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| Standard Operating Instruction – EMS-0100.009B Name: Monthly Compliance Review Procedure | Corresponding Requirements ISO Standard 4.5.1 EMS Manual 4.5.1 |
| Prepared By: Janet Maddox, Industrial Chemist | Revision Date: 04/01/01 Revision #: 0 |
| Approved By: Larry Cummings, Assistant Superintendent of WWTD | Effective Date: 04/01/01 |
| Signature: | Page 1 of 3 |

Monthly Compliance Review Procedure

1.0 Purpose

- 1.1 To track the compliance of the Wastewater Treatment Division with all applicable environmental laws and regulations.
- 1.2 Each month, after Discharge Monitoring Reports (DMR's) have been completed, the employee assigned to complete the monthly compliance review shall follow this procedure to generate a Divisional compliance report for Management Staff.

2.0 Associated Reference Material

- 2.1 Monthly DMR reports
- 2.2 Notice of Violations (NOVs)
- 2.3 Notice of Violation Responses
- 2.4 Penalty Guidance letter from North Carolina Department Of Environment and Natural Resources (NCDENR) dated November 5, 1998-Pretreatment files
- 2.5 Division of Water Quality (DWQ) Audit/Inspection Reports for Laboratory, Wastewater Treatment Plants, Pretreatment and Biosolids.

3.0 Procedure

3.1 Collect Information

- 3.1.1 Contact the Operator Responsible in Charge (ORC's), Lab Supervisors, Industrial Chemist and Biosolids Coordinator for a list of any violations in their area including a description, cause, future actions taken, and whether it caused a major disruption as well as the imposition or resolution of any penalties.
- 3.1.2 Collect and review the monthly DMR Reports, NOV letter(s) from the State, NOV response letters to the state, DWQ Audit/Inspection Reports and all other associated violation explanation letters, and the NCDENR penalty determination assessment letter.

3.2 Complete Report

- 3.2.1 Open the Monthly Violation Report template (EMS-0101.009B) which is located on the computer network under U:/Iso/EMS & Divisionwide Procedures, Forms and Other Documentation/Forms & Charts for EMS Systems and Division.
- 3.2.2 Click on File, Save as, rename the report as “Monthly Violation Report (Month) (Year)” and save in personal document files directory.
- 3.2.3 Click on View, Header and Footer, type in current month and year.
- 3.2.4 Record violations from DMRs, NOVs, DWQ Audit/Inspection reports, and all other sources that correspond to the areas on the violation report. Use information received from conversations with Operator Responsible in Charge (ORC’s), Lab Supervisors, Industrial Chemists and the Biosolids Coordinator. Include descriptions, cause, future actions taken, major disruptions (anything that caused the plant to be in noncompliance), and whether or not the matter is resolved or pending. If a Corrective and Preventative Action Report (C/PAR) has been generated, include that number. Then, refer to the Penalty Guidance letter from NCDENR dated November 15, 1998 for penalty assessments guidance.
- 3.2.5 If any assessments are pending, add them along with to their appropriate assessments at the bottom of the page to the running year to date total penalty assessments.
- 3.7.1 Type in the correct date at the very bottom
- 3.7.2 Save the changes

3.8 Obtain Approval

- 3.8.1 Submit report to the Assistant Superintendent of WWTD for review and approval. If approved the report will be signed and returned. After approval, save report to the U:drive, under Monthly Compliance Report.

3.9 Distribute

- 3.9.1 E-mail copies of the report to the following people and to others as requested:
 - Superintendent of WWTD

- Assistant Superintendent of WWTD
- Industrial Chemists
- EMS coordinator
- Lab Supervisors
- Senior Plant Supervisors
- Senior Plant Operators
- Biosolids ORC

3.9.2 Send copies of the signed originals upon request.

4.0 Environmental Impacts

- 4.1 This procedure helps track compliance with environmental laws and regulations.
- 4.2 By being aware of the status of compliance with regulations, Wastewater Treatment Division Staff are better able to make decisions affecting operations of the Division.
- 4.3 Not following this procedure could contribute to persons being unaware of certain non-compliant issues and therefore not to take proper actions to deal with the problem. This may result in more issues of non-compliance and possibly environmental harm.

5.0 Deviations from this procedure must be documented by completing a Corrective/Preventative Action Report (EMS-0100.009).