

## Are the Audit Protocols Available Now?

Nine of the audit protocols have already been completed and are available to the public:

*Protocol for Conducting Environmental Compliance Audits of Hazardous Waste Generators under the Resource Conservation and Recovery Act* (EPA Document No., EPA-305-B-98-005)

*Protocol for Conducting Environmental Compliance Audits of Treatment Storage and Disposal Facilities under the Resource Conservation and Recovery Act* (EPA Document No., EPA-305-B-98-006)

*Protocol for Conducting Environmental Compliance Audits under the Comprehensive Environmental Response, Compensation, and Liability Act* (EPA Document No., EPA-305-B-98-009)

*Protocol for Conducting Environmental Compliance Audits under the Emergency Planning and Community Right-to-Know Act* (EPA Document No., EPA-305-B-98-007)

*Protocol for Conducting Environmental Compliance Audits of Facilities Regulated under Subtitle D of RCRA* (EPA Document No., EPA-300-B-00-001)

*Protocol for Conducting Environmental Compliance Audits of Used Oil and Universal Waste Generators under the Resource Conservation and Recovery Act* (EPA Document No., EPA-300-B-00-002)

*Protocol for Conducting Environmental Compliance Audits of Storage Tanks under the Resource Conservation and Recovery Act* (EPA Document No., EPA-300-B-00-006)

*Protocol for Conducting Environmental Compliance Audits of Facilities with PCBs, Asbestos, and Lead-based Paint Regulated under TSCA* (EPA Document No., EPA-300-B-00-004)

*Protocol for Conducting Environmental Compliance Audits of Public Water Systems under the Safe Drinking Water Act* (EPA Document No., EPA-300-B-00-005)

EPA expects to issue four more audit protocols to the public by December 2000. These include: Management of Pesticides; Clean Air Act, Clean Water Act and TSCA.

## How do I get copies of the protocols?

The audit protocols have become some of EPA's most frequently requested and downloaded public documents. Since January 1999, EPA has distributed over 24,000 copies of the RCRA Generator, RCRA TSDF, EPCRA and CERCLA Audit Protocols in response to requests from the public.

The protocols can be obtained electronically via EPA's Web site: <http://www.epa.gov/oeca/ccsmd/profile.html>. The EPA Web site offers the protocols in both pdf and MS-Word formats. For greater flexibility, the word processing format allows the user to custom-tailor the protocols to more specific environmental aspects associated with the facility to be audited.

You can also obtain hard copies of the protocols by contacting EPA's National Center for Environmental Publication (NCEP) at 1-800-490-9198. When ordering copies from NCEP, please reference the title and the document number of the protocol(s) you've selected.

## Who Can I Contact for More Information?

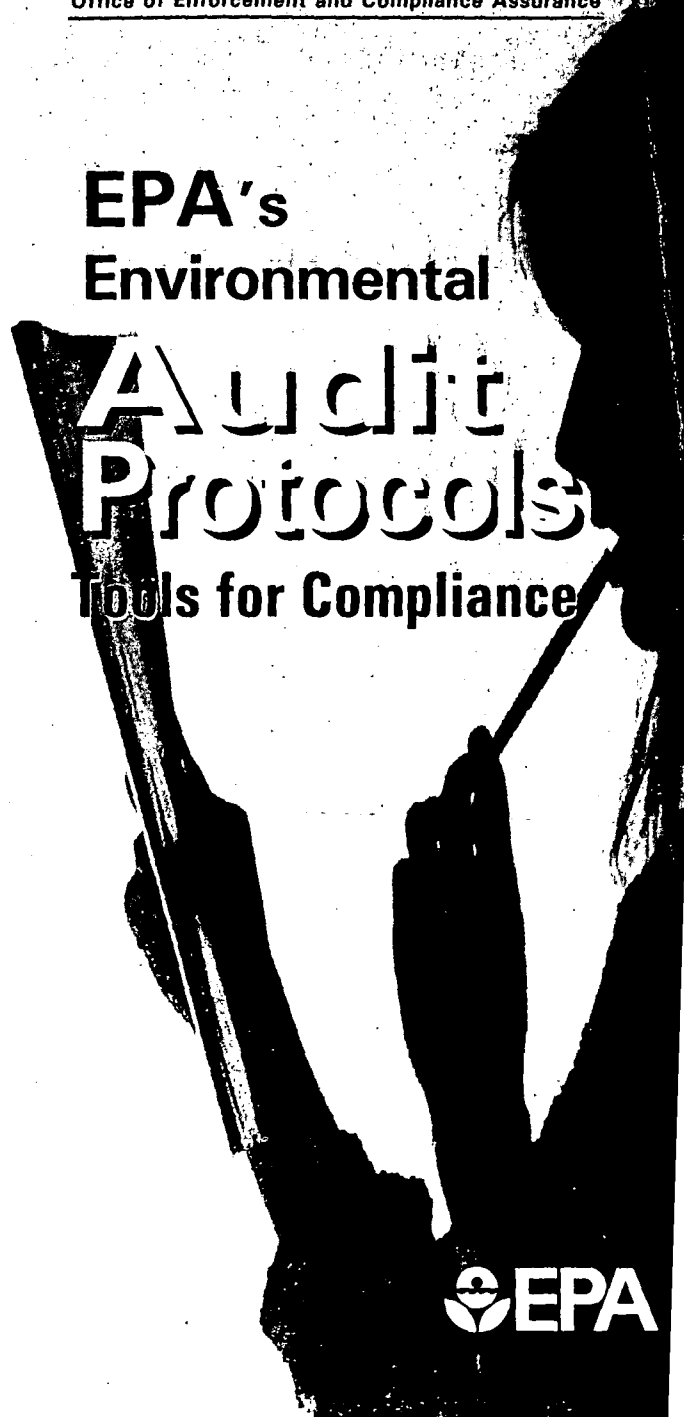
**Richard Satterfield** at the U.S. EPA  
(202) 564-2456 or E-mail at [satterfield.richard@epa.gov](mailto:satterfield.richard@epa.gov)


United States  
Environmental  
Protection Agency

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Office of Enforcement and Compliance Assurance

# EPA's Environmental Audit Protocols Tools for Compliance





**R**egular environmental auditing of your facility is the cornerstone of any environmental management system (EMS). Environmental audits allow facilities to manage their own compliance by identifying: (1) where compliance is being met; (2) potential areas for improvement; (3) opportunities to correct deficiencies. The U.S. Environmental Protection Agency (EPA) is encouraging facilities to self-audit, and is developing 13 separate audit protocol guidebooks to encourage this practice.

The audit protocols are designed for use by persons with various backgrounds including scientists, engineers, lawyers, and business owners or operators. Environmental audit reports are useful to a variety of businesses and industries, local, and federal government facilities, as well as financial lenders, and insurance companies, who need to assess environment performance.

These protocols will provide detailed regulatory checklists that you can customize to meet your specific needs under the following 13 primary environmental management areas:

- Generation of RCRA Hazardous Waste
- Treatment Storage and Disposal of RCRA Hazardous Waste
- RCRA Regulated Storage Tanks
- Universal Waste and Used Oil under RCRA
- Managing Nonhazardous Solid Waste under RCRA
- Clean Water Act
- Safe Drinking Water Act
- TSCA
- Management of Toxic Substances (e.g., PCBs, lead-based paint, and asbestos)
- CERCLA
- Clean Air Act
- Pesticides Management (FIFRA)
- EPCRA

## How will the protocols help with compliance issues at my facility?

*"The Audit Protocols are invaluable as they provide easy-to-understand questions for evaluating compliance, and because they are available in a word processing format. I can customize the checklists to our shipyard facilities to make the audit most effective. Please keep up this very important service."*

—*Thomas L. Stokes, Jr.,  
Stokes Environmental Associates, LTD.*

Each protocol summarizes key statutory requirements, defines regulatory terms and gives an overview of the federal laws affecting the respective environmental management area. The key feature of each protocol is the regulatory checklist containing detailed procedures for conducting a review and audit of facility operations and conditions. The checklists outline performance objectives for the auditor and offer a line of inquiry when evaluating a facility for compliance. Each protocol contains the following information:

- Guidance on the major facility activities and operations evaluated by the protocol and a brief description of how the protocol is to be applied;
- A Regulatory Checklist which matches the regulatory requirements with the task that should be accomplished by the auditor;
- A review of key federal legislation including key issues associated with the subject protocol area;
- Typical issues normally addressed in state and local regulations;
- Key compliance requirements - summarizes the overall thrust of the regulations for a given protocol topic;
- Typical records to review during the course of the audit, highlighting documents, permits, and other pertinent paperwork that should be reviewed by an auditor and reconciled against regulatory requirements;

- Typical physical features to inspect, highlighting pollution control equipment, manufacturing and process equipment and other areas that should be visited and evaluated during an audit;
- A list of key compliance definitions, acronyms and abbreviations and other regulatory "terms of art" used in the federal regulations.

## What if I find a violation while using the protocols?

EPA developed these protocols in support of several EPA policies and programs, such as EPA's Small Business Policy which is designed to promote environmental compliance by providing compliance assistance and incentives like penalty waivers to eligible facilities with 100 or fewer employees. In addition, the protocols were designed to encourage businesses and organizations to perform environmental audits and disclose violations in accordance with EPA's Audit Policy. Like the Small Business Policy, EPA's Audit Policy also offers major incentives for eligible companies and other organizations of all sizes to discover, disclose and correct environmental violations.

These incentives can include the waiver of gravity-based (punitive) penalties brought for violations that are discovered through an environmental audit. If you would like more information on EPA's Small Business and Audit/Self-Disclosure Policies visit our web site at: <http://es.epa.gov/oeca/polguid/polguid1.html> or call EPA's Enforcement and Compliance Docket and Information Center at (202) 564-2614.