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Division of Operations Environmental Implementation Procedure

Date: 06/06/12

Bureau: Highway Maintenance

**Procedure EIP-15**

Revision: 3.2

**Compliance Evaluation**

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#### DOCUMENTS AND RECORDS:

- EIP-15-Form 15a Compliance Evaluation Checklist.
- EIP-14-Form 14b Findings Tracking Log (see EIP 14: EMS Evaluation).
- EIP-7-Form 7b Summary of Competence Evaluation.

#### PROCEDURE:

1. In accordance with the AOC, OSC will coordinate and gather a qualified Compliance Evaluation Team to evaluate Bureau compliance with environmental, legal, and regulatory requirements at least once every three years. Bureaus may benefit by establishing a more frequent schedule of internal compliance evaluations.
2. The Compliance Evaluation Team will use the Compliance Evaluation Checklist developed by OSC for internal compliance evaluations. The Team reviews Bureau documents, records, permits, activities, legal, and regulatory requirements (see EIP-3: Legal and Other Requirements). The completed evaluation checklist will be provided to the Bureau EMS Coordinator and OSC. A summary of the Bureau's competence evaluation is presented in EIP-7- Form 7b Summary of Competence Evaluation.
3. If instances of noncompliance are identified, the Bureau EMS Team develops a corrective and preventative action plan to correct them (see EIP-13: Nonconformity, Preventative, and Corrective Action). A schedule for completion of the actions should be included in the plan. The Bureau EMS Team coordinates with OSC and the Bureau Administrator to confirm that any required regulatory notifications or reports are completed in a timely manner upon discovery of noncompliance.
4. The Bureau EMS Coordinator uses the Findings Tracking Log (EIP-14-Form 14b) to track progress toward returning to regulatory compliance until each finding is closed. Document all activities related to the compliance evaluation and closure of findings.
5. The Bureau Administrator and Bureau EMS Coordinator should confirm that all Bureau plans, policies, and procedures are modified as needed to maintain regulatory compliance. Document all changes and communicate them to affected employees, onsite service providers, and contractors.
6. The Bureau EMS Coordinator reports the results of evaluations and the status of the Bureau's regulatory compliance (including any action plans currently in progress) to Bureau management and OSC.



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**PURPOSE:**

The purpose of this Environmental Implementation Procedure (EIP) is to establish, implement, and maintain a procedure for periodically evaluating compliance with applicable legal, regulatory, and other requirements including the Administrative Order of Consent (AOC). Refer to EIP-14: EMS Evaluation for information about evaluating and auditing the EMS itself.

**RESPONSIBILITY:**

Office of Stewardship and Compliance (OSC):

- Develop a Compliance Evaluation Protocol including a Compliance Evaluation Checklist.
- Provide oversight and assist Bureaus develop and implement internal compliance evaluation programs.
- Assist Bureaus in implementing corrective and preventative actions resulting from evaluation findings.
- Coordinate compliance evaluations with Bureaus.
- Report evaluation findings to NHDOT management.

Director/Bureau Administrator:

- Provide management support and adequate resources to conduct and address findings from internal and external compliance evaluations.

Bureau EMS Coordinator:

- Coordinate with OSC, Bureau management, and the EMS Team to conduct internal compliance evaluations.
- Lead Bureau efforts to address findings from internal evaluations through corrective and preventative actions.
- Track evaluation findings to closure, and periodically report findings and closure status to OSC and Bureau management.

Bureau Employees:

- Participate in internal compliance evaluations as applicable.
- Report any potential or identified legal, regulatory, or other noncompliance to Bureau management and the EMS Team.



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- 7. The Bureau EMS Coordinator maintains all documentation and key records generated as part of this EIP in accordance with EIP-9: Documentation, Document Control, and Records Management.

Approved:	Revision #: <u>3.2</u>
Name	Revision Date: <u>06/06/12</u>
Title	Supersedes Revision #: <u>3.1</u>
Date	

*(Handwritten signature)*  
*STATE MAINT ENGINEER*  
*6/6/12*

