



NSC Webinars

Environmental Program Development

Where Do I Begin

making our world safer®



Environmental Program Development

- Reference Tool for Regulatory Requirements
 - Air
 - Waste
 - Water
- Insure standardized process at your facility
- Assure **complete, accurate, and timely** regulatory reporting and permit compliance



Environmental Program Development

Review all permits, regulatory requirements

- Thoroughly read each permit/regulation
- Understand each requirement
 - Contacts for more info
 - » Company Resources
 - » Non-Regulatory (UNI Waste Reduction Center)
 - » Regulatory



Environmental Program Development

Resources for Regulations

- Internet (Search Engines)
 - Federal – Code of Federal Regulations
 - Federal – Federal Register
 - State – Administrative Code (Exemptions)
 - Local - Ordinances
- Library – Hard Copies/Microfilm
- Pay for Services (Cyberreg's)



Compliance Incentives and Auditing



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Audit Protocols

Audit protocols assist the regulated community in developing programs at individual facilities to evaluate their compliance with environmental requirements under federal law. The protocols are intended solely as guidance in this effort. **The regulated community's legal obligations are determined by the terms of applicable environmental facility-specific permits, underlying statutes and applicable state and local law.**

Environmental audit reports are useful to a variety of businesses and industries, local, state and federal government facilities, as well as financial lenders and insurance companies who need to assess environmental performance. The audit protocols are designed for use by persons with various backgrounds, including scientists, engineers, lawyers and business owners or operators.

These protocols provide detailed regulatory checklists and are provided in an easy to understand question format for evaluating compliance.

The audit protocols cover:

- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
- Clean Water Act (CWA)
- Emergency Planning and Community Right-to-Know Act (EPCRA)
- Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)
- Resource Conservation and Recovery Act (RCRA)
- Safe Drinking Water Act (SDWA)
- Toxic Substance Control Act (TSCA)

In addition, there is a "how to" manual on designing and implementing environmental compliance auditing programs for federal agencies and facilities.

[Audit Protocols and Allied Documents](#) (See "Audit Protocols")

More useful documents that explain how particular sectors are subject to Federal Regulations are located on the [Industry and Government Sectors Page](#).



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Small Business Compliance and Enforcement

[The Small Business Compliance Policy \(PDF\)](#) (5 pp, 256K) promotes environmental compliance among small businesses (those with 100 or fewer employees) by providing incentives to discover and correct environmental problems. EPA will eliminate or significantly reduce penalties for small businesses that voluntarily discover violations of environmental law and promptly disclose and correct them. This Policy implements [section 223 of the Small Business Regulatory Enforcement Fairness Act of 1996 \(PDF\)](#) (29 pp, 99K). ([Additional Small Business Regulatory Enforcement Fairness Act Information](#)).

You will need Adobe Reader to view some of the files on this page. See [EPA's PDF page](#) to learn more.

A wide range of resources are available to help small businesses learn about environmental compliance and take advantage of the Small Business Compliance Policy. These resources include:

- EPA Small Business Resources [Information Sheet \(PDF\)](#), October 2007 (2 pp, 41K), training, checklists, compliance guides, mentoring programs and other activities.
- [The Small Business Compliance Policy Questions and Answers \(PDF\)](#) May 19, 2004, (3 pp, 115K) provides answers to key questions on how small businesses can use the Policy and provides EPA regional contacts for additional information.
- Businesses with more than 100 employees may be eligible for the Policy on Incentives for Self-Policing, known as the [Audit Policy \(PDF\)](#) (49 pp, 153K), which also provides potential penalty reductions for voluntary discovery disclosure and correction of environmental violations.

Businesses can find more information through these Web-based resources:

- [EPA's Small Business Ombudsman's office](#) serves as a conduit for small businesses to access EPA and facilitates communications between the small business community and the Agency. The Office reviews and resolves disputes with EPA and works with EPA personnel to increase their understanding of small businesses in the development and enforcement of environmental regulations.
- [Compliance Assistance Centers](#) [EXIT Disclaimer](#) address real world issues in plain language. Through Web sites, telephone assistance lines, fax-back systems and e-mail discussion groups, the Centers help businesses, local governments and federal facilities understand federal environmental requirements and save money through pollution prevention techniques.
- [Small Business Environmental Home Page](#) [EXIT Disclaimer](#) helps small businesses access and environmental compliance and pollution prevention information.

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Environmental Program Development

What are the permit/regulatory requirements?

- Recordkeeping
- Reporting
- Sampling
- Inspections
- Training



Environmental Program Development

Develop Process for Compliance

- Who is responsible?
- What is required?
- Where is the information kept?
- When is it required?



Environmental Program Development

Who is responsible?

- Develop the list of who is responsible?
- Do they know they are responsible?
- Training?
- Accountability?



Environmental Program Development

Who is responsible?

ENVIRONMENTAL PROGRAM	Departments	Primary Responsibility	Secondary Responsibility	Maint Supervisor	Dept Supervisor	Dept. ME's	R-20	R-37	R-05
AIR									
Construction Permits		Fred Van Schepen							
Operating Permit, Title V		Fred Van Schepen							
Air Emission Inventory & Fees		Julie Ehlers							
Title V Monthly Monitoring & Recordkeeping & Retention		Julie Ehlers							
Servicing of Refrigerant Equipment >50 Lbs.	451			Secondary				Primary	
Operating and Maintenance Plan	644	Jordan Backstrom	Manufacturing Engineer		Primary	Secondary			
CFC's - Inventory Management			Julie Ehlers					Primary	
CFC's - Service Orders, PMs & Repairs				Secondary				Primary	
CFC's - Leak Rates		Julie Ehlers						Secondary	
Refrigerant Monthly Inspections				Secondary				Primary	
CFC Certifications - R37 - Stationary Equipment			Julie Ehlers	Primary					
CFC Certifications - Repair - MVAC Mobile Sources	647, 648, 649, 657, Service Trng		Julie Ehlers		Primary				
Refrigerant Equipment Maintenance/PMs	451			Primary				Secondary	
Charging Units on Assembly Line - Calibration	451			Secondary					Primary



Environmental Program Development

What is required?


- How is the requirement to be completed?
 - Procedures
- Where does the information come from?
 - Documentation
- Training?
- Accountability?



Environmental Program Development

What is required?

John Deere Waterloo Works
Manufacturing Services
Environmental Engineering



Standard Operating Procedure
Tractor & Cab Assembly Operations

Aerosol Cans - Hazardous

Description:
The use of aerosol cans is very limited at TCAO - ether, and adhesive are the only products on the approved list.

All other aerosol cans should **no longer be used**.

Collection and Disposal:

All aerosol cans **including empty, full or partially full** should be collected in a drum that is labeled "Hazardous Waste - Aerosol Cans". This labeled drum can be requested from the Energy Center - 7312.

When the drum is full the hazardous waste move order process must be followed. The Department must call the Environmental Department (7319 or 7744) immediately and they will have it moved to the Energy Center within 72 hours. Only 55 gallons of hazardous waste can be in a satellite accumulation area at any given time.

The Environmental Department is responsible for disposal and will retain all the paperwork in the files.

Latest Revision Date: 19 March 2008

Printed copies are **UNCONTROLLED** and **MAY NOT BE CURRENT**.
The official copy is stored on the intranet. For the most current revision visit:
<http://www2.nj.deere.com/ManufacturingServices/EnvironmentalEngineering>

Aerosol Cans - Standard Operating Procedure - TCAO 1 of 1



DSS WASTE SOP FOR R37

The image displays a grid of 40 pages of a Standard Operating Procedure (SOP) for waste management, arranged in 4 rows and 10 columns. Each page contains text, tables, and diagrams. A mouse cursor is visible over the fourth page in the first row. The pages are titled with 'DSS WASTE SOP FOR R37' and include various sections such as 'Purpose', 'Scope', 'Responsibilities', and 'Procedures'. The text is primarily in black, with some sections highlighted in red or yellow. The pages are pinned to a dark background.



Environmental Program Development

Where is the information kept?

- Filing cabinet
- Electronic
- File Index



Environmental Program Development

When is it required?

- Outlook Calendar
 - Separate from Personal Calendar
 - Documentation on meeting notice
 - Can be sent to those responsible
 - » No confirmation of completion



Environmental Program Development

When is it required?

February 2011

Search RX D12S - DTO

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Jan 30	31 SWPPP-inspections; Mo Waste-RCRA; weekly sto Waste-RCRA; Generator	Feb 1 Air-Recordkeeping; Mor Air-Recordkeeping; Mor Air-Recordkeeping; Moi Air-Title V; Annual Comp NPDES-DMR submissior POTW/NPDES-report sig	2 EMS-Change Managem	3 SPCC-inspections; DO m SWPPP-inspections; Skir	4 EMS-Tracking & CA; wei SWPPP-inspections; Skir 7:30am Waste-RCRA; R	5 POTW-recordkeeping; m
6	7 AIR-Recordkeeping; MO Waste-RCRA; weekly sto Waste-RCRA; Manifest r	8	9 EMS-Change Managem Waste - Metrics; Update 12:00am PCB-recordkee	10 SWPPP-inspections; Skir Waste-Universal; Univer: Waste-Universal; Univer:	11 EMS-Tracking & CA; wei SWPPP-inspections; Skir	12
13	14 12:30am EMS-Chemical Management; Self A 12:30am NPDES-monthly samplir SARA-EMS; program rev Waste-RCRA; weekly sto	15 EMS-Monitoring & Mea	16 EMS-Change Managem	17 SWPPP-inspections; Skir 12:00am PCB-recordkee	18 EMS-Tracking & CA; wei SWPPP-inspections; Skir	19
20	21 Waste-RCRA; Corrective Waste-RCRA; weekly sto	22	23 EMS-Change Managem	24 SWPPP-inspections; Skir	25 EMS-Tracking & CA; wei SWPPP-inspections; Skir	26
27	28 SWPPP-inspections; Mo Waste-RCRA; weekly sto Waste-RCRA; Generator	Mar 1 SWPPP-inspections; Qui EMS-Tracking & CA; Self Air-Recordkeeping; Mor Air-Recordkeeping; Moi Air-Recordkeeping; Mor POTW/NPDES-report sig	2 EMS-Change Managem POTW-permit; permit rer	3 SPCC-inspections; DO m SWPPP-inspections; Skir	4 EMS-Tracking & CA; wei SWPPP-inspections; Skir	5 POTW-recordkeeping; m 6:00am RCRA-training;



Environmental Program Development

When is it required?

Occurs the first weekday of every 1 month effective 6/1/2000 (GMT-06:00) Central Time (US & Canada).
No responses have been received for this meeting.

Sewer

To... Green Allison L

Subject: SEWER 01

Location: Report-Sewer Use


Start time: Tue 3/1/2011 12:00 AM All day event

End time: Wed 3/2/2011 12:00 AM

TASK DESCRIPTION
Submit the monthly Sewer Use Report to the City of Waterloo. This document reports the amount of sanitary water we discharged to the City treatment facility for the previous month. This report is due to the City of Waterloo on the 15th of the following month (i.e.. the March report is due the 15th of April).

TASK FREQUENCY
Once/Month

RELATED DOCUMENTS

 Sewer Use Reports - 2000.xls

HARD COPY FILE LOCATION
Facility Engineering Office

REPORT SUBMITTED TO
Fax to Rita at (319) 291-4523

PERMIT OR REGULATORY REFERENCE
City Ordinance

RESPONSIBLE PARTY
Allison Green



Environmental Program Development

Benefits

- Standard Practice
- Responsibilities Delegated
- Info Available at all Times
- Change Management
- Continuous Improvement



Environmental Program Development

Requires Periodic Reviews

- Self Audits - Calendar
- Review permits/regulations - Calendar
- Update for new rules and permits



Environmental Program Development

Links:

EPA Compliance Audit Information

<http://www.epa.gov/compliance/incentives/auditinfo/protocol.html>