

On-Target Assessment Program to Assess Environmental Compliance and Environmental Management Systems

Air & Waste Management Association

2007 Southern Section Annual Meeting

August 8, 2007

The “Is” or “Was” Statement

- **EMS roll-out was completed at all mills**
- **Change in employee culture**
- **Support of management**
- **External auditors**
- **Internal audit department**

Challenges

- **Diminishing value from external auditors**
- **Internal audit once every three years**
- **EMS dependent on a key player**
- **Continue momentum**
- **Something to report to management**



On-Target EMS Assessment

- **Once every other year**
- **Peer to peer review**
- **Use available tools**
- **Update as necessary**
- **Provide closing conference for EMS team and business teams.**



Environmental Management

#	ITEM	VALUE	% ACHIEVED	EARNED	COMMENTS	CAP?	DATE
EM1	A complete plant environmental workbook exists for the facility containing the details of the plant's Environmental Management System	2	0%-50%-100%	2	Reference Green Book, original SOP book, and current SOP book.		
EM2	An organizational chart, including environmental management, is maintained for the facility.	2	0%-50%-100%	2			
EM3	Job specific environmental responsibilities have been defined for all job positions	2	0%-50%-100%	2			
EM4	Job specific environmental training program has been implemented at the plant to ensure that all employees know the environmental requirements of their job.	2	0%-50%-100%	2			
EM5	A program to regularly review employees in regard to their competency in the environmental requirements of their job has been implemented.	2	0%-50%-100%	1	Quizzes have been done in the past, but not on regularly scheduled basis. No SOP established to conduct competency testing.		
EM6	Standard Operating Procedures have been developed for each manufacturing and ancillary process (such as yard maintenance) and include the environmental aspects associated with each element of the operation	2	0%-50%-100%	2			

Perception Survey

Please take the time to complete this survey regarding environmental concerns.

We need your honest feedback on these 25 statements.

DIRECTIONS:

- 1 Circle the number which matches your opinion in response to each statement.
- 2 Do Not write your name on the form.
- 3 Return the form to the collection point.

1. I am aware of the consequences of not being in environmental compliance.

1	2	3	4	5	6	7
STRONGLY DISAGREE	SOMEWHAT DISAGREE	SLIGHTLY DISAGREE	UNSURE	SLIGHTLY AGREE	SOMEWHAT AGREE	STRONGLY AGREE

2. I believe that following environmental procedures is recognized by supervisors.

1	2	3	4	5	6	7
STRONGLY DISAGREE	SOMEWHAT DISAGREE	SLIGHTLY DISAGREE	UNSURE	SLIGHTLY AGREE	SOMEWHAT AGREE	STRONGLY AGREE

3. I know why it is important to follow environmental procedures.

1	2	3	4	5	6	7
STRONGLY	SOMEWHAT	SLIGHTLY	UNSURE	SLIGHTLY	SOMEWHAT	STRONGLY

Compliance Calendar

Complete	Target Completion Date	ACTIVITY / REPORT	Links	Links	SOP/Link	REQUIRED BY	RESPONSIBLE	DEADLINE/ DATE DUE	REVIEWED BY	SUBMIT TO	FILE
ONGOING ACTIVITY											
Daily Records		Excursion/Deviation tracking				TCEQ	PEM	Daily		File, TCEQ	
Daily Records		Wood and Gas records	Daily Gas			NA	PEM	Daily			
Daily Records		Daily Resin, Glue Usage				TCEQ					
Daily Records		Daily Production				NA					
Daily Records		Parametric Monitoring Daily Review				TCEQ					
Daily Records		Daily Dryer Downtime Tracking				NA					
Daily Records		Daily EH Observation Form			SOP	TCEQ					
Daily Records		Daily WESP Data	WESP Daily Rpt			NA					
Daily Records		Daily COM PMs	Daily COM PM Rpt			TCEQ					
Daily/Weekly		ETOTemp	ETOT Efficiency Data			Corp				Phillip Cobbs and Phi Ly	
Daily/Weekly		Daily Rounds/Inspection	S/WPPP Weekly Same as below			Plant/Environmental	PEM	Weekdays		File	✓
As needed		CEA-101 - Report of Suspected Violation	CEA 101	BCA Form		Suspension & Debarment	PEM	As needed	PM/GEM		✓
As needed		Upset Report and Spill Reports	Spill Rpt Rpt	Upset Link	Upset or Excursion Tracking Tool	30 TAC 101.6	Shift Supervisors	As needed	PEM	TCEQ / File as necessary	✓
		Upset Report and Spill Reports Cont...	Spill Rpt Rpt		Upset #116						
Weekly		Excursion Reports, PC Downtime Numbers	PC Downtime Database	Excursions and Deviations		Business Team	PEM	Thursdays	PEM	Roz Feak, Don S, Mark S, File, Plant Personnel	✓
Monthly		Monthly SPCC, S/WPPP Inspections	SPCC Inspect - Tanks S/WPPP @ Visuals	S/WPPP Weekly	S/WPPP Daily - Utility	Corporate, TCEQ	PEM	Misc.	PEM	TCEQ, S/WPPP, SPCC, File	✓
Monthly		Monthly SPCC, S/WPPP Inspections - Continued	Reports/Daily Logs/Daily Prod	S/WPPP Monthly							
Monthly		Monthly Production Report (Press, TechShield)	Reports/Daily Logs/Daily Prod			Corporate, TCEQ	PEM	monthly	PEM/PM	File	✓
Monthly		WMR - Waste Management Report	Waste Summary Database	Waste Management Report	Wood Calculator	Corporate EA	PEM	10th each month	PEM, PM		✓
Monthly		MER - Monthly Environmental Report	Monthly MER			Corporate EA	PEM	10th each month	PM/PEM	MER@LPCorp, Michelle Boucher, Steve Doffitt	✓

Compliance Plan

Swan Valley OSB Compliance Plan				December 2006
Environment Act Licence Licence No.: 1900-S4				
Subject Item/ Permit Section	Conditions Summary	Compliance Method	Documentation /SOP #	Location of Documentation
<i>Air</i> 1.	In addition to any of the following specifications, limits, terms and conditions specified in this License, the License shall, upon the request of the Director:			
	(a) Sample, monitor, analyze or investigate specific areas of concern regarding any segment, component or aspect of pollutant storage, containment, treatment, handling, disposal or emission systems, for such pollutants, ambient air quality, aquatic toxicity, leachate characteristics, or discharge rates, for such duration and at such frequencies as may be specified;	Air Monitoring Program	Seacor Quarterly Reports	PEM Office, Book Shelf
		Stack Emission Monitoring	Stack Test Reports	PEM Office, Book Shelf
		Surface Water Quality Monitoring	Surface Water Monitoring File by year	PEM Office Filing Cabinet, File #851.0
		Ground Water Quality Monitoring	Ground Water Monitoring File by year	PEM Office, Filing Cabinet, File # 851.1
	(b) Determine the environmental impact associated with the release of any pollutants from the said plant;	Air Monitoring Program;	Seacor Quarterly Reports, Stack Test	PEM Office, Book Shelf PEM Office, Book Shelf

Aspects and Impacts

Environmental Aspect and Impact Ranking Model
Golden, BC

Aspects			Impacts: Environmental and Health Significance							Impacts: Business Significance									
			Impact on Water	Impact on Air	Impact on Land	Employee Health Impact	Impact on Community	Use of Natural Resources / Material / Energy	Avg. Score out of 3	Time to Resolve	Cost to Complete	Effect on Public Image	Concern of Interest	Required by Permit or Regulation	Liability	Compliance	Employee Training Requirements	Avg. Score out of 3	
1	Mill	Handling hazardous materials/waste	1	1	1	3	1	2	0	1.29	2	3	2	1	3	3	2	3	2.38
2	P/	Powerhouse Boiler upsets	0	2	0	0	2	0	2	0.86	2	2	3	3	3	1	2	3	2.38
3	Mill	bg	1	0	3	0	0	3	2	1.29	2	2	1	1	1.5	3	2	3	1.94
4	Mill	Drinking (Well) water use and protection	3	0	0	3	3	3	0	1.71	2	3	2	1	0	3	0	1	1.50
5	Mill	Emergency response	2	0	2	2	2	0	0	1.14	2	3	2	1	1.5	2	2	3	2.06
6	P/	Ash Handling	2	3	0	2	2	2	2	1.86	2	1	1	1	0	0	1	3	1.13
7	Mill	Handling Resin Waste and Wash Water	2	0	2	1	1	1	1	1.14	2	2	1	1	1.5	2	2	2	1.69
8	P/	Fugitive dust from fuel handling and emplo	0	3	1	3	2	0	0	1.29	2	1	0	2	3	1	1	2	1.50
9	P/	Sanderdust (fines) combustion	0	3	2	3	2	2	1	1.86	1	1	2	1	0	0	0	2	0.88
10	Mill	Veneer dryer emission controls	0	3	0	0	3	0	2	1.14	0	0	3	3	3	0	1	2	1.50
11	P/	Soot fallout off-property (public complaint	1.5	1.5	1	3	2	0	0	1.29	1.5	2	2	1	0	1.5	0	2	1.25
12	Mill	Recyclable metal going to local contractor	1	0	3	0	1	2	1	1.14	2	3	1	1	0	2	0	2	1.38
13	P/	Volume of powerhouse ash generation	2	1	3	0	0	3	2	1.57	1	0	2	1	0	2	0	1	0.88
14	Mill	Overflow discharge from #3 dryer sump	2	0	0	0	1	0	0	0.43	3	2	1	1	3	1	2	3	2.00
15	P/	Ash pond closure and aesthetic improvem	2	2	2	0	2	0	0	1.14	1	1	2	1	0	3	0	0	1.00
16	Mill	Stormwater runoff	2	0	0	0	2	0	0	0.57	1	1	1	2	1.5	2	1	3	1.56
17	Mill	Town of Golden Air Quality Committee	0	3	0	0	3	0	0	0.86	0	3	3	3	0	0	0	1	1.25
18	Mill	Waste reduction going to municipal landfill	0	0	2	0	2	1	1	0.86	2	3	1	1	0	0	0	3	1.25
19	Mill	Construction of new Oil Shed	2	0	2	1	0	1	1	1.00	2	2	0	1	0	2	0	1	1.00
#			0							0.00	0								0.00
21			0							0.00	0								0.00
#			0							0.00	0								0.00
#			0							0.00	0								0.00
#			0							0.00	0								0.00
#			0							0.00	0								0.00
#			0							0.00	0								0.00
#			0							0.00	0								0.00
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Report Template

- Introduction
- Results of EMS Self Assessment or Empower Checklists
- Review of EMS Manual
- EMS Training Records
- Aspect and Impact Analysis
- NOV's
- CEA 101s
- CAPs
- SPCC and SWPPP
- Air Permit and Compliance Plan
- Deviation Report
- NPDES and Other Water Permits
- Previous Internal Audit Report
- Previous EMS or On-Target Report
- Additional Areas of Assessment

Assess Performance

- 1. **SOP Reviews**
 - Identify process change or product change
 - Annually or as needed
 - Include verification of same sort
- 2. **Spot Checks**
 - Make sure it still works
 - Hands on observation
 - Who does the spot checks?
 - Documentation as determined by PEM
 - At least annually
- 3. **Review Impacts and Aspects**
 - Tools → common form
 - Annually - ties into goals for coming year
- 4. **EMS Self Assessment**
 - Annually or before OT audit
 - By someone other than PEM – EMS team
 - Identify weaknesses and develop custom plan around deficiencies
- **Meeting (EMS Team)**
 - Mill specific minimum quarterly
 - Generate meeting minutes
- 6. **Training**
 - Non-environmental employee training – 2.0 / year / employee
 - To include reg. specific training requirement
 - Env. emp training – 8.0 / hour / year
 - To include reg. specific training requirement
 - New hire and position changes
- 7. **On Target**
 - Peer assessment from outside the mill
 - Once every three years
 - Use K&D's assessment tool or empower
 - On target team identifies issues and develops CAPs before leaving site.
 - Compliance issues addressed through CEA101.



Questions?