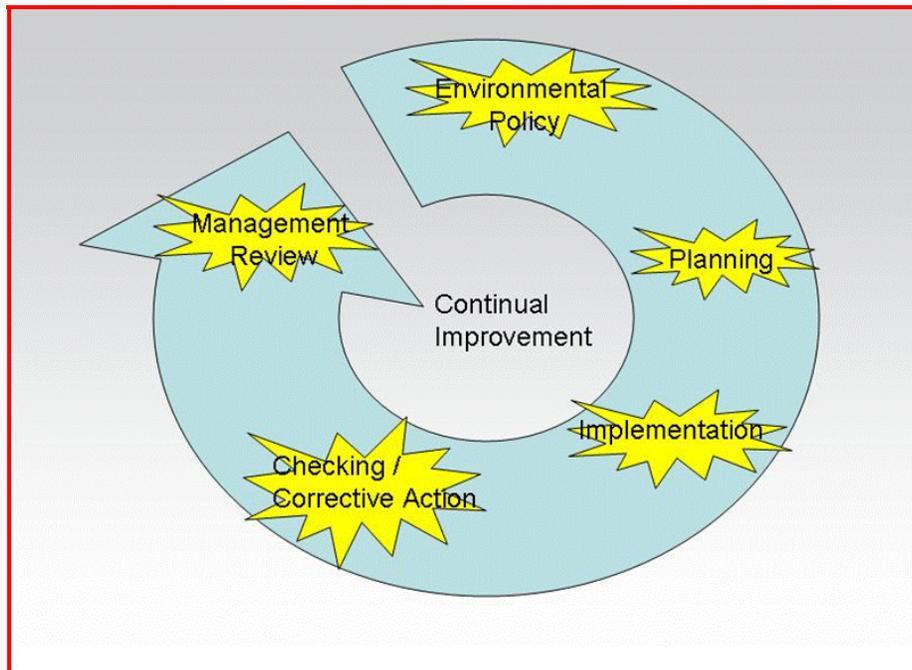




Appendix B Template

Small Community Environmental Protection Plan Instructions, Examples and Forms



Appendix B
Small Community Environmental Protection Plan (SCEPP)

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Small Community Environmental Protection Plan (SCEPP)

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Introduction to Small Community Environmental Protection Plan

These instructions were prepared by the [Arizona Department of Environmental Quality \(ADEQ\)](#) under an agreement with the [U.S. EPA Environmental Policy and State Innovation Grant](#). These instructions were financed in part by funds provided by EPA.

Purpose:

The Arizona Department of Environmental Quality's (ADEQ) [Small Community Policy](#) recognizes the limited financial, technical, and administrative resources available to small communities and special districts for environmental compliance. This template and the *Self-assessment Questionnaires* in [A Guide for Developing and Implementing a Small Community Environmental Protection Plan \(SCEPP\)](#) manual are designed to promote the development and implementation of a *Small Community Environmental Protection Plan (SCEPP)*.

Special Penalty Considerations:

[A Guide for Developing and Implementing a Small Community Environmental Protection Plan \(SCEPP\)](#) manual and *Appendix B Template Small Community Environmental Protection Plan Instructions, Examples, Forms and Glossary* are designed to be used in identifying, prioritizing, correcting, and preventing future environmental compliance problems. ADEQ will make special penalty considerations for small communities and special districts willing to work with ADEQ to achieve these goals. ADEQ will be available to assist in the development of the SCEPP to achieve and maintain compliance. ADEQ's compliance assistance efforts focus on the comprehensive evaluations of compliance with all environmental statutes, rules and regulations that apply to a small community's or special districts' operations. Once the requirements have been met, a small community or special district will qualify for a significant reduction or waiver of penalties that might otherwise be imposed for environmental violations.

Small Community Environmental Protection Plan (SCEPP) Instructions, Examples, Forms and Glossary:

The SCEPP is a "less robust" Environmental Management System (EMS). The SCEPP Template Instructions, Examples, Forms and Glossary were adapted by the Arizona Department of Environmental Quality (ADEQ) from the following resources:

ADEQ's Pollution Prevention Unit, in the ADEQ Waste Programs Division, which implements the state's Pollution Prevention, or P2, program and their [Environmental Management System \(EMS\) Modules](#). The four modules that make up the ADEQ EMS are available at:
<http://www.azdeq.gov/environ/waste/p2/index.html>

Sample EMS Manual: Environmental Management System (EMS) Model Manual Specific to Pennsylvania Municipal Operations: the *EMS Model Manual* was prepared for the Pennsylvania Department of Environmental Protection (PDEP) by Five Winds International.

Office of the Federal Environmental Executive – EMS Tools and Fact Sheets
<http://www.ofee.gov/ems/training/facts.htm>

These instructions include examples with links to blank forms to aid in developing your community's SCEPP Manual. These instructions do not cover every federal, state or local environmental requirement.

For assistance or questions in developing your community's SCEPP and to ensure compliance with specific federal, state or local environmental statutes, rules and regulations contact your [ADEQ Environmental Compliance Assistance Community Liaison](#) at (602) 771-2300 or Toll Free at (800) 234-5677, press 0 to speak to the receptionist who will direct your call.

HOW TO DEVELOP A SCEPP

- 1) The prerequisite to the successful development and implementation of a SCEPP is management commitment. In a community or special district, the governing body is the elected representatives. When the governing body's commitment is combined with employee motivation, the result is a solid management tool.
- 2) Equally important is the appointment of a SCEPP Manager and SCEPP Team by the governing body. These appointments reflect the governing body's support and commitment to provide resources and oversight. The SCEPP Team members include those experienced in a wide variety of functions, such as facility operations, equipment operators, maintenance, engineering, risk management, human resources, and budget and finance. Other than work experience, each of the members should be a dedicated employee with a genuine interest in the SCEPP, and be open to change and new ideas. Once established, the team should meet regularly. For the first team meeting, discuss the task of the team and what roles each team member will play. The task of the team is to develop and implement a SCEPP for the community. The SCEPP Manager works with the SCEPP Team and all employees to identify aspects, determine impacts, and develop objectives and targets.
- 3) The governing body's commitment is reflected in the community's Good Faith Commitment and Environmental Policy, and the development and implementation of a SCEPP. These commitments state that the governing body is willing to commit time, people, and financial resources to the development and implementation of a SCEPP. The purpose of having a written statement and extensive posting of the commitments is to ensure that all employees and stakeholders are aware that the governing body is serious about implementing a SCEPP.

The Good Faith Commitment and Environmental Policy must be, signed by the governing body, dated and posted throughout the community's operations as well as explained to all employees.

Once your community has a SCEPP Manager, SCEPP Team, Good Faith Commitment and Environmental Policy established, your community is ready to develop and implement a SCEPP.

SELF-ASSESSMENT QUESTIONNAIRES

[*A Guide for Developing and Implementing a Small Community Environmental Protection Plan \(SCEPP\)*](#) manual along with the results of the *Self-Assessment Questionnaires* are designed to be used with these instructions in the development and implantation of your community's SCEPP.

**READ THE FOLLOWING INSTRUCTIONS BEFORE
YOU BEGIN DEVELOPING YOUR
SMALL COMMUNITY ENVIRONMENTAL PROTECTION PLAN (SCEPP)**

TEMPLATE INSTRUCTION BOXES:

Instruction boxes will direct you to instructions on developing *procedures, completed examples, flow diagrams and corresponding blank forms*.

See the *Table of Contents* for a list of all documents that should be included in your SCEPP.

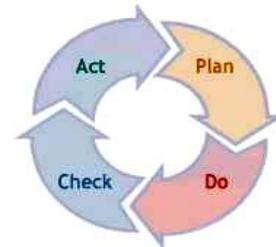
You are welcome to adapt this template and forms to develop your SCEPP.

Plan, Do, Check, Act model is designed to provide a structure for managing and continually improving environmental compliance.

These instructions correspond to ADEQ's [Small Community Policy](#) and are divided into the sections listed below.

SCEPP Sections:

- 1) Small Community Environmental Protection Plan Good Faith Commitment
- 2) Environmental Policy
- 3) Scope of Operations Covered by the SCEPP
- 4) Environmental Aspects and Impacts, Objectives and Targets
- 5) Legal and Other Environmental Requirements
- 6) Environmental Management Programs (EMP)
- 7) Operational Controls & Organizational Structure and Responsibilities (SCEPP Team)
- 8) Training, Awareness and Competency
- 9) Communications & Registry of Stakeholders
- 10) Document Control
- 11) Environmental Records Control
- 12) Emergency Preparedness and Response
- 13) Nonconformance, Corrective and Preventive Actions
- 14) Environmental Compliance Audit
- 15) SCEPP Audit
- 16) Management Review by the Governing Body



Basic Model:

This SCEPP template provides a framework for organizational integration by guiding the user through these four processes:

Plan: Planning by setting community policy and commitments; identifying the characteristics of activities and services and how they relate to environmental compliance; identifying applicable legal and other environmental requirements; and developing objectives and targets to control and improve performance.

Do: Integrating management into normal operations through training, procedures, documentation, and operational controls.

Check: Checking and corrective actions by monitoring and measuring for key parameters and performance metrics, adjusting to address concerns, record keeping, and auditing.

Act: Acting on the results to ensure policy commitments are met and continual improvement occurs.

The SCEPP Template:

Section 1: Good Faith Commitment

A small community or special district must develop a SCEPP that contains policies and procedures, including operation and maintenance procedures, and standards showing how the SCEPP conforms to and will accomplish SCEPP elements to ensure compliance with environmental requirements. No later than one year after entering into a SCEPP agreement with ADEQ, the community or special district must submit a copy of their SCEPP to ADEQ as proof that the SCEPP was developed and is being implemented.

The Good Faith Commitment is essential because it will serve as a guide for the community's SCEPP. Adopt *SCEPP/1.00 Example Good Faith Commitment* to document your community's commitment.

The Good Faith Commitment must be signed by the governing body, dated, and posted throughout the community's facilities/operations as well as explained to all employees.

SCEPP TEAM

The appointment of the SCEPP Team should be formalized by the governing body by signing an internal memorandum. The memorandum should specify the name of individuals, (i.e., the SCEPP Manager and the Team members), who will lead and promote the effort to develop and implement the community's SCEPP. Copies of the memorandum should be widely communicated so employees and stakeholders are aware of the progress of the SCEPP initiative.

The SCEPP Manager and SCEPP Team should meet regularly. For the first team meeting, members should discuss the task of the team and what roles each team member will play. The task of the team is to develop and implement a SCEPP for your community.

*Adapt the **Example Text** in Section 1 **SCEPP/1.00 Example of a Good Faith Commitment** to document your commitment in developing and maintaining a SCEPP.*

Review and integrate the following **before** you develop your Good Faith Commitment:

Section 1 Good Faith Commitment

Section 7 Operational Controls & Organizational Structure & Responsibilities (SCEPP Team)

Section 9 Communications and Registry of Stakeholders

Link to Examples:

[SCEPP/1.00](#) Example Good Faith Commitment (Adapt for your use)

[SCEPP/7-2](#) Example List of Organizational Structure & Responsibilities (SCEPP Team)

[SCEPP/9](#) Example Registry of Stakeholders

Link to Procedures:

[SCEPP/7.01](#) Procedure for Establishing Operational Controls & Organizational Structure & Responsibilities (SCEPP Team)

[SCEPP/9.01](#) Communications & Registry of Stakeholders Procedure

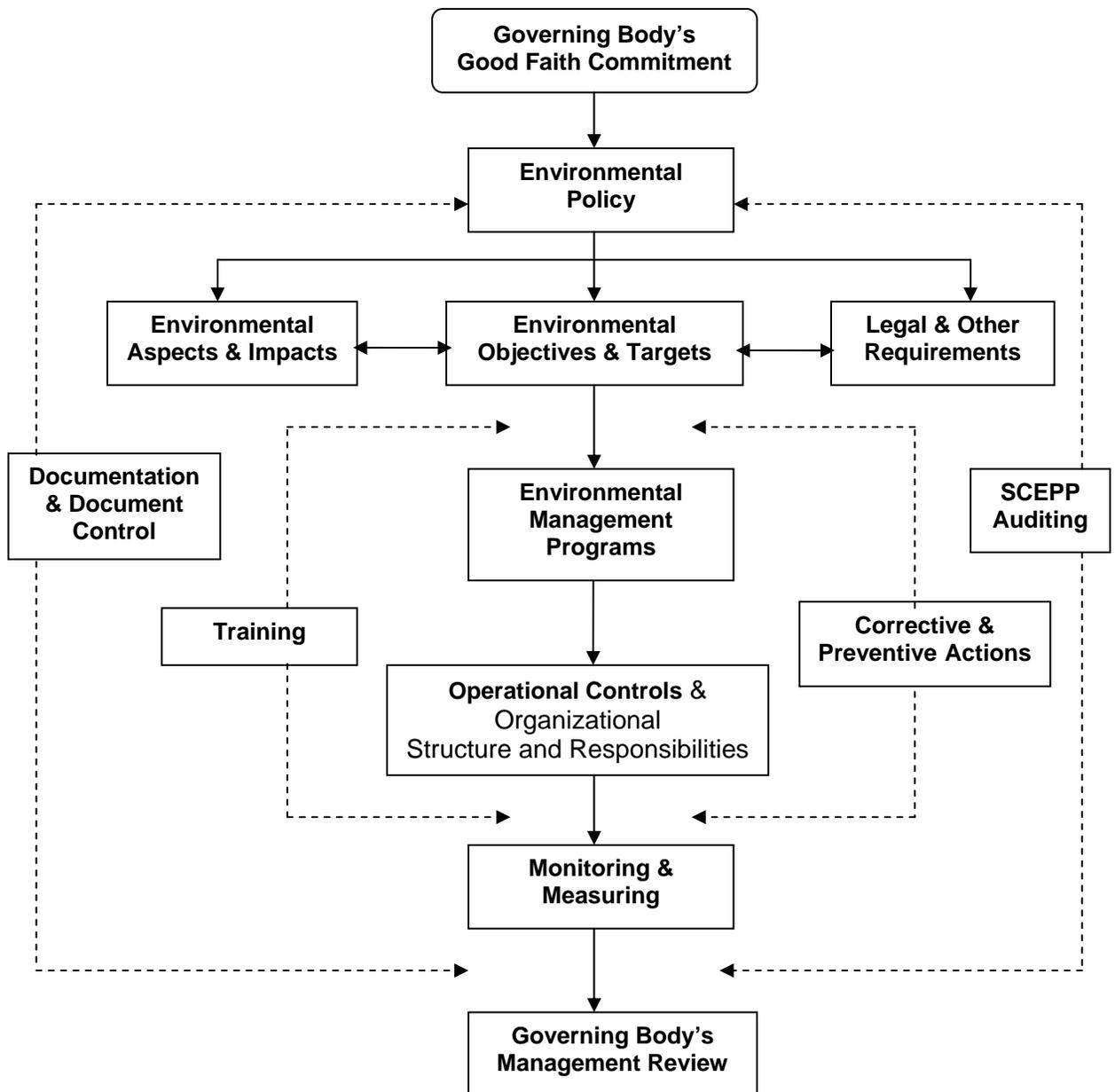
Link to Blank Forms:

[SCEPP/7.01 F2](#) Form for List of Organizational Structure & Responsibilities (SCEPP Team)

[SCEPP/9.01 F1](#) Form for Preparing a Registry of Stakeholders

Appendix B
Small Community Environmental Protection Plan (SCEPP)

Example of the SCEPP Interrelated Components:



Section 2: Environmental Policy

The SCEPP must include an *Environmental Policy* statement that asserts a commitment to environmental excellence and to comply with all environmental requirements. Use this statement as framework for planning and action. The policy states your community's mission and values, and provides a framework on which your community will operate environmentally. The policy must be simple so that everybody in the community can understand it. Because of its significance, the governing body must be involved in the development of the policy. The policy must be signed by governing body which may include the mayor, council and/or city or town manager.

The Environmental Policy must be, signed by your community's governing body, dated and posted throughout the community's facilities/operations and explained to all employees.

Review and integrate the following **before** you develop your Environmental Policy:
Section 9 Communications & Registry of Stakeholders Procedures.

Adapt the **Example Text** to develop your *Environmental Policy*

Link to Example:

[SCEPP/2.01 F1](#) Example Environmental Policy (Adapt for your use)

Link to Procedures:

[SCEPP/2.01](#) Procedure for Developing an Environmental Policy

[SCEPP/9.01](#) Communications & Registry of Stakeholders Procedure

Section 3: Identifying Scope of the Operations Covered by the SCEPP

The SCEPP must identify all activities and operations covered by the SCEPP defined as the SCEPP boundary.

Link to Example:

[SCEPP/3](#) Example List of Operations Covered by the SCEPP

Link to Procedure:

[SCEPP/3.01](#) Procedure for Identifying Scope of the Operations Covered by the SCEPP

Link to Blank Form:

[SCEPP/3.01 F1](#) Form for List of Operations Covered by the SCEPP

Section 4:

Procedure for Identifying Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets

The SCEPP must identify which activities, products, and services have impacts on the environment and what those impacts are.

The SCEPP must establish goals for its operations that are consistent with its environmental policy, that will eliminate the gap between current procedures and an accepted SCEPP framework, and that will reduce the environmental impacts of its operations.

Step 1: Environmental Aspects and Impacts

Environmental Aspects (Inputs): Activities, products or services that can interact with the environment. An activity, process, waste, product, or service does not have to be regulated to be considered an aspect. *[Also see Environmental Impacts]*

Environmental Impacts (Outputs): Any change to the environment, whether adverse or beneficial, wholly or partially, resulting from an organization's activities, products or services. *[Also see Environmental Aspects.]*

Review and integrate the following **before** you develop your Environmental Aspects and Impacts:
Your completed Section 3 Scope of Operations Covered by the SCEPP (SCEPP/3.01 F1 Form for List of Operations Covered by the SCEPP)

Link to Example:

[SCEPP/4](#) Example Setting Aspects, Significant Impacts, Objectives and Targets

Link to Procedure:

[SCEPP/4.01](#) Procedure for Identifying Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets

Link to Diagrams:

[SCEPP/4.01-1](#) Flow Diagram of Impact Significance Evaluation

Link to Blank Forms:

[SCEPP/4.01 F1](#) Form for Preparing a List of Environmental Aspects for One Activity

[SCEPP/4.01 F2](#) Form for Assigning Impacts to Aspects and Determining Significance

[SCEPP/4.01 F3](#) Form for Setting Aspects, Significant Impacts, Objectives and Targets

Step 2: Environmental Objectives and Targets

Environmental Objectives (Goals) - Overall environmental goal, arising from the environmental policy, that an organization sets itself to achieve, and which is quantified where practicable. For example, if reduction in the use of petroleum is an environmental objective, a specific percentage decrease in the associated usage rate could be established as an associated target. [Also see *Environmental Targets*]

Environmental Targets – A detailed environmental goal, quantified where practicable, that arises from environmental objectives (goals), and that needs to be scheduled and assigned in order to achieve those objectives.

Link to Example:

[SCEPP/4 Example Setting Aspects, Significant Impacts, Objectives and Targets](#)

Link to Procedure:

[SCEPP/4.01](#) Procedure for Identifying Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets

Link to Diagram:

[SCEPP/4.01-2](#) Flow Diagram for Establishing Objectives and Targets

Link to Blank Form:

[SCEPP/4.01 F3](#) Form for Setting Aspects, Significant Impacts, Objectives and Targets

Section 5: Legal & Other Environmental Requirements

The SCEPP **must** identify the environmental laws and regulations that apply to its operations.

Procedures **must** be developed that identify all local, state and federal environmental regulatory requirements for all activities for your community. The SCEPP Manager and SCEPP Team is the lead in this process.

Review and integrate the following **before** you develop your Legal and Other Environmental Requirements: Your completed Section 4 Environmental Aspects and Impacts, and Objectives and Targets [SCEPP/4.01 F2 Form for Assigning Impacts to Aspects and Determining Significance, and SCEPP/4.01 F3 Form for Setting Aspects, Significant Impacts, Objectives and Targets], and Section 12 Emergency Preparedness and Response

Link to Example:

[SCEPP/5](#) Example List of Legal and Other Environmental Requirements

Link to Procedure:

[SCEPP/5.01](#) Procedure for Identifying Legal and Other Environmental Requirements

Link to Blank Forms:

[SCEPP/5.01 F1](#) Form for Preparing a List of Legal and Other Environmental Requirements

Section 6: Environmental Management Programs (EMP)

The SCEPP Team must plan specific actions that will achieve its objectives and goals.

This procedure is used to develop all Environmental Management Programs (EMP) required for managing environmental aspects that have significant impacts, and to meet the objectives and targets identified in **Section 4** *Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets*.

Objectives and targets are developed to stimulate action using Environmental Management Programs. This component of the SCEPP translates objectives and targets into **action plans** that direct the community toward achieving results.

Review and integrate the following **before** you develop your Environmental Management Programs:
Your completed Section 4 *Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets*

Link to Example:

[SCEPP/6](#) Example Registry of Environmental Management Programs

Link to Procedure:

[SCEPP/6.01](#) Procedure for Establishing Environmental Management Programs

Link to Blank Forms:

[SCEPP/6.01 F1](#) Form for Preparing Environmental Management Programs

[SCEPP/6.01 F2](#) Form for Preparing a Registry of Environmental Management Programs

Section 7:

Operational Controls & Organizational Structure & Responsibilities

The SCEPP Team must include a system to identify, plan and manage the community's operations consistent with its objectives and targets. In addition, operational control procedures are necessary for any environmental management program and any aspect whether it is regulated or not, and supporting documentation must be developed and tracked. Operational controls are **work instructions** and represent a mechanism used by a community to control its environmental aspects.

The SCEPP Team must identify roles and responsibilities for all employees, including the governing body, with management oversight responsibility for implementing the SCEPP and who must provide adequate resources to ensure compliance.

Review and integrate the following **before** you develop your Operational Controls & Organizational Structure & Responsibilities: Your completed Section 4 Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets, and Section 6 Environmental Management Programs

Link to Examples:

[SCEPP/7-1](#) Example Operational Control Procedures Registry

[SCEPP/7-2](#) Example List of Organizational Structure & Responsibilities (SCEPP Team)

[SCEPP/7-3](#) Example Form for Assessing Facility Operations & Procedures

Link to Procedure:

[SCEPP/7.01](#) Procedure for Establishing Operational Controls & Organizational Structure & Responsibilities (SCEPP Team)

Link to Blank Forms:

[SCEPP/7.01 F1](#) Form for Operational Control Procedures Registry

[SCEPP/7.01 F2](#) Form for List of Organizational Structure & Responsibilities (SCEPP Team)

[SCEPP/7.01 F3](#) Form for Assessing Facility Operations & Procedures

Section 8: Training, Awareness and Competence

The SCEPP must include a plan to ensure all staff, including the governing body if applicable, is trained and capable of carrying out their environmental responsibilities.

Review and integrate the following **before** you develop your Training, Awareness and Competence: Your completed Section 4 Identifying Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets.

Link to Example:

[SCEPP/8](#) Example Environmental Training Requirements & Delivery Log

Link to Procedure:

[SCEPP/8.01](#) Procedure for SCEPP Awareness and Competency Training

Link to Blank Form:

[SCEPP/8.01 F1](#) Form for Preparing Environmental Training Requirements & Delivery Log

Section 9: Communication & Stakeholders Registry

The SCEPP must establish a process for internal and external communications on environmental management issues for all stakeholders.

SCEPP communication includes programs addressing *internal* and *external* parties identified in your *Registry of Stakeholders*. The purpose of *internal* communication is to ensure that environmental information is disseminated to all personnel and that all personnel feel they are able to participate in the SCEPP through available communication channels. Communication with individuals, groups, government regulators, local businesses, and others outside of the community's SCEPP provides insight into how the environmental performance of operations within the community's SCEPP boundary is perceived *externally*.

Link to Example:

[SCEPP/9](#) Example Registry of Stakeholders

Link to Procedure:

[SCEPP/9.01](#) Communications & Registry of Stakeholders Procedure

Link to Blank Form:

[SCEPP/9.01 F1](#) Form for Preparing a Registry of Stakeholders

Section 10: Document Control

The SCEPP must establish a system to ensure effective management of all documents relating to the SCEPP and environmental activities.

Review and integrate the following **before** you develop your Document Control:

Section 7 Operational Control Procedures Registry

Link to Example:

[SCEPP/10](#) Example Master SCEPP Document Control Index

Link to Procedure:

[SCEPP/10.01](#) Document Control Procedures

Link to Blank Form:

[SCEPP/10.01 F1](#) Form for Preparing a Master SCEPP Document Control Index

Section 11: Environmental Records Control

The small community or special district must develop a process to manage and maintain environmental records.

An operational control procedure should be developed to ensure that all environmental records relevant to the SCEPP including training records, and results of audits and reviews are recorded, legible, identifiable, traceable, readily retrievable, and protected against damage, deterioration or loss.

The operational control procedure, *SCEPP/11.01 Procedure for Environmental Records Control*, ensures that environmental records are correctly identified, maintained and disposed of. Record and document retention should also be specified in the procedure. Individual departments can maintain environmental records using the SCEPP procedure. Retention timeframes can be found in federal and state rules and regulations. An example of relevant records is provided in *SCEPP/11 Example Environmental Records Control List*.

Link to Example:

[SCEPP/11](#) Example Environmental Records Control List.

Link to Procedure:

[SCEPP/11.01](#) Procedure for Environmental Records Control

Link to Blank Form:

[SCEPP/11.01 F1](#) Form for Preparing Environmental Records Control List.

Section 12: Emergency Preparedness and Response

The SCEPP must include an emergency preparedness and response plan that identifies potential emergencies and their environmental impacts and procedures for preventing or responding to emergencies and to notify stakeholders if the emergency impacts public health and the environment.

Review and integrate the following **before** you develop your Emergency Preparedness and Response:

Section 8 Training, Awareness and Competency

Section 9 Communications & Registry of Stakeholders and your completed Communications Distribution Plan.

Link to Procedure:

[SCEPP/12.01](#) Procedure for Emergency Preparedness and Response Plans.

Section 13: Nonconformance, Corrective and Preventive Action

The SCEPP must establish a continuous review process by the governing body, SCEPP Manager and SCEPP Team, that identifies and corrects deviations from its SCEPP and details actions to be taken to prevent recurrence.

Link to Procedure:

[SCEPP/13.01](#) Procedure for Nonconformance, Corrective and Preventive Actions

Link to Blank Forms:

[SCEPP/13.01 F1](#) Form for Preparing Corrective and Preventive Action Tracking Log

[SCEPP/13.01 F2](#) Form for Corrective Action Request & Response

Section 14: Environmental Compliance Audit

The SCEPP must include a process to conduct an annual assessment of key SCEPP activities and track compliance with environmental rules and regulations. Upon request, ADEQ will provide the facility specific checklists it uses to evaluate compliance.

Review and integrate the following **before** you develop your Environmental Compliance Audit:

Section 7 Operational Control & Organizational Structure & Responsibility

Section 13 Noncompliance, Corrective and Preventive Action

Section 15 SCEPP Audit

Link to Procedures:

[SCEPP/14.01](#) Procedure for Environmental Compliance Audit

Link to Blank Form:

[SCEPP/14.01 F1](#) Form for Preparing Environmental Compliance Audit Plan

Section 15: SCEPP Audit

The governing body of the small community or special district must make a commitment to an annual comprehensive review of compliance with the SCEPP; documented in a written report; presented to the governing body; and made available to the public and ADEQ.

In addition, the governing body must agree to initiate an independent third-party audit of their SCEPP within 3 years of submitting the SCEPP to ADEQ. ADEQ will be available to conduct this audit upon request.

Review and integrate the following **before** you develop SCEPP Audit:
Section 7 Operational Control & Organizational Structure & Responsibilities
Section 13 Nonconformance, Corrective and Preventive Action
Section 14 Environmental Compliance Audit

Link to Procedure:

[SCEPP/15.01](#) Procedure for SCEPP Compliance Audits.

Link to Blank Forms:

[SCEPP/15.01 F1](#) Form for Preparing a SCEPP Audit Plan

[SCEPP/15.01 F2](#) Form for Preparing a SCEPP Audit Summary Sheet

[SCEPP/15.01 F3](#) Form for Requesting & Responding to SCEPP Audit Finding (Corrective Action)

Section 16: Management Review by the Governing Body

The governing body of the small community or special district must make a commitment to review the annual SCEPP Audit with the goal of continuous improvement of both the plan and environmental performance.

The governing body's management review should include everyone who signed the *Good Faith Commitment* and *Environmental Policy* statements as well as the SCEPP Manager and SCEPP Team, or the current elected governing body representatives.

Link to Procedure:

[SCEPP/16.01](#) Procedure for SCEPP Governing Body Management Review