

CITY OF SHOW LOW

SMALL

COMMUNITY

ENVIRONMENTAL

PROTECTION

PLAN

SCEPP



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1.01 Good Faith Commitment

**SCEPP CONTROLLED DOCUMENT:
GOOD FAITH COMMITMENT**

The **City of Show Low** has implemented a *Small Community Environmental Protection Plan (SCEPP)* as a way of demonstrating environmental leadership, commitment to continual environmental improvement and responsibility to all stakeholders identified in document *SCEPP/9.01 F1 Registry of Stakeholders*.

The City of Show Low is dedicated to providing proactive solutions to our community's environmental needs. We are committed to complying with established environmental standards and seek to be proactive stewards of our community's natural resources by employing all legal means. The City of Show Low will proactively seek to improve the SCEPP.

To ensure the development and maintenance of a complete and effective SCEPP, this manual has been prepared to ensure compliance with federal, state and local environmental regulations. This manual is the central document for identifying and controlling all SCEPP related information and to provide reference to all supporting documents. This SCEPP is based on the "Plan, Do, Check, Act" environmental model with our good faith commitment to continual improvement.

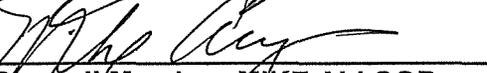
Approved by:

 Mayor, **DARYL SEYMORE**

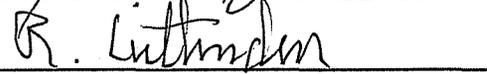
Date: 6-17-14


 Vice-Mayor, **JOHN LEECH, JR.**

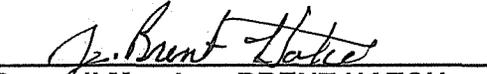
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 Council Member, **MIKE ALLSOP**

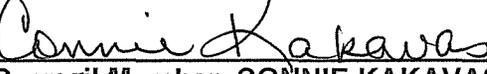
Date: 6-17-14


 Council Member, **RENNIE CRITTENDON**

Date: 6-17-14


 Council Member, **BRENT HATCH**

Date: 6-17-14


 Council Member, **CONNIE KAKAVAS**

Date: 6-17-14


 Council Member, **GENE KELLEY**

Date: 6-17-14


 City Manager, **ED MUDER**

Date: 6-18-14

Filed with the **City of Show Low**, town clerk on this 24th day of June 2014.

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2.01 Environmental Policy

SCEPP CONTROLLED DOCUMENT: ENVIRONMENTAL POLICY

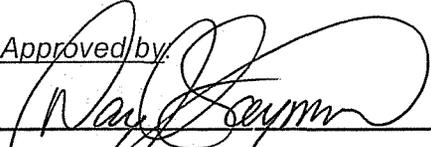
The City of Show Low Environmental Policy

The **City of Show Low**, in our continuing effort to provide our Citizens the highest quality of life, have established this Environmental Policy to demonstrate good stewardship and ongoing improvement of the community environment

Our environmental policy is to be responsible to the people of **Show Low** in protecting the environment. We are committed to complying with accepted environmental practices, including the commitment to meet all applicable legal and other requirements; to strive for continual improvement in our Small Community Environmental Protection Plan; to use energy efficiently and to minimize the creation of wastes and pollution. We will, therefore, manage our processes our materials and our people in order to reduce the environmental impacts and costs associated with providing services to our community.

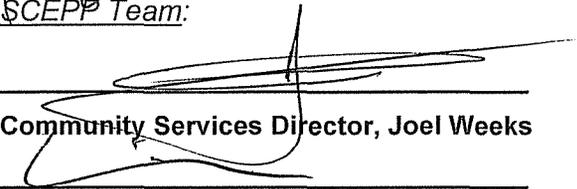
The **Mayor, City Council Members, City Manager and City Staff** pledge to implement this *Small Community Environmental Protection Plan* to further enhance our environmental performance.

This policy will be communicated to all personnel and to all stakeholders interested in the performance of our environmental protections plan.

Approved by:


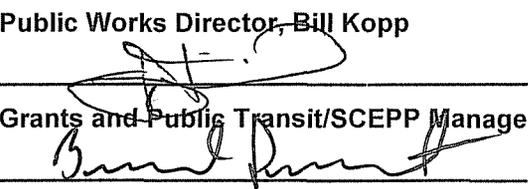
Mayor, Daryl Seymore
SCEPP Team:

Date: 6-17-14



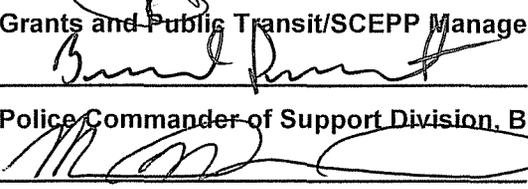
Community Services Director, Joel Weeks

Date: 6/17/14



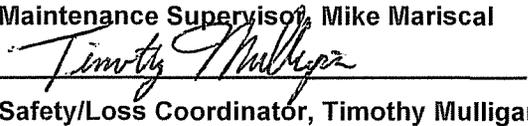
Public Works Director, Bill Kopp

Date: 6/23/14



Grants and Public Transit/SCEPP Manager, Jay Brimhall

Date: 6/17/14



Maintenance Supervisor, Mike Mariscal

Date: 6-19-14

Safety/Loss Coordinator, Timothy Mulligan

Date: 6/23/14

Date: 6-19-14

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3.01 Scope of Operations Covered by the SCEPP

SCEPP CONTROLLED DOCUMENT: PROCEDURE FOR IDENTIFYING SCOPE OF THE OPERATIONS COVERED BY THE SCEPP
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The City of Show Low has developed and implemented a SCEPP to cover municipal operations, within a defined area, known as the SCEPP boundary. These operations/activities are listed in [3.02 List of Operations Covered by the SCEPP](#). The SCEPP addresses all environmental aspects that may have a significant impact on the environment arising from activities within the SCEPP boundary. The SCEPP covers only those aspects for which **The City of Show Low** is responsible or over which it can reasonably expect to have control.

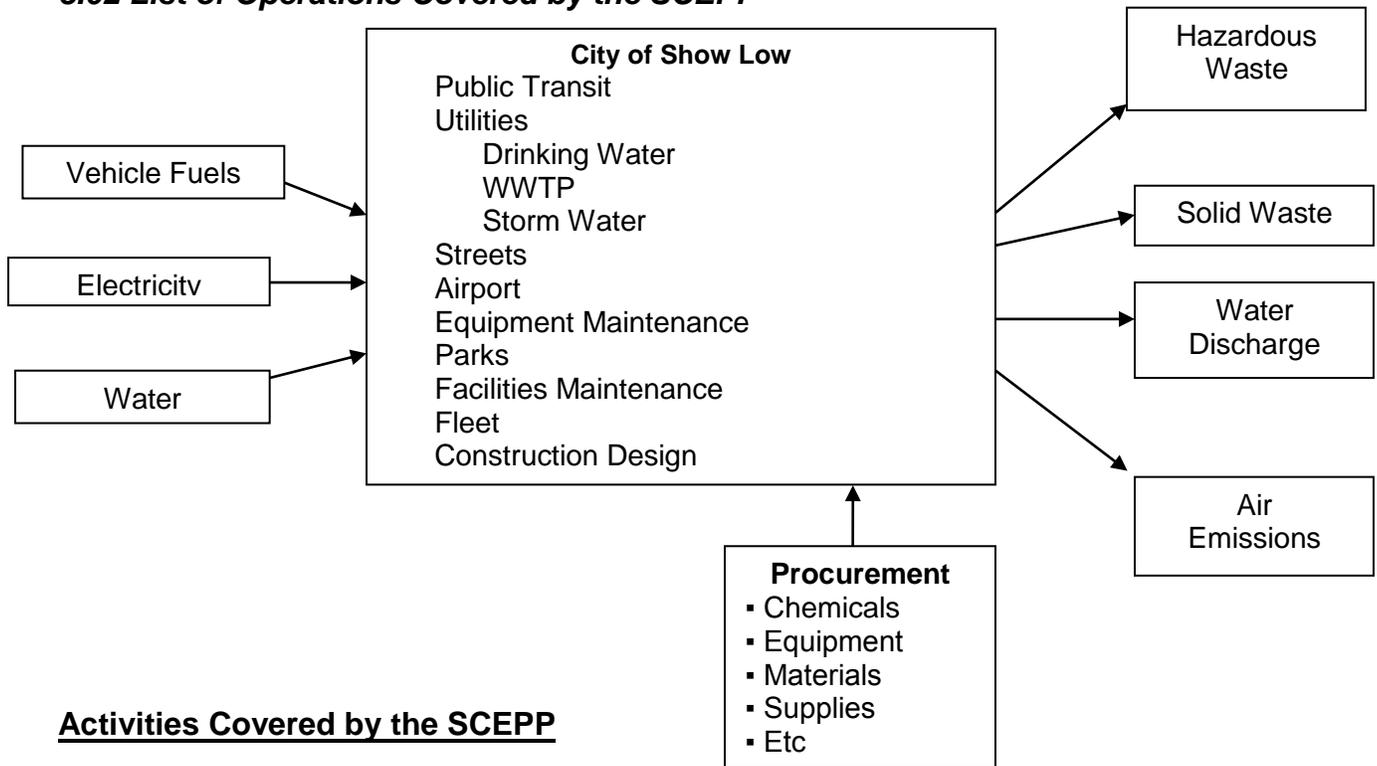
Procedure:

This procedure is used to describe the operations covered by the SCEPP. Operations include all activities, products and services provided by our community.

- 1) Identify all activities covered by the SCEPP which **The City of Show Low** has control over or can influence.
- 2) Divide operations into categories and develop a flowchart that follows materials or activities through their respective processes.
- 3) Identify and list all activities, products and services covered by the SCEPP
 - Review the SCEPP guidance materials when determining what operations should be included
 - Create separate lists of activities, products and services, as needed
 - Start with a comprehensive list as possible grouped into categories and determine if anything may have been missed.
- 4) Document the operations and activities along with a brief description in the form [3.02 List of Operations Covered by the SCEPP](#). Create a separate table for each category of operations.
- 5) Identify regulatory requirements.

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3.02 List of Operations Covered by the SCEPP



Activities Covered by the SCEPP

	Operation/Activity	Description
1.	Public Transit	The Four Seasons and White Mountain Connection bus routes
2.	Utilities-Drinking Water Production and Distribution	Ensure safe and cost responsible production and distribution of water to meet the needs of the citizens of Show Low and infrastructure. Ensure compliance with all applicable rules, laws, and regulations including the compliance with standards applying to selenium
3.	Utilities-Wastewater Collection and Treatment	Ensure safe and cost responsible collection of sanitary wastewater to meet the needs of the citizens of Show Low and infrastructure. Ensure compliance with all applicable rules, laws, and regulations, including compliance with water quality standards applying to ammonia
4.	Streets	Ensure safe and cost responsible operations and maintenance of City road surfaces, and associated drainages.
5.	Airport Fueling	The Show Low Regional Airport has full and self-service fueling for aviation customers.
6.	Airport Drainage	The City of Show Low monitors drainage in accordance to the SWPPP
7.	Equipment Maintenance	The City of Show Low owns, operates and maintains equipment to maintain and beautify city assets
8.	Parks	The City of Show Low is responsible for and maintains public parks for citizen's recreation; including sports. The City also owns and maintains a public cemetery.
9.	Facilities	Maintenance of city owned buildings, hazardous waste disposal (PD)
10.	Fleet	Maintenance of city owned automobiles
11	Ammonia exceedance	AZPDES permit requires new ammonia levels are met within specified timelines and the permit. City has begun construction of a new WWTP to address this issue.
12	Selenium exceedance	AZPDES permit requires new selenium levels are met within specified timelines and the permit. The City will complete the construction of the new WWTP, optimize operations for selenium removal and take other actions as necessary, including a drinking water blending program.
13	Construction Design	Design and construct infrastructure that is cost efficient and environmentally friendly

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4.01 Identifying Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets

**SCEPP CONTROLLED DOCUMENT:
PROCEDURE FOR IDENTIFYING ENVIRONMENTAL ASPECTS, DETERMINING
SIGNIFICANT IMPACTS, AND DEVELOPING OBJECTIVES AND TARGETS**

The SCEPP Team identifies the environmental aspects of all activities within the SCEPP boundary that **The City of Show Low** controls or over which it can be expected to have influence. The SCEPP Team then determines which of the aspects may have a significant impact on the environment. This is done using operational controls procedure. A list of all aspects and the significant impacts is included in [4.01 F3 Form for Setting Aspects, Significant Impacts, Objectives and Targets](#).

Aspects determined to have significant impacts are reviewed at least annually by the SCEPP Team as well as anytime there are new or changed activities to consider. Meeting discussions and procedures used to determine significant impacts are recorded in the SCEPP Team meeting minutes. The SCEPP Manager, Jay Brimhall, the Grants and Public Transit Manager, maintains the SCEPP meeting minutes and other records as required.

The SCEPP establishes goals for its operations that are consistent with **The City of Show Low** environmental policy that will eliminate the gap between current procedures and an accepted SCEPP frame work, and that will reduce the environmental impacts of its operations.

Procedure: Identifying Environmental Aspects and Impacts

Applicable Definitions:

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 (Output): 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.]*

This procedure is used to identify the environmental aspects and their impact for each operation/activity identified in the bottom table of form [3.02 List of Operations Covered by the SCEPP](#).

- 1) For each activity, product or service identified, list the associated environmental aspects using *SCEPP/4.01 F1 Form for Preparing a List of Environmental Aspects for One Activity*. Identify a specific environmental impact caused by each aspect.

Note: If more than one impact exists for a specific aspect, redefine the aspect so there is only one impact. This will make it easier when assessing the significance of the environmental impact

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- [4.01 F1 A – Public Transportation](#)
- [4.01 F1 B – Utilities - Drinking Water Production and Distribution](#)
- [4.01 F1 C – Utilities – Wastewater Collection and Treatment](#)
- [4.01 F1 D –Streets](#)
- [4.01 F1 E –Airport Fueling](#)
- [4.01 F1 F –Airport Drainage](#)
- [4.01 F1 G –Equipment Maintenance](#)
- [4.01 F1 H –Parks](#)
- [4.01 F1 I –Facilities](#)
- [4.01 F1 J –Fleet](#)
- [4.01 F1 K – Ammonia Exceedance from WWTP](#)
- [4.01 F1 L – Storm Water](#)
- [4.01 F1 M – Construction Design](#)

- 2) In determining the significant environmental impact associated with each aspect, note the impact category. Impacts will fall into one of four categories:
- Air: potential degradation of air quality.
 - Water: potential degradation of water quality.
 - Land: potential land contamination.
 - Other: consumption of natural resources including the interactions that use raw materials and natural resources such as water and energy (i.e., water, energy, materials, land or other issues such as noise or odor).

Consider the following criteria:

- Use of natural resources (chemicals and other materials, water, energy)
- Generation of hazardous waste
- Generation of solid waste
- Generation of wastewater
- Emissions to air
- Activity is regulated
- Cost to mitigate
- Employee and public concern
- Frequency of occurrence
- Severity of impact

- 3) Determining Significant Environmental Impacts. For each environmental impact apply the evaluation criteria to determine significance. Use the questions below; [4.01 F Flow Diagram of Impact Significance Evaluation](#) and [4.01 F2 Assigning Impacts to Aspects and Determining Significance](#).

Is it regulated?

Yes: If it is regulated at the federal, state or municipal level.

No: If it is not regulated.

Future: If there is knowledge of pending regulations based on the stakeholder analysis.

Does the aspect pose a potential environmental impact?

Yes: If the aspect is known to create environmental impacts or is likely to create impacts or severe consequences to the environment.

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- No: If the aspect is not known to create environmental impacts nor has negligible consequence to the environment.
- Unknown: If there is insufficient knowledge about the potential for the aspects to create environmental impacts.

Is there significant stakeholder interest?

- Yes: High potential for concern documented and expressed by several stakeholders.
- No: No or little concern.
- Unknown: If there is insufficient knowledge about the level of stakeholder concern.

Is there significant financial opportunity or risk?

- Yes: Costs to currently manage the aspect is significant or potential to create significant cost savings exists.
- No: Currently little or no cost to manage the aspect, or little or no potential for cost savings or revenue generation.
- Unknown: Potential for cost savings or revenue generation or costs to manage the aspect is unknown.

If most or all of the answers are “Unknown” (or Future) additional information will have to be gathered and the aspect reassessed.

Complete [4.01 F3 Setting Aspects: Significant Impacts: Objectives and Targets](#) by adding the results of this analysis to the appropriate headings in the table. For each operational activity, product and service identified, list all environmental aspects and impacts related to each activity, product and service.

Procedures: Identifying Environmental Objectives and Targets

The SCEPP Team establishes environmental objectives and targets to set performance improvement goals for the aspects that may lead to significant impacts. These are integrated into programs developed to stimulate action within individual units, departments or across all operations within the SCEPP boundary. Objectives and targets are developed for aspects considering significant environmental impacts, legal and other requirements, technical and financial feasibility, commitments in the environmental policy and operational requirements.

The SCEPP Team develops objectives and targets to define:

- 1) the performance objectives (e.g., monitor, study, control or improve) for each aspect with a significant environmental impact;
- 2) the specific, quantified targets which define those performance objectives; and
- 3) the planned schedule for achieving targets.

Applicable Definitions:

Environmental Objectives (Goals): Overall environmental goal arising from the environmental policy that an organization sets itself to achieve, and which is quantified where practicable. An example would be: *to install a holding tank, piping, and pumping system in order to reuse treated wastewater. [Also see Environmental Targets].*

Environmental Targets: A detailed environmental goal, quantified where practicable, that

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arises from the environmental objectives (goals) and that needs to be scheduled and assigned in order to achieve those objectives. An example would be: *to reduce water use by 30 percent over baseline in a 12-month period*. Included in the decision of targeting is the assignment of staff responsible for achieving each of the targets. Please note that the actual achievement of a target requires commitment and coordination from multifunctional departments, but one responsible person is needed to direct the effort. [Also see *Environmental Objectives (Goals)*]

Development of Objectives and Targets:

Objectives and targets are developed to address those aspects which a community has determined to have significant impacts. They should support the *Environmental Policy* which promotes pollution prevention, environmental compliance, and continual improvement.

Objectives and targets must be based on technological options, economic feasibility, views of interested parties, and legal considerations. The development of objectives and targets should be conducted by SCEPP team members who are related to the affected activities.

- 1) This procedure is used to evaluate each aspect with a significant impact to assess whether or not an environmental objective and target should be established. Assess each activity with the following questions as outlined in [4.01-2 Flow Diagram of Impact Significance Evaluation](#).
- 2) Evaluate each aspect with a significant impact using the flowchart criteria:
 - Does the organization have control or influence over the aspect?
 - Do technically feasible options exist to control the aspect?
 - Are the technically feasible options financially feasible?
- 3) Once the impact has been assigned against these criteria, determine whether an objective and target should be established using the decision logic from the flowchart criteria.
- 4) Use [4.01 F3 Form for Setting Aspects, Significant Impacts, Objectives and Targets](#) to record the results of the evaluation. Form 4.01 F3 should also present those significant aspects for which objectives and targets will be established at a later date, and include an anticipated timeframe for establishing the objectives and targets.

Objectives and Targets should be set so that they represent a valuable but achievable goal to base the Environmental Management Programs around.

Documentation

Updates and Reviews - The aspects, their rating criteria for significance, and objectives and targets must be reviewed and updated annually. Updates must also be required for any addition or modification of an activity, process, product or service. Changes to the criteria for determining aspects and significant impacts must be recorded in the facility's aspect procedure.

Records - Records generated from this procedure include flowcharts, list of aspects and impacts, aspect analysis, legal requirements, and objectives and targets.

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4.01 F1A Public Transportation

Inputs: What are the interactions occurring or done that use the following: Public Transit
Electricity:
Materials:
Water:
Fuels: Diesel and unleaded gasoline
Other: Automotive fluids and other items that absorb the wear and tear of six (6) buses.
Emissions: What are the interactions occurring that create releases to the following:
Air: Petrol emissions from six (6) buses and one support vehicle
Water: None
Land: Wear and tear items on buses designed to absorb the rigors of a intercity transit system
Other: None

4.01 F1B – Utilities-Drinking Water Production and Distribution

Inputs: What are the interactions occurring or done that use the following:
Electricity: Electrical use to pump ground water into storage facilities. Electrical use to mechanically boost pressure in zones, and or fill storage tanks.
Materials: Pumps, pipes, valves, appurtenances, motors, backfill, export material
Water: Utilized by City and consumer. Used in flushing and cleaning.
Fuels: Consumed by equipment utilized to work on infrastructure
Other: Re-occurring and/or preventative maintenance
Emissions: What are the interactions occurring that create releases to the following:
Air: Emissions from equipment, vehicles, generators
Water: Loss of resource, potential for loss of public and/or private infrastructure
Land: Loss of protection of infrastructure
Other: NA

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4.01 F1 C – Utilities-Wastewater Collection and Treatment

Inputs: What are the interactions occurring or done that use the following:
Electricity: Electrical use to pump ground water into storage facilities. Electrical use to mechanically boost pressure in zones, and or fill storage tanks.
Materials: Pumps, pipes, valves, appurtenances, motors, backfill, export material
Water: Utilized by City and consumer. Used in flushing and cleaning.
Fuels: Consumed by equipment utilized to work on infrastructure
Other: Re-occurring and/or preventative maintenance
Emissions: What are the interactions occurring that create releases to the following:
Air: Emissions from equipment, vehicles, generators
Water: Loss of resource, potential for loss of public and/or private infrastructure, spills may pollute land and water resources
Land: Loss of protection of infrastructure
Other: NA

4.01 F1 D – Streets

Inputs: What are the interactions occurring or done that use the following:
Electricity: Street lights, traffic signals
Materials: Road base materials, asphalt cement, export or import material
Water: Roadway saw cutting, culvert cleaning, water use for material compaction
Fuels: Used by equipment to maintain roadway and drainage infrastructure
Other: NA
Emissions: What are the interactions occurring that create releases to the following:
Air: Emissions from equipment, vehicles, generators
Water: Storm water
Land: Excavated export material
Other: NA

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4.01 F1 E – Airport Fueling

Inputs: What are the interactions occurring or done that use the following:
Electricity: Electrical used in the process of off-loading and loading fuel tanks and trucks and for self-serve fueling system
Materials: Tanks, Hoses and fuel nozzles
Water: Atmospheric condensation in fuel
Fuels: AV Gas and Jet fuel used for aircraft
Other: Re-occurring and/or preventative maintenance
Emissions: What are the interactions occurring that create releases to the following:
Air: Emissions from AV Gas, Jet Fuel, vehicles, and fuel trucks
Water: Possible impacts to water if fueling facilities fail
Land: Possible impacts to land if fueling facilities fail
Other: NA

4.01 F1 F – Airport Drainage

Inputs: What are the interactions occurring or done that use the following:
Electricity:
Materials:
Water: Culvert and drainage cleaning
Fuels: Used by equipment to maintain culverts and ditches
Other:
Emissions: What are the interactions occurring that create releases to the following:
Air: Emissions from equipment and vehicles
Water: Storm water
Land:
Other: NA

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4.01 F1 G – Equipment Maintenance

Inputs: What are the interactions occurring or done that use the following:
Electricity: Common Usage and safety Practices
Materials: Greases, oils and other fluids, used to maintain proper equipment operations
Water: Used for general clean up
Fuels: Diesel and gasoline
Other:
Emissions: What are the interactions occurring that create releases to the following:
Air: Exhaust
Water: Minimal possibility of interaction
Land: Spill could interact with land
Other:

4.01 F1 H – Parks

Inputs: What are the interactions occurring or done that use the following:
Electricity: Sports, restroom and security lighting
Materials: Fertilizer for turf, restroom maintenance supplies, marking chalk (gypsum), herbicide, soils, quick-dry, grass seed
Water: Irrigation, restroom water use; including maintenance
Fuels: 2-cycle fuel for equipment, unleaded gasoline for equipment and diesel for equipment
Other:
Emissions: What are the interactions occurring that create releases to the following:
Air: Normal equipment emissions, dust from ball field maintenance and wind
Water: Watering fields
Land: All green waste recycled
Other:

4.01 F1 I – Facilities

Inputs: What are the interactions occurring or done that use the following:
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Electricity: Security lighting, HVAC, general work place lighting, general office space electrical usage for typical 40 hour work week; including computers, telephones, record management and print copy equipment.
Materials: Paper, restroom supplies, computers, print material production supplies, cleaning supplies, office supplies, possible police acquired drug and other hazardous materials
Water: General office water usage, including restrooms, outdoor landscaping, break room kitchens, fire suppression system(s), dishwashers, ice machines, public pool
Fuels: Natural gas-dehumidification system, boilers
Other: Pool maintenance chemicals, Police Department hazardous waste (confiscated)
Emissions: What are the interactions occurring that create releases to the following:
Air: Landscaping equipment, HVAC emissions, dehumidifier
Water: Landscape irrigation
Land: Green waste recycled
Other: Police Department contraband is hazardous to all of the above.

4.01 F1 J – Fleet

Inputs: What are the interactions occurring or done that use the following:
Electricity:
Materials: Automotive tires
Water:
Fuels: Gasoline, diesel, motor oil
Other: Automotive fluids
Emissions: What are the interactions occurring that create releases to the following:
Air: CO2 Emissions
Water: Oil and other auto fluids could impact water if accidentally released
Land: Oil and other auto fluids could impact water if accidentally released
Other:

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4.01 F1 K – Ammonia Exceedance from WWTP

Inputs: What are the interactions occurring or done that use the following:
Electricity:
Materials:
Water: Exceedance may effect water quality
Fuels:
Other:
Emissions: What are the interaction occurring that create releases to the following:
Air:
Water: Water quality may be effected
Land:
Other:

4.01 F1 L – Storm Water

Inputs: What are the interactions occurring or done that use the following:
Electricity:
Materials:
Water: Recharges with ground water from runoff
Fuels:
Other:
Emissions: What are the interactions occurring that create releases to the following:
Air:
Water: Possible water contamination
Land: Possible impacts to lands if runoff is not controlled
Other:

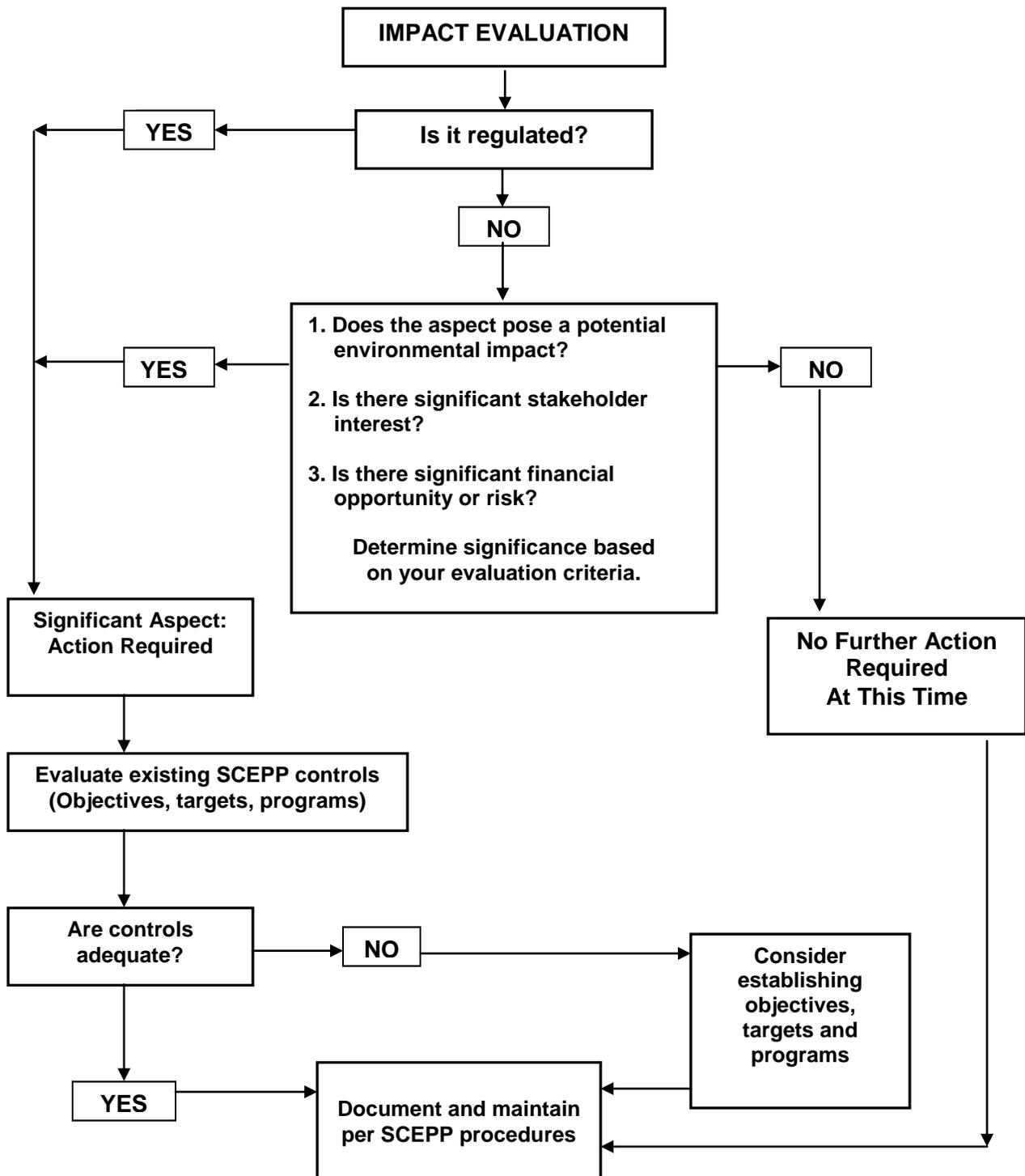
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4.01 F1 M – Construction Design

Inputs: What are the interactions occurring or done that use the following:
Electricity: Electricity used in construction and in daily use
Materials: General construction materials
Water: Water and waste water systems included in designing all ancillary buildings per permitting guidelines
Fuels: Hazardous fuels grouped and used in accordance with SDS guidelines
Other:
Emissions: What are the interactions occurring that create releases to the following:
Air: Possible air contamination during system failure
Water: Possible water contamination if systems fail
Land: Possible impacts to lands if systems fail
Other:

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4.01 2 Flow Diagram of Impact Significance Evaluation



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4.01 F2 Form for Assigning Impacts to Aspects and Determining Significance

Aspects	Impacts				Questions for Significance				Is it a Significant Aspect? Yes/No
	Air	Water	Land	Other	Is it Regulated?	Does the aspect pose a potential environmental risk?	Is there significant stakeholder interest?	Is there significant financial risk or opportunity?	
Public Transportation	Yes	No	Yes	No	Yes	No	Yes	No	Yes
Utilities-Drinking Water Production and Distribution	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Utilities-Wastewater Collection and Treatment	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Streets	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Airport Fueling	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Drainage	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes
Equipment Maintenance	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Parks	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes
Facilities	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Fleet	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Ammonia Exceedances	No	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Storm Water	No	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Construction Design	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes

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4.01 F3 Setting Aspects, Significant Impacts, Objectives and Targets

Activity	Aspect	Significant Impact	Objective	Target
Public Transportation	Provision of Public Transit	Loss of revenue	Safe transportation to public	Meet transit requirements
Utilities-Drinking Water Production and Distribution	Production and distribution	Service interruption, loss of resource, loss of revenue, damage to public and/or private property	Safe, and sustainable production with no loss	No contaminant exceedances. Meet scheduled maintenances requirements.
Utilities-Wastewater Collection and Treatment	Collection and treatment	Service interruption, loss of resource, loss of revenue, damage to public and/or private property	Safe, and sustainable operations with no loss	No sanitary sewer overflows. Clean entire collection system every 2 years. Identify and correct inflow and infiltration as identified. New WWTP under construction to mitigate exceedances.
Streets	Maintenance of road surfaces and roadside drainages	Impacts to motoring and pedestrian traffic safety. Impacts to waters of the US.	Safe and reliable operations resulting in safety and storm water mitigated impacts	PASER evaluation every 5 years. Goal of 10% improvement in top 50% of rating. Implement CRS systems to include, annual drainage assessment.
Airport Fueling	Loading & Off-Loading Fuel	Spill, fire, vapors, damage to public and/or private property	Safe and sustainable receiving and dispensing of fuel	No spills, no fires
Airport Drainage	Maintenance of storm water areas around Airport property	Impacts to property and to waters of the US	Safe storm water mitigated impacts	Regular drainage assessment and periodic maintenance
Equipment Maintenance	Maintenance of city owned and operated equipment	Impacts to property, possible spills into water and land resources	Safe and effective maintenance that ensures minimal environmental impact	As needed departmental audit of procedures on equipment maintenance
Parks	Maintenance of City Parks	Impacts to public recreation	Provide safe and environmentally friendly recreational opportunities for citizens and visitors	Meet and exceed public's recreational needs

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Facilities Maintenance	Maintenance of City buildings and disposal of hazardous materials (Police)	Normal wear and tear in workplace impacts to public buildings	Provide safe and environmentally friendly services	Meet all hazardous waste requirements for disposal of confiscated chemicals” and “adhere to the Asbestos NESHAP and OSHA requirements for city renovation and demolition projects
Fleet	Maintenance of City vehicles	Normal wear and tear to public vehicles	Provide off-site services to citizens; and ensure safe disposal of auto fluids	Provide services to public that require off-site travel via sustainable automobile maintenance practices, including safe disposal of auto fluids
Construction Design	Design and construction of city infrastructure	Shoddy design and construction leads to unsafe and unsustainable public infrastructure	Provide services to all residents and visitors by ensuring all city infrastructure is sound	Adherence to permit requirements and best practices

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5.01 Procedure for Identifying Legal and Other Environmental Requirements

SCEPP CONTROLLED DOCUMENT: PROCEDURE FOR IDENTIFYING LEGAL AND OTHER ENVIRONMENTAL REQUIREMENTS
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As part of the Environmental Policy's commitment to regulatory compliance, **The City of Show Low** has established this procedure for ensuring compliance with environmental regulations and other requirements. This procedure involves identifying, accessing and communicating legal and other environmental requirements that are applicable to the activities within the scope of operations covered by the SCEPP.

Information necessary to ensure compliance is acquired through legal publications and other sources identified by The SCEPP Manager, the Grants and Public Transit Manager of the City of Show Low. The relevant requirements are identified, accessed and communicated to all personnel, as necessary. At least once a year, the SCEPP Manager reviews the current federal, state and local regulatory requirements to ensure ongoing compliance.

Procedure:

The SCEPP Manager, with support from the SCEPP Team, completes [5.01 F1 Form for Preparing a List of Legal and Other Environmental Requirements](#) in its entirety. The SCEPP Team completes the form to the greatest extent possible using all sources of information for identifying applicable legal and other environmental requirements.

After completing [5.01 F1 Form for Preparing a List of Legal and Other Environmental Requirements](#), the SCEPP Manger integrates the list of compliance issues into [4.01 F2 Form for Assigning Impacts to Aspects and Determining Significance](#), declaring all impacts with an applicable legal/regulatory requirement as significant.

The City of Show Low's environmental policy strives for pollution prevention, environmental compliance, and continuous improvement. To comply with environmental laws and regulations, it is necessary to know what the legal and business requirements are for the **City of Show Low's** facilities. Although this SCEPP focuses on environmental compliance, the SCEPP Team can add those provisions required by the Occupational Safety and Health Administration (OSHA) or other agencies that require notification in the event of an accident or injury.

Environmental Requirements include:

- Federal
- State
- County
- Municipal
- Environmental Permitting
- Compliance Monitoring
- Record Keeping and Reporting
- Contingency Plans
- Emergency Preparedness and Response Plans – See **Section 12**

OSHA Requirements may include:

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- Process Safety Management
- Industrial Practices

Reporting Accidents and/or Injuries:

As noted above, it is important that the SCEPP include all regulatory notification requirements when an accident occurs, such as a chemical spill, as well as reporting physical injuries as required.

Environmental Requirements:

The following activities will help the environmental regulatory assessment and annual review process:

- 1) Identify individuals responsible for environmental compliance at the facility. Specify areas of responsibility for each person.
- 2) Identify contractors/vendors who provide environmental services to the facility. Indicate the type of service they offer. *Their activities may be regulated.* Determine if a license or certificate is required to perform environmental services and if that authorization is current including any continuing education requirements. Always obtain a copy of the license or certificate.
- 3) Identify regulatory agencies that the facility would contact for information including reporting an accident or injury. Include the names of the contact person, phone number, and E-mail address.
- 4) Identify all environmental permits currently issued to the facility. Provide essential information for each of the permits, such as permit type, permit number, issuing authority, issue date, and expiration date and monitoring and reporting requirements.
- 5) Identify any *formal* enforcement orders against the facility. Describe the type of the order (e.g. consent order, consent judgment, abatement), the issuing authority, issue date, required action by the facility, due date and the current status. Also identify *informal* enforcement notices such as a *Notice of Opportunity to Correct* (NOC) or a *Notice of Violation* (NOV).

NOTE: Any *formal* or *informal* enforcement notice received after development and implementation of the SCEPP should automatically trigger an immediate review of the SCEPP to determine why the noncompliance occurred and what corrective action should be implemented to prevent future nonconformance with the SCEPP.

- 6) Identify reports, plans, and other documents the facility is required to submit or maintain. These may include emergency spill plans, discharge monitoring records, site remediation plans, pollution prevention plans, pollution prevention progress reports, toxic release inventory forms, hazardous waste manifests, hazardous waste annual reports, etc. Specify the type of reports, the agency requiring it, and the frequency of reporting.
- 7) Identify specific programs and procedures under which the facility operates. The list may include the facility's standard operating practices, pollution prevention, recycling, process safety management, or SCEPP programs. Include the names of the program, initiation date, and person responsible for the program.

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The SCEPP Manager or designee **must** stay informed of changing environmental regulations by:

- Obtaining a hard copy and/or Internet access to applicable EPA, Arizona, and local rules and regulations to assure access to changes in the regulations.
- Reviewing regulatory updates and the community's compliance calendar and attending compliance workshops offered by federal, state and local regulatory agencies.
- Using a consultant and/or agency liaisons and customer service staff specializing in compliance issues.
- Accessing documentation and web sites with compliance assistance guidance.

The SCEPP Manager or designee reviews *SCEPP/5.01 F1 Form for Preparing a List of Legal and Other Environmental Requirements* on a regular basis **annual** to ensure compliance and as part of the SCEPP Audit preparation.

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5.01 F1 Form for Preparing a List of Legal and Other Environmental Requirements

**SCEPP CONTROLLED DOCUMENT:
LIST OF LEGAL AND OTHER ENVIRONMENTAL REQUIREMENTS**

Environmental Aspect	Legal Requirements	Legal Citation
Public Transportation	MV Transportation, the City of Show Low's contracted agent received permitting for transit services as outlined in contract.	ARS Title 28
Wastewater Treatment	Arizona Pollutant Discharge Elimination System Permit (AZPDES), Aquifer Protection Permit (APP)	ARS Title 49, Ch 2, Article 3.1, Federal Water Pollution Control Act, (33 USC -1251 et.seq, Arizona Administrative Code Title 18, Ch 9, Articles 1, 2, 9,10; AZPDES Permit # AZ0023841; APP Inventory #100737
Wastewater Collection	Operation and Maintenance requirements	AAC Title 18, Ch 9, Article 3
Wastewater Collection/Treatment	Operator Certification & License Renewal Hours	AAC Title 18, Ch 5, Article 1
Wastewater Treatment	Bio solids regulations	AAC Title 18, Ch 9, Article 10
Wastewater Collection	Design and Permitting	AAC Title 18, Ch 9, Article 3
Water Production/Distribution	Sampling and reporting requirements	40 C.F.R. Part 141; A.A.C. Title 18 Article 4
Water Production/Distribution	Operations and maintenance requirements including cross connection survey and backflow prevention assemblies installation and testing	40 C.F.R. Part 141; A.A.C. Title 18 Article 4, USC Cross Connection Control Manual, current edition, City Code 14-8-11
Water Production/Distribution	Operator Certification & License Renewal Hours	AAC Title 18 Ch 9, Article 1
Streets	Storm Water Pollution Prevention Plan (SWPPP) for Public Works Yard	A.A.C Title 18, Chapter 9, Article 9; ADEQ Non-Mining MSGP 2010; ADEQ Construction General Permit for construction projects which disturb an acre or more of land
Streets	Snow Removal	City Code Chapter 18
Airport Fueling	Spill Prevention Control and Countermeasure Plan	40 CFR Part 112;

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	(SPCC)	RCRA 140 CFR Part 122; Fire Code
Airport Drainage	Storm water Pollution Prevention Plan for Airport (SWPPP)	ADEQ Non-Mining MSGP 2010 General Permit; FAA Advisory Circular 150-5320-15A Management of Airport Industrial Waste; FAA Part 139 Commercial Air Service Certification; 40 CFR Part 121; Section 402(p) of the Clean Water Act
Equipment Maintenance	SDS Operations Manual(s)	Departmental SDS manual on file where department is housed; used oil requirements: 40 CFR Part 279 and ARS Title 49, Ch 4, Article 7
Parks	SDS Operations manual(s)	Parks SDS Manual on file at Public Works yard
Facilities	SDS Operations manual(s)	Facilities SDS Manual on file at City Hall, and Police Department, hazardous waste management ARS Title 49, Chapter 5; AAC Title 18, Chapter 8
Fleet	Fleet Maintenance Procedures Document, SDS Operations Manual(s), Public Works Fleet Data Software	City Hall, Public Works; used oil requirements: 40 CFR Part 279 and ARS Title 49, Ch 4, Article 7
City building renovation and demolition projects	Asbestos NESHAP	40 CRF Part 61, Subpart M

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Environmental Aspect	Other Requirements	Policy Reference #

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6.01 Procedure for Establishing Environmental Management Programs

The SCEPP Team has established Environmental Management Programs (EMP) for all objectives and targets. EMPs are reviewed and approved by the governing body and SCEPP team prior to implementation. The EMPs define the principal actions to be taken, the individuals responsible and the scheduled times for implementation that will achieve the desired results.

Procedure:

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 [4.01 Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets](#). Environmental Management Programs are **action plans** for implementing environmental improvements.

A description of Environmental Management Programs includes:

- designation of responsibility;
- resources available (budget, staff and technology); and
- time frame of execution

A continual improvement process should be in place to amend Environmental Management Programs when necessary:

- 1) For each environmental aspect with a significant impact identified in form [4.01 F3 Setting Aspects; Significant Impacts; Objectives and Targets](#) for which an objective and target has been developed; a form for preparing Environmental Management Programs was completed.

[6.01 F1A – Public Transit](#)

[6.01 F1B – Wastewater Treatment O&M](#)

[6.01 F1C – Wastewater Collection O&M](#)

[6.01 F1D – Water Production](#)

[6.01 F1E – Water Distribution O&M](#)

[6.01 F1F – Streets O&M](#)

[6.01 F1G – Airport Fueling](#)

[6.01 F1H – Airport Drainage](#)

[6.01 F1I – Equipment Maintenance](#)

[6.01 F1J – Parks](#)

[6.01 F1K – Facilities Maintenance](#)

[6.01 F1L – Fleet](#)

[6.01 F1M Ammonia Exceedance from WWTP](#)

[6.01 F1N Storm Water Pollution Control](#)

[6.01 F1O Construction Design](#)

- 2) Assign each completed form for Preparing Environmental Management, a distinct document control number.

- 3) Use [6.01 F2 Form for Preparing a Registry of Environmental Management Programs](#), to prepare of list of environmental programs.

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This planning process is completed annually or within the normal budgeting period.

6.01 F1A Public Transit

Operation/Activity: Public Transit		EMP Document Control No: 6.01 A	
Facility: Public Transit Depot (Public)		Responsible Persons: MV Transportation Manager (Contractor) Grants and Public Transit Manager Community Services Director	
Resources Available (Including Financial): City of Show Low annual budget, partnership budgets, Arizona Department of Transportation 5311 Rural Transit grant, income generated from ridership.			
Goal Statement: Continue to provide Show Low and the surrounding communities with quality public transit while keeping capital resources, buses primarily, in good working condition as to limit environmental impact			
Objective: Maintain service levels and provide citizens with an alternative to driving personal transportation.		Target and Completion Date: Meet transit requirements; Ongoing	
Strategy: Identify issues with buses and infrastructure and remediate as soon as possible			
Tasks for Achieving Objective and Target: Regular updates and communication with Transportation Advisory Committee and City leaders			
Metrics and Measurement: Regular updates to Transportation Advisory Committee and financial audits by ADOT			
Importance relative to Other Environmental Programs: Little importance to other environmental programs.			
Comments/Process Towards Completion: Ongoing			

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6.01 F1B – Wastewater Treatment O&M

Operation/Activity: Public Transit Wastewater Treatment O & M		EMP Document Control No: 6.01 B	
Facility: 6 th Street Wastewater Treatment Plant		Responsible Persons: Public Works Director	
Resources Available (Including Financial): Annual Capital Improvement Planning. Mandatory reserves budgeted. Staff of 5 FTE Environmental operators, with full complement Public Works Operations staff totaling 30 operators, all of whom hold ADEQ Operator Certifications			
Goal Statement: Through safe and cost responsible service, provide a meaningful quality of life in the City of Show Low and surrounding area. This mission is achieved by creating and maintaining efficient operations of infrastructure and City assets.			
Objective: Design, build, and operate a new wastewater treatment plant (WWTP). Successfully decommission existing WWTP		Target and Completion Date: Meet all APP and AZPDES permit requirements; Spring 2016	
Strategy: Secure a contract and build plant on or ahead of schedule, and on or under budget. Plant will be built, maintained and operated to achieve design discharge limits that comply with all applicable regulatory limits			
Tasks for Achieving Objective and Target: Ensure project stays on schedule and budget. Ensure treated effluent meets effluent limitations			
Metrics and Measurement: Regular project updates to City Council and Management			
Importance relative to Other Environmental Programs: Waste Water Treatment is key component in providing the area with sustainable human capital resources to continue progress towards our city's goals. In a broader framework, our compliance with the federal environmental regulations pertaining to water distribution contributes, in large part, to the city's general viability.			
Comments/Process Towards Completion: As of April 28, 2014 plant is at 60% design and currently over budget estimate.			

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6.01 F1C – Wastewater Collection O&M

Operation/Activity: Wastewater Collection O&M		EMP Document Control No: 6.01 C	
Facility: Show Low Sanitary Wastewater Collection System		Responsible Persons: Public Works Director, Environmental Manager, Wastewater Supervisor	
Resources Available (Including Financial): Annual Capital Improvement Planning. Mandatory reserves budgeted. Staff of 5 FTE Wastewater Collection System operators with full complement of Public Works Operations staff totaling 30 operators, all of whom hold ADEQ Operator Certifications.			
Goal Statement: Through safe and cost responsible service, provide a meaningful quality of life in the City of Show Low and surrounding area. This goal is achieved by creating and maintaining efficient operations of infrastructure and City assets			
Objective: Safe, effective, and efficient operations and maintenance of infrastructure to include; gravity collection system, lift stations, low pressure collection system, and augmentation stations		Target and Completion Date: No Sanitary Sewer Overflows Hydraulically clean entire gravity collection system annually. Ongoing, Hydraulically flush low pressure collection system, annually. Ongoing. Clean each lift station semi-annually. Ongoing. SOP in place Correct any inflow and infiltration, annually. Ongoing, issue contract every year to replace approximately 20 manholes per year, as budget allows.	
Strategy: Continue to follow work order generated preventative and/or re-occurring maintenance activities supporting targets. Continue to request manhole replacement funds through CIP process. Continue with manhole inspection process. As manhole inspections continue staff will add information to GIS.			
Tasks for Achieving Objective and Target: Continue with developed RM/PM tasks that support objectives and targets.			
Metrics and Measurement: Quarterly reports compare compliance. Reviews of these reports and operational adjustments are made to ensure metrics are realized.			
Importance relative to Other Environmental Programs: Water collection is key component in providing the area with sustainable human capital resources to continue progress towards our city's goals. In a broader framework, our compliance with the federal environmental regulations pertaining to water distribution contributes, in large part, to the city's general viability.			
Comments/Process Towards Completion: Ongoing			

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6.01 F1D – Water Production

Operation/Activity: Water Production		EMP Document Control No: 6.01 D	
Facility: Wells: 3, 3a, 3b, 4, 4a, 4c, 4d, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16		Responsible Persons: Public Works Director, Environmental Manager	
Resources Available (Including Financial): Annual Capital Improvement Planning. Mandatory reserves budgeted. Staff of 5 FTE Environmental operators with full complement of Public Works Operations staff totaling 30 operators, all of whom hold ADEQ Operator Certifications.			
Goal Statement: Through safe and cost responsible service, provide a meaningful quality of life in the City of Show Low and surrounding area. This goal is achieved by creating and maintaining efficient operations of infrastructure and City assets.			
Objective: Safe and efficient production of water that meets or exceeds water quality standards.		Target and Completion Date: No contaminant exceedances. Meet scheduled maintenance requirements. Construction of a surface water treatment plant. 2017. Or Construction of a new well to meet demands 2015 Installation of variable frequency drives for larger motors. As identified and funded.	
Strategy: Continue to monitor samples for key elements, i.e. arsenic, selenium. Incorporate budget forecasts and financing request based on current and possible future regulations. Optimize water production through the use of VFDs and best management practices.			
Tasks for Achieving Objective and Target: Continue with developed RM/PM tasks that support objectives and targets.			
Metrics and Measurement: Quarterly reports and all water system monitoring data; compare compliance. Reviews of these reports and operational adjustments are made to ensure metrics are realized. Completion, review, and submittals of annual production reports to regulatory agencies.			
Importance relative to Other Environmental Programs: Water production is key component in providing the area with sustainable human capital resources to continue progress towards our city's goals. In a broader framework, our compliance with the federal environmental regulations pertaining to water distribution contributes, in large part, to the city's general viability.			
Comments/Process Towards Completion: Ongoing			

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6.01 F1E – Water Distribution O&M

Operation/Activity: Water Distribution O&M		EMP Document Control No: 6.01 E	
Facility: City of Show Low Distribution System		Responsible Persons: Public Works Director, Environmental Manager, Water Distribution Supervisor	
Resources Available (Including Financial): Annual Capital Improvement Planning. Mandatory reserves budgeted. Staff of 10 FTE Water Distribution operators with full complement of Public Works Operations staff totaling 30 operators, all of whom hold ADEQ Operator Certifications.			
Goal Statement: Through safe and cost responsible service, provide a meaningful quality of life in the City of Show Low and surrounding area. This goal is achieved by creating and maintaining efficient operations of infrastructure and City assets.			
Objective: Safe and efficient distribution of water that meets or exceeds water quality standards.		Target and Completion Date: No contaminant exceedances. Meet scheduled maintenance requirements. Ensure 100% operation of valves within system every four (4) years Identify all relief valves within 2 years and have added to GIS All PRV maintained 2x year Flushing of mains, monthly Backflow testing compliance 100% compliance annually Maintain 20 year replacement cycle on meters	
Strategy: Ensure system is self-sufficient and maintained in a self-supporting manner. Ensure 100% compliance with sampling and reporting. Ensure target metrics are met with the above completion schedules. Review of established metrics to ensure targets are being met. If targets are not being met identify means to correct deficiencies.			
Tasks for Achieving Objective and Target: Continue with developed RM/PM tasks that support objectives and targets.			
Metrics and Measurement: Quarterly reports and all water system monitoring data; compare compliance. Reviews of these reports and operational adjustments are made to ensure metrics are realized. Completion, review, and submittals of annual production reports to regulatory agencies.			
Importance relative to Other Environmental Programs: Water distribution is key component in providing the area with sustainable human capital resources to continue progress towards our city's goals. In a broader framework, our compliance with the federal environmental regulations pertaining to water distribution contributes, in large part, to the city's general viability.			
Comments/Process Towards Completion: Ongoing			

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6.01 F1F – Streets O&M

Operation/Activity: Streets O&M		EMP Document Control No: 6.01 F	
Facility: City of Show Low Streets Inventory		Responsible Persons: Public Works Director, Streets Supervisor	
Resources Available (Including Financial): Annual Capital Improvement Planning. Mandatory reserves budgeted. Staff of 7 FTE Streets operators, with full complement of Public Works Operations staff totaling 30 operators, all of whom are cross trained within the department.			
Goal Statement: Through safe and cost responsible service, provide a meaningful quality of life in the City of Show Low and surrounding area. This goal is achieved by creating and maintaining efficient operations of infrastructure and City assets.			
Objective: Safe and efficient operations of the City streets, and associated drainage structures		Target and Completion Date: Conduct annual inspection of all drainages in the City. SOP on File Conduct 5 year assessment of condition of Streets (PASER) Conduct annual inspection of Public Works Yard related to the SWPPP Goal of 10% improvement in top 50% of rating. Implement CRS systems to include annual drainage assessment.	
Strategy: Continue to perform street inspections and routine maintenance on streets such as crack sealing, pothole repairs, and continue to assist with annual slurry sealing program.			
Tasks for Achieving Objective and Target: Continue with developed RM/PM tasks that support objectives and targets.			
Metrics and Measurement: Quarterly reports compare compliance. Reviews of these reports and operational adjustments are made to ensure metrics are realized. The completion, review, and submittals of annual production reports to regulatory agencies will be used to track and monitor this aspect. Based on PACER manual, City rates pavement conditions city-wide every 5 years. Trouble spots assessed as needed. Annual drainage assessment included in City's CRS.			
Importance relative to Other Environmental Programs: This element is important to other environmental programs due to the fact the streets maintenance supports a broader effort of providing vital transportation infrastructure to Show Residents and visitors and helps sustain the City's efforts to comply with environmental programs.			
Comments/Process Towards Completion: Ongoing			

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6.01 F1G – Airport Fueling

Operation/Activity: Unloading fuel to fill storage tanks and fueling airplanes.		EMP Document Control No: 6.01 G	
Facility: Show Low Regional Airport		Responsible Persons: Airport Manager and linemen	
Resources Available (Including Financial): Annual Capital Improvement Planning. Mandatory reserves budgeted, Staff of 4 FTE that include an Airport Manager and 3 linemen.			
Goal Statement: Through safe and cost responsible service, provide a meaningful quality of life in the City of Show Low and surrounding area. This goal is achieved by creating and maintaining efficient operations of infrastructure and City assets.			
Objective: Safe and sustainable receiving and dispensing of fuel		Target and Completion Date: No spills or fires. Ongoing training and maintenance with respect to off-loading fuel into storage tank facilities. Ongoing training and maintenance with respect to fueling airplanes. Customer service	
Strategy: Continue to receive training and routinely inspect and repair as needed the equipment and vehicles used in the operation of receiving fuel and selling fuel. Continue to follow industry standard safety and quality assurance protocols.			
Tasks for Achieving Objective and Target: Continue with developed RM/PM tasks that support objectives and targets			
Metrics and Measurement: Daily, monthly, quarterly, and annual fuel logs for quality assurance, receiving, and dispensing. Spill log is kept in compliance per SWPPP guidelines.			
Importance relative to Other Environmental Programs: This element suffuses the City of Show Low's efforts to both provide modern transit options to our citizens and also good environmental stewards of resources and our beautiful Northern Arizona mountain environment.			
Comments/Process Towards Completion: Ongoing			

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6.01 F1H – Airport Drainage

Operation/Activity: Storm Water O&M		EMP Document Control No: 6.01 H	
Facility: Show Low Regional Airport		Responsible Persons: Airport Manager and linemen	
Resources Available (Including Financial): Annual Capital Improvement Planning. Mandatory reserves budgeted, Staff of 4 FTE that include an Airport Manager and 3 linemen.			
Goal Statement: Through safe and cost responsible service, provide a meaningful quality of life in the City of Show Low and surrounding area. This goal is achieved by creating and maintaining efficient operations of infrastructure and City assets.			
Objective: Safe and efficient operation of drainage structures		Target and Completion Date: Conduct quarterly inspections of all drainage outlets on Airport for turbidity and fuel/oil sheen.	
Strategy: Continue to perform drainage inspections and perform maintenance and/or repairs as needed.			
Tasks for Achieving Objective and Target: Continue with developed RM/PM tasks that support objectives and targets.			
Metrics and Measurement: Document inspections and repairs. Review reports based on inspections and repairs quarterly. Should inspections and/or SCEPP audits raise concerns, they will be addressed. No persistent issues exist.			
Importance relative to Other Environmental Programs: Storm Water collection is at the core of the City of Show Low's efforts to mitigate environmental impacts and itself has impacts on all other environmental programs.			
Comments/Process Towards Completion: Ongoing.			

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6.01 F1 I – Equipment Maintenance

Operation/Activity: Parks		EMP Document Control No: 6.01 I	
Facility: Multiple Parks throughout Show Low		Responsible Persons: Parks and Facilities Maintenance Supervisor, Community Services Director, Public Works Director	
Resources Available (Including Financial): City owned equipment and man hours (employees)			
Goal Statement: Through safe and cost efficient service, provide a meaningful quality of life in the City of Show Low. This goal is achieved by creating and maintaining efficient operations of infrastructure and City assets.			
Objective: Provide parks and recreational activities to citizens, residents and visitors, to protect and maintain City investments and infrastructure while attempting to reduce the environmental impacts of operations.		Target and Completion Date: Ongoing effort to minimize outputs. As needed internal audits are performed.	
Strategy: Continue to minimize outputs and reduce environmental impact.			
Tasks for Achieving Objective and Target: Continue with developed RM/PM tasks that support objectives and targets.			
Metrics and Measurement: As needed meeting to ensure compliance with all applicable protocols and procedures.			
Importance relative to Other Environmental Programs: This element is important due to the fact that the equipment used doing City related work, helps mitigate environmental impacts. Due also to the nature of this element, it suffuses all work areas of City of Show Low operations.			
Comments/Process Towards Completion: Ongoing			

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6.01 F1 J - Parks

Operation/Activity: Parks		EMP Document Control No: 6.01 J	
Facility: Multiple Parks throughout Show Low		Responsible Persons: Parks and Facilities Maintenance Supervisor, Community Services Director	
Resources Available (Including Financial): Park land and associated amenities, Multiuse fields, Aquatic Center, Field Lighting, Trail Systems, Fees charged with service provision			
Goal Statement: Through safe and cost efficient service, provide a meaningful quality of life in the City of Show Low. This goal is achieved by creating and maintaining efficient operations of infrastructure and City assets.			
Objective: Provide parks and recreational activities to citizens, residents and visitors, to protect and maintain City investments and infrastructure while attempting to reduce the environmental impacts of operations.		Target and Completion Date: Ongoing effort to minimize outputs. As needed internal audits are performed. Meet and exceed public's recreational needs	
Strategy: Continue to minimize outputs and reduce environmental impact, including proper use of fertilizers.			
Tasks for Achieving Objective and Target: Continue with developed RM/PM tasks that support objectives and targets.			
Metrics and Measurement: As needed meetings and audits (per schedule) to ensure compliance with all applicable protocols and procedures.			
Importance relative to Other Environmental Programs: Parks offer recreation to citizens. While the City of Show Low makes every effort to mitigate environmental impacts of this element, it is of negligible importance to other elements.			
Comments/Process Towards Completion: Ongoing			

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6.01 F1 K – Facilities Maintenance

Operation/Activity: Facilities Maintenance		EMP Document Control No: 6.01 K	
Facility: All City owned buildings		Responsible Persons: Parks and Facilities Maintenance Supervisor, Community Services Director	
Resources Available (Including Financial): City buildings and associated amenities and the maintenance thereof			
Goal Statement: Through safe and cost efficient service, provide a meaningful quality of life in the City of Show Low. This goal is achieved by creating and maintaining efficient operations of infrastructure and City assets.			
Objective: Provide public buildings and for City Staff to work, provide citizens, residents and visitors services and to protect and maintain City investments and infrastructure while attempting to reduce the environmental impacts of operations.		Target and Completion Date: Meet and exceed public's administrative work needs and meet all hazardous waste requirements for disposal of confiscated chemicals. Adhere to Asbestos NESHAP and OSHA requirements for city renovation and demolition projects. Ongoing	
Strategy: Continue to minimize outputs and reduce environmental impact.			
Tasks for Achieving Objective and Target: Continue with developed RM/PM tasks that support objectives and targets.			
Metrics and Measurement: As needed meetings and audit(s) (per schedule) to ensure compliance with all applicable protocols and procedures.			
Importance relative to Other Environmental Programs: Due to the importance of this element in the realization of City of Show Low operations, Facilities Maintenance is important to all other environmental city environmental endeavors.			
Comments/Process Towards Completion: Police Department utilizes Arizona Department of Public Safety and the Show Low Fire Department to dispose of all hazardous materials it collects. This is an ongoing contract and has been in place for a significant amount of time and will continue to be. There have been no issues with this contract and the City does not foresee future issues moving forward.			

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6.01 F1 L - Fleet

Operation/Activity: Fleet Maintenance		EMP Document Control No: 6.01 L	
Facility: City Hall		Responsible Persons: All Department Heads who manage people who use vehicles to complete job-related tasks	
Resources Available (Including Financial): Capital budgeting from general fund and other funds to purchase and maintain City fleet, Public Works software to keep fleet data			
Goal Statement: Provide services to citizens, visitors and regional customers who require service outside of the confines of an administrative setting			
Objective: Provide off-site services to citizens; and ensure safe disposal of auto fluids		Target and Completion Date: Provide services to public that require off-site travel via sustainable automobile maintenance practices, including safe disposal of auto fluids Ongoing	
Strategy: Service vehicles in a timely manner as to prolong their life-cycle and minimize the environmental and the hazardous effects of their use			
Tasks for Achieving Objective and Target: Utilize strategies in the SDS Manual regarding safety			
Metrics and Measurement: As needed internal audit and scheduled audit(s), including input from Risk Manager, on accident statistics and risk factors that will improve general safety.			
Importance relative to Other Environmental Programs: Travel in City owned fleet is important to other environmental programs.			
Comments/Process Towards Completion: Always ongoing efforts to improve environmental and general safety			

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6.01 F1M Ammonia Exceedance from WWTP

Operation/Activity: Ammonia exceedance		EMP Document Control No: 6.01 M	
Facility: Wastewater Treatment Plant		Responsible Persons: Public Works Operations Manager	
Resources Available (Including Financial): Staff, WWTP, Annual budget dedicated to WWT			
Goal Statement: (Describe how this program meets commitments of the Environmental Policy) Meet specific criteria described in AZPDES			
Objective: Operate WWTP effectively meeting all regulatory requirements		Target and Completion Date: Ongoing efforts to comply with AZPDES permit requirements and to ensure safe water for residents	
Strategy: Keep WWTP staff on site daily to ensure compliance with AZPDES guidelines.			
Tasks for Achieving Objective and Target: Adhere to schedule for ammonia testing in AZPDES Permit No. AZ0023841			
Metrics and Measurement: Review sampling per AZPDES Permit No. AZ 0023841			
Importance relative to Other Environmental Programs: This is a key component to maintain a valid AZPDES Permit.			
Comments/Process Towards Completion: As this is a well-defined process outlined in the AZPDES Permitting process, this is an ongoing target area for Show Low.			

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6.01 F1N Storm Water Pollution Control

Operation/Activity: Storm water Pollution Control		EMP Document Control No: 6.01 F1N	
Facility: Airport Public Works Yard		Responsible Persons: Public Works Director Airport Director	
Resources Available (Including Financial): Airport and Public Works Staff, Annual budget dedicated to Airport and Public Works Staff, Infrastructure dedicated to both			
Goal Statement: Prevent the WWTP from polluting native waters. Comply with ADEQ's Construction General Permit for storm water pollution control for both facilities listed.			
Objective: Ensure storm water does not adversely affect natural waters.		Target and Completion Date: "Prepare and implement a Stormwater Pollution Prevention Plan prior to disturbing an acre of more of land for construction projects." Ongoing	
Strategy: The WWTP and Airport storm water restriction structures are to be inspected regularly to ensure stability and effectiveness. Any defects will be reported so corrective actions can be implemented.			
Tasks for Achieving Objective and Target: Inspect structures quarterly, or as needed, to ensure integrity and report to staff enumerated above any potential issues.			
Metrics and Measurement: Annual reviews of inspections will assist in determining the need for modifications in the program's effectiveness.			
Importance relative to Other Environmental Programs: WWTP integrity is important to all other environmental programs as safe water is key to maintaining and improving conditions for citizens.			
Comments/Process Towards Completion: Ongoing monitoring of the WWTP is important and will be a constant task.			

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6.01 F1O Construction Design

Operation/Activity: Construction Design		EMP Document Control No: 6.01 O	
Facility: City of Show Low		Responsible Persons: Public Works Director City Engineer	
Resources Available (Including Financial): Staff time, budgeted projects			
Goal Statement: Design and construct infrastructure that are structurally sound and environmentally sustainable as possible.			
Objective: Employ cost effective best practices that exemplify our City as a leader in economic responsibility, quality infrastructure provision and environmental viability		Target and Completion Date: Design and construct structures that are economical and environmentally viable and comply with requirements articulated in ADEQ permits. Ongoing Meeting permit requirements	
Strategy: Consider cost and new technology in the design and/or renovation/retrofit of new/seasoned infrastructure and weigh said costs with new standards of environmental viability.			
Tasks for Achieving Objective and Target: Obtain training and remain apprised of new regulatory changes			
Metrics and Measurement: Annual reviews of inspections will assist in determining the need for modifications to obtain program effectiveness.			
Importance relative to Other Environmental Programs: Construction and Design integrity is key to all areas of the City's environmental impact.			
Comments/Process Towards Completion: Completion in this area is ongoing			

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6.01 F2 Form for Preparing a Registry of Environmental Management Programs

Operation/Activity	Environmental Aspect	Significant Impact	Objective	Target	EMP Document Control No.
Public Transit	Provision of Transit Services	Loss of income	Provide transit services for city and regional residents	Continue providing quality service	6.01 A
Wastewater Treatment O&M	Adequate treatment of wastewater to ensure environmental protection at discharge locations	Service interruption, loss of resource, loss of revenue, damage to public and/or private property	Design, build, and operate a new wastewater treatment plant (WWTP). Successfully decommission existing WWTP	Meet all APP and AZPDES permit requirements; Spring 2016	6.01 B
Wastewater Collection O&M	Maintaining the integrity of the collection system to avoid breaks, plugs, and odor issues	Service interruption, loss of resource, loss of revenue, damage to public and/or private property	Safe, and sustainable operations with no loss; and meet or exceed water quality standards	No sanitary sewer overflows. Clean entire collection system every 2 years. Identify and correct inflow and infiltration as identified. Goal to replace 20 manholes per year depending on available budget	6.01 C
Water Production	Ensure safe quality water that does not exceed contaminant regulations	Service interruption, loss of resource, loss of revenue, damage to public and/or private property	Safe, and sustainable production with no loss; and meet or exceed water quality standards	No contaminant exceedances. Meet scheduled maintenance requirements. Construction of a surface water treatment plant. 2017. Or Construction of a new well to meet demands 2015 Installation of variable frequency drives	6.01 D

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				for larger motors. As identified and funded.	
Water Distribution O&M	Maintaining the integrity of the distribution system to avoid breaks and cross contamination	Service interruption, loss of resource, loss of revenue, damage to public and/or private property	Safe, and sustainable distribution with no loss; and meets or exceeds water quality standards	No contaminant exceedances. Meet scheduled maintenance requirements. Operate 25% valves within system annually Identify all relief valves within 2 years and have added to GIS All PRV maintained 2x year Flushing of mains, monthly Backflow testing compliance 100% compliance annually Maintain 20 year replacement cycle on meters	6.01 E
Streets O&M	Maintaining the integrity of the streets through routine maintenance to avoid driving hazards and pedestrian hazards	Potential Impacts to motoring and pedestrian traffic safety. Impacts to waters of the US.	Safe and efficient operations of the City streets, and associated drainage structures	PASER evaluation every 5 years. Goal of 10% improvement in top 50% of rating. Implement CRS systems to include, annual drainage assessment	6.01 F
Airport Fueling	Proper off-loading and fueling to ensure environmental protection against air pollution and property damage	Potential Impact to air or water quality, loss of revenue, damage to public and/or private property	Safe and sustainable operations with no loss/damage	No exceedances, spills or fires	6.01 G
Airport Drainage	Maintaining the integrity of the drainage system around the Airport	Potential Impact to waters of the US and damage to	Safe and sustainable operations with no loss/damage	Implement quarterly drainage outlet inspection and routine	6.01 H

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		public and/or private property		maintenance program	
Equipment Maintenance	Maintaining the City's infrastructure through safe and efficient practices to better the community through equipment use	Potential Impact to citizen and visitor via the loss of potential services due to inadequate maintenance of City infrastructure	Provide parks and recreational activities to citizens, residents and visitors, to protect and maintain City investments and infrastructure while attempting to reduce the environmental impacts of operations.	As needed internal audit to identify potential risks and opportunities to make procedures more efficient	6.01 I
Parks	Maintaining fields for public recreational use	Potential impact to waters of the US and damage to public and/or private property	Provide parks and recreational activities to citizens, residents and visitors, to protect and maintain City investments and infrastructure while attempting to reduce the environmental impacts of operations.	Implement as needed audit meeting to review protocols and procedures to ensure best practices being used	6.01 J
Facilities Maintenance	Maintaining public buildings for administrative use	Potential impact to waters of the US and damage to public and/or private property	Provide public buildings and for City Staff to work, provide citizens, residents and visitors services and to protect and maintain City investments and infrastructure while attempting to reduce the environmental	Implement as needed audit meeting to review protocols and procedures to ensure best practices being used	6.01 K

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			impacts of operations.		
Fleet	Providing work-time transportation to employees to better provide services for citizens and visitors	Potential impact to waters of the US and damage to public and/or private property	Provide off-site services to citizens; and ensure safe disposal of auto fluids	Provide services to public that require off-site travel via sustainable automobile maintenance practices, including safe disposal of auto fluids	6.01 L
Ammonia Exceedance	Ongoing efforts to comply with AZPDES permit requirements	Potential impact to waters of the US and damage to public and/or private property	Meet specific criteria described in AZPDES	Ongoing efforts to comply with AZPDES permit requirements and to ensure safe water for residents	6.01 M
Storm Water	Prevent the WWTP from polluting native waters. Comply with ADEQ's Construction General Permit for storm water pollution control.	Potential impact to waters of the US and damage to public and/or private property	Ensure storm water does not breach WWTP facility.	Prepare and implement a Storm water Pollution Prevention Plan prior to disturbing an acre or more of land for construction projects	6.01 N
Construction Design	Goal Statement: Design and construct buildings that are structurally sound and environmentally sustainable as possible.	Potential negative financial impact to City and possible impact to public property	Employ cost effective best practices that exemplify our City as a leader in economic responsibility, quality infrastructure provision and environmental viability	Design and construct structures that are economical and environmentally sustainable	6.01 O

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7.01 Procedure for Establishing Operational Controls & Organizational Structure & Responsibilities

Operational control procedures primarily describe work practices and cover the environmental control of specific operational activities. These are activity-specific in their application.

For each *Environmental Management Program (EMP)* identified in Section 6, operational control procedures must be developed describing how each program will be implemented and who has responsibility for implementation. Operational control procedures are also necessary for any environmental aspect whether it is significant or not and supporting documentation must be developed and tracked.

SCEPP operational control procedures also include the **City of Show Low's** structure and responsibility for management operations. These procedures cover the management and control of both the SCEPP and the principal environmental aspects which the SCEPP manages.

Procedure:

The **City of Show Low** may already have existing policies and procedures in place that set forth the **City of Show Low's** standard operating procedures. The SCEPP Team should review existing policies and procedures to determine if they are current and if additional policies and new procedures must be developed. The SCEPP Team should follow a process to identify all environmental aspects and Environmental Management Programs.

Operational Control Procedures Direct Personnel Work Activities:

Operational control procedures stipulate operating criteria to ensure operations and activities are carried out appropriately. [7.01 F1 Form for Operational Control Procedures Registry](#) lists all operational control procedures for management of the SCEPP and operations with potential for significant environmental impact; and also presents the operational controls associated with established environmental management programs (EMPs). A list of corresponding procedures used to implement aspect operations and environmental management programs should then be developed and recorded using [7.01 F3 Form for Assessing Facility Operations & Procedures](#).

Within each responsible department, separate and distinct regulated facility operations exist.

Regulated facility operations may include:

- 1) Wastewater Treatment Plant
- 2) Public Drinking Water System
- 3) Street Maintenance
- 4) Fleet Management
- 5) Park Maintenance
- 6) Storm Water Compliance
- 7) Construction Permitting

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A facility assessment should identify existing procedures; if they are adequate or need updating; and if a new procedure should be written. Not all missing procedures must be developed all at once. Environmental Management Programs can be created to develop operational control procedures where gaps exist. The needed procedures should be prioritized and the procedures written on a schedule that is appropriate for the community.

Use [7.01 F3 Form for Assessing Facility Operations & Procedures](#) to assess facility operations. A separate form should be used to assess each department's facility operations. Use the results of the [SCEPP Guidance Self-Assessment Questionnaire](#) and [4.01 F3 Form for Assigning Impacts to Aspects and Determining Significance](#) developed in Section 4, to aid in identifying all activities related to a department's facility operations,

The results of the facility assessment and subsequent priority ranking will allow management to create Environmental Management Programs to address as many procedures of concern as can be reasonably handled. When those are completed, the additional procedures can be addressed. The facility assessment should be reviewed annually.

Organizational Structure and Responsibilities (SCEPP Team):

The SCEPP must identify organizational structure and responsibility for management of operations including roles, responsibilities, and authorities for all personnel. The SCEPP Team ensures that the resources (e.g., budget and personnel time) required for implementing and controlling the SCEPP are provided.

A key component of responsibility is identifying the SCEPP Coordinator with primary responsibility for establishing, operating, and maintaining the SCEPP. The SCEPP Coordinator is the leader of the SCEPP Team. The SCEPP Team provides routine SCEPP support and reports directly to the SCEPP Coordinator. A list of roles and responsibilities is available in [7.01 F2 Form for List of Organizational Structure & Responsibilities](#).

Operational Control Procedures:

Operating procedures and work instructions function as a mechanism to control a facility's environmental aspects. Therefore, they are also called "operational controls."

Procedures are usually at a higher level in the document hierarchy, more general, and applicable to a larger audience.

Work instructions, also called "standard operating procedures", are applicable to a specific task or process.

The development of operating procedures and work instructions should focus on the following:

1. The SCEPP team must ensure they conform to the SCEPP requirements including compliance with environmental regulations.
2. The operating procedures and work instructions should be written by the department that oversees the operation.
3. Employees who are going to be involved in the activities or processes should be trained on the procedures or work instructions.

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- 4) Operational control procedures must explicitly describe how environmental management activities will be implemented.
- 5) Operational control procedures must link operations to significant environmental aspects, significant impacts, the environmental policy, objectives and targets.

Final review of the **City of Show Low's** operating procedures should be made by the SCEPP Coordinator, while departmental management should sign off on them. The work instructions should be signed by each department's supervisor and acknowledged by employees who are going to implement the procedures.

Writing Operational Controls:

To direct the responsible departments to write their own operational controls, it is necessary for the SCEPP Team to develop a procedure for writing the general operational controls. The procedure also provides direction on writing operating procedures or work instructions for any operation which if uncontrolled, would have a detrimental effect on the environment.

Operational Controls should also include the following:

- 1) Responsibility – who does the procedure or instruction apply?
- 2) Purpose and Scope – what specific process or activity does the procedure or instructions apply?
- 3) The operational steps for the process itself.
- 4) Emergency Response – what the user has to do if operating parameters are exceeded, or what effect will occur if the procedure or instruction is not followed? What regulatory agency or agencies must be notified in the event of an emergency?
- 5) Records – what kind of environmental record is generated as a result of implementing the procedure or instruction?

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7.01 F1 Operational Control Procedures Registry

SCEPP OPERATIONAL CONTROL PROCEDURES REGISTRY	Document Control Number
Small Community Environmental Protection Plan	SCEPP/1.00
Good Faith Commitment	SCEPP/1.01
Environmental Policy	SCEPP/2.00
Procedure for Developing an Environmental Policy	SCEPP/2.01
Scope of Operations Covered by the SCEPP	SCEPP/3.00
Procedure for Identifying Scope of the Operations Covered by the SCEPP	SCEPP/3.01
Environmental Aspects and Impacts, Objectives and Targets	SCEPP/4.00
Procedure for Identifying Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets	SCEPP/4.01
Public Transit	4.01 F1A
Utilities – Drinking Water Production & Distribution	4.01 F1B
Utilities – Wastewater Collection & Treatment	4.01 F1C
Streets	4.01 F1D
Airport Fueling	4.01 F1E
Airport Drainage	4.01 F1F
Equipment Maintenance	4.01 F1G
Parks	4.01 F1H
Facilities Maintenance	4.01 F1I
Fleet	4.01 F1J
Ammonia Exceedance from WWTP	4.01 F1K
Storm Water	4.01 F1L
Construction Design	4.01 F1M
Legal and Other Requirements	SCEPP/5.00
Procedure for Identifying Legal and Other Requirements	SCEPP/5.01
Environmental Management Programs (EMP)	SCEPP/6.00
Procedure for Establishing Environmental Management Programs	SCEPP/6.01
Public Transportation	6.01 F1A
Wastewater Treatment O&M	6.01 F1B
Wastewater Collection O&M	6.01 F1C
Water Production	6.01 F1D
Water Distribution O&M	6.01 F1E
Streets O&M	6.01 F1F
Airport Fueling	6.01 F1G
Airport Drainage	6.01 F1H
Equipment Maintenance	6.01 F1I
Parks	6.01 F1J

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Facilities Maintenance	6.01 F1K
Fleet	6.01 F1L
Ammonia Exceedance from WWTP	6.01 F1M
Storm Water Pollution Control	6.01 F1N
Construction Design	6.01 F1O
Operational Control & Organizational Structure and Responsibilities	SCEPP/7.00
Procedure for Establishing Operational Controls & Organizational Structure and Responsibilities	SCEPP/7.01
Department () Procedures	SCEPP7.02
	SCEPP/7.03-1
	SCEPP/7.03-2
	SCEPP/7.03-3
	SCEPP/7.04
	SCEPP/7.04-1
Training, Awareness and Competency	SCEPP/8.00
Procedure for SCEPP Awareness and Competency Training	SCEPP/8.01
Communications & Stakeholders Registry	SCEPP/9.00
Communications & Registry of Stakeholders Procedures	SCEPP/9.01
Document Control	SCEPP/10.00
Document Control Procedures	SCEPP10.01
Environmental Records Control	SCEPP/11.00
Procedure for Environmental Records Maintenance	SCEPP/11.01
Emergency Preparedness and Response	SCEPP/12.00
Procedure for Emergency Preparedness and Response Plans	SCEPP/12.01
Nonconformance and Correction and Preventive Actions	SCEPP/13.00
Procedure for Nonconformance Corrective and Preventive Actions	SCEPP/13.01
Environmental Compliance Audit	SCEPP/14.00
Procedure for Environmental Compliance Audit	SCEPP/14.01
SCEPP Audit	SCEPP/15.00
Procedure for SCEPP and Regulatory Compliance Audits	SCEPP/15.01
Management Review	SCEPP/16.00
Procedure for SCEPP Management Review (by the Governing Body)	SCEPP/16.01

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7.01 F2 Form for List of Organizational Structure & Responsibilities

Responsibilities	Governing Body (Mayor & City Council)	City Manager	SCEPP Manager	Police Dept.	Water Dept.	WWTP	Public Works Supervisors	Director of Utilities and Environmental Services
Good Faith Commitment	X	X	X	X	X	X	X	X
Procedure for Developing an Environmental Policy					X	X	X	X
Procedure for Identifying Scope of Operations Covered by the SCEPP			X		X	X	X	X
Environmental Aspects & Impacts, Objectives & Targets					X	X	X	X
Legal & Other Requirements	X	X	X					
Environmental Management Program	X	X					X	X
Operational Control & Organizational Structure & Responsibilities	X	X					X	
Department Procedures					X	X	X	X
Training, Awareness & Competency					X	X	X	X
Communications & Stakeholders Registry			X					
Document Control			X		X	X	X	X
Environmental Records Control					X	X		X
Emergency Preparedness & Response	X	X	X	X	X	X	X	X
Nonconformance & Corrective & Preventive Actions including self- reporting to ADEQ		X	X				X	X
Environmental Compliance Audit					X	X	X	X
SCEPP Audit			X				X	X
Management Review		X					X	X

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7.01 F3 Form for Assessing Facility Operations & Procedures

Aspect/ Activity	Existing <u>Written</u> Procedure	Updating Required	New Written Procedure Needed	Assigned To	Priority Ranking	EMP Due Date
Public Transit	Yes – One document of procedures from Contractor. Where no MV Transportation procedure exists, MV Transp. follows City procedure. Follow ARS Title 28	No	No	Community Services Director, Grant and Public Transit Manager	15	NA
Drinking Water Production	Yes – See Referenced SOP Several Written Procedures	Yes – As Needed	Yes – More Written Procedures Needed	Public Works Director, Environmental Mgr, Water Supervisor	1	NA
Drinking Water Distribution	Yes – See Referenced SOP Several Written Procedures	Yes – As Needed	Yes – More Written Procedures Needed	Public Works Director, Environmental Mgr, Water Supervisor	1	NA
Wastewater Collections	Yes – See Referenced SOP Several Written Procedures	Yes – As Needed	Yes – More Written Procedures Needed	Public Works Director, Wastewater Supervisor	3	NA
Wastewater Treatment	Yes – See Referenced SOP Several Written Procedures	Yes – As Needed	Yes – More Written Procedures Needed	Public Works Director, Environmental Manager	3	NA
Streets Road Surfaces	Yes – Several Written Procedures	Yes – As Needed	Yes – More Written Procedures Needed	Public Works Director, Streets Supervisor	6	NA
Streets Roadside Drainage	Yes – Several Written Procedures	Yes – As Needed	Yes – More Written Procedures Needed	Public Works Director, Streets Supervisor	6	NA
Airport Fueling	Yes-Procedures exist in SWPPP and SPCC	Yes – As Needed	Yes – However, Procedures exist in SWPP and SPCC	Airport Manager/Public Works Director	8	NA
Airport Drainage	Yes-Procedures exist in SWPPP and SPCC	Yes – As Needed	Yes – However, Procedures exist in SWPP and SPCC	Airport Manager/Public Works Director	13	NA
Equipment Maintenance	Yes-Procedures exist in SDS Manual	Yes – As Needed	No	All Department Heads who use City equipment that uses fossil fuels	11	NA

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Parks	Yes-Procedures exist in SDS Manual	Yes – As Needed	No	Parks and Facilities Maintenance Supervisor, Community Services Director	12	NA
Facilities Maintenance	Yes-Procedures exist in SDS Manual	Yes – As Needed	No	Parks and Facilities Maintenance Supervisor, Community Services Director	10	NA
Fleet	Yes- Procedures exist in SDS Manuals throughout City of Show Low buildings and at City Hall , also, Public Works tracks fleet data via computer software	Yes – As Needed	No	All Department Directors that use and have stewardship over City automobiles	14	NA
Ammonia Exceedance	Yes – See Referenced SOP Several Written Procedures	Yes – As Needed	No	Public Works Director, Public Works Operations Manager, Environmental Manager, Water Supervisor	5	NA
Storm Water Pollution Control	Yes – See Referenced SOP Several Written Procedures	Yes – As Needed	No	Public Works Director, Public Works Operations Manager, Environmental Manager	5	NA
Construction Design	Yes-Procedures exist in hard copy format in the Public Works Department at City Hall	Yes – As Needed	No	Public Works Director, City Engineer	9	NA

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8.01 Procedure for SCEPP Awareness and Competency Training

The City of Show Low identifies, plans, monitors and records awareness and competency training needs and delivery for all personnel. The City of Show Low has a procedure to ensure effective and timely training for employees at all levels to ensure awareness of:

- the importance of conformance with the environmental policy;
- the implementation of environmental management procedures and the SCEPP;
- the actual and potential significant environmental impacts of their work activities;
- the environmental benefits of improved personal performance;
- their own roles and responsibilities for achieving conformance with the policy and procedures, and with the requirements of the SCEPP; and
- the potential consequences of departure from specified operating procedures.

The SCEPP Manager, Jay Brimhall, the Grants and Public Transit Manager, is responsible for all training records. Records are to be monitored and reviewed on a scheduled basis annually. Supervisors determine competency as outlined in environmental control procedure

Description:

SCEPP implementation includes training for personnel on both general awareness and competency. Awareness training ensures that all personnel are familiar with the environmental policy and the relevance of the SCEPP, including the potential significant environmental impact of their work activities. Additional competency training addresses environmental procedures that are *specific* to personnel work activities. All personnel receive appropriate training based on a delivery procedure that matches training requirements with personnel job descriptions and work activities.

There are two basic types of environmental training for a SCEPP:

- 1) Awareness training for all employees including the governing body, if applicable.
- 2) Competency training for those whose jobs affect the organization's ability to meet its objectives and targets including legal/regulatory compliance.

Procedure:

- Develop a standard environmental awareness training program for all employees.
- Assemble a list of technical training requirements for the operational control procedures (include initial training and ongoing or refresher training requirements).
- Assemble a list of all staff that will play a role in the SCEPP implementation. The list of environmental aspects and significant impacts in Section 4 [Identifying Environmental Aspects, Determining Significant Impacts, and Developing Objectives and Targets](#) can be used to complete this task.
- Determine the type of training needed for each personnel category and job function. It is important to recognize that the *governing body may also need training* (as well as awareness training), since the governing body is involved in the annual Management Review process.
- Create a Training Matrix with training needs along one-axis and employee groups to be trained along the other. Use the [8.01 F1 Form for Preparing Environmental Training Requirements & Delivery Log](#) to identify staff who should receive training.

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- Prepare a training schedule for initial and continuing training.
- Include provisions for employees transferred to different positions and new hires.
- Deliver SCEPP awareness training to all staff and technical training as required.
- Maintain appropriate records regarding staff that received training, and the content of the training they received.

Training material should include a description of the SCEPP and Environmental Policy, and describe why it is important to the organization, and the role of each employee in its implementation and continuous improvement.

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8.01 F1 Environmental Training Requirements & Delivery Log

Training Required	Description	Mandatory Attendance	Frequency	Date Completed
Environmental Regulations	Training for knowledge and understanding of required monitoring and reporting	Public Works Director, All Supervisors	Annually and/or when new rules/regulations or changes are made from regulatory agencies	
Sampling and Analysis	Training in proper procedures for taking samples and analyzing results	All Public Works	Annually, Date of Hire for New Employee	
Emergency Management and Response	Training in Incident Command courses, Emergency Management, Procedures and Responsibilities	All Public Works	Annually, Date of Hire for New Employee, when new procedures and/or changes are made to existing management plans	
Distribution System	Training for knowledge and understanding of the distribution system and required procedures and responsibilities	All Public Works	Continuous	
Production System	Training for knowledge and understanding of the production system and required procedures and responsibilities	All Public Works	Continuous	
Collection System	Training for knowledge and understanding of the collection system and required procedures and responsibilities	All Public Works	Continuous	
Water/Wastewater Treatment	Training for knowledge and understanding of the water and wastewater treatment procedures and responsibilities	All Public Works	Continuous	
Environmental Audit	Training for knowledge and understanding of procedures and responsibilities	Public Works Director, Environmental Mgr, WWTP Mgr	Annually and/or when new rules/regulations or changes are made from regulatory agencies and/or new procedures are adopted	
OSHA	Training for knowledge and understanding of	All	Continuous	

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	OSHA rules and regulations as they pertain to working environment			
Pavement Preservation	Training for knowledge and understanding of procedures and responsibilities for maintaining safe roadways	Public Works Director, Streets Supervisor, Streets Employees	Continuous	
SWPPP/Drainage	Training for knowledge and understanding of procedures and responsibilities for maintaining functioning drainage systems avoiding damage to public and/or private property	Public Works Director, Streets Supervisor, Streets Employees	Continuous	
Equipment	Training for knowledge and understanding of proper operation of equipment and responsibilities as a CDL driver	All Public Works Operations Employees	Continuous – Training must be signed off for each piece of equipment prior to operating	
Record Keeping	Training for knowledge and understanding of required record keeping practices	All Staff	Continuous and/or when changes are made from regulator agency	
SCEPP Awareness	Training for knowledge and understanding of what SCEPP is and the Environmental Policy	All	Continuous	
SCEPP Audit	Training for knowledge and understanding of annual audit procedures	Public Works Director, Environmental Mgr, Supervisors	Continuous	
HAZCOM	Training in hazardous material	All Airport Personnel	All New Hires; Current Employees as needed	
Spill Prevention Training	Includes complete review of SOW SPCC Plan and proper use of the AST facility and fuel trucks. Testing on the job is required	All Airport Personnel	All New hires; Current Employees as needed	
Spill Control Equipment Training	Training on absorbent material use and application tools and all necessary PPE	All Airport Personnel	All New Hires; Current Employees as needed	
Runway Safety	Training in runway safety and ground vehicle operation	All Airport Personnel	Continuous	

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9.01 Communications & Registry of Stakeholders Procedure

Communications

The City of Show Low has established and is maintaining a procedure for internal and external communication relating to the SCEPP as described by this operational control procedure.

Description:

This procedure describes the process for:

- 1) Internal environmental communications/awareness.
- 2) External environmental communications with interested parties (outside stakeholders).

External communication includes all written or electronic correspondence, telephone, conversations and oral discussions or meetings with external parties. An organization should consider processes for communicating externally on its significant environmental aspects and record its decisions.

Procedure:

- Internal environmental communications will ensure that those personnel at each relevant level and function are aware of:
 - 1) the SCEPP and Environmental Policy;
 - 2) the importance of conformance with the Environmental Policy;
 - 3) all operational control procedures; and
 - 4) individual responsibilities for achieving environmental objectives and targets.
- External Environmental Communications ensure that:
 - 1) The SCEPP and Environmental Policy are available to all stakeholders.
 - 2) External Communication concerning the environmental aspects covered by the SCEPP is directed to the SCEPP Manager.
 - 3) The SCEPP Manager or designee is responsible for determining the need for, and preparation of, any notification to regulatory agencies.
- General Guidelines:
 - 1) Department Managers must keep records of their own internal communications
 - 2) The SCEPP Manager maintains records of *external* environmental communications with interested parties and the media.
 - 3) The SCEPP Manager maintains environmental records including the document control of the SCEPP Manual of Policies, Procedures and Forms.

Communications Distribution Plan:

A communications distribution plan involves identifying what tools are available and will be used for communications and what information should go to what audience. The [Registry of Stakeholders](#) should be part of the communications distribution plan.

Internal communications distribution may include:

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- Interoffice memorandum
- E-mail
- Company Newsletter
- Posted notices on bulletin board
- Suggestion Boxes
- Intranet or internal electronic site accessed by staff only

External communication distribution may include:

- Neighborhood hotline for questions or complaints regarding a facility
- Press releases on environmental activities
- Open house for the community and the employees' families
- Facility tours for the public
- Sponsorship of community events
- Participation in local actions targeting the environment
- Presentations in workshops, conferences, and schools
- Membership and involvement in industry associations and chamber of commerce
- Correspondence with regulating agencies
- Community's Internet website

Preparing a Registry of Stakeholders

Procedure:

Include the entire SCEPP Team in this process to ensure that all possible stakeholders are identified.

Stakeholders: Organizations or individuals with an interest in the environmental performance of the operations covered by the SCEPP.

Note: A Stakeholder can be from *inside* the organization or *outside* public interest groups, individuals and regulators.

Regulatory and Other Requirements: Anything regulated and/or any requirements outlined in legal contractual agreements, or as part of internal policy, should be included in the Registry.

- 1) Use [9.01 F1 Form for Preparing a Registry of Stakeholders](#) to list all stakeholders with an interest in the environmental performance of the operations covered by the SCEPP. This list should also include a list of contacts for self-disclosing violations.
- 2) Describe the nature and structure of the stakeholder group.
- 3) Identify the environmental expectations for each stakeholder group.
- 4) Identify if the environmental expectation includes regulatory and other requirements. (The response can be Yes, No, or Unknown.)
 - Create an action item for all categories where the answer is "Unknown" and assign staff to investigate and report back.
- 5) Use the [Communications Distribution Plan](#) to identify and expedite communications with stakeholders.

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9.01 F1 Registry of Stakeholders

Name of Stakeholder Group	Description of Stakeholder Group	Description of Environmental Expectation	Regulatory or Other Requirement?
Local Residents, Businesses and School District	Residents and businesses in the community including individual customers and rate payers	Disposal and usage actions and knowledge to avoid environmental degradation	Yes
Employees	All permanent and temporary employees of the City of Show Low	Knowledge of work environment and work activities in order to respect and preserve the environment	Yes
Vendors	Businesses from which the City purchases products and/or services	Knowledge of Competitive bidding process, MAG Specifications, Supplemental to MAG Specifications	Yes
Local Police, EMT & Fire Departments	Agencies responsible for police, fire, and emergency response regulations and operations	Ensure compliance with all local environmental regulations which should also be part of the Emergency Preparedness and Response Plan	Yes
Arizona Game & Fish Department	Agency responsible for wetlands, Fools Hollow Lake and Show Low Lake regulations	Knowledge of operations and regulations to avoid environmental degradation while providing community recreation	Yes
ADEQ	State Regulators and compliance officers focusing on environmental compliance	Maintenance of required environmental permits and regulatory compliance	Yes
OSHA	Health and Safety regulatory compliance officers	Compliance with health and safety regulations	Yes
US EPA	Federal regulators and promoters of environmental performance	Compliance with Federal regulations and participation in environmental programs	Yes
US DOT	Department of Transportation	Compliance with CDL regulations	Yes
US DOE	Promoters of energy efficiency and renewable energy resources	Continual improvement in energy use	No

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10.01 Document Control Procedures

The City of Show Low has established and is maintaining information to describe the core elements of the SCEPP. All SCEPP related documents are referenced in the SCEPP manual, and copies of SCEPP documents can be obtained from the SCEPP Manager, or designee, upon request.

The SCEPP requires extensive documentation. Document control procedures are implemented to ensure that all personnel have access to appropriate SCEPP documentation and that out-dated documents are replaced and only current versions are used. SCEPP documentation may be maintained in electronic and/or hard copy form. In either case this procedure is to be applied to ensure appropriate access to and control over the SCEPP documentation including all revisions.

The City of Show Low has established this document control procedure for controlling all documents relevant to the SCEPP. This procedure describes where documents are located and how and when they are reviewed. The procedure ensures that current document versions are available and that obsolete versions are removed from use or properly identified. Controlled documents are maintained in an orderly manner and can be obtained from The SCEPP Manager, Jay Brimhall, the Grants and Public Transit Manager, or designee. A list of controlled documents is provided in [10.01 F1 Form for Preparing a Master SCEPP Document Control Index](#).

Procedure:

- 1) The SCEPP Manager assembles and manages all environmental documentation.
- 2) Develop additional environmental documentation as required based on this guidance. This includes SCEPP responsibility, training and other SCEPP elements.
- 3) Use [10.01 F1 Form for Preparing a Master SCEPP Document Control Index](#) to maintain an index of SCEPP documents and revisions. All revisions made to original SCEPP documents and forms must be recorded and tracked.
- 4) Also see the completed Section 7, [Operational Control Procedures Registry](#).

This SCEPP manual is a controlled document in accordance with this document control procedure. Each page of a controlled document will have the following footer.

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Upon approval by the governing body and the SCEPP Team, the SCEPP Manager or designee, shall issues revisions/updates to the SCEPP manual. All copies of this SCEPP manual or other SCEPP documentation that are not marked with the appropriate footer are uncontrolled and are to be used for reference purposes only.

As a general rule, procedures that are in effect are considered to be documents; whereas procedures that have been superseded by/with updated information become records

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10.01 F1 Form for Preparing a Master SCEPP Document Control Index

Document Control Number	Document Name	Date of Current Version	Location
Document			
2.01	Environmental Policy	10/23/2014	City Hall/PW Facility
3.02	List of Operations covered by the SCEPP	10/23/2014	City Hall/PW Facility
4.01	List of Aspects, Significant Impacts, Objectives and Targets	10/23/2014	City Hall/PW Facility
5.01 F1	List of Legal and Other Environmental Requirements	10/23/2014	City Hall/PW Facility
6.01 F2	Register of Environmental Management Programs	10/23/2014	City Hall/PW Facility
7.01 F1	Operational Control & Organizational Structure and Responsibilities (SCEPP Team)	10/23/2014	City Hall/PW Facility
8.01 F1	Training Awareness and Competency	10/23/2014	City Hall/PW Facility
9.01 F1	Communications & Registry of Stakeholders	10/23/2014	City Hall/PW Facility
10.01	Document Control	10/23/2014	City Hall/PW Facility
11.01	Environmental Records Control	10/23/2014	City Hall/PW Facility
12.01	Emergency Preparedness and Response	10/23/2014	City Hall/PW Facility
13.01	Non-conformance Corrective & Preventative Actions	10/23/2014	City Hall/PW Facility
14.01	Environmental Compliance	10/23/2014	City Hall/PW Facility
15.01	SCEPP Conformance Audit	10/23/2014	City Hall/PW Facility
16.01	SCEPP Governing Body Management Review	10/23/2014	City Hall/PW Facility
Procedures – Also See Operational Control Procedures Registry (Section 7)			
3.00	Scope of Operations	10/23/2014	City Hall/PW Facility
4.00	Procedures for Aspects, Significant Impacts, Objectives and Targets	10/23/2014	City Hall/PW Facility
5.00	Procedures for Legal and Other Environmental Requirements	10/23/2014	City Hall/PW Facility
6.00	Procedures for Environmental Management Programs	10/23/2014	City Hall/PW Facility
7.00	Procedures or Establishing Operational Controls	10/23/2014	City Hall/PW Facility
8.00	Procedures for Awareness and Competency Training	10/23/2014	City Hall/PW Facility
9.00	Communications Procedures	10/23/2014	City Hall/PW Facility
10.00	Document Control Procedures	10/23/2014	City Hall/PW Facility
11.00	Environmental Records	10/23/2014	City Hall/PW Facility
12.00	Emergency Preparedness & Response Plan	10/23/2014	City Hall/PW Facility

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			Facility
13.00	Non-conformance, Corrective & Preventative Plan	10/23/2014	City Hall/PW Facility
14.00	Environmental Compliance Audit	10/23/2014	City Hall/PW Facility
15.00	SCEPP Conformance Audit	10/23/2014	City Hall/PW Facility
15.01 F4	Protocol for Investigating & Correcting SCEPP Non-conformance	10/23/2014	City Hall/PW Facility
16.00	SCEPP Governing Body Management Review	10/23/2014	City Hall/PW Facility
Forms			
4.01 F2	Assigning Impacts to Aspects & Determining Significance	10/23/2014	City Hall/PW Facility
4.01 F3	Environmental Aspects, Impacts, Objectives and Targets	10/23/2014	City Hall/PW Facility
5.01 F1	Preparing a List of Legal & Other Environmental Requirements	10/23/2014	City Hall/PW Facility
6.01 F2	Preparing a Registry of Environmental Management Programs	10/23/2014	City Hall/PW Facility
7.01 F2	List of Organizational Structure and Responsibility	10/23/2014	City Hall/PW Facility
7.01 F3	Assessing Facility Operations & Procedures	10/23/2014	City Hall/PW Facility
10.01 F1	Preparing Master SCEPP Document Control Index	10/23/2014	City Hall/PW Facility
11.01 F1	Preparing Environmental Records Control List	10/23/2014	City Hall/PW Facility
13.01 F1	Preparing Corrective & Preventative Action Tracking Log	10/23/2014	City Hall/PW Facility
13.01 F2	Corrective Action Request & Response	10/23/2014	City Hall/PW Facility
14.01 F1	Preparing Environmental Compliance Audit Plan	10/23/2014	City Hall/PW Facility
15.01 F2	Preparing SCEPP Audit Summary Sheet	10/23/2014	City Hall/PW Facility
15.01 F3	Requesting & Responding to SCEPP Audit Findings	10/23/2014	City Hall/PW Facility

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11.01 Procedure for Environmental Records Control

The City of Show Low has developed this operational control procedure to ensure that all environmental records relevant to the SCEPP including training records, results of audits and reviews are recorded, legible, identifiable, traceable, readily retrievable, and protected against damage, deterioration or loss.

Record and documentation retention are also specified in this procedure. Individual departments maintain environmental records using the SCEPP procedure. Retention timeframes can be found in federal and state rules and regulations. The City of Show Low's relevant records are provided in [11.01 Environmental Records Control List](#).

This procedure is followed to establish and maintain control procedures for identifying, maintaining and disposing of environmental records.

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

Procedure:

Environmental records are maintained in an archive so as to be retrievable as needed.

Records are preserved and archived for retrieval as needed based on the following:

- 1) Include records of all data and information required by Environmental Management Programs such as training records, results of audits and reviews, copies of monitoring (sampling) and reporting analytical results, expired permits, construction approvals, and inspection results.
- 2) Ensure that environmental records are legible, identifiable and traceable to the operation/activity.
- 3) Ensure that environmental records are stored and maintained so they are readily retrievable and protected against damage, deterioration or loss.
- 4) Ensure that the retention times of environmental records have been established, recorded and communicated to staff.

As a general rule, procedures that are in effect are considered to be documents; whereas procedures that have been superseded by/with updated information become records.

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11.01 F1 Form for Preparing Environmental Records Control List

NO.	Record Type	Person Responsible	Location	File Method	Retention Minimum
1.0	ADMINISTRATIVE				
1.01	Purchasing	Public Works Director	City Hall/PW Facility	Electronic & Hard Copy	6 years
1.02	Auditing	Public Works Director, Environmental Mgr	City Hall/PW Facility	Electronic & Hard Copy	7 years
1.03	ADEQ Licensing	Public Works Director, Environmental Mgr, and All Operators	PW Facility	Electronic & Hard Copy	3 years after expired
1.04	In-house Training	Human Resources/Public Works Director	City Hall/PW Facility	Electronic & Hard Copy	3 years
2.0	ENVIRONMENTAL				
2.01	Compliance Violation Reports	Public Works Director & Environmental Mgr	PW Facility, Airport	Hard Copy and Electronic	6 years
2.02	SCEPP Meeting Minutes	SCEPP Manager	City Hall	Electronic	
2.03	Customer Complaints/Reports	Public Works Director	PW Facility	Electronic & Hard Copy	3 years after resolved
2.04	SPCC	Airport Manager	City Hall/Airport	Electronic and Hard Copy	Permanent
3.0	Public Transit				
3.1	Fuel Consumed Report	MV Transportation Manager & Grants and Public Transit Manager	City Hall, Bus Terminal	Electronic and Hard Copy	6 years
3.0	DRINKING WATER MONITORING & REPORTING DATA				
3.01	Compliance Monitoring/Reporting	Public Works Director, Environmental Mgr, Water Supervisor	PW Facility	Electronic & Hard Copy	Permanent
3.02	Operational Reporting	Public Works Director, Environmental Mgr, Water Supervisor	PW Facility	Electronic & Hard Copy	Permanent
3.03	Laboratory Sampling & Testing	Public Works	PW Facility	Electronic	Permanent

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		Director, Environmental Mgr, Water Supervisor		& Hard Copy	
4.0	WASTEWATER MONITORING & REPORTING DATA				
4.01	Compliance Monitoring/Reporting	Public Works Director, Environmental Mgr, Wastewater Supervisor	PW Facility	Electronic & Hard Copy	Permanent
4.02	Operational Reporting	Public Works Director, Environmental Mgr, Wastewater Supervisor	PW Facility	Electronic & Hard Copy	Permanent
4.03	Laboratory Sampling & Testing	Public Works Director, Environmental Mgr, Wastewater Treatment Plant Operator	PW Facility	Electronic & Hard Copy	Permanent
5.0	STREETS MONITORING & REPORTING DATA				
5.1	Street sign inspections	Public Works Director & Streets Supervisor	PW Facility	Electronic & Hard Copy	3 years after fiscal year maint. Performed
5.2	Street light inspections	Public Works Director & Streets Supervisor	PW Facility	Electronic & Hard Copy	3 years after fiscal year maint. Performed
5.3	Drainage/Culvert Inspections	Public Works Director & Streets Supervisor	PW Facility	Electronic & Hard Copy	3 years after fiscal year maint. Performed
5.4	Pavement Inspections	Public Works Director & Streets Supervisor	PW Facility	Electronic & Hard Copy	3 years after fiscal year maint. Performed

6.0	Airport Fueling				
6.01	Compliance Monitoring and Reporting	Airport Manager	Airport	Electronic and Hard Copy	Permanent
6.02	Operational Reporting	Airport Manager	Airport	Electronic and Hard Copy	Permanent

7.0	Airport Drainage				
7.01	Drainage Inspections	Airport Manager	Airport	Electronic and Hard	Permanent

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				Copy	
7.02	SWPPP	Airport Manager	City Hall/Airport	Electronic and Hard Copy	Permanent

8.0	Equipment Maintenance				
8.01	SDS Manual, as needed internal procedural audit	All City Directors and Risk Manager	City Hall	Hard Copy	Permanent

9.0	Parks and Facilities Maintenance				
9.01	Parks SDS Manual, as needed internal procedural audit	Parks and Facilities Maintenance Supervisor	City Hall/Aquatic Center	Hard Copy	Permanent
9.02	Facilities Maintenance SDS Manual, As needed internal procedural audit	Parks and Facilities Maintenance Supervisor, Police Operations Chief	City Hall/Aquatic Center/Police Department	Hard Copy	Permanent

10.0	Fleet				
10.01	SDS Manual and Internal Procedures	All City Directors and Risk Manager	City Hall (Public Works)	Hard Copy	Permanent

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12.01 Procedure for Emergency Preparedness and Response Plans

The City of Show Low SCEPP includes Emergency Preparedness and Response Plans developed using this environmental control procedure. The SCEPP Team reviews emergency plans annually and following any accidents or emergency situations that occur.

This procedure is used to establish plans to prepare for and respond to emergency events with the potential for significant environmental impacts.

Emergency Preparedness and Response Plans identify the potential for and response to environmental accidents and emergency situations as well as the prevention and mitigation of environmental impacts if accidents do occur. **The City of Show Low** has already developed emergency response procedures addressing an emergency, spill or fire, and meet OSHA, EPA, and fire department requirements. The SCEPP team should ensure that an appropriate emergency response plan is established and maintained to adequately prepare, respond to, and mitigate accidents, spills, fires, or other emergency situations, and that regulatory agencies are notified as required. Local police, fire and health services staff should be included in the development of the community's Emergency Preparedness and Response Plans.

Refer to the *SCEPP Guidance Manual* for other emergency plans that may be required for specific operations conducted by the community.

The SCEPP Manager, supported by the SCEPP Team, is responsible for identifying and quantifying environmental risk and implementing plans to avoid the occurrence of emergency events and to mitigate the environmental impacts associated with emergency events that do occur.

The SCEPP Manager supports operational managers in the development and maintenance of *Emergency Preparedness and Response Plans* addressing risks as required by local, state and federal regulations.

The SCEPP Manager ensures the preparation and delivery of training for all personnel as required by the training matrix developed in Section 8 [8.01 F1 Form for Preparing Environmental Training Requirements & Delivery Log](#).

For each emergency incident that does occur, the SCEPP Manager and other relevant personnel use the procedures to evaluate the required response, and take action to minimize the likelihood of its recurrence, and to notify stakeholders if the emergency impacts public health and the environment. Refer to Section 9 [Communications & Registry of Stakeholders](#), and the completed Communications Distribution Plan to notify stakeholders.

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13.01 Procedure for Nonconformance, Corrective and Preventive Actions

The City of Show Low has developed and implemented this procedure to define responsibility and authority for handling and investigating occurrences of nonconformance with the requirements of the SCEPP. This includes taking action to mitigate significant environmental impacts, and initiating and completing corrective and preventive actions. Any changes in procedures resulting from corrective and preventive actions are implemented and recorded. The SCEPP Manager maintains these records.

The SCEPP must establish a continuous management level review process that identifies and corrects nonconformance from the SCEPP and takes actions to prevent recurrence.

This procedure is used for implementing corrective and preventive actions.

The procedures:

- 1) Define responsibility for taking the results of monitoring and measuring and auditing, using them to determine what, if any, corrective and preventive actions need to be implemented.
- 2) Specify what corrective and preventive actions will be taken when nonconformance is discovered outside of the monitoring or auditing procedures – such as when a spill or accident occurs or notice of noncompliance is issued by a regulatory agency.
- 3) Specify how corrective and preventive actions will be documented so that changes to the SCEPP (i.e., continual improvement) can be demonstrated.

Applicable Definitions:

Corrective action is generally a reactive process used to address problems after they have occurred. Corrective action may be triggered by a variety of events, including internal audits and management reviews; neighbor complaints; results from routine self-inspection; monitoring and measurement; spills and emergencies; or a notice of noncompliance from a regulatory agency.

Preventive action is generally a proactive process intended to prevent potential problems before they occur or become more severe. Preventive actions focus on identifying negative trends and addressing them before they become significant. Events that might require preventive action include monitoring and measurement; trend analysis; tracking of progress on achieving objectives and targets; root cause determination for near misses; and customer or neighbor complaints.

Procedure:

The SCEPP Manager is responsible for reviewing issues affecting the SCEPP; the application and maintenance of this procedure; and any updates to the SCEPP documents affected by the preventive and corrective actions.

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The SCEPP Manager is responsible for logging the communications and recording solutions. Department and facility managers must monitor and verify the effectiveness of the solution. The SCEPP Manager is responsible for overall tracking and reporting on preventive and corrective actions.

Responsible personnel must institute required corrective or preventive action; report completion of the required action to the SCEPP Manager; and assure sustained effectiveness. Use [13.01 F2 Form for Corrective Action Request & Response](#) to initiate a corrective action.

Initiating Corrective or Preventive Action:

- 1) Any employee may initiate a corrective or preventive action. The employee is responsible for bringing the problem to the attention of department or facility manager, or the SCEPP Manager. The SCEPP Manager is responsible for determining whether action is required and records the appropriate information. Responsibility for resolving the problem is assigned to a specific individual.
- 2) The SCEPP Manager, working with the department or facility manager, determines an appropriate due date for resolving the issue.

Determining and Implementing Corrective and Preventive Actions:

- 1) The relevant personnel must investigate and resolve the problem and communicate the corrective or preventive action taken to the SCEPP Manager.
- 2) If the relevant personnel cannot resolve the problem by the specified date, he/she is responsible for determining an acceptable alternative due date with the SCEPP Manager.

Tracking Corrective and Preventive Actions:

- 1) The SCEPP Manager is responsible for issuing a weekly report to the responsible personnel detailing any overdue action and request an explanation.
- 2) Records of actions should be maintained for at least two-years after completion of the corrective action or preventive action unless a different retention period is specified by rules or regulations.

Tracking Effectiveness of Solutions:

- 1) The relevant personnel are responsible for verifying the effectiveness of the solution. If the solution is deemed not effective, a new corrective action must be issued to the relevant personnel.

This information is recorded in the [13.01 F1 Form for Preparing Corrective and Preventive Action Tracking Log](#), and is given a document control number.

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13.01 F2 Form for Corrective Action Request & Response

Corrective Action Request and Response:		
Major	Threat to Public Health or Environment	Minor
Corrective Action Requested By (Name & Title):		Date:
Description of the Problem:		
Corrective Action Plan (include a completion date):		
Response to Request for Corrective Action:		
Preventive Action Taken:		
Responsible Person (Name & Title):		Completion Date:
Corrective Action Verified By:		Date Verified:

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14.01 Procedure for Environmental Compliance Audit

The City of Show Low has established an annual environmental compliance audit program to monitor regulatory requirements. A report of the internal audit of regulatory compliance is submitted to the governing body on a yearly basis.

Regulatory monitoring, record keeping and reporting must also be maintained according to regulatory requirements for all *relevant activities* and reviewed on a *regular basis*. These records and periodic reviews must be included in the environmental compliance audit plan.

Environmental Regulatory Major or Minor Violation Identified:

Receipt of a *formal or informal enforcement action* and/or identification of any major or minor violation of environmental regulatory requirements indicate a problem may exist with the SCEPP, either as written, and/or with implementation of the SCEPP. An environmental compliance audit should aid in identifying why the SCEPP failed to prevent regulatory violations and provide insight on improving the SCEPP.

Procedure:

This environmental compliance audit plan is similar to an overall SCEPP audit as described in **Section 15, SCEPP Audit**, except that this audit focuses only on environmental regulatory compliance.

The environmental compliance audit plan defines the objectives of an audit and specifies what is to be accomplished by the audit. Primarily, the audit's goal is to evaluate the extent of conformity of the facility's SCEPP environmental regulatory compliance, as well as the potential improvement of the SCEPP. The plan should ensure that all regulatory elements are covered in the evaluation.

The audit plan should be reviewed and revised as necessary. An environmental regulatory compliance audit should be conducted annually, or upon a change in regulatory requirements or process changes. A good time to review the audit plan would be after completing the audit as a final task of the audit team.

An environmental compliance audit plan defines the process for scheduling, conducting, and reporting the audit results. It specifies what areas will be audited, when, and by whom.

Develop procedures for all areas in which federal, state and local regulatory compliance is required. Use the operational control procedures and work instructions developed under Section 7 [Operational Controls & Organizational Structure and Responsibility](#) to establish compliance audit procedures. The audit criteria are specified in the audit plan.

The Audit Plan procedures include:

1) Audit Schedule

An SCEPP audit plan defines the process for scheduling, conducting, and reporting the compliance audit results. It specifies what areas will be audited, when, and by whom.

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2) Audit Team

An audit team should be appointed with a designated lead auditor and additional audit team members, as deemed necessary. Members must be competent and have appropriate audit training. A lead auditor is appointed when the team consists of more than one auditor. The appointment of an audit team comes with the clarification of the roles and responsibilities of each team members.

3) Documentation

To conduct an audit, the auditors must obtain copies of all environmental regulatory compliance documented procedures, training records, or other materials relevant to the audit. They will review documentation for the audited area, examine past audits, and the SCEPP Audit Sheet for performing the audit.

The [14.01 F1 Form for Preparing Environmental Compliance Audit Plan](#) may require modifications in order to meet the needs of our community's facility-specific operations.

These instructions cover the following SCEPP environmental regulatory compliance elements:

- 1) environmental Regulatory Major or Minor Violations Identified including receipt of any formal or informal enforcement actions from a regulatory agency;
- 2) operational control procedures and work instructions;
- 3) employee training and tracking;
- 4) internal and external communications;
- 5) emergency Preparedness and Response Plan;
- 6) records and recordkeeping;
- 7) prior SCEPP environmental regulatory compliance audits; and
- 8) audit Summary.

Corrective Actions

Use the procedures and forms developed in Section 13 [Nonconformance, Corrective and Preventive Action](#) to address corrective actions identified in the environmental regulatory compliance audit.

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14.01 F1 Form for Preparing Environmental Compliance Audit Plan

AUDIT SCHEDULE

Department to be Audited	Operation to be Audited	Lead Auditor	Audit Team Members	Scheduled Date	Notes
Public Transit	All Tasks	Grants and Public Transit Manager	Community Services Director, MV Transportation Manager (Contracted)	When Contract is Signed	
Water	All Tasks	Public Works Director,	Public Works Director, Env Mgr, Water Supervisor	Every Year	
Wastewater	All Tasks	Public Works Director,	Public Works Director, Env Mgr, Wastewater Supervisor	Every Year	
Treatment Plant	All Tasks	Public Works Director,	Public Works Director, Env Mgr, Wastewater Treatment Plant Operator	Every Year	
Streets	All Tasks	Public Works Director,	Public Works Director, Streets Supervisor	Every Other Year	
Airport	Airport Fueling	Airport Manager	Airport Manager, Public Works Director	Every Other Year	
Airport	Drainage	Airport Manager	Airport Manager, Public Works Director	Every Other Year	
Equipment Maintenance	All Tasks	Risk Manager	SCEPP Committee	Every Third Year	
Parks	All Tasks	Community Services Director	Community Services Director, Parks and Facilities Maintenance Supervisor, SCEPP Manager	Every Third Year	
Facilities Maintenance	All Tasks	Community Services Director	Community Services Director, Parks and Facilities Maintenance Supervisor, Police Operations Chief, SCEPP Manager	Every Year	
Fleet	All Tasks	Risk Manager	All City Directors, SCEPP Committee	Every Other Year	
Ammonia Exceedance	All Tasks	Pub. Works Op. Manager or assignee	Pub. Works Op. Manager, Water Supervisor, Environmental Manager	Every Year	

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Storm Water	All Tasks	Pub. Works Op. Manager or assignee	Pub. Works Op. Manager, Water Supervisor, Environmental Manager	Every Year	
Construction Design	All Tasks	Public Works Director, City Engineer or designee	Public Works Director, Pub. Works. Op Manager, City Engineer; and/or other designee(s)	Every Third Year	

1) ENVIRONMENTAL REGULATORY MAJOR OR MINOR VIOLATION IDENTIFIED

Identification of any major or minor violation of environmental regulatory requirements indicates that a problem exists with the SCEPP, either as written, and/or with implementation of the SCEPP. The following should aid in identifying why the SCEPP failed to prevent regulatory violations and provide insight on improving the SCEPP.

#	Questions	Yes	No	Notes
1.	Have violations been identified in compliance inspection reports? If so, by what regulatory agency? What is the status?			
2.	Have any Notices of Opportunity to Correct (NOC) been issued? If so, by what regulatory agency? What is the status?			
3.	Have any Notices of Violation (NOV) been issued? If so, by what regulatory agency? What is the status?			
4.	Have any other citations or orders been issued for violation of environmental rules and regulations. If so, by what regulatory agency? What is the status?			

2) OPERATIONAL CONTROL

The audit attempts to ensure that written operational procedures and work instructions represent current practice, and that all operations associated with environmental regulatory compliance are addressed in the procedures and work instructions.

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#	Questions	Yes	No	Notes
1.	Have procedures and work instructions been written for all regulated operations?			
2.	Do procedures and work instructions monitor all regulated operations?			
3.	Do the procedures and work instructions ensure that the operations remain within acceptable operational parameters?			
4.	Do the procedures and work instructions include provisions to implement prompt corrective action if a deviation occurs?			
5.	Do the procedures and work instructions mandate a review of records and reports associated with all regulated operations?			

3) EMPLOYEE TRAINING & TRACKING

The purpose of auditing this element is to ensure that training has taken place, and employees have been trained properly, verify that training documentation has been developed and maintained, and has been kept current with respect to any hiring, departures, reorganizations, or new environmental regulatory requirements.

#	Questions	Yes	No	Notes
1.	Have procedures been developed to identify and track the environmental training needs of all personnel who have responsibility for processes related to environmental regulatory compliance?			
2.	Do the training and tracking procedures contain provisions to identify the type and frequency of training?			
3.	Do the procedures identify who needs training?			
4.	Do the procedures contain mechanism to track training of employees?			
5.	Do the procedures contain provisions for review and updating training requirements?			
6.	Do the procedures include appropriate training required as they relate to legal requirements? (Such as: ADEQ, CWA, AQ, RCRA, SPCC, SWPPP, OSHA, etc.)			
7.	Do the training and tracking procedures include provisions to require employee training on the SCEPP procedures?			
8.	Do the procedures contain provisions to require training for new employees that informs them about the facility's environmental policy and about new employees' duties within the SCEPP?			

4) INTERNAL AND EXTERNAL COMMUNICATIONS

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The purpose of auditing communications is to: ensure that the communication procedures are followed and documented and records maintained; find out how inquiries are documented and referred to appropriate personnel; did appropriate personnel respond to the inquiries; review the communication programs and verify that they are being implemented; and evaluate the effectiveness of the program. Has the community received any feedback, good or bad, regarding communication with stakeholders?

#	Questions	Yes	No	Notes
1.	Have communication procedures of the SCEPP been developed and implemented?			
2.	Do the procedures identify the method and type of communication?			
3.	Do the procedures identify the initiator and recipient of the communication?			
4.	Do the procedures mandate the documentation of the receipt and responses to inquiries?			
5.	Do the procedures contain a provision for referral of inquiries?			
6.	Do the procedures contain provisions for personnel to respond to inquiries and document the response?			
7.	Do the procedures provide for review and updating for communication efficiency?			
8.	Do the procedures include a requirement that any changes to the SCEPP be communicated to the appropriate personnel?			
9.	Does the documentation system show that communication is being carried out according to the procedures?			

5) EMERGENCY PREPAREDNESS AND RESPONSE

The goal of this audit is to determine that the current emergency response plan(s), emergency identification, prevention, and mitigation programs, including any drills or equipment maintenance programs have been implemented and maintained. The review should include regulatory based and facility specific programs. Verify if facility changes have been reviewed for their impact on these programs. Find out if emergency response procedures are available and if personnel understand and are trained in their roles.

#	Questions	Yes	No	Notes
1.	Have procedures (and/or an emergency response plans) been developed to respond to and report accidents, spills, malfunctions, process upsets, and other emergency situations?			
2.	Do the procedures provide for notification and reporting of accidents, spills, fires, or emergency situations?			
3.	Do the procedures contain a provision to mitigate or clean-up related environmental impacts?			
4.	Do the procedures provide for investigation of causes of accidents and evaluation of			

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	effectiveness of the response?			
5.	Are regulatory requirements for the facility included in the procedures?			
6.	Have arrangements been made with the local emergency responders?			
7.	Have emergency response drills been conducted pursuant to the procedures?			
8.	Have emergency responders been adequately trained for emergency response actions?			
9.	Are emergency response instructions available in designated locations?			
10.	Is emergency response equipment maintained and employees trained on location and use?			
11.	Do the procedures contain a provision for a review and update to accommodate facility changes?			
12.	Does the documentation system indicate that all procedures for preparedness and response are implemented pursuant to the procedures?			

6) RECORDS and RECORDKEEPING

The audit should determine that the procedures for records and recordkeeping are appropriately developed, maintained, implemented and followed. Ensure that they are available and updated to accommodate facility changes. Verify that the record retention procedure is maintained and followed.

#	Questions	Yes	No	Notes
1.	Has a procedure for tracking records been developed?			
2.	Have the types of records to be retained been identified?			
3.	Has a system for record identification and indexing the records been developed?			
4.	Is there a procedure to remove obsolete records and record destruction?			
5.	Has a procedure for establishing reporting and recordkeeping been developed to document the environmental status of all activities?			
6.	Are there provisions to update the procedures to accommodate facility changes?			
7.	Does the documentation show that reporting and recordkeeping has been implemented according to the procedures?			

7) ENVIRONMENTAL COMPLIANCE AUDITS

The audit of this element is to ensure that overall SCEPP Environmental Compliance Audits are: conducted according to the procedure; audits are performed based on the established schedule; any nonconformance identified in current and past audits resulted in a corrective action that was referred, resolved and verified. Equally important is to verify that audit results were communicated to the governing body as part of the annual internal SCEPP Audit.

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#	Questions	Yes	No	Notes
1.	Are procedures in place to perform an <u>internal</u> environmental compliance audit of all regulated operations?			
2.	Do the procedures explain the objective of the audit?			
3.	Do the procedures contain an audit schedule?			
4.	Do the procedures include a provision of methods of reporting audit results?			
5.	Does the documentation system indicate that procedures for the SCEPP Compliance Audit are implemented pursuant to the procedures?			
6.	Does the documentation system show that nonconformance issues are identified and referred to corrective action system?			
7.	Does the documentation system verify that nonconformance issues are promptly corrected?			
8.	Does the documentation system show that the audit results are communicated to the governing body?			
9.	Have the same violations identified in past <i>compliance inspection reports</i> been cited in later inspection reports?			
10.	Have the same violations identified in past <i>Notices of Opportunity to Correct</i> been cited in later Notices of Opportunity to Correct?			
11.	Have the same violations identified in past <i>Notices of Violation</i> been cited in later Notices of Violation?			
12.	Have the same environmental regulatory violations identified in past citations or orders been cited again in later citations or orders?			

8) **AUDIT SUMMARY**

The internal environmental compliance audit summary should address the following for each audit element:

- 1) Nonconformance issues identified during this audit.
- 2) Areas where nonconformance may exist but need further information for confirmation.
- 3) Areas of improvement that need to be pursued in regard to conformance with SCEPP requirements.

#	Element	Audit Comments & Corrective Actions
1.	Environmental regulatory major or minor violations identified	
2.	Operational controls: procedures and work instructions	
3.	Employee training and tracking	
4.	Internal and external communication	
5.	Emergency preparedness and	

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	response	
6.	Records and recordkeeping	
7.	Compliance with the past SCEPP environmental compliance audit requirements	

CORRECTIVE ACTIONS

Once the audit is completed, the findings will indicate whether the audit evidence conforms or does not conform to the audit criteria. The audit also provides recommendations for areas of improvement. The governing body, SCEPP Manager and SCEPP Team will review the audit conclusions and provide decisions and actions related to possible changes to environmental policy, objectives, targets, and other elements of the SCEPP consistent with the commitment to continual improvement.

Nonconformance can occur due to violations of any legal requirement, process upsets in a significant operation, or violations of SCEPP procedures (examples: work instructions, calibration, or record keeping and reporting requirements are not followed). This means that nonconformance can be detected through a SCEPP environmental compliance audit, but can also be detected by employees that discover a deviation from their daily activities.

Use the procedures and forms developed in **Section 13 [Nonconformance, Corrective and Preventive Action](#)** to address the nonconformance issues identified in the environmental compliance audit.

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15.01 Procedure for SCEPP Conformance Audit

SCEPP feedback is a mechanism for conveying information about how **The City of Show Low** is doing in implementing its SCEPP. When nonconformance exists, a community needs to know the causes of nonconformance and the appropriate action to correct nonconformance. One of the mechanisms to gain feedback is through an SCEPP audit.

This procedure described steps necessary for planning a SCEPP audit, developing an audit procedure, and performing an SCEPP audit. When conducting an audit, the audit team may observe nonconformance issues and areas where nonconformance may exist but needs further information for confirmation. As part of the audit, the audit team will also recommend areas that need to be improved in order to conform to SCEPP requirements.

When nonconformance exists, corrective action needs to be conducted and describes the process for investigating and correcting nonconformance. The procedure contains provisions to initiate and complete corrective action and to review corrective actions for effectiveness.

SCEPP feedback represents an important part of the SCEPP cycle. Through SCEPP feedback, the governing body will be able to provide sound decisions and actions related to possible changes to environmental policy, objectives, targets, and other elements of the SCEPP consistent with the commitment to continual improvement.

The City of Show Low shall conduct an annual internal SCEPP audit to ensure that the SCEPP has been properly implemented and is being maintained. Audits include a review of documentation and records, personnel interviews, and a review of the results from monitoring, including regulatory sampling and measurement.

The results of these audits are documented in a written report presented to governing body and the SCEPP Team for inclusion in the management review process. Audits are performed as described in this operational control procedure. The audit procedure covers the audit scope; frequency; methodologies applied; the responsibilities and requirements for conducting audits; and reporting the audit results. All auditors are properly trained, and the audit records are provided to the SCEPP Manager, **XXX**, for use in **The City of Show Low's Mayor and City Council** management review process.

Description:

Our governing body must make a commitment to an annual comprehensive review of compliance with the SCEPP documented in a written report to be presented to the governing body and made available to the public and ADEQ

The outputs from SCEPP audits feed into two separate processes:

- 1) management review by the government body; and
- 2) corrective and preventive action.

SCEPP audit procedures must be developed and documented with goals that:

- 1) ensure that the procedures incorporated into the SCEPP are being followed; and
- 2) determine if the SCEPP itself requires revision or restructuring.

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Procedure:

Audit Team Selection: One or more auditors comprise an audit team. When the team consists of more than one auditor, a Lead Auditor is designated. The Lead Auditor is responsible for audit team orientation, coordinating the audit process, and preparing the report.

The Lead Auditor prepares a written audit plan for conducting the audit using form [15.01 F1 Form for Preparing a SCEPP Audit Plan](#).

A pre-audit conference is held with SCEPP Manager and SCEPP Team and other appropriate personnel to review the scope, plan and schedule for the audit.

The Lead Auditor prepares the audit report, which summarizes the audit's scope and identifies the audit team. A summary of the results of the SCEPP Audit are described in [15.01 F2 Form for Preparing a SCEPP Audit Summary Sheet](#). A post-audit conference is held to present audit findings, clarify any misunderstandings, and summarize the audit results.

The SCEPP Manager communicates the audit results to the governing body. The SCEPP Manager with the governing body's approval executes follow-up actions as needed using form [15.01 F3 Form for Requesting & Responding to SCEPP Audit Finding](#) (used like a work order).

The SCEPP Manager tracks the completion and effectiveness of corrective actions on the Section 13 form [13.01 F1 Form for Preparing Corrective and Preventive Action Tracking Log](#).

CORRECTIVE ACTION

Once the audit is completed, the findings will indicate whether the audit evidence conforms or does not conform to the audit criteria. The audit also provides recommendations for areas of improvement. The governing body will review the audit conclusions and provide decisions and actions related to possible changes to environmental policy, objectives, targets, and other elements of the SCEPP consistent with the commitment to continual improvement.

Nonconformance can occur due to violations of any legal requirements; process upsets in a significant operation; or violations of SCEPP procedure (examples are: work instructions, calibration, or record keeping and reporting requirements are not followed). This means that nonconformance can be detected in the SCEPP Compliance Audit, but can also be detected by employees that discover a deviation from their daily activities. Nonconformance may have been identified in prior Environmental Compliance Audits or prior SCEPP Compliance Audits and remain unresolved.

Use the [15.01 F3 Form for Requesting & Responding to SCEPP Audit Finding](#) to address the corrective actions identified in the environmental compliance audit.

Use the procedures developed in Section 13 [Nonconformance, Corrective and Preventive Actions](#) to address the corrective actions identified in the SCEPP audit.

Planning an SCEPP Internal Audit: Audit Program and Audit Plan

An audit is a systematic and documented process for obtaining evidence. Many corporations and organizations have specific programs for conducting an audit of their operations. These audit programs include activities necessary for planning and organizing audits, resources

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needed to conduct audits, frequency and types of audits (e.g. quality audit, environmental audit, compliance audit, or joint audit). Based on this audit program, a SCEPP audit plan is written.

The term “systematic” in the definition of audit implies that the audit process is conducted based on an audit plan. The SCEPP audit plan specifies the scope or the extent and boundaries of a SCEPP audit. The audit scope defines the physical locations, organizational units, activities and processes to be audited, and the time period covered by the audit. SCEPP audits can be conducted by hiring a contractor as a third party auditor or through in-house staff. An internal audit *must be conducted annually*.

The term “evidence” in the definition of audit refers to records, statements of fact or other verifiable information relevant to the audit criteria. The audit criteria may include policies, procedures, operational controls, standards, laws and regulations, management system requirements, contractual requirements, or codes of conduct. The audit criteria are specified in the audit plan.

One basic requirement of all audits is that an audit must be independent. Independence refers to being free from bias and conflict of interest. A facility operations manager, finance manager, quality manager, or other functional managers who are free from responsibility for the activity being audited can be designated as members of the SCEPP audit team. The roles and responsibilities of the audit team members must be specified in the audit plan.

The audit plan defines the objectives of an audit and must specify what is to be accomplished by the audit. Primarily, **the audit’s goal is to evaluate the extent of conformity of the community’s SCEPP with audit criteria**, as well as the potential improvement of the SCEPP. The plan should ensure that all SCEPP elements are covered in the evaluation.

AUDIT SCHEDULE

Area or Department Audited	Function or Operation	Lead Auditor	Audit Team Member	Date	Special Instruction Notes
City Hall	Public Transit	SCEPP Manager	SCEPP Manager, Community Services Director	As needed and/or January 2022	Current contract does not expire for another 7 years
Public Works Facility	Operations of Water, Wastewater, Environmental, Streets, Ammonia Exceedance Storm Water Construction Design	SCEPP Manager	SCEPP Team, Public Works Director, Dept. Supervisor, Other assigned staff	Varies. Please refer to section 14.01 for specific breakout	
Airport	Airport Fueling, Airport Drainage	SCEPP Manager	SCEPP Team, Public Works Director, Dept. Supervisor	Every Other year, beginning	

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				in 2016	
City Hall	Parks/Facilities Maintenance, Police Department Hazardous Waste Disposal	SCEPP Manager	SCEPP Team, Public Works Director, Dept. Supervisor	Varies. Varies. Please refer to section 14.01 for specific breakout	
Equipment Maintenance	City Hall, Public Works	SCEPP Manager	Risk Manager, SCEPP Manager	Every Third year, beginning in 2017	
Fleet	City Hall, Public Works	SCEPP Manager	Risk Manager, SCEPP Manager	Every third year, beginning in 2016	
Ammonia Exceedance	Public Works	SCEPP Manager	SCEPP Team, Public Works Director, Dept. Supervisor	Every Year	
Storm Water	Public Works	SCEPP Manager	SCEPP Team, Public Works Director, Dept. Supervisor	Every Year	
Construction Design	Public Works	SCEPP Manager	SCEPP Team, Public Works Director, Dept. Supervisor	Every third year, beginning in 2017	

Audit team members must be competent and have appropriate audit training. A Lead Auditor is appointed when the team consists of more than one auditor. The appointment of audit team comes with the clarification of the roles and responsibilities of each team members.

The audit dates are scheduled in such a way to ensure that all SCEPP elements and related operations are audited at least once a year. The audited operations should be notified at a reasonable time prior to the audit. The Lead Auditor is responsible for the timely completion of the audit cycle (the audit, audit report, and any feedback to the audited operations). Any corrective actions resulting from the audit are the responsibility of the department to be audited.

The objective of an SCEPP audit is to evaluate the extent of conformity of the community's SCEPP audit criteria. If the audit objective for a particular department is also to check for corrective actions for nonconformance from previous audits, this should be stated, and the statement can be written in the "Note" column of the above matrix. Other items which may be placed in the "Special Instruction Notes" column may include logistic arrangement, matters related to confidentiality or audit follow-up actions.

Auditors have to be adequately prepared for the audit by equipping them with policies, procedures, standards, regulatory requirements, prior audit reports, and other pertinent information. A pre-audit meeting with the department's operation supervisor is to be held to review the plan, discussed what will be covered in the audit, and modify as necessary.

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Developing an Audit Procedure

In conducting a site audit, auditors will use the community's standardized guidance to assist them. The guidance is in the form of an audit procedure. The content of an audit procedure is to clarify that the goal of the audit is to evaluate the implementation and maintenance of the community's SCEPP. It attempts to find out whether the community is in conformance with the SCEPP requirements. If nonconformance occurs, corrective and preventive action should be identified.

The site audit procedure also provides guidance on what information will be gathered. The information gathered, or the audit evidence, can be used to determine whether SCEPP objectives and targets are being met, and whether the system is efficient.

All audit information needs to be documented. The audit procedure specifies how results are recorded, reported, and communicated.

After scheduled audits, during the corresponding debrief, the SCEPP manager is responsible, along with members of the SCEPP Team, for the analysis and determination of what future SOPs need to be written, and their inclusion inside future iterations of the SCEPP. This will be done to ensure continued compliance and demonstrated commitment to environmental regulations as outlined by our ADEQ partners.

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15.01 F1 SCEPP Audit Plan

Procedure No:	SCEPP 15.01 F1 SCEPP Audit Plan
Issue Date:	
Revised:	
Title:	SCEPP Site Audit
Approved By:	(Environmental Manager)

1. Purpose

The purpose of this protocol is to establish and maintain an SCEPP Auditing Protocol for **The City of Show Low**. The protocol defines the process for conducting, recording, and reporting of in-house SCEPP audits.

2. Scope

This protocol contains provisions to conduct a SCEPP audit to ensure that the SCEPP is properly implemented and maintained by evaluating system efficiency, reviewing environmental policy, evaluating objectives and targets, assessing whether documented SCEPP procedures are being followed, identifying nonconformance with SCEPP requirements, and whether relevant corrective actions in the system are taken whenever necessary.

3. Procedure

3.1. The SCEPP audit is to cover the following elements:

1. Environmental Policy;
2. Environmental Program development – environmental aspects, objectives, and targets;
3. Operational Control – operational procedures and work instructions;
4. Employee Training and Tracking;
5. Internal and External Communication;
6. Emergency Preparedness and Response;
7. Records and Recordkeeping; and
8. SCEPP Audits (past audit results).

3.2. [SCEPP Audit Sheet](#) is used to conduct the audit.

3.3. Before conducting the audit, a pre-audit conference is scheduled with the department's operations supervisor, or appropriate personnel, to review the plan for the audit.

3.4. Once the audit is done, the completed [SCEPP Audit Sheet](#) is used as the draft SCEPP Audit Report.

3.5. Any discrepancies, exceptions or noncompliance identified in the audit are to be summarized in the *SCEPP Audit Sheet*, as well as areas of improvement that needs to be pursued in regard to environmental management.

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- 3.6. A post-audit conference among members of the audit team, including the department's operations supervisor, or appropriate personnel, is conducted to discuss findings, conclusions and recommendations of the draft SCEPP audit report. Once a consensus on the draft has been reached, the report is finalized as the SCEPP Audit Report.
- 3.7. The SCEPP Audit Report, in the form of the completed [SCEPP Audit Sheet](#), is communicated to the governing body for review.
4. Updates and Reviews
This audit protocol will be reviewed and updated annually, or as necessary because of process changes or changes in the regulatory requirements.
5. Responsibilities
The updates of this SCEPP audit protocol must be approved by the SCEPP Manager.
6. Documentation
The audit reports and any documentation resulting from the audit will be kept in the SCEPP file under the responsibility of the SCEPP Manager.
7. References
The Audit Sheet is provided as reference.

Performing a SCEPP Audit

To conduct an audit, the auditors must obtain copies of all documented procedures, training records, or other materials relevant to the audit. They will review documentation for the audited area, examine past audits, and the community's [SCEPP Audit Sheet](#) for performing the audit.

The following provides an Example of an SCEPP Audit Sheet. The guidance may require modifications in order to meet the needs of the facility-specific audit objectives. This simple guidance covers eight SCEPP elements:

1. Environmental policy;
2. Environmental program development: aspects and impacts, objectives, and targets;
3. Operational controls: procedures and work instructions;
4. Employee training and tracking;
5. Internal and external communication;
6. Emergency preparedness and response;
7. Records and recordkeeping; and
8. SCEPP audits

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15.01 F1A SCEPP Audit Sheet

SCEPP Audit Sheet

Use this sheet and answer the following questions regarding the SCEPP elements for the audited department. If any of the answers is "No", nonconformance to the requirements of the SCEPP exists.

1. Environmental Policy

The purpose of auditing this SCEPP element is to ensure that policy is up-to-date and still appropriate to the nature and scale of current processes, activities, and services. It is also used to verify that the policy is communicated to employees and available to the public.

#	Questions	Yes	No	Notes
1.	Has an environmental policy been developed and approved by an appropriate official?			
2.	Does the policy contain ALL of the following? a) Compliance with applicable environmental laws and regulations. b) Promotion of pollution prevention. c) Commitment to continual improvement.			
3.	Is the policy still appropriate to the nature and scale of current processes, products, and services?			
4.	Does the new employee training cover the environmental policy?			
5.	Are existing employees aware of the policy's existence and its general content?			
6.	Is there a mechanism in place for the policy to be made available to the public?			

2. Environmental Program Development

The auditing purpose here is to ensure that the objectives and targets reflect the department's commitment to regulatory compliance, pollution prevention, and continual improvement. This form is used to verify that the targets are specific, measurable, and with deadlines. It is also used to verify that the program is evaluated on a periodic basis and results are communicated to the governing body.

#	Questions	Yes	No	Notes
1.	Has an SCEPP procedure been developed to identify aspects, impacts, objectives and targets?			
2.	Is the procedure reviewed and updated on a periodic basis, or when changes occur in facility operations (chemical use, process changes, production level, etc)?			
3.	Have the aspects of a facility's processes,			

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	products, and services that have significant impacts been identified?			
4.	Have objectives and targets been identified for the processes, products, and services of significant impact?			
5.	Are the objectives and targets consistent with the facility's environmental policy?			
6.	Does each objective have specific and measurable targets, and the methods to achieve targets with assigned deadlines and designation of responsibility for achievement?			
7.	Is progress being measured toward achieving the objectives and targets?			
8.	Is progress being measured on a periodic basis?			
9.	Have corrective actions been initiated for areas not meeting objectives and targets?			
10.	Have the results been reported to the governing body?			

3. Operational Controls

The audit on operational controls attempts to ensure that the written operational procedures and work instructions represent current practice, and that all operations associated with the significant environmental aspects are addressed in the procedures and work instructions.

#	Questions	Yes	No	Notes
1.	Have procedures and work instructions been written for all operations of significant aspect?			
2.	Do the procedures and work instructions monitor the operations?			
3.	Do the procedures and work instructions ensure that the operations remain within acceptable parameters?			
4.	Do the procedures and work instructions include provisions to implement prompt correction if a deviation occurs?			
5.	Do the procedures and work instructions mandate a review of records and reports associated with the operations?			

4. Employee Training and Tracking

The purpose of auditing this element is to ensure that training has taken place, and the employees have been trained properly, Verify that training documentation has been developed and maintained, and has been kept current with respect to any hiring, departures, reorganizations, or new requirements.

#	Questions	Yes	No	Notes
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1.	Have procedures been developed to identify and track the environmental training needs of all personnel who have responsibility for processes that have significant environmental impact?			
2.	Do the training and tracking procedures contain provisions to identify the type and frequency of training?			
3.	Do the procedures identify who needs training?			
4.	Do the procedures contain mechanism to track training of employees?			
5.	Do the procedures contain provisions for review and update of training requirements?			
6.	Do the procedures include appropriate training required by legal training requirements? (Such as: RCRA, SPCC, SWPPP, OSHA, etc.)			
7.	Do the training and tracking procedures include provisions to require employee training on SCEPP procedures?			
8.	Do the procedures contain provisions to require training for new employees that informs them about the facility's environmental policy and about new employees' duties within the SCEPP?			

5. Internal and External Communication

The audit on communication is to ensure that the communication procedures are followed. Make sure that documentation of the receipt and responses to inquiries is maintained. Find out how these inquiries are documented and referred to appropriate personnel. Review the communication programs and verify that they are being implemented. Evaluate the effectiveness of the programs.

#	Questions	Yes	No	Notes
1.	Have communication procedures of the SCEPP been developed and implemented?			
2.	Do the procedures identify the method and type of communication?			
3.	Do the procedures identify the initiator and recipient of the communication?			
4.	Do the procedures mandate the documentation of the receipt and responses to inquiries?			
5.	Do the procedures contain a provision for referral of inquiries?			
6.	Do the procedures provide for review and updating for communication efficiency?			
7.	Do the procedures include a requirement that any change to the SCEPP or any of its facets be communicated to the appropriate personnel?			
8.	Does the documentation system show that communication is being carried out according to the procedures?			

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6. Emergency Preparedness and Response

The goal of this audit is to determine that the current emergency response plan(s), emergency identification, prevention, and mitigation programs, including any equipment maintenance programs have been implemented and maintained. The review should include the regulatory-based programs. Verify if changes have been reviewed for their effect on these programs. Find out if emergency response procedures are available and if personnel understand and are trained in their roles.

#	Questions	Yes	No	Notes
1.	Have procedures (and/or an emergency response plan) been developed to respond to and report accidents, spills, malfunctions, process upsets, and other emergency situations?			
2.	Do the procedures provide for notification and reporting of accidents, spills, fires, or emergency situations?			
3.	Do the procedures contain a provision to mitigate or clean-up related environmental impacts?			
4.	Do the procedures provide for investigation of causes of accident and evaluation of effectiveness of response?			
5.	Are regulatory requirements for the facility included in the procedures?			
6.	Have arrangements been made with the local emergency responders?			
7.	Have emergency response drills been conducted pursuant to the procedures?			
8.	Have emergency responders been adequately trained for emergency response actions?			
9.	Are emergency response instructions available in designated locations?			
10.	Is emergency response equipment maintained and employees trained on location and use?			
11.	Do the procedures contain a provision for a review and update to accommodate facility changes?			
12.	Does the documentation system indicate that all procedures for preparedness and response are implemented pursuant to the procedures?			

7. Records and Recordkeeping

The audit should determine if the procedures for records and recordkeeping are appropriately developed, maintained, implemented and followed. Ensure that they are available and updated to accommodate changes. Verify that the record retention procedure is maintained and followed.

#	Questions	Yes	No	Notes
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1.	Has a procedure for tracking records been developed?			
2.	Have the types of records to be kept been identified?			
3.	Has a system for record identification and indexing the records been developed?			
4.	Is there a procedure to remove obsolete records and record destruction?			
5.	Has a procedure for establishing reporting and recordkeeping been developed to document the environmental status of all activities?			
6.	Are there provisions to update the procedures to accommodate facility changes?			
7.	Does the documentation show that reporting and recordkeeping has been implemented according to the procedures?			

8. SCEPP Audits

The audit of the SCEPP is to ensure that the SCEPP audit program is conducted according to the procedure, the audits are performed based on the established schedule, and any nonconformance is referred to the corrective action system. Verify that the results of the SCEPP audits are communicated to the governing body.

#	Questions	Yes	No	Notes
1.	Are procedures in place to perform an SCEPP audit for the facility?			
2.	Do the procedures explain the objective of the audit?			
3.	Do the procedures contain the audit schedule?			
4.	Do the procedures include a provision of methods of reporting audit results?			
5.	Does the documentation system indicate that procedures for the SCEPP audit are implemented pursuant to the procedures?			
6.	Does the documentation system show that nonconformance issues are identified and referred to corrective action system?			
7.	Does the documentation system verify that nonconformance issues are promptly corrected?			
8.	Does the documentation system show that the audit results are communicated to the governing body?			

AUDIT SUMMARY

Use [15.01 F2 Form for Preparing a SCEPP Audit Summary Sheet](#) to prepare the audit summary.

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The SCEPP audit summary should address the following for each audit element:

- 1) nonconformance issues identified during this audit;
- 2) areas where nonconformance may exist but need further information for confirmation; and
- 3) areas of improvement that need to be pursued in regard to conformance with SCEPP requirements.

CORRECTIVE ACTION

Use [15.01 F3 Form for Responding to SCEPP Audit Finding](#) to initiate a corrective action.

Once the audit is completed, the findings will indicate whether the audit evidence conforms or does not conform to the audit criteria. The audit also provides recommendations for areas of improvement. The governing body will review the audit conclusions and provide decisions and actions related to possible changes to environmental policy, objectives, targets, and other elements of the SCEPP consistent with the commitment to continual improvement.

Nonconformance can occur due to violations of any legal requirements, process upsets in a significant operation, or violations of SCEPP procedure (examples are: work instructions, calibration, or record keeping requirements or regulatory reporting requirements are not followed). This means that nonconformance can be detected through a SCEPP audit, but it can also be detected by employees that discover a deviation from their daily activities.

When nonconformance exists, the department needs to identify the cause of the nonconformance and evaluate the necessary corrective action. The corrective action chosen should match the magnitude of problems and be appropriate to the environmental impact encountered. The department manager who supervises operations in the area of nonconformance and the SCEPP Manager should monitor the corrective action.

The corrective action may involve modifying existing control mechanisms in order to avoid repetition of the nonconformance. Any changes in the written procedures resulting from the corrective and preventive action must be recorded and employees notified of procedural changes.

To address nonconformance, the department should have in place a procedure which defines responsibility and authority for:

1. handling and investigating nonconformance with the SCEPP;
2. taking action to mitigate any impacts caused by nonconformance; and
3. initiating and implementing corrective and preventive action.

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15.01 F3 Form for Requesting & Responding to SCEPP Audit Finding (Corrective Action)

Type of Non-conformance: (circle as appropriate)		
Major	Minor	Recommendation
Description (include where in the organization the finding was identified):		
SCEPP Reference:	Date:	Finding Number:
Lead Auditor:		Audit Team:
Corrective Action Plan (include time frame):		
Response to Corrective Action Request:		
Preventive Action Taken:		
Responsible Person:		Completion Date:
Corrective Action Verified By:		Date Verified:

15.01 F4 Protocol for Investigating and Correcting SCEPP Nonconformance

Procedure No:	SCEPP 15.01 F1 SCEPP Audit Plan
Issue Date:	
Revised:	
Title:	Protocol for Investigating and Correcting SCEPP Nonconformance
Approved By:	(Environmental Manager)

1. Purpose

The purpose of this protocol is to define authority, responsibility, and methods for investigating and correcting nonconformance with SCEPP requirements.

2. Scope

This protocol contains provisions to initiate and complete corrective actions and to review corrective actions for effectiveness.

3. Procedure

- 3.1. Employees that discover a deviation from operations and activities or a violation of regulatory requirements are to immediately notify their supervisor.
- 3.2. The supervisor will initiate corrective action by identifying the problem, evaluating potential corrections, deciding on the corrective action including an implementation timeline and assignment of tasks, and take the corrective action. The supervisor will record these activities in the SCEPP Corrective Action Form. The supervisor will notify the SCEPP Manager.
- 3.3. When the corrective action is completed, the supervisor will complete the SCEPP Corrective Action Form, date it, and submit the form to the SCEPP Manager.
- 3.4. The SCEPP Manager will review the corrective action form for effectiveness. If necessary, changes in procedures will be made to prevent reoccurrence of the nonconformance.
- 3.5. All corrective actions are to be logged on the SCEPP Corrective Action Log.

4. Updates and Reviews

This protocol and methods used for corrective actions will be reviewed annually, or upon changes in regulatory requirements and operational changes.

5. Responsibilities

- 5.1. Employees are responsible for bringing to their supervisor's attention any areas of nonconformance they discover.

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5.2. The supervisor or the SCEPP Manager can initiate and log a corrective action.

6. Documentation

The corrective action documentation will be kept in the SCEPP file under the responsibility of the SCEPP Manager.

7. Reference

The SCEPP Corrective Action Form and the SCEPP Corrective Action Log are provided as references.

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16.01 Procedure for SCEPP Governing Body Management Review

The SCEPP management review process includes the governing body, **The City of Show Low, Mayor/City Council, and the SCEPP Manager and Team** who share responsibility in reviewing all elements of the SCEPP. Management reviews are conducted annually to ensure suitability, adequacy and effectiveness of the SCEPP, as defined in this procedure. All management review meeting minutes are recorded and kept by The SCEPP Manager, Jay Brimhall, the Grants and Public Transit Manager,.

The management review process is intended to provide a forum for discussing the performance of the SCEPP; opportunities for improvement; and for providing the governing body with a vehicle for making changes to the SCEPP to achieve continual improvement.

The management review team should include everyone who signed the [Good Faith Commitment and Environmental Policy](#) statements or the current elected governing body representatives as well as the SCEPP Manager and Team.

Procedure:

The SCEPP Manager coordinates the SCEPP management review meeting every October. The SCEPP Manager presents a summary of proposed environmental management programs for the next year to be considered in the budget planning process. The SCEPP Manager is also responsible for ensuring that the necessary information is collected prior to the meeting.

At a minimum, each management review meeting should consider the following:

- 1) results of the SCEPP Environmental Compliance Audit since the last meeting;
- 2) results of the SCEPP Audit since the last meeting;
- 3) suitability, adequacy and effectiveness of the Environmental Policy;
- 4) suitability, adequacy and effectiveness of the Environmental Objectives;
- 5) overall suitability, adequacy and effectiveness of the SCEPP;
- 6) status of Aspects, Impacts, Objectives, Targets, Corrective and Preventive Actions;
- 7) summary of proposed Environmental Management Programs for the next year;
- 8) suitability, adequacy and effectiveness of training;
- 9) results of any action items from previous management reviews;
- 10) suitability of resources, considering realignment of resources if required.; and
- 11) extent to which changes in legislation (statutes, rules and regulations), organizational activities, technology or stakeholder interests, require changes to the SCEPP.

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