**Small Community Environmental Protection Plan
(SCEPP)**
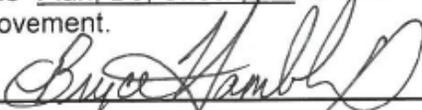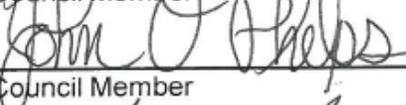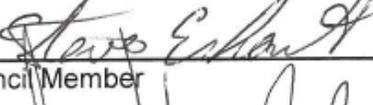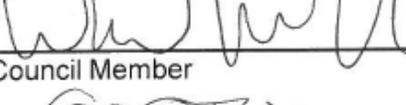
1.01 Good Faith Commitment

The Town of Eagar has implemented a *Small Community Environmental Protection Plan (SCEPP)* as a way of demonstrating environmental leadership, commitment to continual improvement and environmental responsibility to all stakeholders identified in document *SCEPP/9.01 F1 Registry of Stakeholders.*

To ensure the development and maintenance of a complete and effective SCEPP, this manual has been prepared to ensure compliance with federal, state and local environmental regulations. This manual is the central document for identifying and controlling all SCEPP related information and to provide reference to all supporting documents. This SCEPP is based on the "Plan, Do, Check, Act" environmental model with our good faith commitment to continual improvement.

Mayor	Date 7-17-12
Vice-Mayor	Date 7-17-12
Council Member	Date 7-17-2012
Council Member	Date 07-17-12
Council Member	Date 7-17
Council Member	Date 7-17-12
Council Member	Date 7/17/12
Town Manager	Date 7/17/12

Filed with the Town of Eagar, Town clerk on this _17th_ day of _July_ 2012.

cc: SCEPP Manual

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Document Title: Good Faith Commitment			Total Pages: Page 1 of 82

2.01 Environmental Policy

The Town of Eagar Environmental Policy

The Town of Eagar provides collection, treatment and distribution of water and wastewater.

Our environmental policy is to be responsible representatives of the people of Eagar in protecting the environment. We are committed to complying with accepted environmental practices, including the commitment to meet all applicable legal and other requirements; to strive for continual improvement in our Small Community Environmental Protection Plan; to use energy efficiently and to minimize the creation of wastes and pollution. We will therefore manage our processes, our materials and our people in order to reduce the environmental impacts and costs associated with providing services to our community.

The *Mayor, Council, Town Manager and Public Works Department* pledges to implement this *Small Community Environmental Protection Plan* to further enhance our environmental performance.

This policy will be communicated to all personnel and to all stakeholders interested in the performance of our environmental protections plan.

Approved by:

_____   Date: _____7/17/12_____
Mayor

SCEPP Team:

_____   Date: _____7/17/12_____
Town Manager

_____   Date: _____7/17/12_____
Public Works Director

_____   Date: _____7-17-12_____
ADEQ Certified Operator

Document Control No. 2.01	Original Date: 3/21/2012	Revised Last Date: 02/14/2014	Approved by: B. Ray, Public Works Director
Document Title: Environmental Policy			Total Pages: 2 of 82

3.01 Scope of Operations Covered by the SCEPP

SCEPP CONTROLLED DOCUMENT:
PROCEDURE FOR IDENTIFYING SCOPE OF THE OPERATIONS COVERED BY THE SCEPP

The Town of Eagar has developed and implemented a SCEPP to cover municipal operations, within a defined area, known as the SCEPP boundary. These operations/activities are listed in 3.02 List of Operations Covered by the SCEPP. The SCEPP addresses all environmental aspects that may have a significant impact on the environment arising from activities within the SCEPP boundary. The SCEPP covers only those aspects for which **The Town of Eagar** is responsible or over which it can reasonably expect to have control.

<u>Procedure</u>:
This procedure is used to describe the operations covered by the SCEPP. Operations include all activities, products and services provided by our community.

1)   Identify all activities covered by the SCEPP which **The Town of Eagar** has control over or can influence.

2)   Divide operations into categories and develop a flowchart that follows materials or activities through their respective processes.

3)   Identify and list all activities, products and services covered by the SCEPP
- Review the SCEPP guidance materials when determining what operations should be included
- Create separate lists of activities, products and services, as needed
- Start with a comprehensive list as possible grouped into categories and determine if anything may have been missed.

4)   Document the operations and activities along with a brief description in the form 3.02 List of Operations Covered by the SCEPP. Create a separate table for each category of operations.

5)   Identify regulatory requirements.

3.02 List of Operations Covered by the SCEPP

- Collection System O&M
- Used Oil Collection
- Wastewater Treatment Plant O & M
- Storm Water Pollution Prevention
- Equipment Maintenance
- Safe Drinking Water
- Building Demolitions

```
                    City/Town of Eagar
                    • Wastewater treatment plant
                      operations and maintenance
                    • Revenue and Expenditure Control
Wastewater          • Water system maintenance              Effluent
Collection                                                  Discharge
                    • Blue Hills Environmental (Town
                      Manager is on the Board of Directors
Operating             and this is the only involvement for the   Waste Oil
Equipment             Town with Blue Hills)                      Collection

Solid Waste                                                 Safe Drinking
Collection                                                  Water

                    Procurement
                    • Chemicals
                    • Equipment
```

Activities Covered by the SCEPP

	Operation/Activity	Description
1.	Collection Systems O & M	Maintain proper operations of sewer lines. Provide a maintenance activity that monitor(s) and corrects any abnormal operating conditions
2.	Used Oil Collection	Follow Used Oil regulations, collected from do it yourselfers
3.	Wastewater Treatment Plant O & M	Operate and maintain the treatment facility in a manner that meets APP requirements. Including Effluent disposal, and reuse
4.	Storm Water Pollution Prevention	Maintain necessary controls to prevent unpermitted runoff from entering waterways.
5.	Equipment Maintenance	Provide proper repairs and maintenance activities to maintain equipment's operational requirements
6.	Safe Drinking Water	Maintain proper operations of the Water System per EPA/ADEQ regulations.
7.		
8.		
9.		

4.01 Identifying Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets

> **SCEPP CONTROLLED DOCUMENT:**
> **PROCEDURE FOR IDENTIFYING ENVIRONMENTAL ASPECTS, DETERMINING SIGNIFICANT IMPACTS, AND DEVELOPING OBJECTIVES AND TARGETS**

The SCEPP Team identifies the environmental aspects of all activities within the SCEPP boundary that **The Town of Eagar** controls or over which it can be expected to have influence. The SCEPP Team then determines which of the aspects may have a significant impact on the environment. This is done using operational controls procedure. A list of all aspects and the significant impacts is included in 4.01 F3 Form for Setting Aspects, Significant Impacts, Objectives and Targets.

Aspects determined to have significant impacts are reviewed at least annually by the SCEPP Team as well as anytime there are new or changed activities to consider. Meeting discussions and procedures used to determine significant impacts are recorded in the SCEPP Team meeting minutes. The SCEPP Manager Bruce Ray maintains the SCEPP meeting minutes and other records as required.

The SCEPP establishes goals for its operations that are consistent with **The Town of Eagar** environmental policy that will eliminate the gap between current procedures and an accepted SCEPP frame work, and that will reduce the environmental impacts of its operations.

Procedure: Identifying Environmental Aspects and Impacts

Applicable Definitions:

Environmental Aspects (Inputs): Activities, products or services that can interact with the environment. An activity, process, waste, product, or service does not have to be regulated to be considered an aspect. *[Also see Environmental Impacts]*

Environmental Impacts (Output): Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities, products or services. *[Also see Environmental Aspects.]*

This procedure is used to identify the environmental aspects and their impact for each operation/activity identified in the bottom table of form 3.02 List of Operations Covered by the SCEPP.

1) For each activity, product or service identified, list the associated environmental aspects using *SCEPP/4.01 F1 Form for Preparing a List of Environmental Aspects for One Activity.* Identify a specific environmental impact caused by each aspect.

    Note: If more than one impact exists for a specific aspect, redefine the aspect so there is only one impact. This will make it easier when assessing the significance of the environmental impact

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Document Title: Procedure for Identifying Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets			Total Pages: Page 6 of 82

2) In determining the significant environmental impact associated with each aspect, note the impact category. Impacts will fall into one of four categories:
- Air: potential degradation of air quality.
- Water: potential degradation of water quality.
- Land: potential land contamination.
- Other: consumption of natural resources including the interactions that use raw materials and natural resources such as water and energy (i.e., water, energy, materials, land or other issues such as noise or odor).

Consider the following criteria:
- Use of natural resources (chemicals and other materials, water, energy)
- Generation of hazardous waste
- Generation of solid waste
- Generation of wastewater
- Emissions to air
- Activity is regulated
- Cost to mitigate
- Employee and public concern
- Frequency of occurrence
- Severity of impact

3) Determining Significant Environmental Impacts. For each environmental impact apply the evaluation criteria to determine significance. Use the questions below; 4.01 F Flow Diagram of Impact Significance Evaluation and 4.01 F2 Assigning Impacts to Aspects and Determining Significance.

Is it regulated?
Yes:	If it is regulated at the federal, state or municipal level.
No:	If it is not regulated.
Future:	If there is knowledge of pending regulations based on the stakeholder analysis.

Does the aspect pose a potential environmental impact?
Yes:	If the aspect is known to create environmental impacts or is likely to create impacts or severe consequences to the environment.
No:	If the aspect is not known to create environmental impacts nor has negligible consequence to the environment.
Unknown:	If there is insufficient knowledge about the potential for the aspects to create environmental impacts.

Is there significant stakeholder interest?
Yes:	High potential for concern documented and expressed by several stakeholders.

No: No or little concern.
Unknown: If there is insufficient knowledge about the level of stakeholder concern.

Is there significant financial opportunity or risk?
Yes: Costs to currently manage the aspect is significant or potential to create significant cost savings exists.
No: Currently little or no cost to manage the aspect, or little or no potential for cost savings or revenue generation.
Unknown: Potential for cost savings or revenue generation or costs to manage the aspect is unknown.

If most or all of the answers are "Unknown" (or Future) additional information will have to be gathered and the aspect reassessed.

Complete 4.01 F3 Setting Aspects; Significant Impacts; Objectives and Targets.
by adding the results of this analysis to the appropriate headings in the table. For each operational activity, product and service identified, list all environmental aspects and impacts related to each activity, product and service.

Procedures: Identifying Environmental Objectives and Targets

The SCEPP Team establishes environmental objectives and targets to set performance improvement goals for the aspects that may lead to significant impacts. These are integrated into programs developed to stimulate action within individual units, departments or across all operations within the SCEPP boundary. Objectives and targets are developed for aspects considering significant environmental impacts, legal and other requirements, technical and financial feasibility, commitments in the environmental policy and operational requirements.

The SCEPP Team develops objectives and targets to define:

1) the performance objectives (e.g., monitor, study, control or improve) for each aspect with a significant environmental impact;
2) t h e specific, quantified targets which define those performance objectives; and
3) the planned schedule for achieving targets.

Applicable Definitions:

Environmental Objectives (Goals): Overall environmental goal arising from the environmental policy that an organization sets itself to achieve, and which is quantified where practicable. An example would be: *to install a holding tank, piping, and pumping system in order to reuse treated wastewater. [Also see Environmental Targets].*

Environmental Targets: A detailed environmental goal, quantified where practicable, that arises from the environmental objectives (goals) and that needs to be scheduled and assigned in order to achieve those objectives. An example would be: *to reduce water use by 30 percent over baseline in a 12-month period*. Included in the decision of targeting is the assignment of staff responsible for achieving each of the targets. Please note that the actual achievement of a target requires commitment and coordination from multifunctional departments, but one responsible person is needed to direct the effort. *[Also see Environmental Objectives (Goals)]*

Development of Objectives and Targets:

Objectives and targets are developed to address those aspects which a community has determined to have significant impacts. They should support the *Environmental Policy* which promotes pollution prevention, environmental compliance, and continual improvement.

Objectives and targets must be based on technological options, economic feasibility, views of interested parties, and legal considerations. The development of objectives and targets should be conducted by SCEPP team members who are related to the affected activities.

1)   This procedure is used to evaluate each aspect with a significant impact to assess whether or not an environmental objective and target should be established. Assess each activity with the following questions as outlined in *4.01-2 Flow Diagram of Impact Significance Evaluation.*

2)   Evaluate each aspect with a significant impact using the flowchart criteria:
   - Does the organization have control or influence over the aspect?
   - Do technically feasible options exist to control the aspect?
   - Are the technically feasible options financially feasible?

3)   Once the impact has been assigned against these criteria, determine whether an objective and target should be established using the decision logic from the flowchart criteria.

4)   Use 4.01 F3 Form for Setting Aspects, Significant Impacts, Objectives and Targets to record the results of the evaluation. Form 4.01 F3 should also present those significant aspects for which objectives and targets will be established at a later date, and include an anticipated timeframe for establishing the objectives and targets.

Objectives and Targets should be set so that they represent a valuable but achievable goal to base the Environmental Management Programs around.

Documentation
Updates and Reviews - The aspects, their rating criteria for significance, and objectives and targets must be reviewed and updated annually. Updates must also be required for any addition or modification of an activity, process, product or service. Changes to the criteria for determining aspects and significant impacts must be recorded in the facility's aspect procedure.

Records - Records generated from this procedure include flowcharts, list of aspects and impacts, aspect analysis, legal requirements, and objectives and targets.
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4.01 F1 A - Wastewater Collection System O & M

Inputs: What are the interactions occurring or done that use the following:
Electricity: Does not apply to our operations No lift stations
Materials: Jetter and Flush Trailer, Enzyme
Water: Flushing of manholes and clean-outs
Fuels: Operation of preventative maintenance equipment used for cleaning and inspection sewer lines
Other: Scheduled cleaning and inspection of sewer lines and manholes.

Emissions: What are the interactions occurring that create releases to the following:
Air: None of the generators are large enough to require air quality permits
Water: System failure could result in a sanitary sewer overflow.
Land: System failure could result in a sanitary sewer overflow.
Other: (i.e., consumption of other resources or noise, odor etc.) Unexpected failures could result in higher than planned expenses

4.01 F1 B – Used Oil Collection

Inputs: What are the interactions occurring or done that use the following:
Electricity: Oil burned in clean burn heaters
Materials: none
Waste: none
Fuels Oil
Other:

Emissions: What are the interactions occurring that create releases to the following:
Air: Emissions could result from used oil burning
Water: Improper handling of used oil could pollute surface water
Land: Improper handling of used oil could pollute the land surface
Other: (i.e., consumption of other resources or noise, odor etc.)

4.01 F1 C – Wastewater Treatment Plant O & M

Inputs: What are the interactions occurring or done that use the following:
Electricity: Only used during discharge of effluent
Materials: Hand tools for screen cleaning, enzymes and Solar Bee's for BOD maintenance.
Water: None
Fuels: Used for operation vehicles
Other: Refuse collection agency of screening solids.

Emissions: What are the interactions occurring that create releases to the following:
Air: None of the generators are large enough to require air quality permits
Water: System failure could result in a sanitary sewer overflow into natural waterways.
Land: System failure could result in a sanitary sewer overflow.
Other: (i.e., consumption of other resources or noise, odor etc.) Unexpected failures could result in higher than planned expenses

4.01 F1 D – Storm Water

Inputs: What are the interactions occurring or done that use the following:
Electricity: No electricity is used for this item.
Materials: Utilized during activities the BMP will be utilized for SWP.
Water: Water runoff is contained within designated areas and returned through evaporation and ground recharge
Fuels: No fuels are used in this item
Other: Permits are required by ADEQ as necessary

Emissions: What are the interactions occurring that create releases to the following:
Air: none
Water: Lack of storm water best practices could result in water contamination.
Land: Uncontrolled runoff or releases cause by impoundment failures could impact lands
Other: (i.e., consumption of other resources or noise, odor etc.)

4.01 F1 E – Equipment Maintenance and Repairs

Inputs: What are the interactions occurring or done that use the following:
Electricity: Common usage and safety practices
Materials: Greases, oils, and other fluids, used to maintain proper equipment operations
Water: Used for general clean up
Fuels: Rolling equipment diesel and gasoline stored in above ground contained tanks
Other: Used oil is collected in storage tank and recycled as facility heater.

Emissions: What are the interactions occurring that create releases to the following:
Air: Possible impact due to exhaust and/or possible odors from treatment process.
Water: Major failure or breach could result in impact to surrounding lakes and streams.
Land: Major failure could impact surrounding lands.
Other: (i.e., consumption of other resources or noise, odor etc.)   Used oil and grease.

4.01 F1 F– Safe Drinking Water

Inputs: What are the interactions occurring or done that use the following:
Electricity: Well, Pump Stations, Emergency Generators
Materials: PVC, AC, Galvanized, Gas Chlorine on Spring Line
Water: Hydro flushing, Loss of Supply, Rationing
Fuels: Operation or Preventative Maintenance Equipment
Other:

Emissions: What are the interactions occurring that create releases to the following:
Air: Emergency Generator Exhaust
Water: Breaks Causing Flooding, Discharges from Line Flushing Activities
Land: None
Other: (i.e., consumption of other resources or noise, odor etc.)   Unexpected failures could result in higher than planned expenses

4.01 2 Flow Diagram of Impact Significance Evaluation

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                          ┌─────────────────────────┐
                          │   IMPACT EVALUATION     │
                          └─────────────────────────┘
                                      │
                                      ▼
        ┌──────┐              ┌─────────────────────┐
  ◄─────│ YES  │◄─────────────│   Is it regulated?  │
        └──────┘              └─────────────────────┘
                                      │
                                      ▼
                                  ┌──────┐
                                  │  NO  │
                                  └──────┘
                                      │
                                      ▼
                    ┌──────────────────────────────────────┐
        ┌──────┐    │ 1. Does the aspect pose a potential   │           ┌──────┐
  ◄─────│ YES  │◄───│    environmental impact?              │──────────►│  NO  │
        └──────┘    │                                       │           └──────┘
                    │ 2. Is there significant stakeholder    │
                    │    interest?                           │
                    │                                       │
                    │ 3. Is there significant financial      │
                    │    opportunity or risk?                │
                    │                                       │
                    │   Determine significance based         │
                    │   on your evaluation criteria.         │
                    └──────────────────────────────────────┘
```

Significant Aspect: Action Required

No Further Action Required At This Time

Evaluate existing SCEPP controls (Objectives, targets, programs)

Are controls adequate? → **NO** → **Consider establishing objectives, targets and programs**

YES → **Document and maintain per SCEPP procedures**

4.01 F2 Form for Assigning Impacts to Aspects and Determining Significance

Aspects	Impacts				Questions for Significance				
	Air	Water	Land	Other	Is it Regulated?	Does the aspect pose a potential environmental risk?	Is there significant stakeholder interest?	Is there significant financial risk or opportunity?	Is it a Significant Aspect? Yes/No
Wastewater Collection	No	yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Used Oil Collection	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Wastewater Treatment Plant Operations	No	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Wastewater Treatment Plant Maintenance	No	Yes	yes	No	Yes	Yes	Yes	Yes	Yes
Storm Water	No	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Equipment Maintenance	yes	Yes	No	No	No	Yes	Yes	Yes	Yes
Safe Drinking Water	Yesr equi red	Yes	No	No	Yes	Yes	Yes	Yes	Yes

4.01 F3 Setting Aspects, Significant Impacts, Objectives and Targets

Activity	Aspect	Significant Impact	Objective	Target
Wastewater Collection	Cleaning/Inspecting	Service Interruption, SSO	Maintain reliability and eliminate SSO	Provide inspection of 20% of the system annually and identify areas of concern for repairs or rehabilitation
Collection System Design	Submit as required	Unpermitted discharge	Design of future growth	Submit and receive ADEQ approval before construction begins
Wastewater Treatment Plant Operations	Process monitoring/sampling	Permit violations, poor treatment	Meet permit limits, efficiently process wastewater	Meet required sampling and reporting requirements
Wastewater Treatment Plant Maintenance	Preventative maintenance/repairs	Equipment failure	Maintain reliable operations	Monitor equipment operations weekly and provide maintenance and repairs as needed
Construction General Permit	Controlling runoff impact	Stream impact	Prevent pollution from entering waters of the U.S.	Prepare and implement a Stormwater Pollution Prevention Plan prior to disturbing an acre or more of land for construction projects
Heating with used oil	Collecting of oil	Air, land discharges	Accepting only do it yourself used oil generators	Adhere to the town's used oil policy and State regulations
Equipment Maintenance	Equipment Readiness	Equipment Failure	Maintain equipment at 100% efficiency and readiness	Constantly update as equipment needs change

Safe Drinking Water	Preventative Maintenance, Repairs	Notice of Violations, Permit Violations and Health Impacts	Meet all required Sampling Requirements	Meet all routine sampling and reporting requirements

5.01 Procedure for Identifying Legal and Other Environmental Requirements

SCEPP CONTROLLED DOCUMENT: **PROCEDURE FOR IDENTIFYING LEGAL AND OTHER ENVIRONMENTAL REQUIREMENTS**	

As part of the Environmental Policy's commitment to regulatory compliance, **The Town of Eagar** has established this procedure for ensuring compliance with environmental regulations and other requirements. This procedure involves identifying, accessing and communicating legal and other environmental requirements that are applicable to the activities within the scope of operations covered by the SCEPP.

Information necessary to ensure compliance is acquired through legal publications and other sources identified by the SCEPP Manager Bruce Ray. The relevant requirements are identified, accessed and communicated to all personnel, as necessary. At least <u>once a year</u>, the SCEPP Manager reviews the current federal, state and local regulatory requirements to ensure ongoing compliance.

<u>Procedure</u>:

The SCEPP Manager, with support from the SCEPP Team, completes <u>5.01 F1 Form for Preparing a List of Legal and Other Environmental Requirements</u> in its entirety. The SCEPP Team completes the form to the greatest extent possible using all sources of information for identifying applicable legal and other environmental requirements.

After completing <u>5.01 F1 Form for Preparing a List of Legal and Other Environmental Requirements</u>, the SCEPP Manger integrates the list of compliance issues into *<u>4.01 F2 Form for Assigning Impacts to Aspects and Determining Significance</u>,* declaring all impacts with an applicable legal/regulatory requirement as significant.

The Town of Eagar's environmental policy strives for pollution prevention, environmental compliance, and continuous improvement. To adhere to compliance with environmental laws and regulations, it is necessary to know what the legal and business requirements are for the **Town of Eagar's** facilities. Although this SCEPP focuses on environmental compliance, the SCEPP Team can add those provisions required by the Occupational Safety and Health Administration (OSHA) or other agencies that require notification in the event of an accident or injury.

<u>Environmental Requirements include</u>:
- Federal
- State
- County
- Municipal
- Environmental Permitting
- Compliance Monitoring
- Record Keeping and Reporting
- Contingency Plans
- Emergency Preparedness and Response Plans – See **Section 12**

OSHA Requirements may include:
- Process Safety Management
- Industrial Practices

Reporting Accidents and/or Injuries:
As noted above, it is important that the SCEPP include all regulatory notification requirements when an accident such as a when a spill occurs, as well as reporting physical injuries as required.

Environmental Requirements:

The following activities will help the environmental regulatory assessment and annual review process:

1)   Identify individuals responsible for environmental compliance at the facility. Specify areas of responsibility for each person.

2)   Identify contractors/vendors who provide environmental services to the facility. Indicate the type of service they offer. *Their activities may be regulated.* Determine if a license or certificate is required to perform environmental services and if that authorization is current including any continuing education requirements. Always obtain a copy of the license or certificate.

3)   Identify regulatory agencies that the facility would contact for information including reporting an accident or injury. Include the names of the contact person, phone   number, and E-mail address.

4)   Identify all environmental permits currently issued to the facility. Provide essential information for each of the permits, such as permit type, permit number, issuing authority, issue date, and expiration date and monitoring and reporting requirements.

5)   Identify any *formal* enforcement orders against the facility. Describe the type of the order (e.g. consent order, consent judgment, abatement), the issuing authority, issue date, required action by the facility, due date and the current status. Also identify *informal* enforcement notices such as a *Notice of Opportunity to Correct* (NOC) or a *Notice of Violation (NOV).*

      NOTE: Any *formal* or *informal* enforcement notice received after development and implementation of the SCEPP should automatically trigger an immediate review of the SCEPP to determine why the noncompliance occurred and what corrective action should be implemented to prevent future nonconformance with the SCEPP.

6)   Identify reports, plans, and other documents the facility is required to submit or maintain. These may include emergency spill plans, discharge monitoring records, site remediation plans, pollution prevention plans, pollution prevention progress reports, toxic release inventory forms, hazardous waste manifests, hazardous waste annual reports,   etc. Specify the type of reports, the agency requiring it, and the frequency of reporting.

7)   Identify specific programs and procedures under which the facility operates. The list may include the facility's standard operating practices, pollution prevention, recycling, process safety management, or SCEPP programs. Include the names of the program, initiation date, and person responsible for the program.

The SCEPP Manager or designee <u>must</u> stay informed of changing environmental regulations by:

- Obtaining a hard copy and/or Internet access to applicable EPA, Arizona, and local rules and regulations to assure access to changes in the regulations.
- Reviewing regulatory updates and the community's compliance calendar and attending compliance workshops offered by federal, state and local regulatory agencies.
- Using a consultant and/or agency liaisons and customer service staff specializing in compliance issues.
- Accessing documentation and web sites with compliance assistance guidance.

The SCEPP Manager or designee reviews *SCEPP/5.01 F1 Form for Preparing a List of Legal and Other Environmental Requirements* annually to ensure compliance and as part of the SCEPP Audit preparation.

5.01 F1 Form for Preparing a List of Legal and Other Environmental Requirements

	SCEPP CONTROLLED DOCUMENT: LIST OF LEGAL AND OTHER ENVIRONMENTAL REQUIREMENTS	

Environmental Aspect	Legal Requirements	Legal Citation
Wastewater Treatment Plant/Facility	Permits required for operation of the facility including permit required sampling and reporting	ARS § 49-241 – ARS § 49-252 AAC Title 18
Wastewater Treatment Plant/Facility	Operation and Maintenance requirements	AAC Title 18
Wastewater Treatment Plant/Facility	Operator Certification & License Renewal Hours	AAC Title 18
Wastewater Treatment Plant/Facility	Bio solids regulations	40 CFR 503
Wastewater Collection System	CMOM and Construction requirements	AAC Title 18
Design and Approval	ADEQ approval before construction and discharge	AAC Title 18
Drinking Water System	Permits required for operation of facility including construction/modification approvals	A.A.C. Title 18 Chapter 5 Article 5
Drinking Water System	Sampling and reporting requirements	40 C.F.R. Part 141; A.A.C. Title 18 Article 4
Drinking Water System	Operations and maintenance requirements including cross connection survey and backflow prevention assemblies installation and testing	40 C.F.R. Part 141; A.A.C. Title 18 Article 4
Drinking Water System	Hydrant Flushing	A.A.C. Title 18 Chapter 9, Article 9; ADEQ De Minimis Gerneral Permit
Operator Certification for Water Wastewater	Operator certification & license renewal hours	A.A.C. Title 18 Chapter 5 Article 1
Wastewater Collection	collection system design and permitting requirements	A.A.C. R18-9-301
Wastewater Treatment	wastewater treatment plant design and operating/Aquifer Protection Permit	A.R.S 49-241 – 49-252 A.A.C. Title 18 Chapter 9, Articles 1 and 2; Aquifer Protection Permit P-101042
Wastewater Treatment	direct reuse of reclaimed water	A.A.C. Title 18, Chapter 9, Articles 6 and 7, and Chapter 11, Article 3; Reclaimed Water Permit #R101042
Storm Water Pollution Control	ADEQ Construction General Permit (CGP) for disturbance of land surface of at least one acre	A.A.C Title 18, Chapter 9, Articles 9 and 10; ADEQ Construction General Permit

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Environmental Aspect	Other Requirements	Policy Reference #
Solid Waste	street sweeping management	A.R.S. Title 49 Chapter 4; A.A.C. Title 18, Chapter 13
Hazardous Waste	hazardous waste management	A.R.S. Title 49, Chapter 5; A.A.C. Title 18, Chapter 8
Air Emissions	open burning permit	A.R.S. 49-501; A.A.C.R18-2-602
Air Emissions	Asbestos NESHAP; renovation and demolition	40 C.F.R. Part 61, Subpart M
Management of Used Oil	standards for managing used oil	40 C.F.R. Part 279; A.R.S Title 49, Chapter 4 and Article 7
Management of Used Oil	prohibition to land disposal	A.R.S. 49-803

6.01 Procedure for Establishing Environmental Management Programs

The SCEPP Team has established Environmental Management Programs (EMP) for all objectives and targets. EMPs are reviewed and approved by the governing body Mayor Bryce Hamblin, Town Manager Shawn Nau, Public Works Director Bruce Ray, Assistant Finance Director Katie Wood and ADEQ Certified Operator Milton Nelson prior to implementation. The EMPs define the principal actions to be taken, the individuals responsible and the scheduled times for implementation that will achieve the desired results.

Procedure:

This procedure is used to develop all Environmental Management Programs (EMP) required for managing environmental aspects that have significant impacts, and to meet the objectives and targets identified in Section 4.01 Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets. Environmental Management Programs are **action plans** for implementing environmental improvements.

A description of Environmental Management Programs includes:
- designation of responsibility;
- resources available (budget, staff and technology); and
- time frame of execution

A continual improvement process should be in place to amend Environmental Management Programs when necessary:

1)   For each environmental aspect with a significant impact identified in form*4.01 F3* Setting *Aspects; Significant Impacts; Objectives and Targets* for which an objective and target has been developed; a form for preparing Environmental Management Programs was completed*.*

6.01 F1A - Wastewater Collection System O & M
6.01 F1B – Used Oil Collection
6.01 F1C – Wastewater Treatment Plant O &M
6.01 F1D – Storm Water
6.01 F1E – Equipment Maintenance and Repairs
6.01 F1F – Safe Drinking Water

2)   Assign each completed form for Preparing Environmental Management, a distinct document control number.

3)   Use 6.01 F2 Form for Preparing a Registry of Environmental Management Programs, to prepare of list of environmental programs.

This planning process is completed annually or within the normal budgeting period.

6.01 F1A – Wastewater Collection System O & M

Operation/Activity: Wastewater Collection System O & M	EMP Document Control No: 6.01 a
Facility: Town of Eagar	**Responsible Persons:** Bruce Ray / Milt Nelson

Resources Available (Including Financial)**:** Funding through annual operational budget and approved capital projects, staff of 14full-time employees and equipment that include, but not limited to, sewer jetter combination sewer truck, backhoe, portable pumps and generators, welding equipment and other related tools.

Goal Statement: (Describe how this program meets commitments of the Environmental Policy)
Proactive preventative maintenance program greatly reduces the possibility of spills that would threaten the environment and public health by identifying current and potential system problem, and provide necessary remedial repairs.

Objective: Maintain system efficiency and effectiveness.	Target and Completion Date: At the end of each year a progress report will summarize the footages of the collection system inspection and preventative maintenance program that has been completed with the target being 20% of the system annually. The inspected portion is reviewed and repair schedules are set for area of concern.

Strategy:
Manholes are inspected; sewer lines inspected and problems are identified and prioritized according to severity. Treatment plant screen is cleaned daily.

Tasks for Achieving Objective and Target:
The results of the evaluations will be used to determine steps needed to maintain reliable service.

Metrics and Measurement:
Manhole and cleanouts are checked on a daily, weekly and monthly basis and logged so problem manholes and cleanouts are identified and corrections made.

Importance relative to Other Environmental Programs:
The health of the environment and the public depends on the identifying and repairing areas that could cause potential problems with the designed purposes of a collection system.

Comments/Process Towards Completion:
This current year has already inspected and cleaned 20% of the system.

6.01 F1B – Used Oil Collection

Operation/Activity: Used Oil Collection	EMP Document Control No: 6.01 b

Facility: Town of Eagar	Responsible Persons: Bruce Ray / Milt Nelson

Resources Available (Including Financial)**:** Annual budget

Goal Statement: (Describe how this program meets commitments of the Environmental Policy)
The safe collection, storage and disposal of used oil, which is used in the clean burn heating system.

Objective: Understand all related standards and regulations.	Target and Completion Date: Using approved handling, storage and disposal procedures and standards of used oil on a daily basis.

Strategy: Collect, store and dispose of used oil in such a manner that will protect the ground and air from contamination or emissions from the storage and disposal of used oil. Follow the Towns used oil policy.

Tasks for Achieving Objective and Target: Follow the Town's adopted Used Oil Policy.

Metrics and Measurement: Each year the standards will be reviewed and updated as regulatory changes are adopted.

Importance relative to Other Environmental Programs:
Ensure that the Used Oil Policy is followed to provide the environmental protection required.

Comments/Process Towards Completion: The Town follows all policies and standards in order to be in compliance with ADEQ requirements.

6.01 F1C – Wastewater Treatment Plant O & M

Operation/Activity: Wastewater Treatment Plant O & M	EMP Document Control No: 6.01 c
Facility: Town of Eagar	**Responsible Persons: Bruce Ray / Milt Nelson**

Resources Available (Including Financial)**:** Funding through annual operational budget and approved capital projects, staff of 14 full-time employees, training manuals and tools required to perform necessary duties.

Goal Statement: (Describe how this program meets commitments of the Environmental Policy) The management and maintenance of our facilities is to comply with the intent and structure of our permits and in compliance with the standards set forth in our policies.

Objective: Operate the WWTP in the most efficient and effective manner meeting all regulatory requirements.	Target and Completion Date: Daily operation and monitoring reports will provide necessary data used in measuring process compliance. Required ADEQ reporting will be submitted within the time frame required and any non-compliance issues will be addressed as required in the current permit.

Strategy: Operators are on-site daily. The process is sampled, tested and reported in compliance with our Aquifer Protection Permit. The facility has in place quarterly maintenance schedules to maintain equipment reliability.

Tasks for Achieving Objective and Target: Daily operator duties for sampling and recording will be used to analyze the process effectiveness. Any abnormal conditions will be reported and modifications directed. Ongoing training program.

Metrics and Measurement: Reviewing of monitoring reports on a daily and weekly basis will help determine if objectives are being met. The permitted values are used as measurements for compliance.

Importance relative to Other Environmental Programs: Through effective operations of the facility protection of the environment can be greatly improved.

Comments/Process Towards Completion: Through operator training and defining responsibilities greater reliability in the process can be the result.

6.01 F1D –Storm Water Pollution Control

Operation/Activity: Storm Water Pollution Control	EMP Document Control No: 6.01 d

Facility: Town of Eagar	Responsible Persons: Bruce Ray / Milt Nelson

Resources Available (Including Financial)**:**
Funding through annual operating budget approved capital projects, and a staff of 14 full time employees.

Goal Statement: (Describe how this program meets commitments of the Environmental Policy)
The goal for this area of concern is to prevent the wastewater treatment facility from polluting Waters of the U.S. Additionally, the town will comply with ADEQ's Construction General Permit for stormwater pollution control.

Objective: Maintain structures in place to restrict storm water from leaving the facility perimeter.	Target and Completion Date: "Prepare and implement a Stormwater Pollution Prevention Plan prior to disturbing an acre or more of land for construction projects".

Strategy:
The wastewater treatment plant storm water restriction structures are to be inspected quarterly to insure stability and effectiveness. Any defects will be reported so corrective actions can be implemented.

Tasks for Achieving Objective and Target:
Staff is assigned to visually inspect structures quarterly for integrity and report any potential issues.

Metrics and Measurement:
Annual reviews of inspections will help determine the need for any modifications in the program's effectiveness.

Importance relative to Other Environmental Programs:
The wastewater treatment facility has active waterways (creeks) on the east and north sides. It is paramount that we maintain our perimeter structures to insure that contaminates do not enter the waterways. Also, it is important to comply with stormwater pollution prevention requirements for the town's future construction projects, to keep additional sediment from entering area surface waters.

Comments/Process Towards Completion:
Monitoring has been occurring for years and monitoring will continue.

6.01 F1E – Equipment Maintenance

Operation/Activity: Equipment Maintenance	EMP Document Control No: 6.01 e

Facility: Town of Eagar	Responsible Persons: Bruce Ray / Milt Nelson

Resources Available (Including Financial)**:** Funding through annual budget and the use of any full-time employee, equipment and contracted outside services.

Goal Statement: (Describe how this program meets commitments of the Environmental Policy)
The proper maintenance and safe operation of all Town equipment, (Pumps motors, generators and response vehicles) ensures that tools and machines are ready for immediate use in emergencies or otherwise.

Objective: Maintain all equipment at 100% efficiency and effectiveness.	Target and Completion Date: This is a continuous program and is constantly updated as equipment requirements change.

Strategy:
Equipment maintenance target dates and times such as hour meter reads, monthly, quarterly, semi-annual, annual are used to signal the maintenance dept. to perform necessary activities to insure proper operation of equipment.

Tasks for Achieving Objective and Target:
Weekly hour meter readings are utilized to alert maintenance personnel to upcoming maintenance requirements.

Metrics and Measurement:
Logbooks for maintenance (both past and future) are kept in files in main office of different departments. O&M manuals are located in the crew office in the administration building.

Importance relative to Other Environmental Programs:
The proper operation and maintenance of all pumps, motors, and rolling stock insures the proper operation of the process.

Comments/Process Towards Completion:
This program has been occurring for years and will continue with improvements being implemented as required.

6.01 F1 F – Safe Drinking Water

Operation/Activity: Safe Drinking Water	EMP Document Control No: 6.01 f
Facility: Town of Eagar	**Responsible Persons:** Bruce Ray / Milt Nelson

Resources Available (Including Financial)**:** Funding through annual budget and the use of any full-time employee, equipment and contracted outside services.

Goal Statement: (Describe how this program meets commitments of the Environmental Policy) The proper maintenance, safe operation and testing of the system, insures that the Town has a safe water drinking system.

Objective: Maintain 100% good quality water testing record.	Target and Completion Date: This is a continuous program and is constantly updated as testing standards change. Meet routine sampling and reporting requirements.

Strategy: System maintenance and prompt repairs and sanitizing the system when repairs are completed help ensure that goal of safe drinking water for the entire system is maintained.

Tasks for Achieving Objective and Target: Weekly hour meter readings are utilized to alert maintenance personnel to upcoming maintenance requirements.

Metrics and Measurement: Logbooks for maintenance (both past and future) are kept in files in main office of different departments. O&M manuals are located in the crew office in the administration building. All logbooks are kept for 12 years and reviewed annually by Jan 1. Maintain sampling spread sheet.

Importance relative to Other Environmental Programs: The proper operation and maintenance of all pumps, motors, and rolling stock insures the proper operation of the process.

Comments/Process Towards Completion: This program has been occurring for years and will continue with improvements being implemented as required.

6.01 F2 Form for Preparing a Registry of Environmental Management Programs

Operation/Activity	Environmental Aspect	Significant Impact	Objective	Target	EMP Document Control No.
Collection System O & M	Maintaining the collection system integrity.	Land and Water	Maintain reliable operations	Inspection and repair problem areas	6.01 a
Heating with Used Oil	Oil Collection	Air	Proper Storage and Disposal	Comply with Town and State Regulations	6.01b
Wastewater Treatment O & M	Treatment of wastewater	Land and Water	Operate facility within limits of permits	Monitor process	6.01 c
Storm water Pollution	Prevent runoff	Land and Water	Prevent unpermitted flows from entering waterways	Inspect structures necessary in prevention of runoff	6.01 d
Equipment Maintenance	Reliable equipment operations	Land, water and processes	Maintain proper equipment operations	Monitor, repair and replace equipment	6.01 e
Safe Drinking Water	Maintain Safe Drinking Water	Water	Maintain optimal operating system	Inspect and repair system as needed	6.01f

7.01 Procedure for Establishing Operational Controls & Organizational Structure & Responsibilities

Operational control procedures primarily describe work practices and cover the environmental control of specific operational activities. These are activity-specific in their application.

For each *Environmental Management Program (EMP)* identified in Section 6, operational control procedures must be developed describing how each program will be implemented and who has responsibility for implementation. Operational control procedures are also necessary for any environmental aspect whether it is significant or not and supporting documentation must be developed and tracked.

SCEPP operational control procedures also include The Town of Eagar**'s** structure and responsibility for management operations. These procedures cover the management and control of both the SCEPP and the principal environmental aspects which the SCEPP manages.

Procedure:

The Town of Eagar may already have existing policies and procedures in place that set forth The Town of Eagar's standard operating procedures. The SCEPP Team should review existing policies and procedures to determine if they are current and if additional policies and new procedures must be developed. The SCEPP Team should follow a process to identify all environmental aspects and Environmental Management Programs.

Operational Control Procedures Direct Personnel Work Activities:

Operational control procedures stipulate operating criteria to ensure operations and activities are carried out appropriately. *7.01 F1 Form for Operational Control Procedures Registry* lists all operational control procedures for management of the SCEPP and operations with potential for significant environmental impact; and also presents the operational controls associated with established environmental management programs (EMPs). A list of corresponding procedures used to implement aspect operations and environmental management programs should then be developed and recorded using 7.01 F3 Form for Assessing Facility Operations & Procedures..

Within each responsible department, separate and distinct regulated facility operations exist.

Regulated facility operations may include:
1) Wastewater Treatment Plant
2) Public Drinking Water System
3) Fleet Management

A facility assessment should identify existing procedures; if they are adequate or need updating; and if a new procedure should be written. Not all missing procedures must be developed all at once. Environmental Management Programs can be created to develop operational control procedures where gaps exist. The needed procedures should be prioritized and the procedures written on a schedule that is appropriate for the community.

Use [7.01 F3 Form for Assessing Facility Operations & Procedures](#) to assess facility operations. A separate form should be used to assess each department's facility operations. Use the results of the SCEPP Guidance Self-Assessment Questionnaire and [4.01 F3 Form for Assigning Impacts to Aspects and Determining Significance](#) developed in Section 4, to aid in identifying all activities related to a department's facility operations,

The results of the facility assessment and subsequent priority ranking will allow management to create Environmental Management Programs to address as many procedures of concern as can be reasonably handled. When those are completed, the additional procedures can be addressed. The facility assessment should be reviewed <u>annually</u>.

Organizational Structure and Responsibilities (SCEPP Team):

The SCEPP must identify organizational structure and responsibility for management of operations including roles, responsibilities, and authorities for all personnel. The SCEPP Team ensures that the resources (e.g., budget and personnel time) required for implementing and controlling the SCEPP are provided.

A key component of responsibility is identifying the SCEPP Coordinator with primary responsibility for establishing, operating, and maintaining the SCEPP. The SCEPP Coordinator is the leader of the SCEPP Team. The SCEPP Team provides routine SCEPP support and reports directly to the SCEPP Coordinator. A list of roles and responsibilities is available in *[7.01 F2 Form for List of Organizational Structure & Responsibilities.](#)*

Operational Control Procedures:

Operating procedures and work instructions function as a mechanism to control a facility's environmental aspects. Therefore, they are also called "operational controls."

<u>Procedures</u> are usually at a higher level in the document hierarchy, more general, and applicable to a larger audience.

<u>Work instructions,</u> also called "standard operating procedures", are applicable to a specific task or process.

The development of operating procedures and work instructions should focus on the following:

1. The SCEPP team must ensure they conform to the SCEPP requirements including compliance with environmental regulations.

2. The operating procedures and work instructions should be written by the department that oversees the operation.

3. Employees who are going to be involved in the activities or processes should be trained on the procedures or work instructions.

4) Operational control procedures must explicitly describe how environmental management activities will be implemented.

5) Operational control procedures must link operations to significant environmental aspects, significant impacts, the environmental policy, objectives and targets.

Final review of The Town of Eagar's operating procedures should be made by the SCEPP Coordinator, while departmental management should sign off on them. The work instructions should be signed by each department's supervisor and acknowledged by employees who are going to implement the procedures.

Writing Operational Controls:

To direct the responsible departments to write their own operational controls, it is necessary for the SCEPP Team to develop a procedure for writing the general operational controls. The procedure also provides direction on writing operating procedures or work instructions for any operation which if uncontrolled, would have a detrimental effect on the environment.

Operational Controls should also include the following:
1) Responsibility – who does the procedure or instruction apply?

2) Purpose and Scope – what specific process or activity does the procedure or instructions apply?

3) The operational steps for the process itself.

4) Emergency Response – what the user has to do if operating parameters are exceeded, or what effect will occur if the procedure or instruction is not followed? What regulatory agency or agencies must be notified in the event of an emergency?

5) Records – what kind of environmental record is generated as a result of implementing the procedure or instruction?

7.01 F1 Operational Control Procedures Registry

SCEPP OPERATIONAL CONTROL PROCEDURES REGISTRY	Document Control Number
Small Community Environmental Protection Plan	**SCEPP/1.00**
Good Faith Commitment	SCEPP/1.01
Environmental Policy	**SCEPP/2.00**
Procedure for Developing an Environmental Policy	SCEPP/2.01
Scope of Operations Covered by the SCEPP	**SCEPP/3.00**
Procedure for Identifying Scope of the Operations Covered by the SCEPP	SCEPP/3.01
Environmental Aspects and Impacts, Objectives and Targets	**SCEPP/4.00**
Procedure for Identifying Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets	SCEPP/4.01
Legal and Other Requirements	**SCEPP/5.00**
Procedure for Identifying Legal and Other Requirements	SCEPP/5.01
Environmental Management Programs (EMP)	**SCEPP/6.00**
Procedure for Establishing Environmental Management Programs	SCEPP/6.01
Collection System O&M	**6.01 a**
Construction Design	**6.01 b**
Wastewater Treatment	**6.01 c**
Storm Water Pollution	**6.01 d**
Equipment Maintenance	**6.01 e**
Safe Drinking Water	**6.01 f**
Operational Control & Organizational Structure and Responsibilities	**SCEPP/7.00**
Procedure for Establishing Operational Controls & Organizational Structure and Responsibilities	SCEPP/7.01
Department Procedures	**SCEPP7.02**
	SCEPP/7.03-1
Training, Awareness and Competency	**SCEPP/8.00**
Procedure for SCEPP Awareness and Competency Training	SCEPP/8.01
Communications & Stakeholders Registry	**SCEPP/9.00**
Communications & Registry of Stakeholders Procedures	SCEPP/9.01
Document Control	**SCEPP/10.00**

7.01 F2 Form for List of Organizational Structure & Responsibilities

Responsibilities	Governing Body (Mayor & City Council)	SCEPP Manager *Bruce Ray	HR Manager *Eva Wilson	Operator *Milt Nelson	Finance. *Katie Brady					
SCEPP Audit and Review	X	X	X	X	X					
Obtain and Maintain Permits				X	X					
Coordination of SCEPP training requirements		X		X						
Maintain SCEPP Manual		X		X						
Wastewater Compliance		X		X						
Coordinate Emergency Response		X		X						
Identify environmental aspects of operations		X		X						
Establish objectives and goals		X		X	X					
Maintain SCEPP records		X		X						
Coordinate document maintenance and control		X	X	X	X					
Maintain maintenance records				X						

* Responsible for reporting Violations

7.01 F3 Form for Assessing Facility Operations & Procedures

Aspect /Activity	Environmental Activity	Existing Written Procedure	Updating Required	New Written Procedure Needed	Assigned To	Priority Ranking	EMP Due Date
Safe Drinking water	Water Quality Monitoring and Reporting to ADEQ on Approved Forms	No	N/A	Yes	Milton Nelson	H	Jan, 31 2015 with annual review
Wastewater Treatment	Plant Operations	Yes	Yes	Yes	Milton Nelson	H	The first of each Quarter
Safe Drinking Water / Waste Water Treatment / Heating with Used Oil	Emergency Operations Plan (EOP)	Yes	Yes	No	Milton Nelson	H	Annual Review by January 1
Safe Drinking Water/ Waste Treatment	Equipment Maintenance	Yes	No	No	Milt Nelson Shawn Peters	H	July 1 Annual review
Storm Water Pollution	Prevent Run off	No	Yes	Yes	Milt Nelson Shawn Peters Elwin Browning	H	September 1, 2014
Safe Drinking Water / Waste Water Treatment	Licensed Certified Operator with Proper Grade	Yes	N/A	Yes	Milton Nelson	H	Annual July 1
Drinking water/Waste water Engineering reviews	Approval to Construct obtained for new, expansion and/or modification prior to Beginning construction	Yes	N/A	No		M	July 1, 2014
Any and all of the above	Capital Improvement Plan (CIP) includes maintenance, replacement costs, future expansion and/or modifications and rates	See Budget Documents	N/A	Yes	Bruce Ray	H	Annually by June 30.
Heating with Used Oil	Land and Air Pollution	yes	As needed	NO	Bruce Ray	L	January 1, Each Year
Drinking Water	Sampling Procedures	yes	yes	No	Milt Nelson	H	Annual Review July 1

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Waste water Sampling	Sampling Procedures and SMRF	yes	yes	No	Milt Nelson	H	Annual Review July 1

8.01 Procedure for SCEPP Awareness and Competency Training

The Town of Eagar identifies, plans, monitors and records awareness and competency training needs and delivery for all personnel. **The Town of Eagar** has a procedure to ensure effective and timely training for employees at all levels to ensure awareness of:

- the importance of conformance with the environmental policy;
- the implementation of environmental management procedures and the SCEPP;
- the actual and potential significant environmental impacts of their work activities;
- the environmental benefits of improved personal performance;
- their own roles and responsibilities for achieving conformance with the policy and procedures, and with the requirements of the SCEPP; and
- the potential consequences of departure from specified operating procedures.

The SCEPP Manager Bruce Ray is responsible for all training records. Records are to be monitored and reviewed on a scheduled basis annually. Supervisors determine competency as outlined in environmental control procedure

Description:
SCEPP implementation includes training for personnel on both general awareness and competency. Awareness training ensures that all personnel are familiar with the environmental policy and the relevance of the SCEPP, including the potential significant environmental impact of their work activities. Additional competency training addresses environmental procedures that are *specific* to personnel work activities. All personnel receive appropriate training based on a delivery procedure that matches training requirements with personnel job descriptions and work activities.

There are two basic types of environmental training for a SCEPP:

1) Awareness training for all employees including the governing body, if applicable.

2) Competency training for those whose jobs affect the organization's ability to meet its objectives and targets including legal/regulatory compliance.

Procedure:
- Develop a standard environmental awareness training program for all employees.
- Assemble a list of technical training requirements for the operational control procedures (include initial training and ongoing or refresher training requirements).
- Assemble a list of all staff that will play a role in the SCEPP implementation. The list of environmental aspects and significant impacts in Section 4 Identifying Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets can be used to complete this task.
- Determine the type of training needed for each personnel category and job function. It is important to recognize that the *governing body may also need training* (as well as awareness training), since the governing body is involved in the annual Management Review process.
- Create a Training Matrix with training needs along one-axis and employee groups to be trained along the other. Use the 8.01 F1 Form for Preparing Environmental Training Requirements & Delivery Log to identify staff who should receive training.
- Prepare a training schedule for initial and continuing training.

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- Include provisions for employees transferred to different positions and new hires.
- Deliver SCEPP awareness training to all staff and technical training as required.
- Maintain appropriate records regarding staff that received training, and the content of the training they received.

Training material should include a description of the SCEPP and Environmental Policy, and describe why it is important to the organization, and the role of each employee in its implementation and continuous improvement.

8.01 F1 Environmental Training Requirements & Delivery Log

Training Required	Description	Mandatory Attendance	Frequency	Date Completed
SCEPP Awareness	Introduction to SCEPP and Environmental Policy	All	Annually / Date of Hire for new Employee	
Storm Water Pollution Prevention	Procedures and Responsibilities	Waste Water Collection Staff	Annually / Date of Hire for new Employee	
Emergency Response	Procedures and Responsibilities	All	Annually / Date of Hire for new Employee	
OSHA	Required Certifications	Collections Staff	Every 3 Years	
Plant Operations	Required Process Controls	Plant Staff	6 months	
Collection Systems Procedures	Required procedures and practices	Collections Staff	6 months	
Environmental Audit	Environmental Audit Procedures	SCEPP manager and team	Annually	
Annual SCEPP Audit	SCEPP Audit Procedures	SCEPP manager and team	Annually	

9.01 Communications & Registry of Stakeholders Procedure

<u>Communications</u>

The Town of Eagar has established and is maintaining a procedure for internal and external communication relating to the SCEPP as described by this operational control procedure.

<u>Description</u>:
This procedure describes the process for:

1) <u>Internal</u> environmental communications/awareness.

2) <u>External</u> environmental communications with interested parties (outside stakeholders).

External communication includes all written or electronic correspondence, telephone, conversations and oral discussions or meetings with external parties. An organization should consider processes for communicating externally on its significant environmental aspects and record its decisions.

<u>Procedure</u>:
- <u>Internal</u> environmental communications will ensure that those personnel at each relevant level and function are aware of:
  1) the SCEPP and Environmental Policy;
  2) the importance of conformance with the Environmental Policy;
  3) all operational control procedures; and
  4) individual responsibilities for achieving environmental objectives and targets.

- <u>External</u> Environmental Communications ensure that:
  1) The SCEPP and Environmental Policy are available to all stakeholders.
  2) External Communication concerning the environmental aspects covered by the SCEPP is directed to the SCEPP Manager.
  3) The SCEPP Manager or designee is responsible for determining the need for, and preparation of, any notification to regulatory agencies.

- <u>General Guidelines</u>:
  1) Department Managers must keep records of their own internal communications
  2) The SCEPP Manager maintains records of *external* environmental communications with interested parties and the media.
  3) The SCEPP Manager maintains environmental records including the document control of the SCEPP Manual of Policies, Procedures and Forms.

<u>Communications Distribution Plan</u>:

A communications distribution plan involves identifying what tools are available and will be used for communications and what information should go to what audience. The <u>Registry of Stakeholders</u> should be part of the communications distribution plan.

<u>Internal communications distribution may include</u>:
- Interoffice memorandum

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- E-mail
- Company Newsletter
- Posted notices on bulletin board
- Suggestion Boxes
- Intranet or internal electronic site accessed by staff only

External communication distribution may include:
- Neighborhood hotline for questions or complaints regarding a facility
- Press releases on environmental activities
- Open house for the community and the employees' families
- Facility tours for the public
- Sponsorship of community events
- Participation in local actions targeting the environment
- Presentations in workshops, conferences, and schools
- Membership and involvement in industry associations and chamber of commerce
- Correspondence with regulating agencies
- Community's Internet website

Preparing a Registry of Stakeholders

Procedure:
Include the entire SCEPP Team in this process to ensure that all possible stakeholders are identified.

Stakeholders: Organizations or individuals with an interest in the environmental performance of the operations covered by the SCEPP.

Note: A Stakeholder can be from *inside* the organization or *outside* public interest groups, individuals and regulators.

Regulatory and Other Requirements: Anything regulated and/or any requirements outlined in legal contractual agreements, or as part of internal policy, should be included in the Registry.

1) Use 9.01 F1 Form for Preparing a Registry of Stakeholders to list all stakeholders with an interest in the environmental performance of the operations covered by the SCEPP. This list should also include a list of contacts for self-disclosing violations.

2) Describe the nature and structure of the stakeholder group.

3) Identify the environmental expectations for each stakeholder group.

4) Identify if the environmental expectation includes regulatory and other requirements. (The response can be Yes, No, or Unknown.)
   - Create an action item for all categories where the answer is "Unknown" and assign staff to investigate and report back.

5) Use the Communications Distribution Plan to identify and expedite communications with stakeholders.

9.01 F1 Registry of Stakeholders

Name of Stakeholder Group	Description of Stakeholder Group	Description of Environmental Expectation	Contact for Self Violation Reporting	Regulatory or Other Requirement?
Local Residents, Businesses and School District	Residents and businesses in the community including individual Water and Sewer Customers, rate payers.	Provision of services in a way that causes the minimum of environmental degradation	All Users	Yes
Employees	All permanent and temporary employees of the Town	A work environment and work activities that respect and preserve the environment	All Town Employees	YES
Suppliers and Service Providers (Vendors)	Companies from which the Town purchases products or services	Access to environmental information and freedom to complete to provide products and services in a fair process	Maintain spread sheet in Operators office. Update as needed	YES (Fair competition for Service Providers)
Local Police & Fire Departments	Police and fire regulations	Ensure compliance with all local environmental regulations which should also be part of *Emergency Preparedness and Response*	Local, County and Sate Law enforcement agencies	YES
US Forest Service	USDA	Land maintenance for the Spring Line	Local Ranger District	Yes
ADEQ	State regulators and compliance officers focusing on environmental compliance	Maintenance of required environmental permits and regulatory compliance	ADEQ	YES
OSHA	Health and safety regulatory compliance enforcement	Compliance with health and safety regulations	OSHA	YES
US EPA	Federal regulators and promoters of environmental performance	Compliance with Federal regulations and participation in environmental programs	US EPA	YES
US DOE	Promoters of energy efficiency and renewable energy resources	Continual Improvement in energy use	US DOE	NO

10.01 Document Control Procedures

The Town of Eagar has established and is maintaining information to describe the core elements of the SCEPP. All SCEPP related documents are referenced in the SCEPP manual, and copies of SCEPP documents can be obtained from the SCEPP Manager, **Bruce Ray** or designee, upon request.

The SCEPP requires extensive documentation. Document control procedures are implemented to ensure that all personnel have access to appropriate SCEPP documentation and that out-dated documents are replaced and only current versions are used. SCEPP documentation may be maintained in electronic and/or hard copy form. In either case this procedure is to be applied to ensure appropriate access to and control over the SCEPP documentation including all revisions.

The Town of Eagar has established this document control procedure for controlling all documents relevant to the SCEPP. This procedure describes where documents are located and how and when they are reviewed. The procedure ensures that current document versions are available and that obsolete versions are removed from use or properly identified. Controlled documents are maintained in an orderly manner and can be obtained from the SCEPP Manager Bruce Ray or designee. A list of controlled documents is provided in 10.01 F1 Form for Preparing a Master SCEPP Document Control Index.

<u>Procedure:</u>

1) The SCEPP Manager assembles and manages all environmental documentation.

2) Develop additional environmental documentation as required based on this guidance. This includes SCEPP responsibility, training and other SCEPP elements.

3) Use 10.01 F1 Form for Preparing a Master SCEPP Document Control Index to maintain an index of SCEPP documents and revisions. All revisions made to original SCEPP documents and forms must be recorded and tracked.

4) Also see the completed Section 7**,** Operational Control Procedures Registry.

This SCEPP manual is a controlled document in accordance with this document control procedure. Each page of a controlled document will have the following footer.

Document Control No. 0.00	Original Date: 00/00/0000	Revised Last Date: 00/00/0000	Approved by:
Document Title:			Total Pages: Page X of Y

Upon approval by the governing body and the SCEPP Team, the SCEPP Manager, Bruce Ray**,** or designee, shall issues revisions/updates to the SCEPP manual. All copies of this SCEPP manual or other SCEPP documentation that are <u>not</u> marked with the appropriate footer are uncontrolled and are to be used for reference purposes only.

As a general rule, procedures that are in effect are considered to be documents; whereas procedures that have been superseded by/with updated information become records

10.01 F1 Form for Preparing a Master SCEPP Document Control Index

Document Control Number	Document Name	Date of Current Version	Location
Document			
2.01	Environmental Policy	12/02/2010	Mgr's Office=
3.01 F1	List of Operations covered by the SCEPP	03/21/2012	Public Works
4.01 F3	List of Aspects, Significant Impacts, Objectives and Targets	03/21/2012	Public Works
5.01 F1	List of Legal and Other Environmental Requirements	03/21/2012	Public Works
6.01 F2	Register of Environmental Management Programs		
7.01 F2	Operational Control & Organizational Structure and Responsibilities (SCEPP Team)	9/23/2010	Public Works
8.01 F1	Training Awareness and Competency	03/20/2012	Public Works
9.0	Communications & Registry of Stakeholders	10/22/2010	Public Works
10.01 F1	Document Control	12/02/2010	Public Works
11.01 F1	Environmental Records Control	03/20/2012	Public Works
12.01	Emergency Preparedness and Response	10/03/2010	Public Works
Procedures – Also See Operational Control Procedures Registry (Section 7)			
3.01	Procedures for Aspects, Significant Impacts, Objectives and Targets	03/21/2012	Public Works
5.01	Procedures for Legal and Other Environmental Requirements	03/21/2012	Public Works
6.01	Procedures for Environmental Management Programs	03/21/2012	Public Works
8.01	Procedures for Awareness and Competency Training	09/23/2010	Public Works
9.01	Communications Procedures	03/20/2012	Public Works
10.01	Document Control Procedures	03/20/2012	Public Works
11.01	Environmental Records Control Procedures	03/20/2012	Public Works
13.01	Nonconformance, Corrective and Preventive Actions	03/21/2012	Public Works
14.01	Environmental Audit Procedures	03/21/2012	Public Works
15.01	SCEPP Compliance Audit Procedures	09/22/2010	Public Works
16.01	SCEPP Governing Body Management Review	09/22/2010	Public Works
Forms			
4.01 F3	Environmental Aspects, Impacts, Objectives and Targets	03/21/2012	Public Works
15.01 F1	Audit Sheet	09/22/2010	Public Works
15.01 F1	Audit Plan	09/22/2010	Public Works
13.01 F2	Corrective and Preventive Action Request	03/21/2012	Public Works
15.01 F4	Protocol for Investigating and Correcting SCEPP Nonconformance	09/22/2010	Public works

11.01 Procedure for Environmental Records Control

The Town of Eagar has developed this operational control procedure to ensure that all environmental records relevant to the SCEPP including training records, results of audits and reviews are recorded, legible, identifiable, traceable, readily retrievable, and protected against damage, deterioration or loss.

Record and documentation retention are also specified in this procedure. Individual departments maintain environmental records using the SCEPP procedure. Retention timeframes can be found in federal and state rules and regulations. **The Town of Eagar's** relevant records is provided in 11.01 Environmental Records Control List.

This procedure is followed to establish and maintain control procedures for identifying, maintaining and disposing of environmental records.

An operational control procedure should be developed to ensure that all environmental records relevant to the SCEPP including training records, results of audits and reviews are recorded, legible, identifiable, traceable, readily retrievable, and protected against damage, deterioration or loss. This operational control procedure ensures that environmental records are correctly identified, maintained and disposed of.

<u>Procedure</u>:
Environmental records are maintained in an archive so as to be retrievable as needed.

Records are preserved and archived for retrieval as needed based on the following:

1) Include records of all data and information required by Environmental Management Programs such as training records, results of audits and reviews, copies of monitoring (sampling) and reporting analytical results, expired permits, construction approvals, and inspection results.

2) Ensure that environmental records are legible, identifiable and traceable to the operation/activity.

3) Ensure that environmental records are stored and maintained so they are readily retrievable and protected against damage, deterioration or loss.

4) Ensure that the retention times of environmental records have been established, recorded and communicated to staff.

As a general rule, procedures that are in effect are considered to be documents; whereas procedures that have been superseded by/with updated information become records.

11.01 F1 Form for Preparing Environmental Records Control List

NO.	Record Type	Person Responsible	Location	File Method	Retention Minimum
1.0	**ADMINISTRATIVE**				
	Purchasing	B. Ray	Admin Office	Paper	6 years
	Auditing	B. Ray	Admin. Office	Paper	Permanent
	ADEQ Licensing	B. Ray	Admin. Office	Paper	10 years
	In- House Training	B. Ray	Admin. Office	Paper	6 years
2.0	**ENVIRONMENTAL**				
	Compliance Violation Reports	B. Ray	Admin. Office	Paper	10 years
	SCEPP Meeting Minutes	B. Ray	Admin. Office	Paper	5 years
	Customer Complaint Reports	B. Ray	Admin. Office	Paper	10 years
3.0	**WASTE WATER Monitoring & Reporting Data**				
	Compliance Monitoring Reports	M. Nelson	Admin. Office	Paper	10 years
	Operational Reports	M. Nelson	Admin. Office	Electronic	10 years
	Laboratory Sampling & Testing	M. Nelson	Lab Office	Paper	10 years
4.0	**COLLECTION SYSTEMS Monitoring Data**				
	Equipment Maintenance Reports	B. Ray	Supervisor's Office	Paper	10 years
5.0	**Safe Drinking Water**				
	Compliance Monitoring Reports	N. Nelson	Admin Office	Paper	12 Years
	Operational Reports	N. Nelson	Admin Office	Electronic	12 Years
	Laboratory Sampling & Testing	N. Nelson	Lab Office	Paper	12 Years

12.01 Procedure for Emergency Preparedness and Response Plans

The Town of Eagar SCEPP includes Emergency Preparedness and Response Plans developed using this environmental control procedure. The SCEPP Team reviews emergency plans annually and following any accidents or emergency situations that occur.

This procedure is used to establish plans to prepare for and respond to emergency events with the potential for significant environmental impacts.

Emergency Preparedness and Response Plans identify the potential for and response to environmental accidents and emergency situations as well as the prevention and mitigation of environmental impacts if accidents do occur. **The Town of Eagar** has already developed emergency response procedures addressing an emergency, spill or fire, and meet OSHA, EPA, and fire department requirements. The SCEPP team should ensure that an appropriate emergency response plan is established and maintained to adequately prepare, respond to, and mitigate accidents, spills, fires, or other emergency situations, and that regulatory agencies are notified as required. Local police, fire and health services staff should be included in the development of the community's Emergency Preparedness and Response Plans.

Refer to the *SCEPP Guidance Manual* for other emergency plans that may be required for specific operations conducted by the community.

The SCEPP Manager, supported by the SCEPP Team, is responsible for identifying and quantifying environmental risk and implementing plans to avoid the occurrence of emergency events and to mitigate the environmental impacts associated with emergency events that do occur.

The SCEPP Manager supports operational managers in the development and maintenance of *Emergency Preparedness and Response Plans* addressing risks as required by local, state and federal regulations.

The SCEPP Manager ensures the preparation and delivery of training for all personnel as required by the training matrix developed in Section 8 8.01 F1 Form for Preparing Environmental Training Requirements & Delivery Log.

For each emergency incident that does occur, the SCEPP Manager and other relevant personnel use the procedures to evaluate the required response, and take action to minimize the likelihood of its recurrence, and to notify stakeholders if the emergency impacts public health and the environment. Refer to Section 9 Communications & Registry of Stakeholders, and the completed Communications Distribution Plan to notify stakeholders.

Emergency Response/Vulnerability Assessment Plan for Water has been developed and is maintained in the Town Clerks office and Public Works Office.

13.01 Procedure for Nonconformance, Corrective and Preventive Actions

The Town of Eagar has developed and implemented this procedure to define responsibility and authority for handling and investigating occurrences of nonconformance with the requirements of the SCEPP. This includes taking action to mitigate significant environmental impacts, and initiating and completing corrective and preventive actions. Any changes in procedures resulting from corrective and preventive actions are implemented and recorded. The SCEPP Manager, Bruce Ray maintains these records.

The SCEPP must establish a continuous management level review process that identifies and corrects nonconformance from the SCEPP and takes actions to prevent recurrence.

This procedure is used for implementing corrective and preventive actions.

The procedures:
1) Define responsibility for taking the results of monitoring and measuring and auditing, using them to determine what, if any, corrective and preventive actions need to be implemented.

2) Specify what corrective and preventive actions will be taken when nonconformance is discovered outside of the monitoring or auditing procedures – such as when a spill or accident occurs or notice of noncompliance is issued by a regulatory agency.

3) Specify how corrective and preventive actions will be documented so that changes to the SCEPP (i.e., continual improvement) can be demonstrated.

Applicable Definitions:

Corrective action is generally a reactive process used to address problems after they have occurred. Corrective action may be triggered by a variety of events, including internal audits and management reviews; neighbor complaints; results from routine self-inspection; monitoring and measurement; spills and emergencies; or a notice of noncompliance from a regulatory agency.

Preventive action is generally a proactive process intended to prevent potential problems before they occur or become more severe. Preventive actions focus on identifying negative trends and addressing them before they become significant. Events that might require preventive action include monitoring and measurement; trend analysis; tracking of progress on achieving objectives and targets; root cause determination for near misses; and customer or neighbor complaints.

Procedure:

The SCEPP Manager is responsible for reviewing issues affecting the SCEPP; the application and maintenance of this procedure; and any updates to the SCEPP documents affected by the preventive and corrective actions.

The SCEPP Manager is responsible for logging the communications and recording solutions. Department and facility managers must monitor and verify the effectiveness of the solution. The SCEPP Manager is responsible for overall tracking and reporting on preventive and corrective actions.

Responsible personnel must institute required corrective or preventive action; report completion of the required action to the SCEPP Manager; and assure sustained effectiveness. Use 13.01 F2 Form for Corrective Action Request & Response to initiate a corrective action.

Initiating Corrective or Preventive Action:
1) Any employee may initiate a corrective or preventive action. The employee is responsible for bringing the problem to the attention of department or facility manager, or the SCEPP Manager. The SCEPP Manager is responsible for determining whether action is required and records the appropriate information. Responsibility for resolving the problem is assigned to a specific individual.

2) The SCEPP Manager, working with the department or facility manager, determines an appropriate due date for resolving the issue.

Determining and Implementing Corrective and Preventive Actions:
1) The relevant personnel must investigate and resolve the problem and communicate the corrective or preventive action taken to the SCEPP Manager.

2) If the relevant personnel cannot resolve the problem by the specified date, he/she is responsible for determining an acceptable alternative due date with the SCEPP Manager.

Tracking Corrective and Preventive Actions:
1) The SCEPP Manager is responsible for issuing a weekly report to the responsible personnel detailing any overdue action and request an explanation.

2) Records of actions should be maintained for at least two-years after completion of the corrective action or preventive action unless a different retention period is specified by rules or regulations.

Tracking Effectiveness of Solutions:
1) The relevant personnel are responsible for verifying the effectiveness of the solution. If the solution is deemed not effective, a new corrective action must be issued to the relevant personnel.

This information is recorded in the 13.01 F1 Form for Preparing Corrective and Preventive Action Tracking Log, and is given a document control number.

13.01 F1 Form for Preparing Corrective and Preventative Action Tracking Log

N0.	Requested By	Issued To	Date of the Request	Corrective Action Completed Date	Effectiveness Verified Date	Closed Date

13.01 F2 Form for Corrective Action Request & Response

Corrective Action Request and Response:		
Major	**Threat to Public Health or Environment**	**Minor**
Corrective Action Requested By (Name & Title)**:**		**Date:**
Description of the Problem:		
Corrective Action Plan (include a completion date):		
Response to Request for Corrective Action:		
Preventive Action Taken:		
Responsible Person (Name & Title)**:**	**Completion Date:**	
Corrective Action Verified By:	**Date Verified:**	

14.01 Procedure for Environmental Compliance Audit

The Town of Eagar has established an annual environmental compliance audit program to monitor regulatory requirements. A report of the internal audit of regulatory compliance is submitted to the governing body on a yearly basis.

Regulatory monitoring, record keeping and reporting must also be maintained according to regulatory requirements for all *relevant activities* and reviewed on a *regular basis.* These records and periodic reviews must be included in the environmental compliance audit plan.

Environmental Regulatory Major or Minor Violation Identified:

Receipt of a *formal or informal enforcement action* and/or identification of any major or minor violation of environmental regulatory requirements indicate a problem may exist with the SCEPP, either as written, and/or with implementation of the SCEPP. An environmental compliance audit should aid in identifying why the SCEPP failed to prevent regulatory violations and provide insight on improving the SCEPP.

Procedure:

This environmental compliance audit plan is similar to an overall SCEPP audit as described in **Section 15**, *SCEPP Audit*, except that this audit focuses only on environmental regulatory compliance.

The environmental compliance audit plan defines the objectives of an audit and specifies what is to be accomplished by the audit. Primarily, the audit's goal is to evaluate the extent of conformity of the facility's SCEPP environmental regulatory compliance**,** as well as the potential improvement of the SCEPP. The plan should ensure that all regulatory elements are covered in the evaluation.

The audit plan should be reviewed and revised as necessary. An environmental regulatory compliance audit should be conducted annually, or upon a change in regulatory requirements or process changes. A good time to review the audit plan would be after completing the audit as a final task of the audit team.

An environmental compliance audit plan defines the process for scheduling, conducting, and reporting the audit results. It specifies what areas will be audited, when, and by whom.

Develop procedures for all areas in which federal, state and local regulatory compliance is required. Use the operational control procedures and work instructions developed under Section 7 Operational Controls & Organizational Structure and Responsibility to establish compliance audit procedures. The audit criteria are specified in the audit plan.

The Audit Plan procedures include:

1) **Audit Schedule**
An SCEPP audit plan defines the process for scheduling, conducting, and reporting the compliance audit results. It specifies what areas will be audited, when, and by whom.

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2) Audit Team

An audit team should be appointed with a designated lead auditor and additional audit team members, as deemed necessary. Members must be competent and have appropriate audit training. A lead auditor is appointed when the team consists of more than one auditor. The appointment of an audit team comes with the clarification of the roles and responsibilities of each team members.

3) Documentation

To conduct an audit, the auditors must obtain copies of all environmental regulatory compliance documented procedures, training records, or other materials relevant to the audit. They will review documentation for the audited area, examine past audits, and the SCEPP Audit Sheet for performing the audit.

The 14.01 F1 Form for Preparing Environmental Compliance Audit Plan may require modifications in order to meet the needs of our community's facility-specific operations.

These instructions cover the following SCEPP environmental regulatory compliance elements:

1) environmental Regulatory Major or Minor Violations Identified including receipt of any formal or informal enforcement actions from a regulatory agency;
2) operational control procedures and work instructions;
3) employee training and tracking;
4) internal and external communications;
5) emergency Preparedness and Response Plan;
6) records and recordkeeping;
7) prior SCEPP environmental regulatory compliance audits; and
8) audit Summary.

Corrective Actions

Use the procedures and forms developed in Section 13 Nonconformance, Corrective and Preventive Action to address corrective actions identified in the environmental regulatory compliance audit.

14.01 F1 Form for Preparing Environmental Compliance Audit Plan

AUDIT SCHEDULE

Department to be Audited	Operation to be Audited	Lead Auditor	Audit Team Members	Scheduled Date	Notes

1) ENVIRONMENTAL REGULATORY MAJOR OR MINOR VIOLATION IDENTIFIED

Identification of any major or minor violation of environmental regulatory requirements indicates that a problem exists with the SCEPP, either as written, and/or with implementation of the SCEPP. The following should aid in identifying why the SCEPP failed to prevent regulatory violations and provide insight on improving the SCEPP.

#	Questions	Yes	No	Notes
1.	Have violations been identified in compliance inspection reports? If so, by what regulatory agency? What is the status?			
2.	Have any Notices of Opportunity to Correct (NOC) been issued? If so, by what regulatory agency? What is the status?			
3.	Have any Notices of Violation (NOV) been issued? If so, by what regulatory agency? What is the status?			
4.	Have any other citations or orders been issued for violation of environmental rules and regulations. If so, by what regulatory agency? What is the status?			

2) OPERATIONAL CONTROL

The audit attempts to ensure that written operational procedures and work instructions represent current practice, and that all operations associated with environmental regulatory compliance are addressed in the procedures and work instructions.

#	Questions	Yes	No	Notes
1.	Have procedures and work instructions been written for all regulated operations?			
2.	Do procedures and work instructions monitor all regulated operations?			
3.	Do the procedures and work instructions ensure that the operations remain within acceptable operational parameters?			
4.	Do the procedures and work instructions include provisions to implement prompt corrective action if a deviation occurs?			
5.	Do the procedures and work instructions mandate a review of records and reports associated with all regulated operations?			

3) EMPLOYEE TRAINING & TRACKING

The purpose of auditing this element is to ensure that training has taken place, and employees have been trained properly, verify that training documentation has been developed and maintained, and has been kept current with respect to any hiring, departures, reorganizations, or new environmental regulatory requirements.

#	Questions	Yes	No	Notes
1.	Have procedures been developed to identify and track the environmental training needs of all personnel who have responsibility for processes related to environmental regulatory compliance?			
2.	Do the training and tracking procedures contain provisions to identify the type and frequency of training?			
3.	Do the procedures identify who needs training?			
4.	Do the procedures contain mechanism to track training of employees?			
5.	Do the procedures contain provisions for review and updating training requirements?			
6.	Do the procedures include appropriate training required as they relate to legal requirements? (Such as: ADEQ, CWA, AQ, RCRA, SPCC, SWPPP, OSHA, etc.)			
7.	Do the training and tracking procedures include provisions to require employee training on the SCEPP procedures?			
8.	Do the procedures contain provisions to require training for new employees that informs them			

	about the facility's environmental policy and about new employees' duties within the SCEPP?			

4) INTERNAL AND EXTERNAL COMMUNICATIONS

The purpose of auditing communications is to: ensure that the communication procedures are followed and documented and records maintained; find out how inquiries are documented and referred to appropriate personnel; did appropriate personnel respond to the inquiries; review the communication programs and verify that they are being implemented; and evaluate the effectiveness of the program. Has the community received any feedback, good or bad, regarding communication with stakeholders?

#	Questions	Yes	No	Notes
1.	Have communication procedures of the SCEPP been developed and implemented?			
2.	Do the procedures identify the method and type of communication?			
3.	Do the procedures identify the initiator and recipient of the communication?			
4.	Do the procedures mandate the documentation of the receipt and responses to inquiries?			
5.	Do the procedures contain a provision for referral of inquiries?			
6.	Do the procedures contain provisions for personnel to respond to inquires and document the response?			
7.	Do the procedures provide for review and updating for communication efficiency?			
8.	Do the procedures include a requirement that any changes to the SCEPP be communicated to the appropriate personnel?			
9.	Does the documentation system show that communication is being carried out according to the procedures?			

5) EMERGENCY PREPAREDNESS AND RESPONSE

The goal of this audit is to determine that the current emergency response plan(s), emergency identification, prevention, and mitigation programs, including any drills or equipment maintenance programs have been implemented and maintained. The review should include regulatory based and facility specific programs. Verify if facility changes have been reviewed for their impact on these programs. Find out if emergency response procedures are available and if personnel understand and are trained in their roles.

#	Questions	Yes	No	Notes
1.	Have procedures (and/or an emergency response plans) been developed to respond to and report accidents, spills, malfunctions, process upsets, and other emergency situations?			
2.	Do the procedures provide for notification and reporting of accidents, spills, fires, or emergency situations?			

3.	Do the procedures contain a provision to mitigate or clean-up related environmental impacts?			
4.	Do the procedures provide for investigation of causes of accidents and evaluation of effectiveness of the response?			
5.	Are regulatory requirements for the facility included in the procedures?			
6.	Have arrangements been made with the local emergency responders?			
7.	Have emergency response drills been conducted pursuant to the procedures?			
8.	Have emergency responders been adequately trained for emergency response actions?			
9.	Are emergency response instructions available in designated locations?			
10.	Is emergency response equipment maintained and employees trained on location and use?			
11.	Do the procedures contain a provision for a review and update to accommodate facility changes?			
12.	Does the documentation system indicate that all procedures for preparedness and response are implemented pursuant to the procedures?			

6) RECORDS and RECORDKEEPING

The audit should determine that the procedures for records and recordkeeping are appropriately developed, maintained, implemented and followed. Ensure that they are available and updated to accommodate facility changes. Verify that the record retention procedure is maintained and followed.

#	Questions	Yes	No	Notes
1.	Has a procedure for tracking records been developed?			
2.	Have the types of records to be retained been identified?			
3.	Has a system for record identification and indexing the records been developed?			
4.	Is there a procedure to remove obsolete records and record destruction?			
5.	Has a procedure for establishing reporting and recordkeeping been developed to document the environmental status of all activities?			
6.	Are there provisions to update the procedures to accommodate facility changes?			
7.	Does the documentation show that reporting and recordkeeping has been implemented according to the procedures?			

7) ENVIORNMENTAL COMPLIANCE AUDITS

The audit of this element is to ensure that overall SCEPP Environmental Compliance Audits are: conducted according to the procedure; audits are performed based on the established schedule; any nonconformance identified in current and past audits resulted in a corrective action that was referred, resolved and verified. Equally important is to verify that audit results were communicated to the governing body as part of the annual internal SCEPP Audit.

#	Questions	Yes	No	Notes
1.	Are procedures in place to perform an <u>internal</u> environmental compliance audit of all regulated operations?			
2.	Do the procedures explain the objective of the audit?			
3.	Do the procedures contain an audit schedule?			
4.	Do the procedures include a provision of methods of reporting audit results?			
5.	Does the documentation system indicate that procedures for the SCEPP Compliance Audit are implemented pursuant to the procedures?			
6.	Does the documentation system show that nonconformance issues are identified and referred to corrective action system?			
7.	Does the documentation system verify that nonconformance issues are promptly corrected?			
8.	Does the documentation system show that the audit results are communicated to the governing body?			
9.	Have the same violations identified in past *compliance inspection reports* been cited in later inspection reports?			
10.	Have the same violations identified in past *Notices of Opportunity to Correct* been cited in later Notices of Opportunity to Correct?			
11.	Have the same violations identified in past *Notices of Violation* been cited in later Notices of Violation?			
12.	Have the same environmental regulatory violations identified in past citations or orders been cited again in later citations or orders?			

8) **AUDIT SUMMARY**

The <u>internal</u> environmental compliance audit summary should address the following for each audit element:

1) Nonconformance issues identified during this audit.
2) Areas where nonconformance may exist but need further information for confirmation.
3) Areas of improvement that need to be pursued in regard to conformance with SCEPP requirements.

#	Element	Audit Comments & Corrective Actions
1.	Environmental regulatory major or minor violations identified	
2.	Operational controls: procedures and work instructions	
3.	Employee training and tracking	
4.	Internal and external communication	
5.	Emergency preparedness and response	
6.	Records and recordkeeping	
7.	Compliance with the past SCEPP environmental compliance audit requirements	

CORRECTIVE ACTIONS

Once the audit is completed, the findings will indicate whether the audit evidence conforms or does not conform to the audit criteria. The audit also provides recommendations for areas of improvement. The governing body, SCEPP Manager and SCEPP Team will review the audit conclusions and provide decisions and actions related to possible changes to environmental policy, objectives, targets, and other elements of the SCEPP consistent with the commitment to continual improvement.

Nonconformance can occur due to violations of any legal requirement, process upsets in a significant operation, or violations of SCEPP procedures (examples: work instructions, calibration, or record keeping and reporting requirements are not followed). This means that nonconformance can be detected through a SCEPP environmental compliance audit, but can also be detected by employees that discover a deviation from their daily activities.

Use the procedures and forms developed in **Section 13** *Nonconformance, Corrective and Preventive Action* to address the nonconformance issues identified in the environmental compliance audit.

15.01 Procedure for SCEPP Compliance Audit

SCEPP feedback is a mechanism for conveying information about how **The Town of Eagar** is doing in implementing its SCEPP. When nonconformance exists, a community needs to know the causes of nonconformance and the appropriate action to correct nonconformance. One of the mechanisms to gain feedback is through an SCEPP audit.

This procedure described steps necessary for planning a SCEPP audit, developing an audit procedure, and performing an SCEPP audit. When conducting an audit, the audit team may observe nonconformance issues and areas where nonconformance may exist but needs further information for confirmation. As part of the audit, the audit team will also recommend areas that need to be improved in order to conform to SCEPP requirements.

When nonconformance exists, corrective action needs to be conducted and describes the process for investigating and correcting nonconformance. The procedure contains provisions to initiate and complete corrective action and to review corrective actions for effectiveness.

SCEPP feedback represents an important part of the SCEPP cycle. Through SCEPP feedback, the governing body will be able to provide sound decisions and actions related to possible changes to environmental policy, objectives, targets, and other elements of the SCEPP consistent with the commitment to continual improvement.

The Town of Eagar shall conduct an annual internal SCEPP audit to ensure that the SCEPP has been properly implemented and is being maintained. Audits include a review of documentation and records, personnel interviews, and a review of the results from monitoring, including regulatory sampling and measurement.

The results of these audits are documented in a written report presented to governing body and the SCEPP Team for inclusion in the management review process. Audits are performed as described in this operational control procedure. The audit procedure covers the audit scope; frequency; methodologies applied; the responsibilities and requirements for conducting audits; and reporting the audit results. All auditors are properly trained, and the audit records are provided to the SCEPP Manager**, Bruce Ray,** for use in **The Town of Eagar's Mayor and City Council** management review process.

Description:
Our governing body must make a commitment to an annual comprehensive review of compliance with the SCEPP documented in a written report to be presented to the governing body and made available to the public and ADEQ

The outputs from SCEPP audits feed into two separate processes:

1) management review by the government body; and
2) corrective and preventive action.

SCEPP audit procedures must be developed and documented with goals that:

1) ensure that the procedures incorporated into the SCEPP are being followed; and
2) determine if the SCEPP itself requires revision or restructuring.

Procedure:

Audit Team Selection: One or more auditors comprise an audit team. When the team consists of more than one auditor, a Lead Auditor is designated. The Lead Auditor is responsible for audit team orientation, coordinating the audit process, and preparing the report.

The Lead Auditor prepares a written audit plan for conducting the audit using form 15.01 F1 Form for Preparing a SCEPP Audit Plan.

A pre-audit conference is held with SCEPP Manager and SCEPP Team and other appropriate personnel to review the scope, plan and schedule for the audit.

The Lead Auditor prepares the audit report, which summarizes the audit's scope and identifies the audit team. A summary of the results of the SCEPP Audit are described in 15.01 F2 Form for Preparing a SCEPP Audit Summary Sheet. A post-audit conference is held to present audit findings, clarify any misunderstandings, and summarize the audit results.

The SCEPP Manager communicates the audit results to the governing body. The SCEPP Manager with the governing body's approval executes follow-up actions as needed using form 15.01 F3 Form for Requesting & Responding to SCEPP Audit Finding (used like a work order).

The SCEPP Manager tracks the completion and effectiveness of corrective actions on the Section 13 form 13.01 F1 Form for Preparing Corrective and Preventive Action Tracking Log.

CORRECTIVE ACTION
Once the audit is completed, the findings will indicate whether the audit evidence conforms or does not conform to the audit criteria. The audit also provides recommendations for areas of improvement. The governing body will review the audit conclusions and provide decisions and actions related to possible changes to environmental policy, objectives, targets, and other elements of the SCEPP consistent with the commitment to continual improvement.

Nonconformance can occur due to violations of any legal requirements; process upsets in a significant operation; or violations of SCEPP procedure (examples are: work instructions, calibration, or record keeping and reporting requirements are not followed). This means that nonconformance can be detected in the SCEPP Compliance Audit, but can also be detected by employees that discover a deviation from their daily activities. Nonconformance may have been identified in prior Environmental Compliance Audits or prior SCEPP Compliance Audits and remain unresolved.

Use the 15.01 F3 Form for Requesting & Responding to SCEPP Audit Finding to address the corrective actions identified in the environmental compliance audit.

Use the procedures developed in Section 13 Nonconformance, Corrective and Preventive Actions to address the corrective actions identified in the SCEPP audit.

Planning an SCEPP Internal Audit: Audit Program and Audit Plan

An audit is a systematic and documented process for obtaining evidence. Many corporations and organizations have specific programs for conducting an audit of their operations. These audit programs include activities necessary for planning and organizing audits, resources needed to conduct audits, frequency and types of audits (e.g. quality audit, environmental audit, compliance audit, or joint audit). Based on this audit program, a SCEPP audit plan is written.

The term "systematic" in the definition of audit implies that the audit process is conducted based on an audit plan. The SCEPP audit plan specifies the scope or the extent and boundaries of a SCEPP audit. The audit scope defines the physical locations, organizational units, activities and processes to be audited, and the time period covered by the audit. SCEPP audits can be conducted by hiring a contractor as a third party auditor or through in-house staff. An internal audit *must be conducted annually*.

The term "evidence" in the definition of audit refers to records, statements of fact or other verifiable information relevant to the audit criteria. The audit criteria may include policies, procedures, operational controls, standards, laws and regulations, management system requirements, contractual requirements, or codes of conduct. The audit criteria are specified in the audit plan.

One basic requirement of all audits is that an audit must be independent. Independence refers to being free from bias and conflict of interest. A facility operations manager, finance manager, quality manager, or other functional managers who are free from responsibility for the activity being audited can be designated as members of the SCEPP audit team. The roles and responsibilities of the audit team members must be specified in the audit plan.

The audit plan defines the objectives of an audit and must specify what is to be accomplished by the audit. Primarily, **the audit's goal is to evaluate the extent of conformity of the community's SCEPP with audit criteria**, as well as the potential improvement of the SCEPP. The plan should ensure that all SCEPP elements are covered in the evaluation.

AUDIT SCHEDULE

Area or Department Audited	Function or Operation	Lead Auditor	Audit Team Member	Date	Special Instruction Notes

Audit team members must be competent and have appropriate audit training. A Lead Auditor is appointed when the team consists of more than one auditor. The appointment of audit team comes with the clarification of the roles and responsibilities of each team members.

The audit dates are scheduled in such a way to ensure that all SCEPP elements and related operations are audited at least once a year. The audited operations should be notified at a reasonable time prior to the audit. The Lead Auditor is responsible for the timely completion of the audit cycle (the audit, audit report, and any feedback to the audited operations). Any corrective actions resulting from the audit are the responsibility of the department to be audited.

The objective of an SCEPP audit is to evaluate the extent of conformity of the community's SCEPP audit criteria. If the audit objective for a particular department is also to check for corrective actions for nonconformance from previous audits, this should be stated, and the statement can be written in the "Note" column of the above matrix. Other items which may be placed in the "Special Instruction Notes" column may include logistic arrangement, matters related to confidentiality or audit follow-up actions.

Auditors have to be adequately prepared for the audit by equipping them with policies, procedures, standards, regulatory requirements, prior audit reports, and other pertinent information. A pre-audit meeting with the department's operation supervisor is to be held to review the plan, discussed what will be covered in the audit, and modify as necessary.

Developing an Audit Procedure
In conducting a site audit, auditors will use the community's standardized guidance to assist them. The guidance is in the form of an audit procedure. The content of an audit procedure is to clarify that the goal of the audit is to evaluate the implementation and maintenance of the community's SCEPP. It attempts to find out whether the community is in conformance with the SCEPP requirements. If nonconformance occurs, corrective and preventive action should be identified.

The site audit procedure also provides guidance on what information will be gathered. The information gathered, or the audit evidence, can be used to determine whether SCEPP objectives and targets are being met, and whether the system is efficient.

All audit information needs to be documented. The audit procedure specifies how results are recorded, reported, and communicated.

15.01 F1 SCEPP Audit Plan

Procedure No:	SCEPP 15.01 F1 SCEPP Audit Plan
Issue Date:	
Revised	
Title:	SCEPP Site Audit
Approved By:	(Environmental Manager)

1. Purpose

The purpose of this protocol is to establish and maintain an SCEPP Auditing Protocol for **The Town of Eagar.** The protocol defines the process for conducting, recording,   and reporting of in-house SCEPP audits.

2. Scope

This protocol contains provisions to conduct a SCEPP audit to ensure that the SCEPP is properly implemented and maintained by evaluating system efficiency, reviewing environmental policy, evaluating objectives and targets, assessing whether documented   SCEPP procedures are being followed, identifying nonconformance with SCEPP requirements, and whether relevant corrective actions in the system are taken whenever necessary.

3. Procedure

3.1. The SCEPP audit is to cover the following elements:

1. Environmental Policy;
2. Environmental Program development – environmental aspects, objectives, and targets;
3. Operational Control – operational procedures and work instructions;
4. Employee Training and Tracking;
5. Internal and External Communication;
6. Emergency Preparedness and Response;
7. Records and Recordkeeping; and
8. SCEPP Audits (past audit results).

3.2. SCEPP Audit Sheet is used to conduct the audit.

3.3. Before conducting the audit, a pre-audit conference is scheduled with the department's operations supervisor, or appropriate personnel, to review the plan for the audit.

3.4. Once the audit is done, the completed SCEPP Audit Sheet is used as the draft SCEPP Audit Report.

3.5. Any discrepancies, exceptions or noncompliance identified in the audit are to be summarized in the *SCEPP Audit Sheet*, as well as areas of improvement that needs to be pursued in regard to environmental management.

3.6. A post-audit conference among members of the audit team, including the department's operations supervisor, or appropriate personnel, is conducted to discuss findings, conclusions and recommendations of the draft SCEPP audit report. Once a consensus on the draft has been reached, the report is finalized as the SCEPP Audit Report.

3.7. The SCEPP Audit Report, in the form of the completed SCEPP Audit Sheet, is communicated to the governing body for review.

4. Updates and Reviews
   This audit protocol will be reviewed and updated annually, or as necessary because of process changes or changes in the regulatory requirements.

5. Responsibilities
   The updates of this SCEPP audit protocol must be approved by the SCEPP Manager.

6. Documentation
   The audit reports and any documentation resulting from the audit will be kept in the SCEPP file under the responsibility of the SCEPP Manager.

7. References
   The Audit Sheet is provided as reference.

Performing a SCEPP Audit

To conduct an audit, the auditors must obtain copies of all documented procedures, training records, or other materials relevant to the audit. They will review documentation for the audited area, examine past audits, and the community's SCEPP Audit Sheet for performing the audit.

The following provides an Example of an SCEPP Audit Sheet. The guidance may require modifications in order to meet the needs of the facility-specific audit objectives. This simple guidance covers eight SCEPP elements:

1. Environmental policy;
2. Environmental program development: aspects and impacts, objectives, and targets;
3. Operational controls: procedures and work instructions;
4. Employee training and tracking;
5. Internal and external communication;
6. Emergency preparedness and response;
7. Records and recordkeeping; and
8. SCEPP audits

15.01 F1A SCEPP Audit Sheet

SCEPP Audit Sheet
Use this sheet and answer the following questions regarding the SCEPP elements for the audited department. If any of the answers is "No", nonconformance to the requirements of the SCEPP exists.

1. Environmental Policy

The purpose of auditing this SCEPP element is to ensure that policy is up-to-date and still appropriate to the nature and scale of current processes, activities, and services. It is also used to verify that the policy is communicated to employees and available to the public.

#	Questions	Yes	No	Notes
1.	Has an environmental policy been developed and approved by an appropriate official?			
2.	Does the policy contain ALL of the following? a) Compliance with applicable environmental laws and regulations. b) Promotion of pollution prevention. c) Commitment to continual improvement.			
3.	Is the policy still appropriate to the nature and scale of current processes, products, and services?			
4.	Does the new employee training cover the environmental policy?			
5.	Are existing employees aware of the policy's existence and its general content?			
6.	Is there a mechanism in place for the policy to be made available to the public?			

2. Environmental Program Development

The auditing purpose here is to ensure that the objectives and targets reflect the department's commitment to regulatory compliance, pollution prevention, and continual improvement. This form is used to verify that the targets are specific, measurable, and with deadlines. It is also used to verify that the program is evaluated on a periodic basis and results are communicated to the governing body.

#	Questions	Yes	No	Notes
1.	Has an SCEPP procedure been developed to identify aspects, impacts, objectives and targets?			
2.	Is the procedure reviewed and updated on a periodic basis, or when changes occur in facility operations (chemical use, process changes, production level, etc)?			
3.	Have the aspects of a facility's processes, products, and services that have significant			

#		Yes	No	Notes
	impacts been identified?			
4.	Have objectives and targets been identified for the processes, products, and services of significant impact?			
5.	Are the objectives and targets consistent with the facility's environmental policy?			
6.	Does each objective have specific and measurable targets, and the methods to achieve targets with assigned deadlines and designation of responsibility for achievement?			
7.	Is progress being measured toward achieving the objectives and targets?			
8.	Is progress being measured on a periodic basis?			
9.	Have corrective actions been initiated for areas not meeting objectives and targets?			
10.	Have the results been reported to the governing body?			

3. Operational Controls

The audit on operational controls attempts to ensure that the written operational procedures and work instructions represent current practice, and that all operations associated with the significant environmental aspects are addressed in the procedures and work instructions.

#	Questions	Yes	No	Notes
1.	Have procedures and work instructions been written for all operations of significant aspect?			
2.	Do the procedures and work instructions monitor the operations?			
3.	Do the procedures and work instructions ensure that the operations remain within acceptable parameters?			
4.	Do the procedures and work instructions include provisions to implement prompt correction if a deviation occurs?			
5.	Do the procedures and work instructions mandate a review of records and reports associated with the operations?			

4. Employee Training and Tracking

The purpose of auditing this element is to ensure that training has taken place, and the employees have been trained properly, Verify that training documentation has been developed and maintained, and has been kept current with respect to any hiring, departures, reorganizations, or new requirements.

#	Questions	Yes	No	Notes
1.	Have procedures been developed to identify and			

#	Questions	Yes	No	Notes
	track the environmental training needs of all personnel who have responsibility for processes that have significant environmental impact?			
2.	Do the training and tracking procedures contain provisions to identify the type and frequency of training?			
3.	Do the procedures identify who needs training?			
4.	Do the procedures contain mechanism to track training of employees?			
5.	Do the procedures contain provisions for review and update of training requirements?			
6.	Do the procedures include appropriate training required by legal training requirements? (Such as: RCRA, SPCC, SWPPP, OSHA, etc.)			
7.	Do the training and tracking procedures include provisions to require employee training on SCEPP procedures?			
8.	Do the procedures contain provisions to require training for new employees that informs them about the facility's environmental policy and about new employees' duties within the SCEPP?			

5. Internal and External Communication

The audit on communication is to ensure that the communication procedures are followed. Make sure that documentation of the receipt and responses to inquiries is maintained. Find out how these inquiries are documented and referred to appropriate personnel. Review the communication programs and verify that they are being implemented. Evaluate the effectiveness of the programs.

#	Questions	Yes	No	Notes
1.	Have communication procedures of the SCEPP been developed and implemented?			
2.	Do the procedures identify the method and type of communication?			
3.	Do the procedures identify the initiator and recipient of the communication?			
4.	Do the procedures mandate the documentation of the receipt and responses to inquiries?			
5.	Do the procedures contain a provision for referral of inquiries?			
6.	Do the procedures provide for review and updating for communication efficiency?			
7.	Do the procedures include a requirement that any change to the SCEPP or any of its facets be communicated to the appropriate personnel?			
8.	Does the documentation system show that communication is being carried out according to the procedures?			

6. Emergency Preparedness and Response

The goal of this audit is to determine that the current emergency response plan(s), emergency identification, prevention, and mitigation programs, including any equipment maintenance programs have been implemented and maintained. The review should include the regulatory-based programs. Verify if changes have been reviewed for their effect on these programs. Find out if emergency response procedures are available and if personnel understand and are trained in their roles.

#	Questions	Yes	No	Notes
1.	Have procedures (and/or an emergency response plan) been developed to respond to and report accidents, spills, malfunctions, process upsets, and other emergency situations?			
2.	Do the procedures provide for notification and reporting of accidents, spills, fires, or emergency situations?			
3.	Do the procedures contain a provision to mitigate or clean-up related environmental impacts?			
4.	Do the procedures provide for investigation of causes of accident and evaluation of effectiveness of response?			
5.	Are regulatory requirements for the facility included in the procedures?			
6.	Have arrangements been made with the local emergency responders?			
7.	Have emergency response drills been conducted pursuant to the procedures?			
8.	Have emergency responders been adequately trained for emergency response actions?			
9.	Are emergency response instructions available in designated locations?			
10.	Is emergency response equipment maintained and employees trained on location and use?			
11.	Do the procedures contain a provision for a review and update to accommodate facility changes?			
12.	Does the documentation system indicate that all procedures for preparedness and response are implemented pursuant to the procedures?			

7. Records and Recordkeeping

The audit should determine if the procedures for records and recordkeeping are appropriately developed, maintained, implemented and followed. Ensure that they are available and updated to accommodate changes. Verify that the record retention procedure is maintained and followed.

#	Questions	Yes	No	Notes
1.	Has a procedure for tracking records been developed?			
2.	Have the types of records to be kept been identified?			
3.	Has a system for record identification and indexing the records been developed?			
4.	Is there a procedure to remove obsolete records and record destruction?			
5.	Has a procedure for establishing reporting and recordkeeping been developed to document the environmental status of all activities?			
6.	Are there provisions to update the procedures to accommodate facility changes?			
7.	Does the documentation show that reporting and recordkeeping has been implemented according to the procedures?			

8. SCEPP Audits

The audit of the SCEPP is to ensure that the SCEPP audit program is conducted according to the procedure, the audits are performed based on the established schedule, and any nonconformance is referred to the corrective action system. Verify that the results of the SCEPP audits are communicated to the governing body.

#	Questions	Yes	No	Notes
1.	Are procedures in place to perform an SCEPP audit for the facility?			
2.	Do the procedures explain the objective of the audit?			
3.	Do the procedures contain the audit schedule?			
4.	Do the procedures include a provision of methods of reporting audit results?			
5.	Does the documentation system indicate that procedures for the SCEPP audit are implemented pursuant to the procedures?			
6.	Does the documentation system show that nonconformance issues are identified and referred to corrective action system?			
7.	Does the documentation system verify that nonconformance issues are promptly corrected?			
8.	Does the documentation system show that the			

audit results are communicated to the governing body?			

AUDIT SUMMARY

Use 15.01 F2 Form for Preparing a SCEPP Audit Summary Sheet to prepare the audit summary.

The SCEPP audit summary should address the following for each audit element:

1) nonconformance issues identified during this audit;
2) areas where nonconformance may exist but need further information for confirmation; and
3) areas of improvement that need to be pursued in regard to conformance with SCEPP requirements.

CORRECTIVE ACTION

Use 15.01 F3 Form for Responding to SCEPP Audit Finding to initiate a corrective action.

Once the audit is completed, the findings will indicate whether the audit evidence conforms or does not conform to the audit criteria. The audit also provides recommendations for areas of improvement. The governing body will review the audit conclusions and provide decisions and actions related to possible changes to environmental policy, objectives, targets, and other elements of the SCEPP consistent with the commitment to continual improvement.

Nonconformance can occur due to violations of any legal requirements, process upsets in a significant operation, or violations of SCEPP procedure (examples are: work instructions, calibration, or record keeping requirements or regulatory reporting requirements are not followed). This means that nonconformance can be detected through a SCEPP audit, but it can also be detected by employees that discover a deviation from their daily activities.

When nonconformance exists, the department needs to identify the cause of the nonconformance and evaluate the necessary corrective action. The corrective action chosen should match the magnitude of problems and be appropriate to the environmental impact encountered. The department manager who supervises operations in the area of nonconformance and the SCEPP Manager should monitor the corrective action.

The corrective action may involve modifying existing control mechanisms in order to avoid repetition of the nonconformance. Any changes in the written procedures resulting from the corrective and preventive action must be recorded and employees notified of procedural changes.

To address nonconformance, the department should have in place a procedure which defines responsibility and authority for:

1. handling and investigating nonconformance with the SCEPP;

2. taking action to mitigate any impacts caused by nonconformance; and

3. initiating and implementing corrective and preventive action.

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15.01 F2 Form for Preparing a SCEPP Audit Summary Sheet

Element Number	Description	Audit Results	
		Major/Minor Findings	Comments

SCEPP Audit Summary By:

_____

Lead Auditor   Date

_____

Audit Team   Date

_____

Audit Team   Date

_____

Audit Team   Date

15.01 F3 Form for Requesting & Responding to SCEPP Audit Finding (Corrective Action)

Type of Non-conformance: (circle as appropriate)		
Major	**Minor**	**Recommendation**

Description (include where in the organization the finding was identified):

SCEPP Reference:	Date:	Finding Number:

Lead Auditor:	Audit Team:

Corrective Action Plan (include time frame):

Response to Corrective Action Request:

Preventive Action Taken:

Responsible Person:	Completion Date:

Corrective Action Verified By:	Date Verified:

15.01 F4 Protocol for Investigating and Correcting SCEPP Nonconformance

Procedure No:	SCEPP 15.01 F1 SCEPP Audit Plan
Issue Date:	
Revised	
Title:	Protocol for Investigating and Correcting SCEPP Nonconformance
Approved By:	(Environmental Manager)

1. Purpose

The purpose of this protocol is to define authority, responsibility, and methods for investigating and correcting nonconformance with SCEPP requirements.

2. Scope

This protocol contains provisions to initiate and complete corrective actions and to review corrective actions for effectiveness.

3. Procedure

3.1. Employees that discover a deviation from operations and activities or a violation of regulatory requirements are to immediately notify their supervisor.

3.2. The supervisor will initiate corrective action by identifying the problem, evaluating potential corrections, deciding on the corrective action including an implementation timeline and assignment of tasks, and take the corrective action. The supervisor will record these activities in the SCEPP Corrective Action Form. The supervisor will notify the SCEPP Manager.

3.3. When the corrective action is completed, the supervisor will complete the SCEPP Corrective Action Form, date it, and submit the form to the SCEPP Manager.

3.4. The SCEPP Manager will review the corrective action form for effectiveness. If necessary, changes in procedures will be made to prevent reoccurrence of the nonconformance.

3.5. All corrective actions are to be logged on the SCEPP Corrective Action Log.

4. Updates and Reviews

This protocol and methods used for corrective actions will be reviewed annually, or upon changes in regulatory requirements and operational changes.

5. Responsibilities

5.1. Employees are responsible for bringing to their supervisor's attention any areas of nonconformance they discover.

5.2. The supervisor or the SCEPP Manager can initiate and log a corrective action.

6. Documentation
The corrective action documentation will be kept in the SCEPP file under the responsibility of the SCEPP Manager.

7. Reference
The SCEPP Corrective Action Form and the SCEPP Corrective Action Log are provided as references.

16.01 Procedure for SCEPP Governing Body Management Review

The SCEPP management review process includes the governing body, Mayor Bryce Hamblin, Town Manager Shawn Nau, Public Works Director Bruce Ray, Finance Director Katie Brady and ADEQ Certified Operator Milton Nelson who share responsibility in reviewing all elements of the SCEPP. Management reviews are conducted annually to ensure suitability, adequacy and effectiveness of the SCEPP, as defined in this procedure. All management review meeting minutes are recorded and kept by the SCEPP Manager Bruce Ray**.**

The management review process is intended to provide a forum for discussing the performance of the SCEPP; opportunities for improvement; and for providing the governing body with a vehicle for making changes to the SCEPP to achieve continual improvement.

The management review team should include everyone who signed the Good Faith Commitment and Environmental Policy statements or the current elected governing body representatives as well as the SCEPP Manager and Team.

Procedure:

The SCEPP Manager coordinates the SCEPP management review meeting. The meeting coincides with the annual business planning and financial review meeting. The SCEPP Manager presents a summary of proposed environmental management programs for the next year to be considered in the budget planning process. The SCEPP Manager is also responsible bi annually for ensuring that the necessary information is collected prior to the meeting.

At a minimum, each management review meeting should consider the following:

1) results of the SCEPP Environmental Compliance Audit since the last meeting;

2) results of the SCEPP Audit since the last meeting;

3) suitability, adequacy and effectiveness of the Environmental Policy;

4) suitability, adequacy and effectiveness of the Environmental Objectives;

5) overall suitability, adequacy and effectiveness of the SCEPP;

6) status of Aspects, Impacts, Objectives, Targets, Corrective and Preventive Actions;

7) summary of proposed Environmental Management Programs for the next year;

8) suitability, adequacy and effectiveness of training;

9) results of any action items from previous management reviews;

10) suitability of resources, considering realignment of resources if required.; and

11) extent to which changes in legislation (statutes, rules and regulations), organizational activities, technology or stakeholder interests, require changes to the SCEPP.