TOWN OF SPRINGERVILLE

Small Community Environmental Protection Plan (SCEPP)

AUGUST 2015

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1.01 GOOD FAITH COMMITMENT

The Town of Springerville has implemented a Small Community Environmental Protection Plan (SCEPP) as a way of demonstrating environmental leadership, commitment to continual improvement and environmental responsibility.

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

Mayor Mary Nedrow Date 8-20-15

Vice-Mayor Susan Silva Date 8-19-15

Council Member Richard Dana Date 8-19-15

Council Member [illegible] Date 8-19-15

Council Member [illegible] Date 8-19-15

Town Manager [illegible] Date 8-24-15

2.01 The Town of Springerville Environmental Policy

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

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

Approved by:

Mayor Mary Nelson Date 8/20/2015

SCEPP Team:

Title _____ Date 8-24-15

Title _____ Date 8-24-15

Title _____ Date 8/24/15

Title _____ Date _____

Title _____ Date _____

Title _____ Date _____

Title _____ Date _____

3.01 Scope of Operations Covered by the SCEPP

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

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

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

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

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

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

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

5) Identify regulatory requirements.

3.02 List of Operations Covered by the SCEPP

Activities Covered by the SCEPP

	Operation/Activity	Description
1.	**Provide safe drinking water**	Distribute safe drinking water to residences and businesses. Maintain certified operators for Treatment and Distribution of water in the system. Continue membership in ADEQ's Monitor Assistance Program (MAP), and tests for Total Coli form monthly and lead and copper annually. Post an annual Consumer Confidence Report (CCR) to its customers and ADEQ.
2.	**Waste water collection and treatment**	Safely collect and treat sewage for the Town. Maintain certified operators for its Wastewater Collection System and Wastewater Treatment Plant. Enforce ordinance for Grease Traps. Maintain compliance with the Aquifer Protection Permit from ADEQ for the Wastewater Facilities.
3.	**Road Maintenance**	Provide safe and reliable roads to the public cleaning up debris, patching potholes, grading unimproved roads and removing snow during winter months.
4.	**Used Oil**	Safely dispose of used oil and oil filters.
5.	**Branch Clean Up**	Keeping the Town clean for appearances. Continue practice of collecting trimmings (tree limbs, grass) and accepting trimmings from residences and burning them in the winter when there is no inherent danger from wind spread or temperature issues, in conformance with ADEQ's open burn rule.
6	Hazardous Waste generation	Maintain status as a Conditionally Exempt Small Quantity Generator (CESQG)
7	Above Ground Storage Tanks (ASTs)	Manage and maintain the Town's two (2) ASTs in conformance with regulatory and industry standards. Maintain cement pads so any potential leaks or problems are quickly recognized and impact to the environment is avoided.
8	Mosquito abatement program	Continue mosquito abatement program and store no more than five (5) gallons of the approved pesticide, at one time, in a well-ventilated area off the ground. Only properly trained and certified personnel will be authorized to handle and use the pesticide.
9	Spill clean-up	The Town mechanic, as well as all maintenance workers, will continue to utilize the proper absorbents to clean up any spills that may occur.
10	Trash Clean-up	Hold an annual "Spring Clean-up" to assist residents with trimmings and refuse disposal. Continue practice of enforcing the removal of abandoned vehicles.

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

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

The SCEPP Team identifies the environmental aspects of all activities within the SCEPP boundary that The Town of Springerville 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 Tim Rasmussen- Public Works Director maintains the SCEPP meeting minutes and other records as required.

The SCEPP establishes goals for its operations that are consistent with The Town of Springerville 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

4.01 F1A - Safe Drinking Water
4.01 F1B – Waste Water Collections
4.01 F1 C – Road Maintenance
4.01 F1 D – Used Oil
4.01 F1 E – Branch Removal

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

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

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

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

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

   Is there significant stakeholder interest?
   Yes: High potential for concern documented and expressed by several stakeholders.
   No: No or little concern.

Unknown: If there is insufficient knowledge about the level of stakeholder concern.

Is there significant financial opportunity or risk?

Yes: Costs to currently manage the aspect is significant or potential to create significant cost savings exists.

No: Currently little or no cost to manage the aspect, or little or no potential for cost savings or revenue generation.

Unknown: Potential for cost savings or revenue generation or costs to manage the aspect is unknown.

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

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

Procedures: Identifying Environmental Objectives and Targets

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

The SCEPP Team develops objectives and targets to define:

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

Applicable Definitions:

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

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

Development of Objectives and Targets:

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

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

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

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

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

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

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

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

Records - Records generated from this procedure include flowcharts, list of aspects and impacts, aspect analysis, legal requirements, and objectives and targets.

4.01 F1A - Safe Drinking Water

Inputs: What are the interactions occurring or done that use the following:
Electricity: Power used for pumps
Materials: Pumps, Tanks and Chlorine
Water: Flushing lines for line maintenance
Fuels: Propane will be used for the backup generator to power the East Booster Station & Tank Well
Other: Future plans to "Ice Pig" (clean) the main water lines to the Town
Emissions: What are the interactions occurring that create releases to the following:
Air: Minor emissions from the future backup generator
Water:
Land: Overflow and discharge of water from the storage tanks.
Other: (i.e., consumption of other resources or noise, odor etc.) Minor noise pollution from the future backup generator

4.01 F1B – Waste Water Collections and Treatment

Inputs: What are the interactions occurring or done that use the following:
Electricity: Pumps, Aerators, Motor for the clarifier
Materials: Sewer lines- (future cleaning and replacement of lines), Zymetreat & Chlorine Tablets
Water: Discharge to effluent to Nelson Lands (Wildlife Refuge)
Fuels: Electricity
Other:
Emissions: What are the interactions occurring that create releases to the following:
Air:
Water: Discharging effluent to a wildlife refuge. Possible impacts to Nutrioso Creek if there is an upset at the plant or collection system.
Land: When and if sewer overflows occur
Other: (i.e., consumption of other resources or noise, odor etc.) Waste Water Collections and Treatment can produce odors however Springervilles WWTP is in a remote area and we do not receive complaints. Town staff will manually add ferrous salts (ferric chloride, ferrous chloride or ferrous sulfate) to the wet well to prevent the formation of hydrogen sulfide.

4.01 F1 C – Road Maintenance

Inputs: What are the interactions occurring or done that use the following:
Electricity:
Materials: Oil, Cinders for snow/ ice,
Water: Use water for dust control when blading roads
Fuels: Oil, Gas and Diesel
Other:
Emissions: What are the interactions occurring that create releases to the following:
Air: Dust from road work- Air emissions from paving. Reduced dust from maintaining and blading roads. Exhaust from heavy equipment.
Water: Storm water runoff- Future Hydraulics and Hydrology Study of the Town.
Land:
Other: (i.e., consumption of other resources or noise, odor etc.) **Noise pollution from heavy equipment**

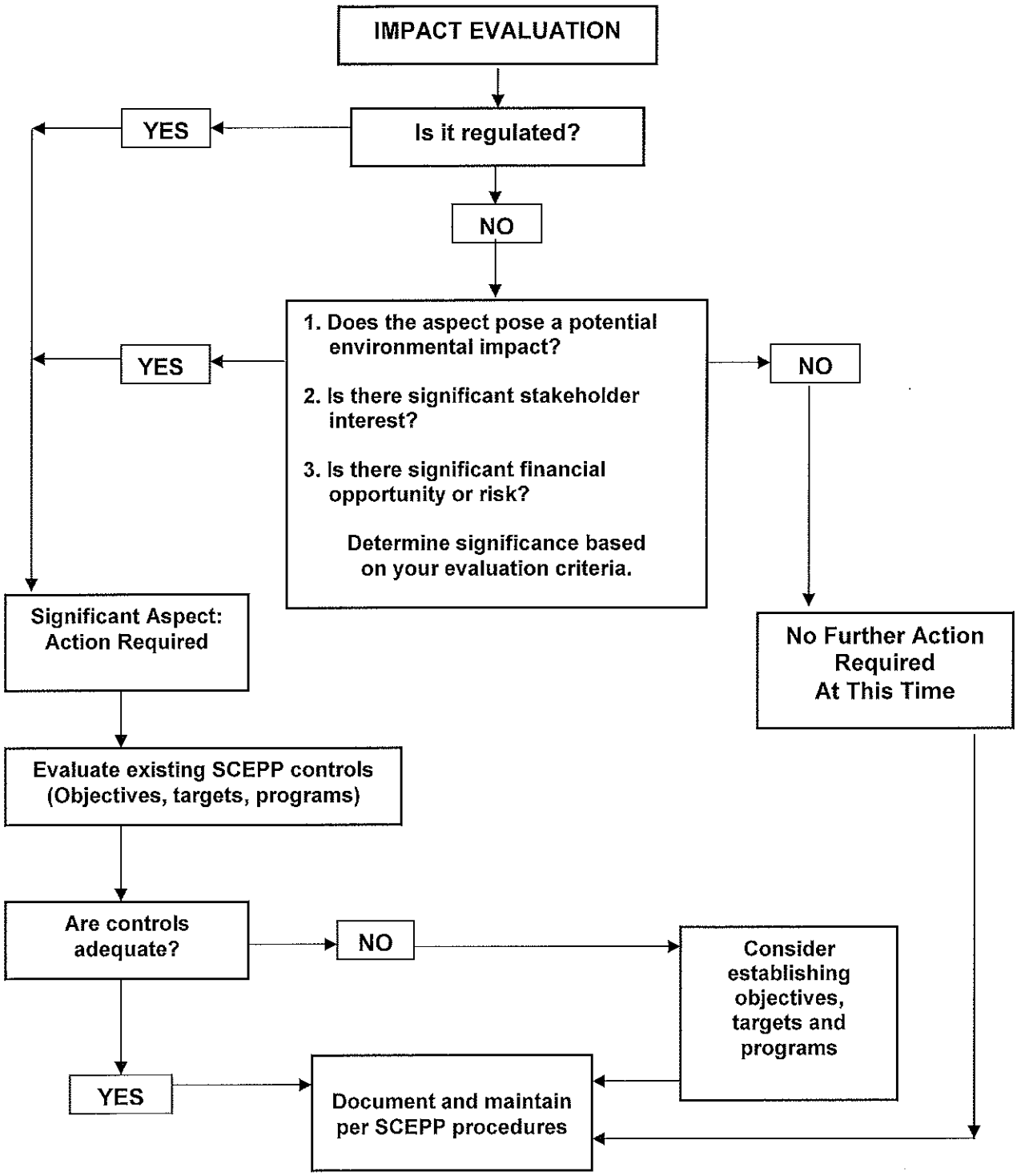
4.01 F1 D – Used Oil

Inputs: What are the interactions occurring or done that use the following:
Electricity:
Materials: Used Oil and Used Oil Filters
Water:
Fuels:
Other: Oil and Oil Filters collected in containers and picked up by Mesa Environmental and refined every other month
Emissions: What are the interactions occurring that create releases to the following:
Air:
Water: Possible storm water run-off
Land: Possible spills or leaks
Other: (i.e., consumption of other resources or noise, odor etc.)

4.01 F1 E –Branch Removal

Inputs: What are the interactions occurring or done that use the following:
Electricity:
Materials: Wood, Heavy Equipment
Water:
Fuels: Diesel & Gasoline
Other:
Emissions: What are the interactions occurring that create releases to the following:
Air: Reduced burning, Dust particles from cutting, Air emissions from vehicle or power equipment
Water: Reduced water for burning control
Land: Clean properties in the Town & prevent branch dumping within the Town
Other: (i.e., consumption of other resources or noise, odor etc.) Noise pollution from machinery to cut (such as chainsaws)

4.01 2 Flow Diagram of Impact Significance Evaluation



4.01 F2 Form for Assigning Impacts to Aspects and Determining Significance

	Impacts				Questions for Significance				
Aspects	**Air**	**Water**	**Land**	**Other**	**Is it Regu-lated?**	**Does the aspect pose a potential environmental risk?**	**Is there significant stakeholder interest?**	**Is there significant financial risk or opportunity?**	**Is it a Significant Aspect? Yes/No**
Backflow Prevention	No	Yes	No		Yes	Yes	No	No	Yes
Cleaning the water lines	No	Yes	No		Yes	No	No	No	Yes
Certify employees in water & waste water	No	Yes	No		Yes	No	No	No	Yes
Cleaning the sewer lines	Yes	Yes	Yes		No	Yes	No	Yes	Yes
Replacing sewer lines	Yes	Yes	Yes		No	Yes	No	Yes	Yes
Paving new roads (that are dirt)	Yes	Yes	Yes		Yes	No	Yes	No	Yes
Mill & overlay fatigue roads	Yes	No	Yes		No	No	Yes	No	Yes
Recycle used oil and filters	No	Yes	Yes		Yes	No	No	No	Yes
Clean branches in Town	Yes	No	Yes		No	No	Yes	No	Yes

4.01 F3 Setting Aspects, Significant Impacts, Objectives and Targets

Activity	Aspect	Significant Impact	Objective	Target
Safe Drinking Water	Backflow Prevention	Yes	Minimize and prevent backflow cross connections	Increased annual compliance to 100%
Safe Drinking Water	Cleaning the water lines	Yes	Improve water quality and line capacity	Clean lines to a 95% to the new state by August 2015
Safe Drinking Water	Certified in water & waste water	Yes	Get more employees to be certified operators	Have 60% of Public Works Employees Certified by June 2015
Sewage Collection	Cleaning the sewer lines	Yes	Root and debris removal	Clean lines to a 90% to the new state by August 2015
Sewage Collection	Replacing sewer lines	Yes	Replace lines in problem areas	Camera 100% and replace high priority lines identified by the cleaning and camera project by August 2016
Road Maintenance	Pave new roads	Yes	Pave dirt roads within Town	Pave Becker Lake & Hooper Ranch by June 2025
Road Maintenance	Mill and repave roads	Yes	Repair roads to a new state	Repave/ chip seal 20% of roads by June 2018
Oil and oil filters collection	Recycle used oil and oil filters	Yes	Used oil removal	Remove and recycle all used oil and oil filters
Branch Removal	Pick up branches within the Town	Yes	Remove debris & branches	Increased participation by 10% every year

5.01 Procedure for Identifying Legal and Other Environmental Requirements

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

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

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**

OSHA Requirements may include:

- Process Safety Management
- Industrial Practices

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

Environmental Requirements:

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

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

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

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

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

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

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

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

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

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

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

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

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

SCEPP CONTROLLED DOCUMENT:
LIST OF LEGAL AND OTHER ENVIRONMENTAL REQUIREMENTS

Aspect	Legal Requirements	Legal Citation
Drinking Water System	*Permits required for operation of facility including construction/modification approvals*	*AAC Title 18 Chapter 5*
	Sampling and reporting requirements	*AAC Title 18 Chapter 4*
	Operations and Maintenance requirements including cross-connection survey and backflow prevention assemblies (installation as required) and testing	*AAC Title 18 Chapter 4*
	Operator Certification & License Renewal Hours	*AAC Title 18 Chapter 5*
Wastewater Treatment Plant/Facility	*Permits required for operation of the facility including permit required sampling and reporting*	*AAC Title 18 Chapter 9*
	Operation and Maintenance requirements	*AAC Title 18 Chapter 9*
	Operator Certification & License Renewal Hours	*AAC Title 18 Chapter 5*
	State Aquifer Protection Permit	*ARS § 49-241 – ARS § 49-252; AAC Title 18*
Grease Traps	*Town Ordinance*	
Material Storage and Use	*ASTs*	*Fire Code; SPCC; 40 Code of Federal Regulations Part 112*
Emergency Planning - EPCRA	*SARA Title III Hazardous Waste Reporting – Community Right to Know Act*	*40 CFR Part 370*
	SARA Title III Toxic Chemical Release Reporting – Community Right to Know Act	*40 CFR Part 372*
Hazardous Waste Management	*Conditionally Exempt Small Quantity Generator*	*AAC Title 18 Chapter 8*
Used Oil Management	*Recycle used oil and used oil filters*	*ARS Title 49 Chapter 4*

Open Burning	*Open burn permitting*	*AAC Title 18 Chapter 2*
Renovation and Demolition Projects	*Asbestos NESHAP*	*40 Code of Federal Regulations Part 61, Subpart M*
Airport Maintenance	*Stormwater Pollution Control*	*ADEQ Multi-Sector General Permit*
Road Maintenance	*ADEQ Construction General permit (CGP) for disturbance of land surface of at least one acre*	*ADEQ Construction General Permit*

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 Tim Rasmussen- Public Works Director and Robert Pena- Foreman prior to implementation. The EMPs define the principal actions to be taken, the individuals responsible and the scheduled times for implementation that will achieve the desired results.

Procedure:

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

A description of Environmental Management Programs includes:

- designation of responsibility;
- resources available (budget, staff and technology); and
- time frame of execution

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

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

6.01 F1A – Backflow Prevention
6.01 F1B – Clean Main Water Lines
6.01 F1C – Water and Wastewater Certifications
6.01 F1D – Sewer Cleaning
6.01 F1E – Replace Sewer Lines
6.01 F1F – Pave Dirt Roads
6.01 F1G – Seal Existing Roads
6.01 F1H – Recycle Used Oil and Filters
6.01 F1I– Branch Removal

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

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

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

6.01 F1A- Backflow Prevention

Operation/Activity: **Backflow Prevention**	**EMP Document Control No:** **001**
Facility: **Public Water System**	**Responsible Persons:** **Tim Rasmussen**
Resources Available (Including Financial): **Two employees are available to conduct outreach and ensuring that all backflows are in compliance.**	
Goal Statement: (Describe how this program meets commitments of the Environmental Policy) To ensure that the Town protects its public water system from contamination caused by a backflow through unprotected cross- connections, require the installation and periodic testing of backflow-prevention assemblies.	
Objective: **Have all businesses install backflows prevention and get annual testing**	**Target and Completion Date:** Increase annual compliance with install and testing from 40% to 100%
Strategy: **Implement an Annual Tester Notification Discontinuation Of Water Service Standard Operating Procedure**	
Tasks for Achieving Objective and Target: **Create spread sheets and timelines for compliance. Letters are sent out and compliance is tracked. Public Works Director may visit to ensure compliance.**	
Metrics and Measurement: **There are 1st, 2nd & 3rd notices for compliance with dates for compliance. A spread sheet is used to verify when completion for install or testing is done and reviewed by the Public Works Director and may be audited by ADEQ.**	
Importance relative to Other Environmental Programs: **Protection of the Town's water system.**	
Comments/Process Towards Completion: **We are currently on the 3rd and last notices. The water will be turn off for noncompliance.**	

6.01 F1B – Clean Main Water Lines

Operation/Activity: **Cleaning the Main Water Lines**	**EMP Document Control No:** **002**
Facility: **Public Water System**	**Responsible Persons:** **Public Works Director- Tim Rasmussen** **Contractor to do the work**
Resources Available (Including Financial): **Water Infrastructure Finance Authority**	
Goal Statement: (Describe how this program meets commitments of the Environmental Policy) To clean the main water lines to a 95% clean state.	
Objective: **Use a process called "Ice Pigging" which is an ice slurry process pressurized in the lines to clean the lines.**	**Target and Completion Date:** Clean lines to a 95% new state and completed by August 2015.
Strategy: **Use the WIFA loan to hire a contractor to use the "Ice Pigging". A process to clean the water lines back to an original new state. Then develop a maintenance program to flush the water lines throughout the year to flush sediment out of the lines.**	
Tasks for Achieving Objective and Target: Hiring a contractor- Ice Pigging- Yearly Maintenance Program	
Metrics and Measurement: Test water on a monthly and annual basis. The cleaning of the lines is measured by how much sediment is taken out of the lines and how clean the water is after the sediment is relieved from the lines.	
Importance relative to Other Environmental Programs:	
Comments/Process Towards Completion: **WIFA Loan is funded to do this project. Construction Documents are being drawn up.**	

6.01 F1C – Water and Wastewater Certification

Operation/Activity: **Certified Employees In Water & Waste Water**	**EMP Document Control No:** **003**
Facility: **Public Water System & Waste Water System**	**Responsible Persons:** **Public Works Employees**
Resources Available (Including Financial): **ADEQ training & Gateway Community College testing**	
Goal Statement: (Describe how this program meets commitments of the Environmental Policy) To have more Town employees trained and certified in Water Collections, Water Distribution, Waste Water Treatment Plant Operator	
Objective: **For staff to have a better knowledge of how the Towns' system works and to have cross trained employees**	**Target and Completion Date:** Train and certify employees that have a Class 1, to get a Class 2. Get the employees that do not have any certifications trained and certified in Water or Waste Water. Annual Performance Reviews are done with each individual employee. Employees are asked to gain certifications by years end.
Strategy: **Spend time training and certifying employees by rewarding them with merit raises and responsibility. Cross train employees between different departments.**	
Tasks for Achieving Objective and Target: Inspire Public Works Employees and offer them training. Training and testing are printed out and placed on the employees bulletin board and discussed in weekly staff meetings. Check regularly for PDH hours.	
Metrics and Measurement: Increase employee training and certification by 60%	
Importance relative to Other Environmental Programs	
Comments/Process Towards Completion:	

6.01 F1D – Sewer Cleaning

Operation/Activity: **Sewer Cleaning**	**EMP Document Control No:** **004**
Facility: **Public Sewage Collection System**	**Responsible Persons:** **Public Works Director- Tim Rasmussen** **Contractor to do the work**
Resources Available (Including Financial): **Water Infrastructure Finance Authority**	
Goal Statement: (Describe how this program meets commitments of the Environmental Policy) To clean the sewer lines to a 90% clean state.	
Objective: **Auger the sewer lines from manhole to manhole. Camera the lines and GPS points for repair.**	**Target and Completion Date:** Clean the sewer lines to a 90% new state and identify repair areas by August 2015
Strategy: **Use the WIFA loan to hire a contractor to auger, sewer cam and GPS problem areas in need for replacement or repair.**	
Tasks for Achieving Objective and Target:	
Metrics and Measurement: Annual cam the town sewer system. Decrease the call outs for plugged sewer lines by 95% reduction.	
Importance relative to Other Environmental Programs:	
Comments/Process Towards Completion: **Public Works has started repairing and replacing repetitive problem areas where the sewer callouts have declined 30% this year.**	

6.01 F1E – Replace Sewer Lines

Operation/Activity: **Replacing sewer lines**	**EMP Document Control No:** **005**
Facility: **Public Sewage Collection System**	**Responsible Persons:** **Town of Springerville Public Works**
Resources Available (Including Financial): **Water Infrastructure Finance Authority**	
Goal Statement: (Describe how this program meets commitments of the Environmental Policy) Repair and replace existing sewer lines that are identified by the auguring and cleaning of the sewer system.	
Objective: **Auger the sewer lines from manhole to manhole. Camera the lines and GPS points for repair. Repair or replace the lines that are in need of repair or replacement,**	**Target and Completion Date:** Camera 100% and replace high priority lines identified by the cleaning and camera project by August 2016
Strategy: **Use the WIFA loan to hire a contractor to auger, sewer cam and GPS problem areas in need for replacement or repair. Town of Springerville Public Works would then repair or replace sections identified.**	
Tasks for Achieving Objective and Target:	
Metrics and Measurement: Annual cam the town sewer system. Decrease the call outs for plugged sewer lines by 95%.	
Importance relative to Other Environmental Programs:	
Comments/Process Towards Completion: **Public Works has been digging and replacing repetitive areas with sewer problems. Sewer call outs have declined 30% this year.**	

6.01 F1F – Pave Dirt Roads

Operation/Activity: Pave Existing Roads	**EMP Document Control No:** **006**
Facility: **Road Maintenance**	**Responsible Persons:** **Town of Springerville Public Works**
Resources Available (Including Financial): **Surface Transportation Program/ Transportation Improvement Program through ADOT & NACOG**	
Goal Statement: (Describe how this program meets commitments of the Environmental Policy) To pave two existing roads within the Town of Springerville that is currently dirt road based.	
Objective: **Pave existing dirt roads within the town**	**Target and Completion Date:** 7/ 2025 Budget yearly and use the ADOT Programs to fund paving of Hooper Ranch Rd & Becker Lake Rd.
Strategy: Use the Surface Transportation Program/ Transportation Improvement Program through ADOT & NACOG to surface two existing roads within the town with asphalt.	
Tasks for Achieving Objective and Target: Attend bi-monthly NACOG Regional Transportation Meetings/ Use the Transportation Improvement Program for funding.	
Metrics and Measurement: Review annual budget and allocate existing budgeted monies for these projects on an annual basis.	
Importance relative to Other Environmental Program: **Increased dust control for the town**	
Comments/Process Towards Completion:	

6.01 F1G – Seal Existing Roads

Operation/Activity: Mill and overlay/ chip seal existing roads	**EMP Document Control No:** **007**
Facility: **Road Maintenance**	**Responsible Persons:** **Town of Springerville Public Works**
Resources Available (Including Financial): **Surface Transportation Program/ Transportation Improvement Program through ADOT & NACOG/ Town of Springerville**	
Goal Statement: (Describe how this program meets commitments of the Environmental Policy) Mill and Overlay/ chip seal existing Town roads that show signs of fatigue and cracking	
Objective: **Mill and overlay/ chip seal existing roads within the town**	**Target and Completion Date:** Ongoing target- Identify and plan by yearly budgeting. Repave/ chip seal 20% of roads by June 2018
Strategy: Use the Surface Transportation Program/ Transportation Improvement Program through ADOT & NACOG to mill and overlay/ chip seal existing roads that show signs of fatigue and cracking	
Tasks for Achieving Objective and Target: Attend bi-monthly NACOG Regional Transportation Meetings/ Use the Transportation Improvement Program for funding and budget through the Town of Springerville.	
Metrics and Measurement: Using a spreadsheet, identify targets and track them including funding and completion dates	
Importance relative to Other Environmental Programs:	
Comments/Process Towards Completion: **Mill and overlay on South Pima in 2015 & Mill and overlay Coconino in 2017/ 2018**	

6.01 F1H – Recycle Used Oil and Filters

Operation/Activity: Recycle used oil and oil filters	**EMP Document Control No:** **008**
Facility: **Oil and oil filter collection**	**Responsible Persons:** **Town of Springerville Public Works**
Resources Available (Including Financial): **Mesa Environmental (this is a free service)**	
Goal Statement: (Describe how this program meets commitments of the Environmental Policy) Recycle used oil and oil filters	
Objective: **Recycle used oil and oil filters**	**Target and Completion Date:** Started program 4-2013- Ongoing program 100% of recycled oil meets vendor requirements
Strategy: Recycle used oil and oil filters by partnering with Mesa Environmental	
Tasks for Achieving Objective and Target: Continue saving the Towns used oil and oil filters and recycling them by giving them to Mesa Environmental. They are picked up every third month.	
Metrics and Measurement: Pick up receipts are retained for evidence of this program. The receipts show that the oil was tested and accepted if there was not any other materials present	
Importance relative to Other Environmental Programs: Used oil never wears out. It just gets dirty and can be recycled, cleaned, and used again. Recycling used motor oil conserves a natural resource (oil) and is good for the environment too. Motor oil poured onto the ground or into storm drains, or tossed into trash cans (even in a sealed container) can contaminate and pollute the soil, groundwater, streams, and rivers. Recycling your used motor oil reduces this pollution threat. When you take your used oil to a certified center for recycling, you are protecting the environment, conserving a valuable resource.	
Comments/Process Towards Completion: **Started this process 4-2013**	

6.01 F1 I – Branch Removal

Operation/Activity: Branch removal within the town	**EMP Document Control No:** **009**
Facility: **Branch/ Trash removal**	**Responsible Persons:** **Town of Springerville Public Works Staff**
Resources Available (Including Financial)**:** **Public Works Department**	
Goal Statement: (Describe how this program meets commitments of the Environmental Policy) Every year advertise and pick up branches from town residences for one week. Residences that have had a complaint or Code Enforcement Issue will be mailed a flyer about the program.	
Objective: **Inspire residence to clean their yards every Spring**	**Target and Completion Date:** Every May of each year. A goal of 10% increment per year
Strategy: Inspire residences to clean their yards by advertising and implementing a free branch pick up by the town	
Tasks for Achieving Objective and Target: Advertise, coordinate with Blue Hills for a free trash day at the transfer station, schedule work crews to pick up branches that are called in and scheduled	
Metrics and Measurement: The quantity of truck loads are recorded and tracked year to year	
Importance relative to Other Environmental Programs: This is a positive reflection of the community by doing your part to clean up your neighborhood. Picking up will not only improve how the environment looks but also how clean it is. Cleaning up your community will help people to notice that they also can contribute to keeping it picked up.	
Comments/Process Towards Completion: The Town obtains a burn permit from Apache County and ADEQ	

6.01 F2 Form for Preparing a Registry of Environmental Management Programs

Operation/Activity	Environmental Aspect	Significant Impact	Objective	Target	EMP Document Control No.
Safe Drinking Water	Backflow Prevention	Yes	Minimize and prevent backflow cross connections	Increase compliance to 100%	001
Safe Drinking Water	Cleaning the water lines	Yes	Improve water quality and line capacity	Clean lines to a 95% new state	002
Safe Drinking Water	Certified in water & waste water	Yes	Get employees trained	Have 60% of Public Works Employees certified	003
Sewage Collection	Cleaning the sewer lines	Yes	Root and debris removal	Clean lines to a 90% new state	004
Sewage Collection	Replacing new sewer lines	Yes	Replace lines in problem areas	Cam and replace 25% of the town lines	005
Road Maintenance	Pave existing roads	Yes	Pave dirt roads within the town	Pave Becker Lake and Hooper Ranch road	006
Road Maintenance	Mill and overlay or chip seal roads	Yes	Repair roads with fatigue	Mill and overlay or chip seal 20% of the roads	007
Oil and Oil Filter Collection	Recycle used oil and oil	Yes	Used oil and filter removal	Remove and recycle used oil	008

	filters			and oil filters	
Branch Removal and Trash Day	Remove branches in town and set up a free dump day with Blue Hills	Yes	Pick up and remove branches and set up a day for residences to clean up trash from their property	Inspire residences to clean up their yards every spring; increase participation by 10% each year.	009

7.01 Procedure for Establishing Operational Controls & Organizational Structure & Responsibilities

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

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

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

Procedure:

The Town of Springerville may already have existing policies and procedures in place that set forth the Town of Springerville'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.

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.

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

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

Writing Operational Controls:

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

Operational Controls should also include the following:

1) Responsibility – who does the procedure or instruction apply?

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

3) The operational steps for the process itself.

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

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

7.01 F1 Operational Control Procedures Registry

SCEPP OPERATIONAL CONTROL PROCEDURES REGISTRY	Document Control Number

Small Community Environmental Protection Plan	**SCEPP/1.00**
Good Faith Commitment	SCEPP/1.01
Environmental Policy	**SCEPP/2.00**
Procedure for Developing an Environmental Policy	SCEPP/2.01
Scope of Operations Covered by the SCEPP	**SCEPP/3.00**
Procedure for Identifying Scope of the Operations Covered by the SCEPP	SCEPP/3.01
Environmental Aspects and Impacts, Objectives and Targets	**SCEPP/4.00**
Procedure for Identifying Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets	SCEPP/4.01
Legal and Other Requirements	**SCEPP/5.00**
Procedure for Identifying Legal and Other Requirements	SCEPP/5.01
Environmental Management Programs (EMP)	**SCEPP/6.00**
Procedure for Establishing Environmental Management Programs	SCEPP/6.01
Operational Control & Organizational Structure and Responsibilities	**SCEPP/7.00**
Procedure for Establishing Operational Controls & Organizational Structure and Responsibilities	SCEPP/7.01
Department () Procedures	**SCEPP7.03**
Safe Drinking Water	SCEPP/7.03-1
Wastewater Treatment	SCEPP/7.03-2
Microbiological Sample Siting Plan and Sampling Procedures	SCEPP/7.03-3
Emergency Operations Plan for water emergencies	SCEPP/7.03-4
Annual BackflowTester Notification Discontinuation Of Water Service Standard Operating Procedure	SCEPP/7.03-5
Sewer Main Preventative Maintenance Program	SCEPP/7.03-6
Water Main Preventative Maintenance Program	SCEPP/7.03-7
Training, Awareness and Competency	**SCEPP/8.00**
Procedure for SCEPP Awareness and Competency Training	SCEPP/8.01
Communications & Stakeholders Registry	**SCEPP/9.00**
Communications & Registry of Stakeholders Procedures	SCEPP/9.01
Document Control	**SCEPP/10.00**
Document Control Procedures	SCEPP10.01

Environmental Records Control	**SCEPP/11.00**
Procedure for Environmental Records Maintenance	SCEPP/11.01
Emergency Preparedness and Response	**SCEPP/12.00**
Procedure for Emergency Preparedness and Response Plans	SCEPP/12.01
Nonconformance and Correction and Preventive Actions	**SCEPP/13.00**
Procedure for Nonconformance Corrective and Preventive Actions	SCEPP/13.01
Environmental Compliance Audit	**SCEPP/14.00**
Procedure for Environmental Compliance Audit	SCEPP/14.01
SCEPP Audit	**SCEPP/15.00**
Procedure for SCEPP and Regulatory Compliance Audits	SCEPP/15.01
Management Review	**SCEPP/16.00**
Procedure for SCEPP Management Review (by the Governing Body)	SCEPP/16.01

7.01 F2 Form for List of Organizational Structure & Responsibilities

Responsibilities	Governing Body (Mayor & Town Council)	SCEPP Manager	Public Housing	Police Dept.	Water Dept.	WWTP	Public Works Supervisors	Fire Dept.	Sanitation	Director of Utilities and Environmental Services
Back Flow Prevention		X			X		X			
Cleaning Water Lines	X	X			X		X			
More Certified Employees		X			X	X	X			
Cleaning Sewer Lines	X	X					X			
Replacing Sewer Lines	X	X				X	X			
Pave Existing Roads	X	X					X			
Mill And Overlay Roads	X	X					X			
Recycle Used Oil & Filters		X					X		X	
Branch & Trash Removal		X					X		X	
Reporting violations to management and ADEQ										
Self Reporting	X	X		X	X	X	X	X		X

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
Safe Drinking Water	Yes	Yes	No	R. Pena	H	January, 15 2017
Wastewater Treatment	Yes	Yes	No	R. Pena	H	January, 15 2017
Microbiological Sample Siting Plan and Sampling Procedures	Yes	Yes	No	T. Rasmussen	H	November 2017
Emergency Operations Plan for water emergencies	Yes	Yes	No	T. Rasmussen	H	November 2017
Annual Backflow Tester Notification Discontinuation Of Water Service Standard Operating Procedure	Yes	Yes	No	T. Rasmussen	H	Annually September
Sewer Main Preventative Maintenance Program	No	N/A	Yes	T. Rasmussen	H	January 2016
Water Main Preventative Maintenance Program	No	N/A	Yes	T. Rasmussen	H	January 2016

8.01 Procedure for SCEPP Awareness and Competency Training

The Town of Springerville identifies, plans, monitors and records awareness and competency training needs and delivery for all personnel. The Town of Springerville 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 Public Works Director Tim Rasmussen is responsible for all training records. Records are to be monitored and reviewed on a scheduled basis annually. Supervisors determine competency as outlined in environmental control procedure

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

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

1) Awareness training for all employees including the governing body, if applicable.
2) Competency training for those whose jobs affect the organization's ability to meet its objectives and targets including legal/regulatory compliance.

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

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

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

8.01 F1 Environmental Training Requirements & Delivery Log

Training Required	Description	Mandatory Attendance	Frequency	Date Completed
SCEPP Awareness	Introduction to SCEPP and Environmental Policy	All	Annual/ Date of Hire for new Employees	
Storm Water Pollution Prevention	Procedures and Responsibilities	Waste Water Collection Staff	Annual/ Date of Hire for new Employees	
Emergency Response	Procedures and Responsibilities	All	Annual/ Date of Hire for new Employees	
OSHA	Required Certifications	Collections Staff	Every 3 years	
Plant Operations	Required Process Controls	Plant Staff	6 Months	
Collection Systems Procedures	Required procedures and practices	Collections Staff	6 Months	
Environmental Audit	Environmental Audit Procedures	SCEPP manager and team	Annually	
Annual SCEPP Audit	SCEPP Audit Procedures	SCEPP manager and team	Annually	
Professional Development Hours (PDHs)	Water and wastewater operators must complete 30 PDHs every three years for license renewal.	Certified Operators	Every 3 Years	

9.01 Communications & Registry of Stakeholders Procedure

Communications

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

Description:
This procedure describes the process for:

1) Internal environmental communications/awareness.
2) External environmental communications with interested parties (outside stakeholders).

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

Procedure:

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

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

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

Communications Distribution Plan:

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

Internal communications distribution may include:

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

External communication distribution may include:

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

Preparing a Registry of Stakeholders

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

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

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

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

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

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

3) Identify the environmental expectations for each stakeholder group.

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

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

9.01 F1 Registry of Stakeholders

Name of Stakeholder Group	Description of Stakeholder Group	Description of Environmental Expectation	Regulatory or Other Requirement?
Local Residences, Businesses and School District	Residents and businesses in the community are taxpayers, including Water and Sewer Customers	Provision of services in a way that causes the minimum of environmental degradation	Yes
Local Environmental Groups	Citizens and special interest groups promoting environmental protection	Continual improvement in environmental performance	No
Employees	All permanent and temporary employees of the municipality	All work environment and work activities that respect and preserve the environment	No
Suppliers and Service Providers (Vendors)	Companies from which the municipality purchases products and services	Access to environmental information and freedom to complete to provide products and services in a fair process	Yes
Local Police & Fire Departments	Police and Fire regulations	Ensure compliance with all local environmental regulations which should also be part of Emergency Preparedness and Response	Yes
ADEQ	State regulators and compliance officers focusing on environmental compliance	Maintenance of required environmental permits and regulatory compliance; Self-reporting of violations	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 and renewable energy resources	Continual improvement in energy use	No

10.01 Document Control Procedures

The Town of Springerville 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, Public Works Director Tim Rasmussen or designee, upon request.

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

The Town of Springerville 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 Public Works Director Tim Rasmussen 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.

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

Upon approval by the governing body and the SCEPP Team, the SCEPP Manager, Public Works Director Tim Rasmussen, or designee, issue 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

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		Managers Office
3.01 F1	List of Operations covered by the SCEPP		Public Works
4.01 F3	List of Aspects, Significant Impacts, Objectives and Targets		Public Works
5.01 F1	List of Legal and Other Environmental Requirements		Public Works
6.01 F2	Register of Environmental Management Programs		Public Works
7.01 F2	Operational Control & Organizational Structure and Responsibilities (SCEPP Team)		Public Works
8.01 F1	Training Awareness and Competency		Public Works
9.0	Communications & Registry of Stakeholders		Public Works
10.01 F1	Document Control		Public Works
11.01 F1	Environmental Records Control		Public Works
12.01	Emergency Preparedness and Response		Public Works
Procedures – Also See Operational Control Procedures Registry (Section 7)			
3.01	Procedures for Aspects, Significant Impacts, Objectives and Targets		Public Works
5.01	Procedures for Legal and Other Environmental Requirements		Public Works
6.01	Procedures for Environmental Management Programs		Public Works
8.01	Procedures for Awareness and Competency Training		Public Works
9.01	Communications Procedures		Public Works
10.01	Document Control Procedures		Public Works
Forms			
4.01 F3	Environmental Aspects, Impacts, Objectives and Targets		Public Works
15.01 F1	Audit Checklist		Public Works
13.01 F2	Corrective and Preventive Action Request		Public Works

11.01 Procedure for Environmental Records Control

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

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

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

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

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.

11.01 F1 Form for Preparing Environmental Records Control List

NO.	Record Type	Person Responsible	Location	File Method	Retention Minimum
1.0	**ADMINISTRATIVE**				
1.01		Procurement	Central Records	Electronic Data System	
1.02	Purchasing	Rasmussen	Admin. Office	Paper	6 Years
1.03	Auditing	Rasmussen	Admin. Office	Paper	Permanent
1.04	ADEQ Licensing	Rasmussen	Admin. Office	Paper	10 Years
1.05	In House Training	Rasmussen	Admin. Office	Paper	6 Years
1.06					
2.0	**ENVIRONMENTAL**				
2.01	Compliance Violation Reports	Rasmussen	Admin. Office	Paper	10 Years
2.02	SCEPP Meeting Minutes	Rasmussen	Admin. Office	Paper	5 Years
2.03	Customer Complaint Reports	Rasmussen	Admin. Office	Paper	10 Years
2.04					
2.05					
2.06					
3.0	**Program Specific (e.g. DRINKING WATER MONITORING & REPORTING DATA)**				
3.01	Compliance Monitoring Reports	Pena	Admin. Office	Paper	12 Years
	Operational Reports	Pena	Admin. Office	Paper	12 Years
	Laboratory Sampling & Testing	Pena	Lab/ Admin. Office	Paper	12 Years
4.0	**Program Specific (e.g. WASTEWATER MONITORING & REPORTING DATA)**				
4.01	Compliance Monitoring Reports	Pena	Admin. Office	Paper	10 Years
	Operational Reports	Pena	Admin. Office	Paper	10 Years
	Laboratory Sampling & Testing	Pena	Lab/ Admin. Office	Paper	10 Years

12.01 Procedure for Emergency Preparedness and Response Plans

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

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

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

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

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

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

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

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

13.01 Procedure for Nonconformance, Corrective and Preventive Actions

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

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

This procedure is used for implementing corrective and preventive actions.

The procedures:

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

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

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

Applicable Definitions:

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

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

Procedure:

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

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

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

Initiating Corrective or Preventive Action:

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

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

Determining and Implementing Corrective and Preventive Actions:

1) The relevant personnel must investigate and resolve the problem and communicate the corrective or preventive action taken to the SCEPP Manager.

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

Tracking Corrective and Preventive Actions:

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

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

Tracking Effectiveness of Solutions:

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

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

13.01 F1 Form for Preparing Corrective and Preventative Action Tracking Log

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

13.01 F2 Form for Corrective Action Request & Response

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

14.01 Procedure for Environmental Compliance Audit

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

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

Environmental Regulatory Major or Minor Violation Identified:

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

Procedure:

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

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

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

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

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

The Audit Plan procedures include:

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

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

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

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

These instructions cover the following SCEPP environmental regulatory compliance elements:

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

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

14.01 F1 Form for Preparing Environmental Compliance Audit Plan

AUDIT SCHEDULE

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

1) ENVIRONMENTAL REGULATORY MAJOR OR MINOR VIOLATION IDENTIFIED

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

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

2) OPERATIONAL CONTROL

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

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

3) EMPLOYEE TRAINING & TRACKING

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

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

4) INTERNAL AND EXTERNAL COMMUNICATIONS

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

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

5) EMERGENCY PREPAREDNESS AND RESPONSE

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

#	Questions	Yes	No	Notes
1.	Have procedures (and/or an emergency response plans) been developed to respond to and report accidents, spills, malfunctions, process upsets, and other emergency situations?			
2.	Do the procedures provide for notification and reporting of accidents, spills, fires, or emergency situations?			
3.	Do the procedures contain a provision to mitigate or clean-up related environmental impacts?			

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

6) RECORDS and RECORDKEEPING

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

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

7) ENVIORNMENTAL COMPLIANCE AUDITS

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

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

8) AUDIT SUMMARY

The 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	

	and work instructions	
3.	Employee training and tracking	
4.	Internal and external communication	
5.	Emergency preparedness and response	
6.	Records and recordkeeping	
7.	Compliance with the past SCEPP environmental compliance audit requirements	

CORRECTIVE ACTIONS

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

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

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

15.01 Procedure for SCEPP Conformance Audit

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

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

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

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

The Town of Springerville 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, Public Works Director Tim Rasmussen, for use in The Town of Springerville's Mayor and Town Council management review process.

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

The outputs from SCEPP audits feed into two separate processes:

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

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

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

Procedure:

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

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

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

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

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

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

CORRECTIVE ACTION

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

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

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

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

Planning an SCEPP Internal Audit: Audit Program and Audit Plan

An audit is a systematic and documented process for obtaining evidence. Many corporations and organizations have specific programs for conducting an audit of their operations. These audit programs include activities necessary for planning and organizing audits, resources

needed to conduct audits, frequency and types of audits (e.g. quality audit, environmental audit, compliance audit, or joint audit). Based on this audit program, a SCEPP audit plan is written.

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

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

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

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

AUDIT SCHEDULE

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

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

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

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

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

Developing an Audit Procedure

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

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

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

15.01 F1 SCEPP Audit Plan

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

1. Purpose

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

2. Scope

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

3. Procedure

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

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

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

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

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

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

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

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

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

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

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

7. References
The Audit Sheet is provided as reference.

Performing a SCEPP Audit

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

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

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

15.01 F1A SCEPP Audit Sheet

SCEPP Audit Sheet

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

1. Environmental Policy

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

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

2. Environmental Program Development

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

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

	track the environmental training needs of all personnel who have responsibility for processes that have significant environmental impact?			
2.	Do the training and tracking procedures contain provisions to identify the type and frequency of training?			
3.	Do the procedures identify who needs training?			
4.	Do the procedures contain mechanism to track training of employees?			
5.	Do the procedures contain provisions for review and update of training requirements?			
6.	Do the procedures include appropriate training required by legal training requirements? (Such as: RCRA, SPCC, SWPPP, OSHA, etc.)			
7.	Do the training and tracking procedures include provisions to require employee training on SCEPP procedures?			
8.	Do the procedures contain provisions to require training for new employees that informs them about the facility's environmental policy and about new employees' duties within the SCEPP?			

5. Internal and External Communication

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

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

6. Emergency Preparedness and Response

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

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

7. Records and Recordkeeping

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

#	Questions	Yes	No	Notes

1.	Has a procedure for tracking records been developed?			
2.	Have the types of records to be kept been identified?			
3.	Has a system for record identification and indexing the records been developed?			
4.	Is there a procedure to remove obsolete records and record destruction?			
5.	Has a procedure for establishing reporting and recordkeeping been developed to document the environmental status of all activities?			
6.	Are there provisions to update the procedures to accommodate facility changes?			
7.	Does the documentation show that reporting and recordkeeping has been implemented according to the procedures?			

8. SCEPP Audits

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

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

AUDIT SUMMARY

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

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

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

CORRECTIVE ACTION

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

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

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

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

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

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

1. handling and investigating nonconformance with the SCEPP;

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

3. initiating and implementing corrective and preventive action.

15.01 F2 Form for Preparing a SCEPP Audit Summary Sheet

Element Number	Description	Audit Results	
		Major/Minor Findings	Comments

SCEPP Audit Summary By:

Lead Auditor Date

Audit Team Date

Audit Team Date

Audit Team Date

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

Type of Non-conformance: (circle as appropriate)		
Major	**Minor**	**Recommendation**
Description (include where in the organization the finding was identified):		
SCEPP Reference	**Date:**	**Finding Number:**
Lead Auditor:	**Audit Team:**	
Corrective Action Plan (include time frame):		
Response to Corrective Action Request:		
Preventive Action Taken:		
Responsible Person:	**Completion Date:**	
Corrective Action Verified By:	**Date Verified:**	

15.01 F4 Protocol for Investigating and Correcting SCEPP Nonconformance

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

1. Purpose

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

2. Scope

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

3. Procedure

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

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

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

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

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

4. Updates and Reviews

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

5. Responsibilities

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

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

6. Documentation

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

7. Reference

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

16.01 Procedure for SCEPP Governing Body Management Review

The SCEPP management review process includes the governing body, The Town of Springerville's, Mayor/Town Council, 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 Public Works Director Tim Rasmussen.

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.

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Douglas A. Ducey
Governor

Misael Cabrera
Director

September 21, 2015

Mr. Steve West, Manager
Town of Springerville
418 E. Main St.
Springerville, AZ 85938

Re: Town of Springerville Small Community Environmental Protection Plan

Dear Mr. West:

Thank you for the submittal of the Town of Springerville's revised Small Community Environmental Protection Plan (SCEPP) on August 26, 2015.

The Arizona Department of Environmental Quality (ADEQ) has reviewed the Town's SCEPP. We are pleased to announce that it meets the requirements set forth in ADEQ's Small Community Policy. We recognize this as a significant accomplishment and commend you for establishing a model environmental management program. Congratulations!

ADEQ encourages the Town of Springerville to post the public portions of this SCEPP (and future SCEPP updates) on its Web site.

Please let us know how we can continue to assist as you and your staff move forward and implement the SCEPP to manage the Town's environmental impacts efficiently and effectively. Also, please continue to self-report future environmental violations if they should arise. Byron James, ADEQ Northeast Arizona Community Liaison, will continue to be a key contact for you. He can be reached at (928) 337-3565 or via e-mail at bfj@azdeq.gov.

Thank you again for your good faith commitment to environmental compliance and the decision to participate in ADEQ's Small Communities Environmental Compliance Assistance Program. We are pleased to partner with the Town of Springerville in this endeavor.

Sincerely,

Ian D. Bingham
Ombudsman

cc: Mr. Tim Rasmussen, Springerville Public Works Director

ADEQ Arizona Department of Environmental Quality NEWS RELEASE

DATE: Jan. 19, 2016
CONTACT: Caroline Oppleman, Public Information Officer, (602) 771-2215, co2@azdeq.gov

ADEQ Recognizes Town of Springerville Leadership in Proactive Environmental Protection Programs

PHOENIX (Jan. 19, 2016) – Arizona Department of Environmental Quality (ADEQ) officials announced today that the Town of Springerville in Apache County is the third municipality in the state to complete a Small Community Environmental Protection Plan (SCEPP).

With a SCEPP in place, Springville is now better positioned to contribute to a cleaner, natural environment and more livable community. The Town also is eligible for up to a 100 percent penalty reduction for future environmental violations.

Steve West, Springerville Town Manager said, "Participation in the ADEQ Small Communities Environmental Compliance Assistance Program exemplifies the Town of Springerville's commitment to continual improvement and environmentally stewardship for the benefit of those we serve."

A SCEPP is a component of the ADEQ Small Communities Environmental Compliance Assistance Program (SCECAP). Small cities, towns and special water and wastewater districts often lack resources and staff to address their environmental concerns. This program helps them comply with state and federal environmental laws and reduce the number of violations and enforcement actions.

"We are committed to helping small communities in the state affordably protect their public health and air, land and water resources," said ADEQ Director Misael Cabrera. "We congratulate the Town of Springerville for being a leader in the effort to build environmental cooperation and hope other small towns and wastewater and water districts join the program," Director Cabrera added.

With completion of this milestone, the Town of Springerville also applied for recognition under Arizona's Voluntary Environmental Stewardship Program (VESP). ADEQ accepted the Town into the VESP at the Silver Level for its superior compliance history demonstrated by at least three years without environmental enforcement action.

The Silver Level recognizes organizations going above and beyond what is legally required to prevent pollution and conserve natural resources. The Town of Springerville has an ongoing commitment to protect air quality through its Branch Cleanup Project, which reduces smoke in residential neighborhoods. Town officials are measuring program participation, working to increase each year.

ADEQ will present the Town with Certificates of Recognition for both proactive, voluntary environmental protection programs at the Jan. 20, Springerville Town Council meeting.

- more -

Background

Established in 2007 with funding from the Environmental Council of States, ADEQ's Small Communities Environmental Compliance Assistance Program is a statewide voluntary program that assists small towns and special water and wastewater districts with complying with state and federal environmental laws and reducing the number of violations and enforcement actions.

For more information about ADEQ SCECAP please visit:
http://www.azdeq.gov/function/compliance/smallcomm.html

For more information about ADEQ VESP, please visit:
http://www.azdeq.gov/vesp.html

About ADEQ
Established by the Arizona Legislature under the Environmental Quality Act of 1986, the Arizona Department of Environmental Quality is the state agency responsible for protecting and enhancing public health and the environment of Arizona.

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ADEQ
Arizona Department
of Environmental Quality