



Downing Street Garage Environmental Management System (EMS)

1. Policy – Downing Street Garage is committed to environmental stewardship by:
 - 1.1 Setting 3 year goals to lessen our carbon footprint in energy, water usage and recycling
 - 1.2 Achieving certifications that go beyond compliance
 - 1.3 Communicating our commitment to our customers, employees, vendors and the community

2. Planning
 - 2.1 Environmental Aspects
 - 2.1.1 Identifying activities/their impacts
 - 2.1.1.1 Office
 - 2.1.1.1.1 Printing papers and generating repair orders/use of electricity, ink and paper
 - 2.1.1.1.2 Computer and server use/use of electricity
 - 2.1.1.1.3 Providing shuttle rides/gasoline usage
 - 2.1.1.1.4 Errands/gasoline usage
 - 2.1.1.1.5 Drinking water for customers and employees/recycling plastic and paper cup and water usage
 - 2.1.1.2 Shop
 - 2.1.1.2.1 Repairs with air tools/use of electricity (compressor)
 - 2.1.1.2.2 Changing oil/disposal of used oil and filters
 - 2.1.1.2.3 Washing cars as a service/use of electricity, gas and water
 - 2.1.1.2.4 Washing engines with pressure washer/use of electricity, water and gas
 - 2.1.1.2.5 Receiving parts/recycling the packaging
 - 2.1.1.2.6 Washing parts in parts washer/using reused water and electricity
 - 2.1.1.2.7 Using lifts/use of electricity
 - 2.1.1.3 Maintenance
 - 2.1.1.3.1 Changing light bulbs/use of energy and disposal of bulbs
 - 2.1.1.3.2 Washing floors and concrete pad/electricity, gas and water usage
 - 2.1.1.3.3 Heating and cooling the building/use of natural gas/electricity
 - 2.1.1.3.4 Cleaning shop/rag and laundry service and product usage
 - 2.1.1.3.5 Lighting the shop day and night/use of electricity
 - 2.1.1.3.6 Watering the garden by signage/use of water
 - 2.1.2 Criteria used to determine the significance of the impact
 - 2.1.2.1 Impact on the environment high, medium or low? (based on Scott Meyers Footprint Metrics Tools)
 - 2.1.2.2 Length of time spent and frequency of each activity. (ex: list the hours/week)
 - 2.1.2.3 Least expense for greatest difference on the environmental impact



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2.1.3 Prioritizing

- 2.1.3.1 Assign "high, medium or low" impact to each activity.
- 2.1.3.2 List the hours/week spent on each activity, cumulative.
- 2.1.3.3 Eliminate those activities that are least changeable.
- 2.1.3.4 Highlight 2-3 activities in each area (office, shop and maintenance) that will be the least expensive to change with the greatest environmental impact.
- 2.1.3.5 Choose four total activities per year that team members are most passionate about.
- 2.1.3.6 Re-evaluate and update the list of aspects/impacts each January and choose four for the current year.

2.2 Legal and other Requirements

2.2.1 List of known legal requirements

2.2.1.1 Servicing Motor Vehicle Air Conditioners

2.2.1.1.1 Technician training and certification - Technicians who repair or service HFC-134a motor vehicle air conditioners (MVACs) must be trained and certified by an EPA-approved organization. Training programs must include information on the proper use of equipment, the regulatory requirements, the importance of refrigerant recovery and the effects of ozone depletion. To be certified, technicians must pass a test demonstrating their knowledge in these areas. Mobile Air Conditioning Society (MACS) and Automotive Service Excellence (ASE) offer certifications that are approved under Section 609 of the Clean Air Act Amendments of 1990.

2.2.1.1.2 Recordkeeping requirements – Since we do not send refrigerant to a reclamation facility our only requirement is to maintain records (on-site) showing that all service technicians are properly certified.

2.2.1.1.3 Certification requirements – Service shops must certify to EPA that they have acquired and are properly using approved refrigerant recovery equipment, and that each person using the equipment has been properly trained and certified.

2.2.1.2 Emissions Repairs - Air Care Colorado registers facilities and technicians who are making repairs on vehicles with failed emissions. A monthly report card is sent to each facility reflecting a Repair Effectiveness Index (REI). Our REI is currently and continuously rated 100 compared to an average of 84 (for the period ending July 31, 2008) for all Registered Repair Facilities in the state of Colorado (313 active facilities).

2.2.1.3 Denver Fire Department

2.2.1.3.1 Annual Fire Safety Inspections – We are current with our inspections and our yearly reports from 8/17/04 through 5/30/08 show "no violations".

2.2.1.3.2 We maintain a current Hot Work (or welding) permit. See attached.



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- 2.2.1.4 EPA ID Number: COR000202598 - Conditionally exempt generator established Nov. 9, 2001 by the Hazardous Materials & Waste Management Division of the Colorado Dept. of Public Health and Environment.
- 2.2.1.5 Sand/Oil/Grease Interceptor - The interceptor is a preliminary treatment device designed to prevent sand/oil/grease from entering the sanitary sewerage system of the City and County of Denver. To function properly the interceptor must be cleaned on a regular basis. The frequency of cleaning depends on several factors including type and volume of business, and operating procedures.
 - 2.2.1.5.1 Section 5.07 of the Public Works Rules and Regulations states: 'Where preliminary treatment or flow-equalizing facilities are provided for any waters or wastes, they shall be maintained continuously in satisfactory and effective operation by the owner at his (her) expense.'
 - 2.2.1.5.2 We currently have our interceptor cleaned by AIRVAC Services every 2 years and have records to prove this. The last cleaning was on 4/30/07.
 - 2.2.1.5.3 We also complete the City and County of Denver, Department of Public Works, Wastewater Management Division's "Sand-Oil-Grease Interceptor Update Form" when it is requested and have forms on file from 2002.
- 2.2.2 Procedure to identify and keep up-to-date with legal and other requirements
 - 2.2.2.1 Continue membership in Automotive Service Association (ASA)
 - 2.2.2.2 Sign up to receive weekly emails from ASA National regarding legislative issues
www.asashop.org
 - 2.2.2.3 Attend the Legislative Breakfast at the national Congress of Automotive Repair and Service (CARS) trade show in November
 - 2.2.2.4 Use as a resource [A Business Guide to U.S. EPA Climate Partnership Program](#) at <http://www.epa.gov/partners/> if it is applicable to our business.
- 2.3 Objectives and Targets
 - 2.3.1 To be an active participant in our community's commitment to modifying the impact that our work, life and business has on the environment through programs such the Colorado Environmental Leadership Program.
 - 2.3.2 To incorporate our Environmental Management System into our daily standard operating procedures while actively managing the program.
 - 2.3.2.1 To develop a plan of action and affect at least four aspects each year (one per quarter) over the next three years.
 - 2.3.2.2 To solicit input, guidance and participation from all team members as it relates to the aspects they are most passionate about.
 - 2.3.3 To be flexible and responsive by changing the aspects as pressing environmental issues and needs arise.



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2.4 Environmental Management Program(s)

- 2.4.1 Co-owners write simple strategic plan by Sept. 30, 2008 that includes all three objectives above.
- 2.4.2 For rest of 2008 identify just two aspects by the end of September 2008 that can be measured and affected by December 2008
 - 2.4.2.1 August and September 2008, devote ½ hour at 2 lunch meetings to identify the two aspects we want to focus on in the last quarter of 2008. Co-owners will see these to completion.
 - 2.4.2.2 Use the October through December meetings to discuss and relay progress on the two previously identified aspects.
- 2.4.3 Use the meetings to review and discuss the status of initiatives and the potential for changing or modifying the aspects to focus on. Communicate that the team's input is appreciated and needed and provide a forum for them to communicate to management when they see a pressing issue or need.

3. Implementation and Operation

3.1 Structure and Responsibility

- 3.1.1 Everyone at Downing Street Garage is involved in activities that have a direct impact on the environment.
- 3.1.2 Rebecca Kirchdorfer (co-owner) will manage the EMS:
 - 3.1.2.1 Create a plan with support from Doug Kirchdorfer (co-owner) and Chris Lechman (general manager)
 - 3.1.2.2 Provide an environment where the entire team can participate
 - 3.1.2.3 Review the EMS plan yearly
 - 3.1.2.4 Update the EMS as needed

3.2 Training, Awareness and Competence

- 3.2.1 The entire team will be involved in creating the Environmental Management Strategic Plan. Once plan is written it will be reviewed and signed off by each team member as their commitment to participate
- 3.2.2 An Environmental Policy review is currently included in:
 - 3.2.2.1 Weekly lunch meeting for 8/7/08
 - 3.2.2.2 Orientation for new employees
- 3.2.3 Individual activities, whether part of our current procedures or part of each year's strategic plan, will be communicated and incorporated, using written procedures for specific job descriptions. These procedures will be integrated into each team members book of duties and procedures and will be also be stored electronically



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3.3 Communication

3.3.1 Internal

- 3.3.1.1 Support from co-owners and management
- 3.3.1.2 Weekly Meetings/Team involvement
- 3.3.1.3 New hire orientation
- 3.3.1.4 Written policies and procedures, which currently include many recycling initiatives

3.3.2 External

- 3.3.2.1 Create Website drop-down menu button called "Environmental"
 - 3.3.2.1.1 Environmental Policy
 - 3.3.2.1.2 EMS strategic plan/goals for the year
 - 3.3.2.1.3 List acknowledgements/awards with links
 - 3.3.2.1.4 Provide links and information on pertinent issues (currently do)
- 3.3.2.2 Marketing, tie all messaging together to inform about DSG commitment
 - 3.3.2.2.1 Collateral
 - 3.3.2.2.2 PR
 - 3.3.2.2.3 Media advertising, Comcast and Denver Newspaper Agency, Colorado Public Radio
- 3.3.2.3 Mission and core values posted in reception/waiting room, visible to all who visit
- 3.3.2.4 Participation in workshops, panels and organizations to promote environmental stewardship and to mentor other community members and businesses

3.4 EMS Documentation – (We have started an EMS manual using the outline from Section 2 of this application)

- 3.4.1.1 Policy
- 3.4.1.2 Planning
- 3.4.1.3 Implementation
- 3.4.1.4 Checking/Correcting
- 3.4.1.5 Legal Compliance for the activities in our specific operation of auto repair with supporting documentation for current legal requirements (include location of files for all legal documents/certifications)
- 3.4.1.6 Audits
- 3.4.1.7 Colorado ELP
- 3.4.1.8 A Business Guide to U.S. EPA Climate Partnership Programs



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3.5 Document Control

- 3.5.1 Responsible for document control, Rebecca and Doug Kirchdorfer and Chris Lechman
- 3.5.2 Documents
 - 3.5.2.1 Original documents/certifications are kept in the locked black filing cabinet under "Legal Requirements"
 - 3.5.2.2 Working documents are kept in the EMS Manual

3.6 Operational Control – Included in the EMS Manual under 3.4.above

3.7 Emergency Preparedness and Response

- 3.7.1 Safety Policy attached
- 3.7.2 MSDS Training attached
- 3.7.3 When Someone Gets Hurt Emergency Procedure attached
- 3.7.4 Emergency Evacuation included under Denver Fire Department in Section 2

4. Checking and Corrective Action

4.1 Monitoring and Measurement

- 4.1.1 Measurable goals most likely to be one of the following:
 - 4.1.1.1 Quantity of energy use reduction in kWh per year
 - 4.1.1.2 Quantity of non-hazardous waste reduction in dumpsters per year
 - 4.1.1.3 Quantity of water use reduction in gallons per year
- 4.1.2 Resources used for monitoring
 - 4.1.2.1 Xcel Energy
 - 4.1.2.2 Denver Water
 - 4.1.2.3 U. S. Waste and Waste Management
 - 4.1.2.4 Sustainability Footprint Aspects and Impacts Spreadsheets developed by Scott Meyers, EnviroGroup Limited
 - 4.1.2.5 Other web-based carbon footprint measuring tools

4.2 Nonconformance of EMS, Corrective and Preventive Action

- 4.2.1 Reporting – develop a reporting system with entire team.
- 4.2.2 With the team member responsible for nonconformance of EMS
 - 4.2.2.1 Identify the cause
 - 4.2.2.2 Determine corrective action
 - 4.2.2.3 Update related procedures/have everyone involved sign and date new procedure

4.3 Records

- 4.3.1 Legal Requirements Recordkeeping - Payments made to entities requiring certifications, inspections and audits are to be filed in the corresponding file for that entity and will include:
 - 4.3.1.1 Original bill (copy goes with bookkeeping file) with check number and date of check
 - 4.3.1.2 Original certification if any stapled on top of the bill
- 4.3.2 Keep Monitoring Reports in physical EMS Manual until supplemental files are necessary



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4.4 EMS Audit

- 4.4.1 Review of each aspect and its impact (4/year) before moving on to the next aspect
- 4.4.2 Internal Audits
 - 4.4.2.1 Maintaining the Silver Colorado Environmental Leadership Program Certification over 3 years will require continuous self-initiated audits, at a minimum of one year increments.
 - 4.4.2.2 July 2009 - Apply for the Gold Colorado Environmental Leadership Program Certification; this will require continuous self-initiated audits as well
 - 4.4.2.3 Yearly audits scheduled in January
- 4.4.3 External Audits
 - 4.4.3.1 Procedures, need to develop
 - 4.4.3.2 Identify affordable company with auditor trained in auditing and management systems concepts
 - 4.4.3.3 Schedule first audit with this company in January of 2009, subsequently every two years
 - 4.4.3.4 Keep copies of audits in the EMS Manual until they require a file

4.5 Management Review

- 4.5.1 Have co-owners and general manager read, make revisions, sign and date this first EMS at the manager dinner meeting held in August 2008.
- 4.5.2 Once per year have co-owners and general manager re-read, update, sign and date the EMS at the manager dinner meeting held in January.