



Division of Operations Environmental Implementation Procedure
Bureau: Highway Maintenance

Date: 5/10/2017

Procedure EIP-15
Compliance Evaluation

Revision: 3.3

Page 1 of 3

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. Refer to EIP-14: EMS Evaluation for information about evaluating and auditing the EMS itself.

RESPONSIBILITY:

Commissioner/Division Director:

- Approve and communicate the intent of the Departments Environmental Programs and auditing program.
- Attend Annual Bureau EMS Management Reviews to hear bureau specific compliance and EMS status summaries.

Office of Stewardship and Compliance (OSC):

- Develop a random auditing program including program specific checklist to determine facility compliance with applicable environmental laws and regulations.
- Assist Bureau in implementing corrective and preventative actions resulting from evaluation findings.
- Coordinate compliance evaluations with Bureau.
- Report evaluation findings to NHDOT management including the Bureau Administrator, District Engineer, EMS Coordinator, and Safety and Environmental Coordinator.

Bureau Administrator/District Engineer:

- Provide management support and adequate resources to conduct Compliance Evaluations and Peer Reviews, and address their findings.

Bureau EMS Coordinator/Safety and Environmental Coordinator:

- Coordinate with OSC, Bureau management, and the facility staff to conduct compliance evaluations.
- Lead Bureau efforts to address findings from compliance audits through corrective and preventative actions.
- Track audit findings to closure, and periodically report findings and closure status to OSC and Bureau management.

Bureau Employees:

- Participate in compliance evaluations as applicable.



Division of Operations Environmental Implementation Procedure
Bureau: Highway Maintenance

Date: 5/10/2017

Procedure EIP-15
Compliance Evaluation

Revision: 3.3

Page 2 of 3

DOCUMENTS AND RECORDS:

- OSC Audit Checklists
- EIP-13-Form 13a Nonconformity, Preventive and Corrective Action Log
- EIP-7-Form 7b Summary of Competence Evaluation.
- Internal Peer review form
- OSC Audit Checklists

PROCEDURE:

External Bureau Audits:

1. In accordance with the Environmental Audit Program (Environmental Program #13), OSC will conduct random monthly, program-specific, audits to evaluate Bureau compliance with environmental, legal, and regulatory requirements.
2. The Auditors will use the program-specific checklists developed by OSC. Auditors will review Bureau documents, records, permits, and activities in comparison to legal and regulatory requirements (see EIP-3: Legal and Other Requirements). A summary of the bureaus monthly compliance evaluations will be provided to the Bureau Administrator. The EMS Coordinator, District Engineer, Safety and Environmental Coordinator, and facility patrol foreman as appropriate will receive a copy of the completed evaluation checklist. 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 personnel evaluate the cause of the noncompliance issue and develop a corrective and preventative action plan when required (see EIP-13: Nonconformity, Preventative, and Corrective Action Log). 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 Nonconformity, Preventive and Corrective Action Log (EIP-13-Form 13a) 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.



Division of Operations Environmental Implementation Procedure
Bureau: Highway Maintenance

Date: 5/10/2017

**Procedure EIP-15
Compliance Evaluation**

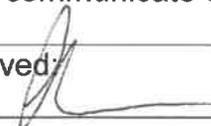
Revision: 3.3

Page 3 of 3

- 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.

Internal Bureau Audits:

- 1. Twice a year. Bureau of Highway Maintenance Safety and Environmental Coordinators conduct Peer Reviews of selected patrol sheds in each district.
- 2. The SECs use (EIP-15-Form 15a Peer Review Checklist). Auditors will review Bureau documents, records, permits, and activities in comparison to legal and regulatory requirements (see EIP-3: Legal and Other Requirements). The completed evaluation checklist along with a cover letter will be provided to the District Engineer, EMS Coordinator, and facility patrol foreman as appropriate.
- 3. If instances of noncompliance are identified, the Bureau personnel evaluate the cause of the noncompliance issue and address the issues with the patrol foreman on site, and provide a summary and recommendations to the District Engineer. If necessary a follow-up evaluation is scheduled.
- 4. The SECs 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. The patrol foreman will communicate changes to appropriate onsite service providers, and contractors.

Approved: 	Revision #: <u>3.3</u>
Name _____ <u>STATE MAINT ENG</u>	Revision Date: <u>5/10/2017</u>
Title _____	Supersedes
Date <u>10/4/17</u>	Revision #: <u>3.2</u>

