TITLE: COFL-GTL-EP-4.5.2-1 Evaluation of Compliance Procedure

Persons responsible: Water and Wastewater Treatment Manager
Areas of application: George T. Lohmeyer Wastewater Treatment Plant (GTL)
Document Location: www.fortlauderdale.gov/ESMS

Revisions

<table>
<thead>
<tr>
<th>Rev. No.</th>
<th>Date</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>001</td>
<td></td>
<td></td>
</tr>
<tr>
<td>002</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Recurring action items

<table>
<thead>
<tr>
<th>Activity</th>
<th>Responsibility</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Procedure Index

1.0 Purpose
2.0 Scope
3.0 Responsibility
4.0 Definitions
5.0 Process
6.0 References / Related Documents
1.0 Purpose

1.1 The purpose of this procedure is to ensure that compliance with relevant environmental legislation and regulations is being evaluated on a periodic basis for GTL.

1.2 This procedure describes the method used by GTL during the implementation of its Compliance Evaluation including planning self-audits, conducting self-audits, and posting the self-audit reports and follow up of nonconformance’s using corrective and/or preventive actions.

1.3 The process of compliance evaluation (or auditing) is clearly different than Internal ESMS Auditing or management system audits. Refer to COFL-GTL-EP-4.5.5-1 Internal Audit Procedure for further details.

2.0 Scope

2.1 This procedure is responsive to element 4.5.2 Evaluation of Compliance, of the ISO 14001:2004 standard, and covers the operations of the GTL.

2.2 This procedure is intended to evaluate environmental compliance GTL and track compliance through corrective action implementation.

3.0 Responsibility

3.1 The Regional Wastewater Facility Manager is responsible for:

3.1.1 Maintaining this procedure;

3.1.2 Implementing, planning, scheduling and maintaining Compliance Evaluations as defined by this procedure;

3.1.3 Issuing and reviewing Compliance Evaluation reports to the Water and Wastewater Treatment Manager and ESMS Core Team;

3.1.4 Providing education and training to employees that assist in conducting Compliance Evaluations;

3.1.5 Following up on findings and nonconformance(s) to ensure that corrective action is being taken;

3.1.6 Providing assistance in identifying solutions to problems identified during Compliance Evaluations;

3.1.7 Keeping informed of the Compliance Evaluation findings and non-conformances and following up on the corrective actions. Regional Wastewater Facility Manager should be receiving the necessary information and recommendations from the Water and Wastewater Treatment Manager to determine the success of the Compliance Evaluation.
3.2 The **Management Representative** is responsible for:
   3.2.1 Selecting the Compliance Evaluation Team Leader and Team members;

3.3 The **ESMS Coordinator** is responsible for:
   3.3.1 Ensuring final (or closed) nonconformance and corrective actions are documented and maintained as objective evidence;
   3.3.2 Ensuring that corrective actions are documented;

3.4 The **Compliance Evaluation Team Leader** is responsible for:
   3.4.1 Assisting the **Management Representative** with the selection and designation of the Compliance Evaluation Audit Teams;
   3.4.2 Notifying and confirming the scheduled date for the Compliance Evaluation with GTL personnel and the Compliance Evaluation Team members;
   3.4.3 Leading the Compliance Evaluation Team decisions and ensuring the documentation is complete and correct for the Compliance Evaluation;
   3.4.4 Conducting a briefing or opening meeting with GTL personnel to:
      3.4.4.1 Inform the GTL personnel of the purpose of the Compliance Evaluation;
      3.4.4.2 Inform GTL personnel of their environmental compliance responsibilities and required participation in the evaluation process;
      3.4.4.3 Answer any preliminary questions regarding the Compliance Evaluation.
   3.4.5 Submitting the results of the Compliance Evaluation findings and nonconformance\'s to the **Regional Wastewater Facility Manager** and **Management Representative**.

3.5 The **Compliance Evaluation Team** is responsible for:
   3.5.1 Conducting and actively participating in the Compliance Evaluation;
   3.5.2 Documenting the findings and non-conformances on the checklist and CAR forms **COFL-GTL-ED 4.5.2-2 Compliance Evaluation** and **COFL-GTL-ED 4.5.3-2 Corrective Action Request (CAR)**.

3.6 The **Regional Chief Wastewater Operators** are responsible for:
   3.6.1 Cooperating with the Compliance Evaluation Team Leader to ensure that the evaluation is accomplished when scheduled;
   3.6.2 Ensuring that the department is prepared for the Compliance Evaluation;
   3.6.3 Accommodating the evaluation team to optimize the efficiency of the evaluation;
   3.6.4 Promptly correcting findings identified during the evaluation; and
3.6.5 Documenting corrective action taken and reporting to the team leader;
3.6.6 Ensuring that required internal (daily, weekly, or monthly) inspections are conducted and that identified deficiencies are addressed promptly.

3.7 The ESMS Core Team is responsible for:

3.7.1 Reviewing and approving procedure and work products annually using COFL-GTL-ED-4.5.2- Evaluation of Compliance Annual Review Template.

4.0 Definitions
4.1 Refer to COFL-GTL-ED-4.4.4-2 ESMS Related Definitions

5.0 Process
5.1 The Compliance Evaluation Team Leader must be from a section other than the one being evaluated. The Compliance Evaluation Team members must have no responsibility for the area or activity being evaluated.

5.2 The Compliance Evaluation of GTL is conducted once every calendar year. To conduct the evaluation, the Compliance Evaluation Team Leader and team members must do the following:

5.2.1 Establish a process, which includes protocols, for the upcoming year’s evaluation;
5.2.2 Communicate the date(s) of the evaluation to Regional Wastewater Facility Manager;
5.2.3 Conduct briefing or opening meeting with GTL personnel;
5.2.4 Conduct the evaluation;
5.2.5 During the evaluation also perform a record review of applicable compliance documents, such as manifests and environmental permits;
5.2.6 Findings that can be immediately corrected should be completed during the walkthrough and documented on the checklist;
5.2.7 Conduct a debriefing or closing meeting with appropriate GTL personnel;
5.2.8 Prepare a report listing the evaluation findings, including a priority for addressing the issues to the GTL Team. All participants of the evaluation will follow COFL-GTL-EP 4.5.3-1 Nonconformity, Corrective and Preventive Action procedure;
5.2.9 Set a schedule for following up on evaluation findings to ensure their resolution;
5.2.10 Document all evaluation findings either in report form or using the ESMS documentation COFL-GTL-ED-4.5.2-2F Compliance Evaluation, or COFL-GTL-EP 4.5.3-2 Corrective Action Request (CAR) form;
5.2.11 The Regional Wastewater Facility Manager will receive an evaluation.
summary or copies of the completed checklist and CAR’s to begin the corrective and / or preventive actions;

5.2.12 Periodic evaluation of compliance with relevant environmental legislation and regulations is a requirement of the ISO 14001 standard. Additional requirements for compliance may be further addressed in COFL-GTL-EP 4.3.2-1 Legal & Other Requirements and COFL-GTL-EP 4.5.1-1 Monitoring and Measurement;

5.2.13 All documentation pertaining to the Compliance Evaluation will conform to the documentation and record requirements of the ESMS as defined in COFL-GTL-EP 4.4.5-1 Control of Documents and COFL-GTL-EP 4.5.4-1 Control of Records.

5.2.14 Another requirement of the ISO 14001 standard is to periodically evaluate compliance with “other” requirements to which the organization subscribes. Establish a separate process for this or combine these evaluations into the Compliance Evaluation;

5.2.15 Ensure the results of the Compliance Evaluation are communicated to the Water and Wastewater Treatment Manager.

6.0 References / Related Documents

6.1 COFL-GTL-EP 4.5.3-1 Nonconformity, Corrective and Preventive Action procedure
6.2 COFL-GTL-EP 4.3.2-1 Legal & Other Requirements procedure
6.3 COFL-GTL-EP 4.5.1-1 Monitoring and Measurement procedure
6.4 COFL-GTL-EP 4.4.5-1 Control of Documents procedure
6.5 COFL-GTL-EP 4.5.4-1 Control of Records procedure
6.6 COFL-GTL-ED 4.5.2-2 (F) Compliance Evaluation
6.7 COFL-GTL-ED 4.5.3-2 Nonconformity, Corrective Action Request (CAR)
6.8 COFL-GTL-ED 4.5.3-3 Nonconformity, Preventive Action Proposal Form
6.9 COFL-GTL-ED 4.5.3-4(F) Correction Action Log/Report
6.10 COFL-GTL-ED-4.5.2-3 Evaluation of Compliance Annual Review Maintenance