

NACO SANITARY DISTRICT

P.O. Box 755

Naco, Arizona 85620

Small Community Environmental Protection Plan (SCEPP)

June 2014

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1.01 Good Faith Commitment

1.01 Good Faith Commitment

The **Naco Sanitary District** 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.

Approved by:



NSD President, Foy Armstrong

Date: August 30, 2013



Director, J. Frank James

Date: August 30, 2013



Remote Operator, Kevin Quint

Date: August 30, 2013

Included in the permanent records of the **Naco Sanitary District** on this 30th day of
August, 2013.

Document Control No. 1.01	Original Date: August 30, 2013	Revised Last Date: June 4, 2014	Approved by: J. Frank James, Director
Document Title: Environmental Policy			Total Pages: Page 1 of 75

2.01 Environmental Policy

2.01 Environmental Policy

The Naco Sanitary District Environmental Policy

The **Naco Sanitary District**, in our continuing effort to provide our Citizens the highest quality of life, have established this Environmental Policy to demonstrate good stewardship and ongoing improvement of the community environment

Our environmental policy is to be responsible to the people of **Naco** 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 Naco Sanitary Board of Directors, Naco Sanitary District Director, Naco Sanitary District Remote Operator, and contractors engaged by the Naco Sanitary District pledge 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.

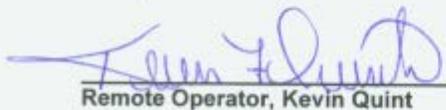
Approved by:


NSD President, Foy Armstrong

Date: August 30, 2013


Director, J. Frank James

Date: August 30, 2013

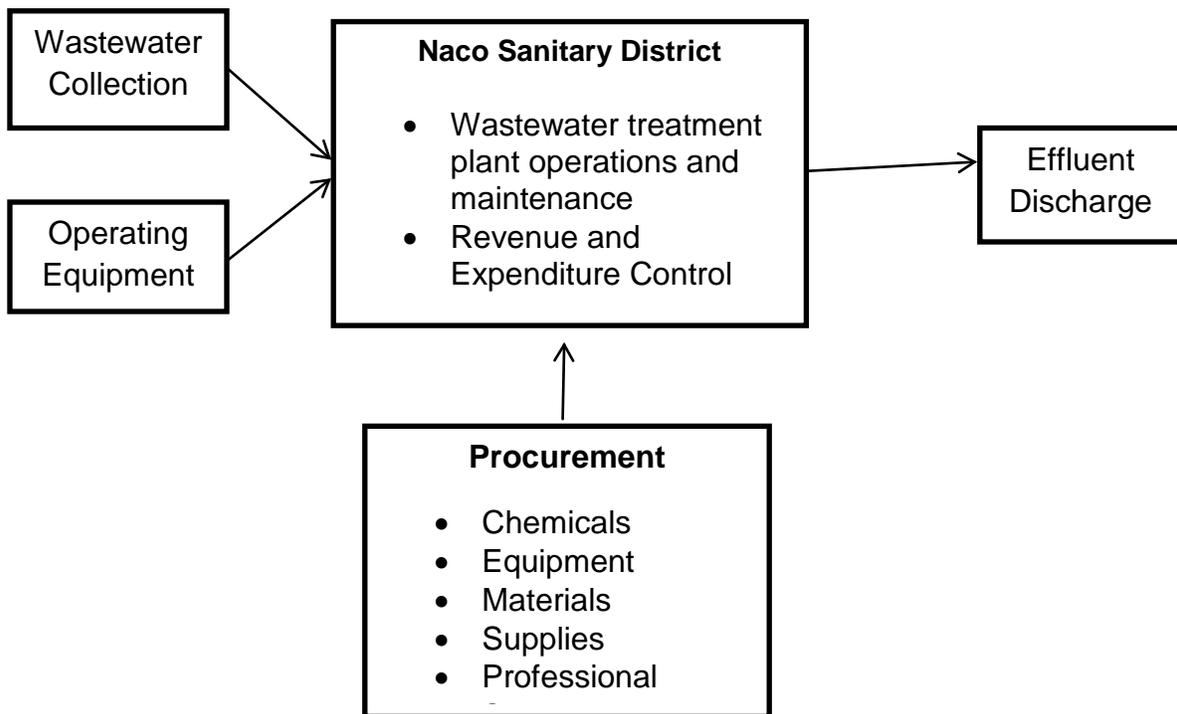

Remote Operator, Kevin Quint

Date: August 30, 2013

Document Control No. 1.01	Original Date: August 30, 2013	Revised Last Date: June 4, 2014	Approved by: J. Frank James, Director
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3.01 Scope of Operations Covered by the SCEPP

The Naco Sanitary District has developed and implemented a SCEPP to cover its municipal operations, within a defined area, known as the SCEPP boundary. 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 Naco Sanitary District is responsible or over which it can reasonably expect to have control.



Document Control No. 3.01	Original Date: August 30, 2013	Revised Last Date: June 4, 2014	Approved by: J. Frank James, Director
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Operation/Activity		Description/ Service Provided
1.	Collection Systems O & M	Maintain proper operation of sewer lines. Provide maintenance activities that monitor and correct any abnormal operating conditions.
2.	Wastewater Treatment Plant O & M	Operate and maintain the treatment facility in a manner that meets APP requirements.
3.	Construction Design & General Permit requirements	Follow General Permit requirements for construction and discharge authorizations for collections system expansions.
4.	Storm Water Pollution Prevention	Berms have been built and are maintained to divert infrequent storm water, and its subsequent potential for pollution, away from the treatment plant facilities.
5.	Equipment Maintenance	Provide proper repairs and maintenance activities to maintain equipment's operational requirements

Document Control No. 3.01	Original Date: August 30, 2013	Revised Last Date: June 4, 2014	Approved by: J. Frank James, Director
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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 **Naco Sanitary District** 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 **J. Frank James** maintains the SCEPP meeting minutes and other records as required.

The SCEPP establishes goals for its operations that are consistent with the **Naco Sanitary District** 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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- [4.01 F1A Wastewater Collection System O & M](#)
- [4.01 F1B Construction Design](#)
- [4.01 F1C Plant Operation – Process monitoring and sampling](#)
- [4.01 F1D Storm Water](#)
- [4.01 F1E Equipment Maintenance and Repairs](#)

- 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?

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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) the 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

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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 F1A Wastewater Collection System O & M

Inputs: What are the interactions occurring or done that use the following:
Electricity: Monitoring device and three monitoring wells
Materials: Tools, lubricants, grease removal solutions.
Water: Wash down. Samples from the monitoring wells are removed to Tucson for laboratory analysis (currently by CAS, LLC), and after processing, the laboratory disposes of the samples.
Fuels: Operate equipment used for cleaning and inspection of 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

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4.01 F1B Construction Design

Engineered approved design of system through ADEQ approval process in early to mid-1970's. No construction has been undertaken at the facility since its completion, nor is construction anticipated at the facility in the near future. Wastewater collection system expansion does require construction and discharge authorizations from ADEQ.

In December 2008, construction was performed for the NSD by a private contractor who repaired and bermed the access road leading to the treatment facility, but there were no resultant emissions that could be associated with the implementation of the treatment facility design.

Inputs: What are the interactions occurring or done that use the following:
Electricity: None
Materials: None
Water: None
Fuels: None
Other: None
Emissions: What are the interactions occurring that create releases to the following:
Air: None
Water: None
Land: None
Other: (i.e., consumption of other resources or noise, odor etc.) There is little or no sound associated with the treatment facility, which is located more than two miles from the nearest residence. ADEQ inspections have not detected more than negligible odor at the facility.

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4.01 F1C Plant Operation – Process monitoring and sampling

Inputs: What are the interactions occurring or done that use the following:
Electricity: Low usage for process equipment, also includes a backup generator
Materials: Sewer Slayer for the control of grease.
Water: According to the original agreement with the rancher, Jack Ladd, from whom the property for the treatment facility was purchased, any reclaimed water from the facility was to be channeled to Mr. Ladd's open range. However, evaporation always has prevented the formation of measureable reclaimed water.
Fuels: Used for operations of heavy equipment and generator
Other: Reporting to ADEQ in accordance with the Naco Sanitary District's Aquifer Protection Permit (APP File #100833)
Emissions: What are the interactions occurring that create releases to the following:
Air: The small size and limited usage of the NSD generator does not require a permit. The NSD does not require, own, or use heavy equipment that might create emissions toxic to the air.
Water: In the unlikely event that discharge was created, there would be a potential for it to reach Green Bush draw.
Land: If the unlikely event that discharge was created, there would be a potential for it to reach the open range of the Jack Ladd ranch that directly adjoins the facility.
Other: (i.e., consumption of other resources or noise, odor etc.) Negligible odor may occur as a result of the treatment process

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4.01 F1D Storm Water

Inputs: What are the interactions occurring or done that use the following:
Electricity: No electricity is used for this item.
Materials: Chemicals are contained to prevent possible environmental contamination.
Water: Water runoff is diverted away from the treatment process by berms.
Fuels: No fuels are used in this item.
Other: Permits are required by ADEQ for construction projects (including new sewer collection system projects) disturbing at least one acre of land. If and when construction projects were planned, a Construction General Permit would be obtained.
Emissions: What are the interactions occurring that create releases to the following:
Air: None.
Water: There has never been an incident of storm water discharge from the facility, nor are there waterways contiguous to the facility that could be impacted. Surface waters can be impacted by sediment from construction projects.
Land: None
Other: (i.e., consumption of other resources or noise, odor etc.)

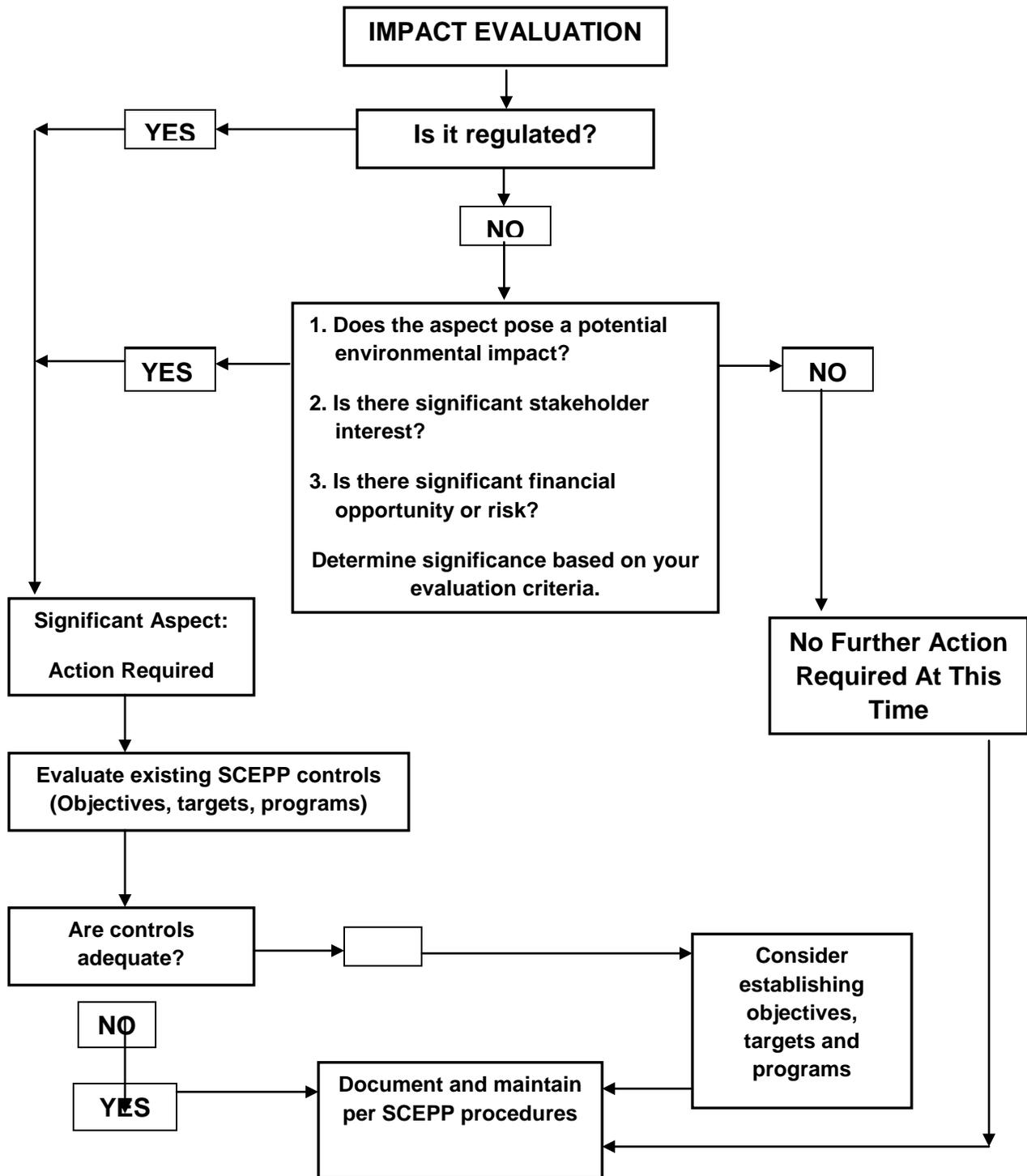
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4.01 F1E Equipment Maintenance and Repairs

Inputs: What are the interactions occurring or done that use the following:
Electricity: Low usage and safety practices
Materials: Greases, oils, and etc. used to maintain proper equipment operations
Water: The small quantities of water that are used for general clean are readily evaporated.
Fuels: Maintenance equipment.
Other:
Emissions: What are the interactions occurring that create releases to the following:
Air: Negligible impact due to possible odors from treatment process.
Water: No actual equipment is used.
Land: The treatment facility does not have concrete pads. In addition, most equipment maintenance that utilizes greases and oils is conducted off-site.
Other: (i.e., consumption of other resources or noise, odor etc.) Used oil and grease.

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4.01 F2 Flow Diagram of Impact Significance Evaluation



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4.01 F3 Setting Aspects, Significant Impacts, Objectives and Targets

Activity	Aspect	Significant Impact	Objective	Target
Wastewater Collection	Inspection, cleaning maintenance, repair	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 at least three months before construction begins
Plant Operations	Process monitoring/sampling	Permit violations, poor treatment	Meet permit limits, efficiently process wastewater	Meet required sampling and reporting requirements in Naco Sanitary District's Aquifer Protection Permit (APP File #100833)
Plant Maintenance	Preventative maintenance/repairs	Equipment failure	Maintain reliable operations	Monitor equipment operations and provide maintenance and repairs as needed
Storm Water	Controlling conjectural runoff impact	Waterway impact	Prevent pollution from entering waters of the U.S.	Store chemicals in sealed storage unit inspected weekly for security

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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 Naco Sanitary District** 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 **J. Frank James**. The relevant requirements are identified, accessed and communicated to all personnel, as necessary. At least once a year, the SCEPP Manager reviews the current federal, state and local regulatory requirements to ensure ongoing compliance.

Procedure:

The SCEPP Manager, with support from the SCEPP Team, completes [5.01 F1 Form for Preparing a List of Legal and Other Environmental Requirements](#) 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 [5.01 F1 Form for Preparing a List of Legal and Other Environmental Requirements](#), the SCEPP Manger integrates the list of compliance issues into [4.01 F2 Form for Assigning Impacts to Aspects and Determining Significance](#), declaring all impacts with an applicable legal/regulatory requirement as significant.

The Naco Sanitary District 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 **Naco Sanitary District** 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.

Environmental Requirements include:

- Federal
- State
- County
- Municipal
- Environmental Permitting
- Compliance Monitoring
- Record Keeping and Reporting
- Contingency Plans
- Emergency Preparedness and Response Plans – See **Section 12**

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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.

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- 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 must 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](#) on a regular basis **annual** to ensure compliance and as part of the SCEPP Audit preparation.

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6.01 Procedure for Establishing Environmental Management Programs

The SCEPP Team has established Environmental Management Programs (EMP) for all objectives and targets. EMP are reviewed and approved by the governing body **Foy Armstrong, J. Frank James , and Kevin Quint** 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 FIA Wastewater Collection System O & M](#)

[6.01 F1B Construction Design](#)

[6.01 F1C Wastewater Treatment Plant Operations](#)

[6.01 F1D Storm Water Pollution Control](#)

[6.01 F1E Equipment Maintenance and Repair](#)

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.

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6.01 FIA Wastewater Collection System O & M

Operation/Activity: Collection System O & M		EMP Document Control No: 6.01 F1a	
Facility: Naco Sanitary District		Responsible Persons: Kevin Quint	
Resources Available: Funding through annual operations budget, staff of one [1] independent contractor, and necessary equipment that includes, but is not limited to, portable pumps and generators, and property maintenance tools. In addition, the use of CCTV surveillance that results in a DVD and photo-graphic record of sections of main sewer lines.			
Goal Statement: As can be attested to by almost 40-years of operations without being fined or seriously admonished by ADEQ or any other regulatory agency, the policy of the Naco Sanitary District will continue to be a commitment to continuous proactive preventative maintenance programs by identifying current and potential system problem, and providing necessary remedial repairs that greatly reduce the possibility of spills or other conditions that would threaten the environment and/or public health.			
Objective: Maintain system efficiency and effectiveness.		Target and Completion Date: At the end of each year, a progress report will summarize the areas of the collection system that have been inspected and the preventative maintenance program that has been completed with the target being 20% of the system annually. The inspected portion[s] will be reviewed and repair schedules set for areas of concern.	
Strategy: The Operator performs all maintenance operations, and repairs if necessary, at the treatment facility—a three-pond evaporative system—no less than once or twice each week. Manholes and sewer lines are inspected monthly or as required. Any identified problems are prioritized for repair or remedy according to severity and/or the impact or potential impact on public health and safety as well as the integrity of the system.			
Tasks for Achieving Objective and Target: The collection system is gridded on a map of the system to ensure 20% or more annual inspection and preventive maintenance procedures as described in Target and Completion Date above. Staff utilizes an independently contracted operator with CCTV equipment to evaluate the condition of pipes.			
Metrics and Measurement: Results of inspections—whether annual, scheduled, or as required—are logged and a DVD record of CCTV monitoring is maintained when utilized.			
Importance relative to Other Environmental Programs: The environment and health of the public depends on identifying and repairing areas that could cause potential problems with the designed purposes of a collection system.			
Comments/Process Towards Completion: The Naco Sanitary District's collection and treatment systems were constructed to serve a population of 20,000. The population of the community has never reached 1,000 since the system went on-line in 1975. Projections for significant population growth are minimal. As a result, the inspection process is basic: by removing a manhole cover at any point throughout the system, it is readily discernible if the graded flow of several inches of water at the base of an eight-foot sewer main is flowing westward toward the treatment plant. If the flow is found to be interrupted, immediate steps, including a CCTV inspection is immediately initiated and corrective actions employed.			
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6.01 F1B Construction Design

Operation/Activity: Construction Design		EMP Document Control No: 6.01 F1b	
Facility: Naco Sanitary District		Responsible Persons: J. Frank James	
Resources Available (Including Financial): Computer design program, contracted engineering services and annual budget			
Goal Statement: Designing and submitting all required sewer collection projects to meet all ADEQ and District standards, including obtaining ADEQ Discharge Approval, if applicable, in a manner that meets the growth needs of the community.			
Objective: Understand all related standards and regulations.		Target and Completion Date: Using approved construction design standards, each project will receive ADEQ approval at least three (3) months before construction begins. No completion date is relevant, because construction projects vary in scope and funding availability.	
Strategy: Design sewer project(s) that will meet the future need of customers within the District's service area and submit all required documents needed for ADEQ approval.			
Tasks for Achieving Objective and Target: Utilize current construction standards and applicable regulations in the designing of sewer systems.			
Metrics and Measurement: Each year the District standards will be reviewed and updated as regulatory changes are adopted.			
Importance relative to Other Environmental Programs: Insure that proper design and construction provides the environmental protection required.			
Comments/Process Towards Completion: The District just completed the updating of construction standards in compliance with ADEQ requirements.			

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6.01 F1C Wastewater Treatment Plant Operations

Operation/Activity: Wastewater Treatment Plant Operations		EMP Document Control No: 6.01 F1c	
Facility: Naco Sanitary District		Responsible Persons: Kevin Quint	
Resources Available (Including Financial): Funding through annual operational budget, staff of 1 full-time independent contractor as remote operator, laboratory, manuals, as well as tools and equipment necessary to perform necessary duties.			
Goal Statement: The management and maintenance of the Naco Sanitary District's facilities complies with the intent and structure of our permits and with the standards set forth in our policies.			
Objective: Operate the WWTP in the most efficient and effective manner, while meeting all regulatory requirements.		Target and Completion Date: 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: The operator is on-site at least one day per week. The treatment process is sampled, tested and reported in compliance with the Naco Sanitary District's Aquifer Protection Permit. Biosolids are reported as per the Naco Sanitary District's AZPDES permit. The facility has in place monthly maintenance schedules to maintain equipment reliability.			
Tasks for Achieving Objective and Target: A staff member of an independent laboratory takes samples from the system on a quarterly schedule. Samples are analyzed and recorded in Tucson. Laboratory analysis reports in conjunction with the tapes from the on-site SCADA monitor are used to create quarterly SMURP reports that are transmitted to Phoenix. Any abnormal conditions are reported and remedied directly. Additionally, staff is advised of training programs and opportunities, a preventative maintenance program is ongoing, and SCADA monitoring has been SOP since 2002.			
Metrics and Measurement: Review of monitoring reports on a quarterly basis determines if objectives are being met. Permitted values are used as measurements for compliance.			
Importance relative to Other Environmental Programs: Protection of the environment can be greatly realized through effective operations of the facility.			
Comments/Process Towards Completion: Greater reliability in the process can result through operator training and clearly defined responsibilities.			

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6.01 F1D Storm Water Pollution Control

Operation/Activity: Storm Water Pollution Control		EMP Document Control No: 6.01 F1d	
Facility: Naco Sanitary District		Responsible Persons: Kevin Quint	
Resources Available (Including Financial): Funding through annual operating budget and a staff of one (1) independent contractor as remote operator. Also an independent laboratory, operations manuals, as well as tools and equipment to perform the necessary duties and to achieve necessary results.			
Goal Statement: The goal for this area of concern is to prevent the treatment facility from polluting waters controlled by the State and Federal government.			
Objective: Maintain structures in place to restrict storm water from leaving the facility perimeter.		Target and Completion Date: The ADEQ Construction General Permit will be followed with any construction project disturbing at least one acre of land. Also, any new potential sources of pollution will be identified and reported to the ADEQ inspector to ensure compliance with requirements, and chemicals will be stored in a sealed storage unit, inspected weekly for security.	
Strategy: The storm water restriction berms are to be inspected monthly and after every storm event 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 berms monthly 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 standard operating procedures.			
Importance relative to Other Environmental Programs: None.			
Comments/Process Towards Completion: Monitoring has been occurring for years and monitoring will continue.			
Permit Renewal: N/A			

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6.01 F1E Equipment Maintenance and Repair

Operation/Activity: Equipment Maintenance		EMP Document Control No: 6.01 F1e	
Facility: Naco Sanitary District		Responsible Persons: Kevin Quint	
Resources Available (Including Financial): Funding through annual budget and the use of contracted outside professional services when and if necessary.			
Goal Statement: The proper maintenance and safe operation of all District equipment 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. Any abnormal equipment operations will be reported and necessary corrective actions will be taken. During annual budget development, determinations with regard to funds anticipated to maintain operational efficiency and effectiveness are discussed and included.	
Strategy: Monthly equipment inspection, maintenance, and testing signal necessary steps to insure proper operation of equipment.			
Tasks for Achieving Objective and Target: Staff performs the maintenance and repairs on equipment necessary to provide proper operations. If necessary repairs are beyond the abilities of staff, the services of independent contractors are employed.			
Metrics and Measurement: Log books for maintenance (both past and future), lab reports, and O&M manuals are kept in files in the operator's building at the treatment plant site.			
Importance relative to Other Environmental Programs: The operation and maintenance of all pipes/manholes ensures the proper treatment process.			
Comments/Process Towards Completion: This program has been occurring for years and will continue with improvements being implemented as required.			

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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	Provide inspection of 20% of the system annually and identify areas of concern for repairs or rehabilitation	6.01 F1a
Construction Design	Designing systems that provide proper transporting of wastewater.	Land and Water	Design proper capacity	Submit and receive ADEQ approval at least three months before construction begins	6.01 F1b
Wastewater Treatment	Treatment of wastewater	Land and Water	Operate facility within limits of permits	Meet required sampling and reporting requirements	6.01 F1c
Storm water Pollution	Prevent runoff into the treatment process	Land and Water	To divert all rain water away from the treatment ponds.	Monitor equipment operations and provide maintenance and repairs as needed	6.01 F1d
Equipment Maintenance	Reliable equipment operations	Land, water and processes	Maintain proper equipment operations	Store chemicals in sealed storage unit inspected weekly for security	6.01 F1e

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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 **Naco Sanitary District'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 **Naco Sanitary District** may already have existing policies and procedures in place that set forth the **Naco Sanitary District'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) Solid Waste Collection
- 4) 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.

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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 annually.

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."

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

Work instructions, 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.

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

Final review of the **Naco Sanitary District'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?

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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	
Wastewater Collection System O & M		SCEPP/6.01 FIA	
Construction Design		SCEPP/6.01 F1B	
Wastewater Treatment Plant Operations		SCEPP/6.01 F1C	
Storm Water Pollution Control		SCEPP/6.01 F1D	
Equipment Maintenance and Repair		SCEPP/6.01 F1E	
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	
Plant Operations		SCEPP 7.01 F3	
Water Quality Monitoring and Reporting to ADEQ on Approved Forms			
Equipment Maintenance			
Storm Water Pollution			
Emergency Operations Plan (EOP)			
Licensed Certified Operator with Proper Grade			
Approval to Construct obtained for new, expansion and/or modification <u>prior</u> to beginning construction			
Capital Improvement Plan (CIP) includes maintenance, replacement costs, future expansion and/or modifications and rates			
Training, Awareness and Competency		SCEPP/8.00	
Procedure for SCEPP Awareness and Competency Training		SCEPP/8.01	
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7.01 F2 Form for List of Organizational Structure & Responsibilities

Responsibilities		Governing Body	SCEPP Manager	HR Manager	Maintenance		Engineering	Supervisors	Finance	SCEPP Management Representative	
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SCEPP Audit and Review		X						X		X	
Obtain and Maintain Permits							X			X	
Coordination of SCEPP training requirements		X						X		X	
Maintain SCEPP Manual		X								X	
Wastewater Compliance								X		X	
Coordinate Emergency Response		X						X		X	
Identify environmental aspects of operations		X						X		X	
Establish objectives and goals		X						X		X	
Maintain SCEPP records		X						X		X	
Coordinate document maintenance and control		X						X		X	
Maintain maintenance records					X			X		X	
Maintain calibration records							X	X		X	
Maintain Lab compliance							X			X	

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7.01 F3 Form for Assessing Facility Operations & Procedures

Aspect/Activity	Existing Written Procedure	Updating Required	New Written Procedure Needed	Assigned To	Priority Ranking	EMP Due Date
Plant Operations	Yes	No	Yes	Kevin Quint	1	July 2015
Water Quality Monitoring and Reporting to ADEQ on Approved Forms	No	No	Yes	Kevin Quint	2	90 Days
Equipment Maintenance	Yes	No	No	Kevin Quint	3	N/A
Storm Water Pollution	No	No	Yes	Kevin Quint	4	July 2015
Emergency Operations Plan (EOP)	Yes	No	No	Kevin Quint J. Frank James	5	Annual Review
Licensed Certified Operator with Proper Grade	No	N/A	Yes	Kevin Quint	N/A	July 2015
Approval to Construct obtained for new, expansion and/or modification <u>prior</u> to beginning construction	No	N/A	Yes	J. Frank James	N/A	October 2014
Capital Improvement Plan (CIP) includes maintenance, replacement costs, future expansion and/or modifications and rates	N/A	N/A	No	N/A	N/A	FY 2015-2016

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8.01 Procedure for SCEPP Awareness and Competency Training

The Naco Sanitary District identifies, plans, monitors and records awareness and competency training needs and delivery for all personnel. The Naco Sanitary District 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 J. Frank James 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.

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- Prepare a training schedule for initial and continuing training.
- 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.

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8.01 F1 Environmental Training Requirements & Delivery Log

Training Required	Description	Mandatory Attendance	Frequency	Date Completed
SCEPP Awareness	Report and review of updates, additions, deletions, and other changes that have been made to the SCEPP.	Yes All NSD staff and Governing Board Members	Annually	
WIFA Workshops	Availability of funds and requisites for obtaining financial assistance.	No	When scheduled by ADEQ	

9.01 Communications & Registry of Stakeholders Procedure

The Naco Sanitary District has established and maintains procedures for internal and external communication relating to the SCEPP.

During the course of normal operations, internal environmental communications and awareness are accomplished through monthly written reports to Governing Board members and Board meetings [to which members of the entire community are invited through public postings and notices printed on the reverse side of monthly bills.] In addition, every customer, as well as relevant external parties, is provided with an Annual Report that updates recipients on important NSD issues of the year past and the upcoming year. In the event of emergencies, special Board meetings would be called and notices to the public provided.

If necessary, external communications with interested parties [e.g., parties included in the Naco Sanitary District's current Emergency Response Manual] would be accomplished via electronic correspondence and telephone.

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9.01 F1 Registry of Stakeholders

Name of Stakeholder Group	Description of Stakeholder Group	Description of Environmental Expectation	Regulatory or Other Requirement?
Local Residents	Residents in the community including individual rate payers, special interest groups, etc.	Provision of services in a way that causes minimum of environmental degradation	NO
Local Environmental Groups	Citizens and special interest groups promoting environmental protection	Continual improvement in environmental performance towards a leadership position	NO
Employees	All permanent and temporary employees of the District	A work environment and work activities that respect and preserve the environment	NO
Suppliers and Service Providers (Vendors)	Companies from which the District purchases products or services	Access to environmental information and freedom to compete to provide products and services in a fair process	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 <i>Emergency Preparedness and Response</i>	YES
ADEQ	State regulators and compliance officers focusing on environmental compliance	Maintenance of required environmental permits & regulatory compliance	YES
OSHA	Health and safety regulatory compliance enforcement	Compliance with health and safety regulations	YES
US EPA	Federal regulators and promoters of environmental performance	Compliance with Federal regulations and participation in environmental programs	YES
US DOE	Promoters of energy efficiency & renewable energy resources	Continual Improvement in energy use	NO

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10.01 Document Control Procedures

The **Naco Sanitary District** 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, **J. Frank James** 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 **Naco Sanitary District** 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 **J. Frank James** or designee. A list of controlled documents is provided in [10.01 F1 Form for Preparing a Master SCEPP Document Control Index](#).

Procedure:

- 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.

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Upon approval by the governing body and the SCEPP Team, the SCEPP Manager, **J. Frank James**, or designee, shall issues revisions/updates to the SCEPP manual. All copies of this SCEPP manual or other SCEPP documentation that are not 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

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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	08/30/2013	Director's office
3.01 F1	Scope of Operations covered by the SCEPP	08/30/2013	Director's office
4.01 F3	List of Aspects, Significant Impacts, Objectives and Targets & Sub-documents	08/30/2013	Director's office
5.01 F1	List of Legal and Other Environmental Requirements	08/30/2013	Director's office
6.01	Register of Environmental Management Programs	08/30/2013	Director's office
7.01 F2	Operational Control & Organizational Structure and Responsibilities (SCEPP Team)	08/30/2013	Director's office
8.01	Training Awareness and Competency	08/30/2013	Director's office
9.01	Communications & Registry of Stakeholders	08/30/2013	Director's office
10.01 F1	Document Control	08/30/2013	Director's office
11.01 F1	Environmental Records Control	08/30/2013	Director's office
12.01	Emergency Preparedness and Response	08/30/2013	Director's office
Procedures – Also See Operational Control Procedures Registry (Section 7)			
4.01	Procedures for Aspects, Significant Impacts, Objectives and Targets	08/30/2013	Director's office
5.01	Procedures for Legal and Other Environmental Requirements	08/30/2013	Director's office
6.01	Procedures for Environmental Management Programs	08/30/2013	Director's office
7.01	Operational Control and Responsibilities Procedures	08/30/2013	Director's office
8.01	Procedures for SCEPP Awareness and Competency Training	08/30/2013	Director's office
9.01	Communications & Registry of Stakeholders Procedures	08/30/2013	Director's office
10.01	Document Control Procedures	08/30/2013	Director's office
11.01	Environmental Records Control Procedures	08/30/2013	Director's office
12.01	Procedure for Emergency Preparedness and Response Plans		
13.01	Nonconformance, Corrective and Preventive Actions	08/30/2013	Director's office
14.01	Environmental Audit Procedures	08/30/2013	Director's office
15.01	SCEPP Compliance Audit Procedures	08/30/2013	Director's office
16.01	SCEPP Governing Body Management Review	08/30/2013	Director's office
Forms			
4.01 F3	Environmental Aspects, Impacts, Objectives and Targets	08/30/2013	Director's office
15.01 F1A	Audit Checklist	08/30/2013	Director's office
15.01 F2	Preparing a SCEPP Audit Summary Sheet	08/30/2013	Director's office
15.01 F3	Requesting & Responding to SCEPP Audit Finding (Corrective Action)	08/30/2013	Director's office

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11.01 Procedure for Environmental Records Control

The Naco Sanitary District 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 Naco Sanitary District's** relevant records are 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.

Procedure:

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.

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12.01 Procedure for Emergency Preparedness and Response Plans

The Naco Sanitary District 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 Naco Sanitary District** has already developed emergency response procedures in its Emergency Response Manual for 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 was developed in 2007 and is maintained electronically as well as in hardcopies. It is updated annually taking wastewater operations and storm water conditions into consideration.

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13.01 Procedure for Nonconformance, Corrective and Preventive Actions

Naco Sanitary District has developed and implemented this operational control 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 J. Frank James 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.

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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.

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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:

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14.01 Procedure for Environmental Compliance Audit

Naco Sanitary District has established an annual environmental compliance audit program to monitor regulatory requirements. **A report of the internal audit of regulatory compliance will be submitted to the governing body in August of each year.**

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**

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

2) **Audit Team**

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Designate a lead auditor and audit team members. 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 current SCEPP Compliance Audit Procedures 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.

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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			

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	about new employees' duties within the SCEPP?			
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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 inquiries 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) ENVIRONMENTAL COMPLIANCE AUDITS

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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 <i>compliance inspection reports</i> been cited in later inspection reports?			
10.	Have the same violations identified in past <i>Notices of Opportunity to Correct</i> been cited in later Notices of Opportunity to Correct?			
11.	Have the same violations identified in past <i>Notices of Violation</i> 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 internal 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	

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	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.

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15.01 Procedure for SCEPP Conformance Audit

SCEPP feedback is a mechanism for conveying information about how **The Naco Sanitary District** 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 Naco Sanitary District 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, **J. Frank James**, for use in **The Naco Sanitary District's** 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:

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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.

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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

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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.

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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 Naco Sanitary District**. 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.

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- 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

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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			

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	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			

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	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?			

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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			

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	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:

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- 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 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.

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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.

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16.01 Procedure for SCEPP Governing Body Management Review

The SCEPP management review process includes **The Naco Sanitary District's governing body, and the SCEPP Manager and Team** 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 J. Frank James.

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 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.

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