

1.0 Introduction: Policy and Scope and Context

The City and County of Denver (CCD) implements the *Denver Environmental Performance Program* (DEPP) to effectively manage CCD's environmental impacts, achieve intended environmental outcomes, enhance environmental performance, and promote sustainable development. The program is an Environmental Management System (EMS) started in 2008 which contains processes established, implemented, maintained, and are continually improved by the ISO 14001 requirements. The Denver Environmental Performance Program is working towards certification through the ISO 14001:2015 Standard. It is managed by the Senior Program Administrator, Department of Public Health & Environment (DDPHE); who serves as the Management Representative.

The core document of the Denver Environmental Performance Program is its Environmental Policy. CCD's Environmental Policy, established by the Mayor, outlines its commitment to environmental protection, preventing pollution, fulfilling compliance obligations, and continual improvement by enhancing environmental performance. CCD sets environmental goals to support the Environmental Policy and monitor how the program achieves its intended outcomes.

The DEPP Scope is inward facing. Its purposefully defined scope is the internal operations of the City and actions planned or taken by City employees fulfilling their assigned duties including: maintaining property, providing services, purchasing and using materials and equipment. The DEPP Scope includes all of CCD's departments and operations, specifically those on City Properties. It excludes Denver International Airport that operates its own DEPP, Denver Zoo that operates its own Campus Management System (CMS), and the Denver Art Museum. Most of the included ISO 14001 departments are housed and/or operate at City-owned facilities. Two independent cultural facilities, the Denver Botanic Gardens and the Denver Museum of Nature & Science, voluntarily participate inside CCD's scope. While the scope includes 27 City agencies and approximately 12,000 employees, it excludes the actions and decisions of elected officials or bodies in their political, non-administrative functions. The DEPP is not public facing. Public engagement and communication are outside the scope, with the exception of positive press releases demonstrating the City's environmental stewardship or other similar communications.

The City has determined climate change is a relevant issue; and considers ways to reduce its impacts. For example, the City supports renewable energy, energy efficiency, and of course education and awareness.

CCD considered the following to determine the DEPP scope:

- External and internal issues relevant to the purpose of the DEPP and that affect the ability of the DEPP to achieve its intended outcomes
- Compliance obligations

- Physical and process boundaries (ISO14001:2015 “organizational units, functions and physical boundaries”)
- CCD activities, products and services
- CCD’s authority and ability to exercise control and influence in relation to the above considerations

Both the Environmental Policy and DEPP System Manual (which includes the scope) are available to City employees on the DEPP Portal. Both are available to the public and other interested parties on the DDPHE website, or through the EQ comments inquiry on the Environmental Quality page.

<u>Related DEPP Documents:</u>	CCD-101	Environmental Policy
	CCD-102	DEPP System Manual

1.1 DEPP Structure

CCD’s DEPP follows the **Plan – Do – Check – Act** cycle that considers significant environmental aspects and overall objectives. The Manual outlines the DEPP and references ‘Related Documents’ which are specific processes for each DEPP element. Not all DEPP documents are referenced in the Manual.

1.2 Key Elements the DEPP

- Policy, Management Commitment & Review: CCD’s Environmental Policy is top management’s commitment to managing and prioritizing environmental issues. The DEPP Executive Team participates in the Management Review.
- Aspects and Impacts: CCD identifies its significant environmental risks and opportunities through a defined process.
- Compliance Obligations: CCD complies with all obligations (local, state and federal regulations) and other voluntary requirements it chooses, e.g. Executive Orders. CCD considers these requirements as it relates to its aspects and while continually improving its DEPP.
- Objectives and Planning: CCD’s Work Plan process ensures that departmental priorities are set according to its significant environmental aspects, legal requirements, and risks and opportunities.
- Resources: Roles and responsibilities are set for the Executive Team, Core Team members, and other supporting staff that participate in the DEPP. The Executive Team ensures the appropriate personnel have the appropriate responsibility and authority to make the DEPP effective.
- Environmental Procedures: Instructions intended to meet or exceed regulatory requirements. Environmental Procedures set performance requirements and recommended guidance for critical activities conducted through CCD’s operations.

Deviation from these procedures could result in environmental pollution. Consequences of deviating include CCD being charged with violation of the law, fined and/or subjected to other legal action and penalties.

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- Training and Communication: Environmental awareness training is provided for all staff and targeted trainings are provided for staff with specific environmental responsibilities. Communication strives to engage City staff and maintain awareness at a high level.
- Documentation and Records Management: They are controlled on the DEPP Site, which is maintained by DDPHE. The DEPP Administrator works with departments to ensure that documents outside of the DEPP Site are controlled in conformance with the ISO 14001 Standard.
- Emergency Response: CCD has integrated environmental considerations into Emergency Response Programs, ensuring that environmental issues are included when responding to an incident.
- Inspections and Internal Review: Regular compliance inspections ensure activities are conducted in accordance with compliance obligations. Annual DEPP Internal Audits ensure that the DEPP is functioning as intended and supporting the commitments described in the policy and program documents. Additionally, these annual processes are a great way to keep track of sustainability goals and other quantifiable metrics.

1.3 Document Hierarchy

The documents representing the DEPP can be organized along the following hierarchy:

"Why do the DEPP?"	<u>Level 1</u> Environmental Policy
"What is in the DEPP?"	<u>Level 2</u> DEPP Manual & Scope, Aspects, Risks & Opportunities
Process Descriptions of "How the DEPP works?"	<u>Level 3</u> Process Documents
Specific Details of "How the DEPP works?"	<u>Level 4</u> Environmental Procedures, Work Plans
"What's been done as a result of the DEPP?"	<u>Level 5</u> Records

2.0 Planning

CCD considered the external and internal issues and requirements of its interested parties relevant to the activities within the scope of the department's operations and controlled by the DEPP. These considerations helped CCD to establish and maintain the DEPP to achieve its intended outcomes.

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The DEPP includes detailed plans, described below, to address the significant environmental aspects, compliance obligations, and risks and opportunities associated with departmental activities. Actions to implement the environmental management system plans describe how DEPP processes will be integrated into departmental processes (including business processes where appropriate). These actions will be evaluated to determine their effectiveness and to identify opportunities for improvement. CCD considers its technological, financial, and operational requirements when planning these actions.

<u>Related DEPP Documents:</u>	CCD-201	Environmental Aspect Definitions
	CCD-204	Work Plan Process

2.1 ENVIRONMENTAL ASPECTS AND CONTROL

An environmental aspect is an element of a organizations's activities, products or services that interacts with the environment, e.g. stormwater pollution, contaminated land/groundwater remediation, hazardous waste disposal, etc. An impact is any change to the environment, adverse or beneficial, wholly or partially resulting from the environmental aspects; e.g., degradation of air and/or water quality. A significant aspect is an aspect that has or can have significant environmental impact(s).

CCD maintains a process for identifying significant environmental aspects based on a Department's (e.g. Office of Human Resources) or Departmental sub-group's (e.g. DFD Fleet, DFD Stations, etc.) activities, products, or services.

Significant Environmental Aspects:

Fueling	Stormwater (MS4, MFRCP, etc)	Spills	Storage Tanks (SPCC)	Pesticides & Fertilizers
Emerging Contaminants	Air Quality	Streetsweeping positive aspect	Streetsweeping negative aspect	Vehicle Maintenance
Recyclable / Reusable Materials	Street Maintenance	Haz Materials & Haz Waste	Asbestos Containing Materials (ACM)	Procurement / Purchasing
Greenhouse Gases/Climate Change	Remediation	Snow Removal	Abandoned Waste	Construction & Const. Waste
Drum Management	Used Oil Management	*Regulated Waste	*Wastewater	

The environmental aspects are used to control impacts that a Department has influence over by:

- Establishing and maintaining Environmental Procedures to cover situations where their absence could lead to deviations from the environmental policy, objectives, and annual targets:

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- Stipulating operating procedures in the Guidelines/Instructions; and
- Establishing and maintaining Environmental Procedures related to significant environmental aspects of goods and services used by a Department and communicating relevant procedures and requirements to employees, suppliers, and contractors.

Related DEPP Documents: CCD-201 Aspect Identification and Assessment Process
Environmental Aspect Definitions

2.2 ENVIRONMENTAL RISKS AND OPPORTUNITIES

CCD has determined risks and opportunities related to its environmental aspects, compliance obligations, and those associated with the external and internal issues and requirements of its interested parties identified during the planning process. Risks and opportunities will be addressed where:

- Action will be necessary to give assurance that the DEPP can achieve its intended outcomes
- Action will prevent or reduce undesired effects, including the potential for external environmental conditions to affect CCD and the communities it serves
- Continual improvement can be realized

<u>Related DEPP Documents:</u>	CCD-201	Environmental Aspect Definitions
	CCD-204	Work Plan Process

2.3 Compliance Obligations

CCD maintains a process to identify and have access to compliance obligations to which the organization subscribes and is applicable to the environmental aspects of its activities and services. These legal requirements include federal, state, regional, and local requirements in the form of statutes, regulations, ordinances, Mayoral Executive Orders, and permits. The DEPP ensures that primary responsible agencies:

- Identify Compliance obligations applicable to the environmental aspects of CCD operations
- Compliance obligations are communicated to the relevant persons in CCD, and on a general level to all of CCD, as appropriate
- Ensure compliance with legal requirements, including conditions on permits, exemptions, consents, authorizations, etc., and other organizational (environmental) requirements
- Identify non-compliances and communicate them to the appropriate level within a Department
- Track and implement corrective actions, including changes to procedures or Environmental Procedures, through the Corrective Action Reporting (CAR) tool.

Document Owners track proposed legislation, regulations, and rulemaking and assess their impact on CCD and its operations. Document Owners engage with regulatory bodies to help shape regulations to try to minimize impacts to CCD's interests and to facilitate implementation of new or changed requirements, and thus help ensure compliance with compliance obligations.

Related DEPP Documents: CCD-202 Compliance Obligations Process

2.4 Objectives, Targets, and Planning

The DEPP documents CCD-wide Objectives and Department Objectives through an annual planning process. Objectives focus on environmental and performance goals that emphasize continuous improvement. When setting and reviewing the objectives, the DEPP Administrator and Departmental Core Team member consider:

- Legal and other regulatory requirements
- Significant environmental aspects
- Technological options
- Financial, operational, and business requirements
- Remedial actions
- Views of interested parties
- Available resources
- CCD Policy Statements

Progress towards achieving its goals documented throughout the year as part of the review process. Objectives and targets shall be consistent with the Environmental Policy.

Related DEPP Documents: CCD-203 Work Plan Process

Work Plan Template

3.0 Implementation & Operations: Procedures & Responsibilities

CCD assigns responsibilities to individuals who can implement the tenets of the Environmental Policy and DEPP. The DEPP Administrator serves as the Management Representative to top management and the DEPP Executive Team who provide the technological and financial resources, including personnel with specialized skills, essential to implement and control the DEPP. Roles and responsibilities are defined, documented, and communicated to facilitate effective environmental management.

CCD maintains Environmental Procedures to avoid negative environmental impacts related to significant aspects. Where environmental impact cannot be avoided, Environmental Procedures identify best management practices for impact minimization and/or mitigation. Environmental Procedures identify allowed/prohibited actions, and any relevant regulations related to the specific activity.

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Related DEPP Documents:

CCD-301 Environmental Procedure Process
DEPP Teams Roles and Responsibilities

3.1 Training

CCD's environmental training program ensures all critical CCD employees are properly trained and aware of their environmental responsibilities. CCD personnel performing tasks that have the potential to cause significant environmental impacts are provided training for awareness, procedures, and response notification and actions in the case of an incident. All new CCD employees receive general DEPP awareness training as an online module in New Employee Orientation. CCD contractors' environmental awareness and impacts to the environment are managed through a contractor management process that may include itDEPP such as a pre-qualification process and contract specifications.

Competence is defined as the knowledge, skills, and abilities necessary to perform tasks repeatedly to the required standard under real conditions. Contractor competence is vetted through the RFP/competitive bid process. Employees and contractors should be aware of the hazards, aspects, and risks they face, the primary controls for those risks, and their responsibilities to maintain those controls.

Training serves to assure all relevant personnel are aware of:

- The CCD Environmental Policy
- The importance of conformance and their roles/responsibilities in maintaining conformance with the Environmental Policy, relevant Environmental Procedures, and DEPP requirements;
- The significant environmental aspects and related impacts (actual or potential) from work activities, including the benefits of improved and enhanced personal environmental performance;
- Their roles and responsibilities in emergency preparedness and response requirements; and
- The potential consequences of departing from Environmental Procedures and the implications of not conforming with DEPP requirements, including not fulfilling the organization's compliance obligations.

Related DEPP Documents:

CCD-302 Environmental Training Process

3.2 Communication

CCD maintains procedures for internal and external communication of environmental information, including:

- Internal communication between the various levels and functions of CCD.
- Receiving, documenting, and responding to relevant communication from external interested parties, especially regarding significant environmental aspects.

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Related DEPP Documents:

CCD-303

DEPP Communication Process

3.3 Documentation and Records

CCD maintains a document and record control process that facilitates the effectiveness of the DEPP to ensure documents and records:

- Can be located;
- Are periodically reviewed, revised (as necessary) and approved for adequacy by authorized personnel;
- Are readily available in their current version where operations or activities essential to the DEPP are performed;
- If obsolete, are properly removed from all points of use, or are otherwise assured against unintended use;
- Maintain a standardized format, which requires them to be legible, have an owner, version number, document control number and be dated last review; and
- If obsolete and are needed for legal and/or knowledge preservation purposes, are suitably identified as a record.

Related DEPP Documents:

CCD-304 Document Control Record Management Process

3.4 Emergency Preparedness and Response

CCD's Emergency Preparedness and Response program identifies and responds to accidents and emergency situations, including the mitigation of environmental impacts. DDPHE has staff who are specialized emergency responders who offer technical expertise and guidance for incidents involving CCD operations. Training and exercises are performed periodically to test the adequacy of procedures and to ensure competency; limited to only DDPHE staff.

CCD reviews and revises the environmental portions of its emergency preparedness and response procedures, after the occurrence of accidents or emergency situations. This review documents the causes of the incident to plan for prevention of a future incident.

Related DEPP Documents:

CCD-306 Emergency Preparedness and Response

3.5 Environmental Lifecycle Perspective

CCD's DEPP is planned, implemented, and continually improved considering the interlinked stages from generation/composition of resources needed to perform activities within the DEPP scope, to final disposal of items used during operations. This lifecycle perspective is focused on the environmental aspects CCD can control and those influenced within the DEPP scope.

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Lifecycle considerations are accounted for when determining environmental aspects of CCD's projects, programs, initiatives, activities, and services. These environmental aspects may result in environmental impacts during development, implementation, change, steady state, and end of life operational activity. Identified aspects are evaluated for significance and potential environmental impacts; CCD applies appropriate controls to ensure these are managed and controlled to protect the environment.

The lifecycle perspective is also considered during CCD development activities such as the acquisition, renovation, or sale of real estate where environmental impacts have or could arise. CCD performs environmental impact assessments to ensure all aspects of the property lifecycle are assessed, and actions are taken to address potential impacts that may result from the real estate transaction or project.

The lifecycle perspective is also applied to purchasing materials and itDEPP that while in use or disposal may impact the environment. CCD identifies and purchases the least environmentally hazardous products that satisfy their intended purpose, informs personnel working of the importance of using products which reduce environmental impacts, and works to replace existing products with less environmentally hazardous options. CCD disposes of products in an environmentally safe manner that prevents pollution and environmental impacts. CCD informs personnel about potential impacts associated with the use, end-of-life treatment, and final disposal of products to raise awareness and reduce environmental impacts.

Related DEPP Documents:

CCD-201 Environmental Aspects Definitions

CCD-301 Purchasing

Phase I Environmental Site Assessment (ESA) Procedure

Real Estate Notification Process

4.0 Checking & Corrective Action - Monitoring, Measurement, and Inspection

CCD maintains procedures to monitor, measure and inspect the key characteristics of its operations and activities that have a significant impact on the environment. This includes recording information to track performance, relevant operational controls and conformance with CCD's stated objectives and targets. Monitoring equipment that is used to demonstrate compliance with a regulatory requirement shall be calibrated and maintained and records of this process shall be retained according to CCD's records management process.

Related DEPP Documents:

CCD-401 Environmental Monitoring Program

CCD-402 Environmental Inspection Program

4.1 Corrective Action Reporting

CCD maintains procedures for defining responsibility and authority in the handling and investigating of a non-conformance, acting to mitigate any impacts caused, and for completing corrective action. Any corrective action taken to eliminate the causes of non-conformances will be appropriate to the

magnitude of the problem and the environmental impact encountered. CCD implements and records any changes in the documented procedures resulting from corrective action on the DEPP site.

Related DEPP Documents: CCD-403 Corrective Action Reporting Process

4.2 Internal DEPP Audit

CCD DEPP Internal Audit program monitors its activities, operations, and DEPP performance to ensure the City performs in a manner that meets its environmental objectives. Internal Audits:

- Identify areas of potential non-conformance to the Standard and timely corrective action
- Determine if the DEPP conforms to planned arrangements for the DEPP
- Determine if the DEPP has been properly implemented and maintained
- Provide information on the results of DEPP reviews to management

The DEPP Internal Audit uses a risk-based approach that focuses on the environmental importance of the activity concerned and the results of previous audits. The audit procedures cover the audit scope, frequency, changes made to processes affecting environmental management, DEPP methodologies, as well as the responsibilities and requirements for conducting the audit and reporting results.

Related DEPP Documents: CCD-404 Internal Audit Program
CCD maintains a documented procedure for evaluating compliance with relevant compliance obligations.

5.0 Management Review

CCD's top management and the DEPP Executive Team reviews the DEPP performance in accordance with the ISO 14001 Standard to ensure the DEPP' objectives and targets are met, as well as the continuing suitability, adequacy and effectiveness of the DEPP. The Management Review touches on the required elements of the ISO Standard to ensure all necessary information is collected to perform its evaluation. Action items identified during the management review are prioritized, assigned, and given targeted completion dates. The Management Review may address possible needs for changes to policy, objectives, and other elements of the DEPP.

Related DEPP Documents: CCD-501 Management Review Process

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Document Home: PowerDMS

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