



# EVALUATION OF COMPLIANCE STANDARD ENVIRONMENTAL OPERATING PROCEDURE

**WASTE  
REDUCTION  
& DISPOSAL  
DIVISION**

## ISO 14001- 4.5.2.

### 1.0 PURPOSE AND SCOPE

1.1 The purpose of this procedure is to ensure that the Waste Reduction and Disposal Division (WRAD) of the Environmental Services Department (ESD) has a documented means of evaluating compliance with relevant environmental legislation and regulations (legal requirements) associated with its operations as defined by section 4.5.2.1 of the ISO 14001 International Standard.

1.2 This procedure also provides a documented means for evaluating compliance with other requirements to which it subscribes, such as the ISO 14001 International Standard, as defined by section 4.5.2.2 of the ISO 14001 International Standard.

1.3 This procedure covers identifying, correcting and preventing regulatory violations associated with the laws, regulations, and other requirements established at the federal, state and local levels that apply to the operations of the WRAD as well as direction for supporting the WRAD's Environmental Management System (EMS).

### 2.0 RESPONSIBILITY AND AUTHORITY

2.1 Deputy Director WRAD – is responsible for ensuring that Section Managers comply with the requirements set forth in the permit conditions and laws and regulations associated with the operations of the WRAD as well as all requirements of the WRAD's EMS. The Deputy Director reviews and approves all program and project plans designed to meet or exceed the regulatory requirements for the operation and maintenance activities of the WRAD. In addition, s/he will review all inspection checklists and audit reports to ensure that "Observations," "Areas of Concern," "Notice of Violation" or EMS non-conformance issues are addressed in a timely and appropriate manner.

2.2 Section Managers – Section Managers are responsible for knowing and complying with the environmental laws and regulations pertinent to their sections as well as the requirements of the EMS. Section Managers are also responsible for meeting and/or exceeding the requirements set forth in the permit conditions and laws and regulations associated with the operations of the WRAD. Section Managers will review all inspection checklists and ensure that all staff members are informed, trained, and comply with all regulatory requirements associated with their respective areas of responsibility. They will also ensure that all EMS requirements associated with their area of responsibility are communicated to their staff and that all staff members are trained and comply with those requirements.

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2.3 Employees – Employees are responsible for notifying their supervisor when they discover or suspect a regulatory non-compliance has or will occur. They are also responsible for reporting any environmental impacts or non-conformances associated with their job to their supervisor or the Environmental Management Representative.

### **3.0 PROCEDURE**

3.1 Compliance assessments are accomplished through routine, (daily, weekly, monthly, quarterly, etc.) inspections conducted by WRAD staff to ensure that permit conditions and other regulatory requirements associated with its operations are met on a continuous basis.

These inspections include, but are not limited to:

- quarterly groundwater monitoring events,
- weekly landfill gas “flare” system readings,
- periodic (weekly, bi-weekly, monthly, etc.) landfill gas probe readings,
- daily refuse “final cover” material inspections,
- quarterly landfill cap inspections,
- seasonal (per storm event) stormwater control device inspections,
- daily bird control assessment,
- Third Party and internal EMS audits.

Section Managers shall routinely train their staff and monitor their performance for all regulated activity within their section. Training and performance monitoring can be accomplished internally or through an appropriate outside resource, i.e. Department/WRAD staff, consultants, regulatory agencies, etc.

3.2 Periodic (monthly, quarterly, annual) regulatory inspections are also conducted to ensure WRAD is meeting the minimum guidelines set forth in the permit conditions and laws and regulations associated with the Division’s operations. When periodic site visits (i.e., planned regulatory inspections, Environmental Management System audits, etc.) are scheduled, Section Managers will ensure that all personnel, equipment, and resources required to complete the activity are available.

3.3 The Deputy Director-WRAD or his/her designee shall establish a schedule in which, on a quarterly basis, the Division will assess its regulatory compliance. The results of this quarterly report will be sent to the EMR for record retention.

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3.4 Section Managers are responsible for correcting all deficiencies identified through either internal and external inspections, EMS audits, or as a result of new or modified regulations and permit conditions. Corrective action will be directed by regulatory agencies, the Deputy Director WRAD, or through Corrective/Preventive Action Requests as a result of internal audits or observations of Division staff. Results of all regulatory inspections and audits will be sent to the WRAD Deputy Director for review and resolution.

**4.0 REFERENCES**

Cross-reference any summary listings of legal requirements or other registries, etc.

WRAD SEOP 4.3.2 “Legal and Other requirements”

EMS-Manual                    Section 4.3.2, “Legal and Other requirements”  
    Section 4.5.2 “Evaluation of Compliance”

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