



Verification	Originator	Approved	Issued
Initials	ADS	ST	ST
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TITLE: COFL-FF-EP 4.5.2-1 Evaluation of Compliance

Person responsible: Environmental Services Manager

Area of application: Fleet Fenceline

Document location: www.fortlauderdale.gov/ESMS

Revisions

Rev. No.	Date	Description
001	12/8/15	Moved section 3.6.1 to Program Manager section as 3.1.6. Corrected all numbering for section 3.0 onward. Added ":2004" to all ISO 14001 mentions.
002	5/13/16	Fixed spacing in section 3.5.

Recurring action items

Activity	Responsibility	Frequency
1. Review Compliance with environmental regulations and policies	Environmental Services Manager	Annually
2. Conduct Compliance Evaluation	Compliance Evaluation Team Leader and Compliance Evaluation Team	Annually
3. Conduct Annual Review of Evaluation of Compliance	Program Manager, Environmental Services Manager	Annually

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1.0 Purpose

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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 the City of Fort Lauderdale Fleet Fenceline
- 1.2 This procedure describes the method used by the City of Fort Lauderdale 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-FF-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 Fleet Fenceline.
- 2.2 This procedure is intended to evaluate environmental compliance for the City of Fort Lauderdale Fleet Fenceline and track compliance through corrective action implementation.

3.0 Responsibility

- 3.1 The **Program 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 appropriate departments and senior management;
 - 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 Keeping informed of the Compliance Evaluation findings and non-conformances and following up on the corrective actions. **Program Manager** should be receiving the necessary information and recommendations from the **Management Representative** to determine the success of the Compliance Evaluation.



- 3.2 The **Environmental Services Manager** is responsible for:
 - 3.2.1 Providing assistance to departments in identifying solutions to problems identified during Compliance Evaluations;
- 3.3 The **Management Representative** is responsible for:
 - 3.3.1 Selecting the Compliance Evaluation Team Leader and Team members;
- 3.4 The **ESMS Coordinator** is responsible for:
 - 3.4.1 Ensuring final (or closed) nonconformance and corrective actions are documented and maintained as objective evidence;
 - 3.4.2 Ensuring that corrective actions are documented;
- 3.5 The **Compliance Evaluation Team Leader** is responsible for:
 - 3.5.1 Assisting the **Management Representative** with the selection and designation of the Compliance Evaluation Audit Teams;
 - 3.5.2 Notifying and confirming the scheduled date for the Compliance Evaluation with affected department personnel and the Compliance Evaluation Team members;
 - 3.5.3 Leading the Compliance Evaluation Team decisions and ensuring the documentation is complete and correct for the Compliance Evaluation;
 - 3.5.4 Conducting a briefing or opening meeting with facility personnel to:
 - 3.5.4.1 Inform the facility personnel of the purpose of the Compliance Evaluation;
 - 3.5.4.2 Inform facility personnel of their environmental compliance responsibilities and required participation in the evaluation process;
 - 3.5.4.3 Answer any preliminary questions regarding the Compliance Evaluation.
 - 3.5.5 Submitting the results of the Compliance Evaluation findings and nonconformance's to the **Program Manager** and **Management Representative**.

The **Compliance Evaluation Team** is responsible for:

- 3.6.1 Conducting and actively participating in the Compliance Evaluation;
- 3.6.2 Documenting the findings and non-conformances on the checklist and CAR forms **COFL-FF-ED 4.5.2-2 Compliance Evaluation** and **COFL-FF-ED 4.5.3-2 Corrective Action Request (CAR)**.

The **Area Supervisors** are responsible for:

- 3.7.1 Cooperating with the Compliance Evaluation Team Leader to ensure that the evaluation is accomplished when scheduled;
- 3.7.2 Ensuring that the department is prepared for the Compliance Evaluation;



- 3.7.3 Accommodating the evaluation team to optimize the efficiency of the evaluation;
- 3.7.4 Promptly correcting findings identified during the evaluation; and
- 3.7.5 Documenting corrective action taken and reporting to the team leader;
- 3.7.6 Ensuring that required internal (daily, weekly, or monthly) inspections are conducted and that identified deficiencies are addressed promptly.

The **ESMS Core Team** is responsible for:

- 3.8.1 Reviewing and approving procedure and work products annually using **COFL-FF-ED-4.5.2- Evaluation of Compliance Annual Review Maintenance**

4.0 Definitions

- 4.1 Refer to **COFL-FF-EP-4.4.4-2 Related Definitions Procedure**

5.0 Process

- 5.1 The Compliance Evaluation Team Leader must be from a department other than the one being audited. The Compliance Evaluation Audit Team members must have no responsibility for the area or activity being evaluated.
- 5.2 The Compliance Evaluation of the Fleet Fenceline is conducted once every calendar year. No more than 15 months will elapse between evaluations. 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 each affected department;
 - 5.2.3 Conduct briefing or opening meeting with facility 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 facility personnel;
 - 5.2.8 Prepare a report listing the evaluation findings, including a priority for addressing the issues to proper management personnel. Participants of the evaluation will follow **COFL-FF-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 evaluation findings either in report form or using the ESMS documentation **COFL-FF-EP 4.5.2-2 Compliance Evaluation**, or **COFL-FF-EP 4.5.3-2 Corrective Action Request (CAR)** form;
- 5.2.11 The participating **Area Supervisor** 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 14001:2004 standard. Additional requirements for compliance may be further addressed in **COFL-FF-EP 4.3.2-1 Legal & Other Requirements** and **COFL-FF-EP 4.5.1-1 Monitoring and Measurement**;
- 5.2.13 Documentation pertaining to the Compliance Evaluation will conform to the documentation and record requirements of the ESMS as defined in **COFL-FF-EP 4.4.5-1 Control of Documents** and **COFL-FF-EP 4.5.4-1 Control of Records**.
- 5.2.14 Another requirement of the ISO 14001:2004 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 **Management Representative**.

6.0 References / Related Documents

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