Compliance Management and Audit Plan (CMAP)

- Environmental Policy
- Requirements
- Delineation of Duties
- Training
- Tools
- Daily Operations
- Compliance Activities
- MOC
- Records
- Reports
Corporate Environmental Policy

> In the context of a CMAP, the environmental policy is a statement that demonstrates the company’s commitment to environmental compliance and stewardship.
> The policy should be reinforced with training, during audit visits, and during performance reviews.
> The point is not to make some stratospheric statement, but rather to begin to build a culture of compliance. The increasing burden of environmental regulations necessitates a greater cultural focus.

Requirements

> Determine applicable regulations and their detailed requirements.
> Can also include corporate directives and goals.
> How to document these requirements for each site?
   Excel, SharePoint
   Binders
   EMIS (Intelex, Enviance, etc.)
> Can result in hundreds, if not thousands, of individual tasks and compliance touch points in a region or field.
Delineation of Duties

> The specific duties and expectations for each individual with environmental responsibilities must be clearly stated in writing and should be continually reinforced and reevaluated.
> These duties and expectations may be stated as part of the job description, discussed during performance reviews, and reinforced during staff meetings and training events.
> A cross-functional flow diagram that graphically illustrates duties and expectations can be very effective.
  > This exercise is often useful in identifying gaps in responsibilities and lines of communication.
> Once duties and responsibilities have been established in writing, training modules can then be developed that are specifically designed with these duties and responsibilities in mind.

Training Program

> An effective, consistent, and timely training program is pivotal to the success of a CMAP.
> Training helps to prevent gaps in compliance coverage, ensures consistency, helps manage “typical risks,” and is important for transitioning responsibilities.
> To be effective on an ongoing basis, a training program must be strategically developed in a way that enables employees to effectively attend to their assigned responsibilities.
Compliance Assistance Tools

> **White Papers and Guidance Documents** - Developed based on systemic issues, focus areas, findings during Audits, etc.

> **Decision Flow Charts** - These may be developed for routine events such as asset swaps (MOC), process modifications, process improvement and maintenance events, upset events, CapEx decisions, recordkeeping and reporting requirements, etc.

Compliance Assistance Tools (cont.)

> **Checklists** - Compliance checklists are very effective tools for assisting personnel to comply with permit conditions, site changes and maintenance, NSPS and NESHAP requirements, SSM/M requirements.

> **Reporting Tools** - Having readily available/vetted reporting and recordkeeping templates with instructions ensures consistency and saves time.
The Audit Program (cont.)

> The audit program should consist of the following:
  - Detailed Compliance Audit
  - Interim Compliance Review
  - Field Review
  - Acquisition Audit (Due Diligence)
  - Focus Area Audits

> Also review effectiveness of, and compliance with, the CMAP. Look for areas that require refinement, correction, and improvement.

Operations: Management of Change

> Goal: Capture and review activities that may require permitting or that trigger new requirements.

> How to capture these for further review:
  - Develop screening tools
  - Add an "Environmental Review" review requirement in the approval process
  - Include Environmental personnel in engineering meetings
Operations: Internal Documentation

- How to manage the flow of compliance data coming from the site(s)?
  - Have an established policy for file retention and reporting
  - Intranet (forms, folders)
  - EMIS
  - Use a Responsibilities/Documentation Flow Diagram
- Be aware of the file and records retention policy of the EPA, State, and your company.

CMAP Summary

- An effective compliance management program does not happen by itself. It must be *intentional*.