



Verification	Originator	Approved	Issued
Initials	MRA	ST	ST
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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

Rev. No.	Date	Description
001	8/7/15	Minor text updates
002	7/19/16	Added recurring action items activities and responsibilities. Update text in responsibilities section.

Recurring action items

Activity	Responsibility	Frequency
1. Review Compliance with environmental regulations and policies	Regional Wastewater Facility Manager	Annually
2. Conduct Compliance Evaluation	Compliance Evaluation Team Leader and Compliance Evaluation Team	Annually
3. Conduct Annual Maintenance Review of Evaluation of Compliance	Regional Wastewater Facility Manager/ GTL Team	Annually

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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 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 GTL.
- 2.2 This procedure is intended to evaluate environmental compliance of 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 Coordinate with the Compliance Evaluation Team Leader for implementing, planning, scheduling and maintaining *Compliance Evaluations* as defined by this procedure;
 - 3.1.3 Coordinate with the Compliance Evaluation Team Leader for issuing and reviewing *Compliance Evaluation* reports. Provide report to the Water and Wastewater Treatment Manager, GTL Team 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 and GTL staff are 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 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 will 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 Set a schedule for following up on evaluation findings to ensure their resolution;
 - 5.2.9 Document 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;
 - 5.2.10 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;

- 5.2.11 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**;
- 5.2.12 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**.
- 5.2.13 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