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1. Purpose / Scope

This procedure defines the mechanism for planning and implementing the EMMP audits and/or inspections at the Macaé Merchant Power Plant. This is intended to be an internal audit regarding EMMP administrative aspects.

2. Responsible Parties

- El Paso Brazilian Environmental Manager or his designee

3. Forms Used

- Preventive Action Request (PAR) – O-EF 019.A
- Corrective Action Request (CAR) – O-EF 019.B
- Operating Environmental Management Plan Audit Check-list – O-EF 017.A

4. References

- EMMP current edition
- Environmental Impact Study (EIA) of the Macaé Merchant Power Plant;
- ISO 14001:1996, Elements 4.5.1 and 4.5.4

5. Definitions

Auditee: individual or company audited.

Auditor: audit team member performing the audit.

Audit Criteria: policies, practices, procedures or other requirements against which the auditor compares objective evidence about the subject matter.

Finding: an existing condition supported by objective evidence.

EMMP: Environmental Management and Monitoring Plan

Non-compliance: the non-fulfillment of specified requirements.

EIS: Environmental Impact Statement

6. Procedure

The El Paso Brazilian Environmental Manager shall plan, schedule and implement internal environmental management and monitoring plan audits. Revisions to the audit schedule may be based on the findings of prior audits.

The audit frequency will be established on a priority basis, taking into account previous audit results and the relative importance of the area or department, and will not be less than once per year.


For each area or department within the facility, an audit team will be formed whose members are external to the area or department to be audited, or even external to the Macaé Merchant Power Plant. This independence will be documented by indicating on the audit report or other audit record the Department/Organization for which the auditors work.

At least one member of the team shall be competent in the environmental auditing process, through either training and/or experience.

All members of the audit team shall have an awareness and understanding of the environmental management and monitoring plan through formal and informal training.

The scope and criteria of the audit will be established for each area or department prior to each audit. Audit criteria are documented in the Operation EMMP Audit Checklist – O-EF 017.A.

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During the audit, the audit team will record information, such as: items checked, individuals interviewed, any concerns identified and any corrective or preventive actions completed during the audit. The audit team shall promptly notify the Environmental Coordinator or HSE Supervisor or designees of any possible regulatory non-compliance, as pertinent. Upon verification of non-compliance, the Environmental Coordinator or HSE Supervisor will notify the Plant Manager.

Upon completion of the internal audit, the audit team will review their findings with the auditee and the responsible accountable area or department representative. The team will then open a CAR for each finding of non-conformance using form O-EF 019.B, and/or open a PAR for each suggested preventive action to be taken using form O-EF 019.A

The Environmental Coordinator and the HSE Supervisor or designees will track the status of all outstanding CARs/PARs using the Internal Environmental Audit Summary Report – Form O-EF-017.B.

The Area or Department Supervisor is to identify the root cause of the non-compliance (where applicable); the preventive and corrective actions to be undertaken; and the dates by which these actions will be completed. This information will be documented on the original CAR/PAR and the CAR/PAR will be sent to the applicable Area or Department Manager. A copy of the CAR/PAR will also be forwarded to the Environmental Coordinator or HSE Supervisor or designees within the time frame established during the audit review meeting.

Upon completion of the preventive and corrective actions, the Plant Manager will acknowledge completion of these actions by signing the original CAR/PAR and returning it to the Environmental Coordinator or HSE Supervisor.

Preventive and corrective actions will be verified during the next internal audit or through specifically scheduled verification of actions prior to the next audit.

When full compliance is confirmed or preventive and corrective actions accepted, the audit team leader will sign the original CAR/PAR and return it to the Environmental Coordinator or HSE Supervisor for closure and filing. A copy shall be forwarded to the Brazilian Environmental Manager.

The Plant Manager or designee will summarize system audit results with the Brazilian Environmental Manager at least once a year.

7. General Rules

Records, including CARs/PARs, relating to potential or actual non-compliance issues, will be treated as confidential and will be kept separate from those relating to EMMP audits.

Potential non-compliance issues must receive prompt attention and timely corrective action.

All audit/inspection records shall be marked "Environmental Audit/Inspection Report: Privileged Document" and distributed to individuals with a need to know their contents in order to assess, respond to or remedy a potential or actual non-compliance.

8. Records

All audit records must be filed by the Environmental Coordinator and the HSE Supervisor.

9. Records of Revisions

Revision Date	Description	Sections Affected

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QUESTION	CURRENT STATUS	CURRENTLY MEETS	RESOURCES REQUIREMENTS	DOCUMENTATION / REFERENCE
1. General Policy				
Considering the current EMMP:				
Is the EMMP known by top management and key actors?				
Is the EMMP appropriate to the nature, scale, and environmental impacts of the site's activities, products, or services?				
Have the EMMP basic goals, objectives and standards been actually used by management?				
Has the EMMP been widely communicated throughout the organization (all facilities and organizational levels/functions)?				
2. Legal and Other Requirements				
Is there a process in place to identify legal and other requirements applicable to environmental aspects of the organization's activities, products and services?				
Is this process documented in a procedure?				
Do sites/facilities have access to the specific text or provisions of legal and other requirements?				

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QUESTION	CURRENT STATUS	CURRENTLY MEETS	RESOURCES REQUIREMENT	DOCUMENTATION / REFERENCE
3. Objectives and Targets				
Do the objectives and targets address the significant environmental aspects?				
Are the views of stakeholders considered in establishing objectives and targets?				
4. Environmental Management Aspects				
Does the EMMP address what the major activities associated with achieving the objectives and targets are?				
Are the designated responsibilities for these activities appropriate (for all functions and levels of the organization)?				
Does the EMMP address the means and time frame for implementing these activities in an appropriate manner?				
Is there a process to review changes in activities, products or services in order to implement the management of change procedure?				
Is the organization able to meet the existing objectives and targets in case additional significant environmental aspects are imminent?				
Is there a process for amending the program to ensure that it applies to new or modified activities, products, or services?				
Has management provided adequate resources (human, technological and financial) for the implementation and control of the EMMP?				

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QUESTION	CURRENT STATUS	CURRENTLY MEETS	RESOURCES REQUIREMENT	DOCUMENTATION / REFERENCE
5. Training, Awareness and Competence				
Have effective training programs been implemented, consistent with the needs of individual line and staff personnel?				
Is there an ongoing process in place to identify environmental training needs for all personnel whose work could create a significant environmental impact?				
Are employees with environmental-related activities competent with respect to those activities?				
6. Communications				
Is the process in place to ensure that there are internal (including top-down, bottom-up and lateral/cross function) communications related to performance expectations, responsibilities, problems, lessons learned, and is actual performance working satisfactorily?				
7. Outreach to Stakeholders				
Is the process in place working satisfactorily?				
8. EMMP Documentation				
Has the organization documented the core elements of EMMP (e.g., objectives, responsibilities, key monitoring programs, and management procedures)?				
Does their documentation describe how these elements relate to one another and reference other relevant supporting documents?				

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QUESTION	CURRENT STATUS	CURRENTLY MEETS	RESOURCES REQUIREMENT	DOCUMENTATION / REFERENCE
9. Document Control				
Are all documents associated with the EMMP, and required by the responsible parties, easily located?				
Are these documents periodically reviewed, revised as necessary, and approved for adequacy by authorized personnel?				
Are the documents legible and dated (with dates of revision) and maintained in an orderly fashion for appropriate, specified time periods?				
10. Emergency Preparedness and Response				
Are the procedures to identify, plan for, and respond to emergency situations, including preventing and mitigating associated environmental impacts, satisfactory?				
Are the procedures reviewed and revised on a periodic basis, including after actual emergencies?				
Are the emergency procedures periodically tested?				
11. Monitoring and Measurement				
Have the monitoring procedures been properly documented?				
Is monitoring equipment calibrated and maintained and are records maintained?				
12. Non-Compliance, Corrective/ Preventive Action				
Have corrective and preventive actions been taken to address non-compliances?				
Are these actions commensurate				

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Are these actions commensurate with the nature and scale of the non-compliances?				
13. Records				
Is the records management procedure properly documented?				
Are the records legible, identifiable and traceable to the activity, product or service involved?				
Are the records labeled, readily retrievable and protected against damage and deterioration?				
Are record retention times established and recorded?				
14. Management Review				
Is top management periodically provided with information adequate to review the EMMP to ensure its continuing suitability, adequacy and effectiveness?				
Do they review this information to assess the need for changes?				
Is the review documented?				

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