.

Chapter X- Pollution Prevention Program

10.1 Overview

The Amtrak Environmental Policy (EMS-P-000) states:

“We will protect the environment and conserve its resources by reusing material, recycling waste, and preventing pollution.”

“We will minimize the environmental impacts of Amtrak’s operations through reviews of the design, construction, and maintenance procedures for our equipment and facilities, and by implementing appropriate control measures.”

This statement of environmental commitment establishes the framework for Amtrak’s Pollution Prevention (P2) Policy and Guidance (EMS-P/G-003). Amtrak’s goal is to recycle paper, cardboard, aluminum, plastic, newspaper, and glass at Amtrak facilities and operations. This effort will support Amtrak’s environmental stewardship policy of material reuse.

Amtrak incorporates pollution prevention into its regular operations, the start-up of new initiatives, and modification of existing processes. It is accomplished through the following source reduction techniques:

- 1) Promoting the use of alternative, non-hazardous materials
- 2) Increasing the purchase of recycled content and recycled products
- 3) Modifying processes and procedures to eliminate or reduce waste or pollution
- 4) Improving housekeeping practices
- 5) Routinely maintaining equipment and facilities
- 6) Increasing environmental awareness and training
- 7) Employing environmental Best Management Practices, including spill and leak prevention, waste segregation, preventive maintenance, material handling improvements, inventory control, and production scheduling

The Environmental Department assists Managers and Supervisors with the Pollution Prevention Program implementation based on the five key principles as stated below.

10.2 Employee Involvement

Amtrak will foster a team-approach to conserve resources and promote environmental awareness through integration and coordination among Amtrak waste generators, Division, Environmental Department, and other departmental personnel. We will also include applicable environmental and P2 goals as a part of Management employee performance measures, where applicable.

10.3 Strategic Planning

Amtrak will incorporate P2 goals and objectives into Engineering, Mechanical, Operations, System Shops, On-board Services, Material Control and support operations.

The Chemical Task Force is also used to promote the substitution for, and use of, less hazardous, non-hazardous, biodegradable, and recycled materials, wherever possible.

10.4 Tracking and Reporting

Amtrak has established a tracking system designed to start to establish baseline waste characterization and monitor waste generation data to enabling quantitative evaluation of P2 progress.

In addition, Amtrak plans to develop and maintain a system for reporting material usage, waste generation, and waste minimization internally and in accordance with regulatory requirements.

10.5 Resource Allocation

Amtrak will update funding requests to include return-on-investment for P2 and waste minimization as applicable and seek funding, as needed, for project implementation to realize cost savings, or cost avoidance.

In addition, Amtrak will support recruitment and assignments of Division personnel to support the P2 program and project implementation.

10.6 Technical Support

Amtrak will provide technical guidance to personnel seeking assistance on P2 and waste minimization projects and initiatives.

Also, Amtrak will review new and existing Amtrak operations, processes, and activities for P2 and waste minimization opportunities based on the EPA's framework of reduce, reuse and recycle.

Chapter XI- Program Evaluation and Improvement

11.1 Metrics Tracking

Amtrak recognizes that a critical component of an EMS is the ability to measure the performance and progress of individuals, facilities and programs. Towards that end, Amtrak will determine the most appropriate and important parameters of its environmental performance (including compliance) to monitor. Amtrak is committed to tracking key metrics to measure the defined parameters.

Amtrak will utilize appropriate mechanisms for tracking and analyzing the results of these measurements. These metrics are utilized as part of the development of environmental goals, and are incorporated into the EIS, where possible, and used to track Amtrak's progress.

11.2 Annual EMS Review

The Environmental Department will review Amtrak's EMS program annually, and update the EMS Manual, as needed, to reflect any changes made in the EMS initiative. The Environmental Department, with input from the Law Department, will conduct the review each December. The EMS Steering Committee will be briefed on any significant changes. The EEOC will be asked to review and approve any significant program modifications.

11.3 Third-Party Review

An independent third party will periodically be retained to conduct a comprehensive EMS program review by benchmarking and analyses against EPA, ISO, and best practice standards. This was performed in August 2002, and Amtrak used this evaluation to help determine the current form of its EMS program, including the identification and addressing of possible gaps in the program compared to established benchmarks. Subsequent EMS program reviews will be considered on a 5-year basis.

Chapter XII- Public Involvement/Community Outreach

12.1 Overview

Amtrak has developed several tools for ongoing community information and involvement in the environmental aspects of the organization's operations and general environmental awareness. These include a commitment to an annual Amtrak Environmental Report and support for company involvement in key industry organizations and other projects.

12.2 Amtrak Annual Environmental Report

Amtrak's Annual Environmental Report serves to inform employees and stakeholders about the EMS initiative and to report on the company's environmental performance. Amtrak's first Annual Environmental Report was published for the year 2000. Since then, annual reports have also been issued each year. These reports are posted on Amtrak's Intranet and distributed internally to Amtrak's various environmental committees, Division and Back Shop managers, and to environmental staff by e-mail and regular mail so that people can have both electronic and hard copies if they desire.

12.3 Community Education and Involvement

Amtrak serves as a voluntary member of the Executive Order 13101 Task Force headed by the Office of the Federal Environmental Executive (OFEE). The Task Force is implementing the recommendations of the "White House Task Group on Pollution Prevention".

Amtrak is also a member of the Environmental Committee of the Association of American Railroads (AAR) and has assisted in the Committee's development of environmental training for Short-Line railroads.

Amtrak operations in the State of California have become a partner in the EPA's WasteWise Program. This is a free, voluntary, EPA program that works to eliminate costly municipal solid waste, benefiting the environment.

Also, Amtrak works with various local organizations on environmental education and community beautification projects. Two Amtrak environmentalists serve as members of the Corporate and Professional Advisory Board for the New York City High School for Environmental Studies. This is a specialized New York City high school, located on the West Side of Manhattan that offers an extensive curriculum in environmental studies to a diverse student population. Their Advisory Board activities have included in-class lectures, program evaluation and career advice and guidance.

Amtrak initiated a trial, environmental internship program with Temple University in Philadelphia, PA in 2004. Four students participated in the 2004 spring program that was designed to evaluate wastewater treatment process options for RR shop industrial wastewater runoff.