

Development Authority of the North Country Governance Policies

Subject: Environmental, Health & Safety Compliance Plan

Adopted: February 17, 2011

Resolution: 2011-02-02



Environmental, Health & Safety Compliance Plan

SECTION 1.0 PURPOSE

The purpose of this document is to describe the process for conducting internal safety and environmental compliance audits. This compliance plan is intended to: 1) identify audit priorities for the upcoming calendar year; and 2) provide guidance to Division Managers regarding internal audit procedures. Additional compliance audit items may be added at the discretion of the Executive Director.

SECTION 2.0 RESPONSIBILITY

Environmental, health and safety (EH&S) is the responsibility of all employees. Successful EH&S programs require strong support from all levels of management. The specific responsibilities for staff associated with this plan are outlined below:

Senior Management

1. Demonstrate institutional commitment to compliance;
2. Establish a work environment that supports environment, health and safety;
3. Oversee follow up on EH&S audits.

Division Managers

1. Communicate with subordinates the importance of compliance;
2. Provide documentation requested for EH&S audits;
3. Provide written documentation of audit issue resolution.

Engineering Manager

1. Develop the annual EH&S audit plan;
2. Oversee completion of audits;
3. Notify the Executive Director of audit results;
4. Assisting divisions with EH&S compliance as requested or as outlined on the Engineering compliance matrices.

SECTION 3.0 ENVIRONMENTAL AND SAFETY AUDIT PLAN OUTLINE

In general, audits will seek to verify that EH&S tasks are completed on schedule and ensure compliance with minimum requirements federal, state, and internal requirements. To this end, Engineering will assist in the development of calendar year environmental and safety compliance matrices for each division. It is the responsibility of the Division Managers, or their appointed designee, to ensure that processes are in place to complete the required items on schedule.

3.1 Safety Audit

The Safety Compliance audit will consist of the following tasks:

1. On an annual basis each division will be required to document completion of specific elements identified on the audit. This audit is not intended to be a comprehensive review but rather a sampling of various compliance areas (i.e., training, permits, inspections, document audits etc.). The audit will strive to sample ~25% of the facility requirements. Managers will be notified by January 2nd of the items that are being audited for the prior calendar year. The requested documents will be provided by February 1st annually. Results of the audit will be documented and provided to the Safety Committee and Executive Director by March 1st.
2. On a semi-annual basis, the Safety Committee will conduct general safety inspections of Authority facilities including a sampling of Water Quality facilities, Solid Waste Management facilities, Administrative, Telecommunication and Engineering Offices. Results of these inspections will be documented and provided to the Executive Director within thirty days of each audit.

3.2 Environmental Compliance Audit

The Environmental Compliance audit will consist of the following tasks:

1. Annually there is a NYSDEC required environmental audit. This audit consists of screening questions which may require subsequent documentation. On April 1st the Division Managers will be provided the screening questions to be completed by April 15th. The Environmental Audit Team will complete their review of the screening question answers and request any documentation required from each division by May 15th. This documentation is to be provided to the Environmental Audit Team by June 1st so that they may submit the audit results to the NYSDEC by June 30th. Results of the NYSDEC Audit will be provided to the Executive Director to review before final submittal.
2. Each division will be required to provide proof of completion of specific elements from the previous calendar year's Environmental Compliance Matrix. This audit is not intended to be a comprehensive review but rather a sampling of various compliance areas (i.e., training, permits, inspections, document audits etc.). The audit will strive to sample ~25% of the facility requirements. Managers will be notified by May 15th of the items that are being audited for the prior calendar year. The requested documents will be provided by June 1st annually. Results of the audit will be documented and provided to the Executive Director by July 31st.
3. On an annual basis, the Engineering Division will conduct a PBS Compliance inspection of Authority facilities in January. Results of this inspection will be documented and provided to the Executive Director by March 15th.

3.3 Audit Questions

Additionally, the following questions will be asked of each division for the Safety Compliance and Environmental Compliance Matrix Audit:

1. What is your process for ensuring the Environmental and Safety related tasks are completed on schedule
2. What is your process for updating Environmental and Safety task when changes are needed?
3. How/where do you store Environmental and Safety related compliance documents (i.e., safety training records, permits, etc.)?

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