

	ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN					PROC. No.: O-EP 018
	DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	CONTINUOUS IMPROVEMENT	
COPY No. 001	PAGE 1 of 2	ENVIRONMENTAL COMPLIANCE AUDIT				REV. No. 001

1. Purpose

This procedure defines the mechanism for planning and implementing environmental regulatory compliance audit and/or inspections at the Macaé Merchant Power Plant. This is intended to serve an internal audit of environmental aspects and/or impacts.

2. Responsible Parties

- EL Paso Corporate
- El Paso Brazilian Environmental Manager
- Environmental Coordinator and HS Supervisor as pertinent
- The Plant Manager

3. Forms Used

- Internal Environmental Audit Summary Report, O-EF-018.A
- Operation Compliance Report – Air Emissions and Air Quality, O-EF-018.B
- Operation Compliance Report – Noise, O-EF 018.C
- Operation Compliance Report – Liquid Effluents and Water Quality, O-EF-18.D
- Operation Compliance Report – Solid Waste, O-EF 018.E
- Operation Compliance Report – Worker’s Safety, O-EF 018.F

4. References

- EMMP
- Preventive and Corrective Actions(PAR and CAR), O-EP 019
- 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 member(s) 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.

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

6. Procedure

The Environmental Coordinator and HS Supervisor are responsible for performing monthly environmental and health & safety compliance audits, using Operation Environmental Compliance Inspection Forms, O-EF 018.B through F, during the audits and record information, such as: items checked, individuals interviewed, any possible regulatory non-compliance issues. The Environmental Coordinator and HS Supervisor shall promptly notify the Plant Manager or designee of any possible regulatory non-compliance. Upon verification of non-compliance, the Plant Manager shall notify the El Paso Brazilian Environmental Manager.

The Environmental Coordinator or HS Supervisor review possible regulatory non-compliance issues with the Area or Department. The Environmental Coordinator and HS Supervisor also prepare a PAR/CAR identifying the issues, preventive and corrective actions required, and the individuals responsible for completing the actions. The Area or Department Manager and the Plant Manager or designee will be informed about the PAR/CAR in order to take the needed action.

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On completion of the preventive and corrective actions, the Area or Department Supervisor will acknowledge completion of these actions by signing the original CAR and returning it to the Environmental Coordinator or HS Supervisor as pertinent.

Revision Date	Description	Sections Affected

Regardless of the acknowledgement of completion by the Area or Department Supervisor, the Environmental Coordinator or HS Supervisor will also check the follow-up of the preventive and corrective actions in a timely manner.

Each calendar quarter, the Environmental Coordinator or HS Supervisor will present a summary of open CARs reporting regulatory non-compliance to the Plant Manager for review.

7. General Rules

Records, including CARs, 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 who need to know their contents in order to assess, respond to or remedy a potential or actual non-conformance.

8. Records

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

9. Records of Revisions

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ENVIRONMENTAL MANAGEMENT SYSTEM PLAN

DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	CONTINUOUS IMPROVEMENT
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**OPERATION ENVIRONMENTAL COMPLIANCE AUDIT
AIR EMISSIONS AND AIR QUALITY**

Element		Macaé Merchant Power Plant Inspection					Verification	
N#	Description	YES	NO	Accumulated Verifications	Corrective Measure	Date of Completion	Status	Date
1.	Regarding all the atmospheric emission sources, can the following be noticed: a) Smoke? b) Fugitive dust? c) Odor? d) Others (specify)?							
2.	If smoke is noticed, is it dark?							
3.	Do the emission results measured by the CEMS comply with legal emission standards?							
4.	Do the air quality results measured at the air quality station within the Macaé Merchant Power Plant comply with legal air quality standards?							
Environmental Coordinator or Designee: Date:							Inspector: Date:	

Remarks:

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Element		Macaé Merchant Power Plant Inspection					Verification	
N#	Description	YES	NO	Accumulated Verifications	Corrective Measure	Date of Completion	Status	Date
1.	Have any atypical situations been registered with regard to equipment noise levels at the plant?							
2.	Are fence line measurements in accordance with background and regulatory limits (each 6 months only)?							
3.	Have there been any complaints from the community?							
Environmental Coordinator or Designee: Date:							Inspector: Date:	

Remarks:

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ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN

**FORM No.
O-EF 018.D**

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**OPERATIONS COMPLIANCE REPORT
LIQUID EFFLUENTS AND WATER QUALITY**

REV. No.
001

Element		Macaé Merchant Power Plant Inspection					Verification	
N#	Description	YES	NO	Accumulated Verifications	Corrective Measure	Date of Completion	Status	Date
1.	Is there any indication of mixing potentially contaminated effluents with rainwater? If yes, indicate the location.							
2.	Is the sewage treatment system working properly?							
3.	Is the industrial wastewater treatment system properly maintained?							
4.	Do all the parameters measured at the discharge point of the wastewater treatment system comply with legal standards?							
5.	Is there any visible leakage in the pipeline entering or exiting the wastewater treatment system?							
6.	Is any anomaly such as odor, color, foam, etc., observed at the discharge point of the wastewater treatment system?							
7.	Are all three oil-water separators working properly?							
8.	Are all three oil-water separators properly maintained?							
9.	Is there any visible leakage in the pipeline entering or exiting each of the three oil-water separators?							
10.	Is any anomaly, such as odor, color, foam, etc., observed at the discharge point of the effluents coming from the three oil-water separators into the final disposal pit?							

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ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN

**FORM No.
O-EF 018.D**

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**OPERATIONS COMPLIANCE REPORT
LIQUID EFFLUENTS AND WATER QUALITY**

REV. No.
001

Element		Macaé Merchant Power Plant Inspection					Verification	
N#	Description	YES	NO	Accumulated Verifications	Corrective Measure	Date of Completion	Status	Date
11.	Is there any visible leakage in the pipeline entering or exiting the wastewater final disposal pit?							
12.	Do all the parameters measured at the discharge point of the wastewater final accumulation pit comply with legal standards?							
13.	Is any anomaly, such as odor, color, foam, etc., observed in the discharge of the effluents by the Macaé Merchant Power Plant into the Macaé River?							
14.	Do all the parameters measured of the discharge of effluents from the Macaé Merchant Power Plant into the Macaé River comply with legal standards?							
Environmental Coordinator or designee: Date:							Inspector: Date:	

Remarks:

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ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN

**FORM No.
C-EF 018.E**

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**OPERATION ENVIRONMENTAL COMPLIANCE AUDIT
SOLID WASTES**

REV. No.
001

Element		Macaé Merchant Power Plant Inspection					Verification	
N#	Description	YES	NO	Accumulated Verifications	Corrective Measure	Date of Completion	Status	Date
1.	Are the waste containers covered?							
2.	Are the waste containers in good condition?							
3.	Are the waste containers properly labeled?							
4.	Is the type of waste accumulated compatible with its container?							
5.	Do all containers remain closed, except during filling/emptying?							
6.	Do the containers have water inside?							
7.	Is the plant clean?							
8.	Do all employees know how to separate wastes?							
9.	Is the waste separation system being followed?							
10.	Except for oily wastes, are hazardous wastes found only at accumulation areas?							
11.	Is there any evidence of spills and/or leakages at the area?							
12.	Is there any noticeable odor?							
13.	Are hazardous materials handled only by authorized, trained personnel?							
14.	Is there an emergency communication procedure, visible and in good condition, posted at the waste accumulation area?							

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ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN

**FORM No.
C-EF 018.E**

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**OPERATION ENVIRONMENTAL COMPLIANCE AUDIT
SOLID WASTES**

REV. No.
001

Element		Macaé Merchant Power Plant Inspection					Verification	
N#	Description	YES	NO	Accumulated Verifications	Corrective Measure	Date of Completion	Status	Date
15.	Do all employees know how to respond in case of an emergency at the waste accumulation area?							
16.	Are there spill kits at the waste accumulation area?							
17.	Are there fire extinguishers at the waste accumulation and storage area?							
18.	Are the PPEs required for access to the waste accumulation area identified and used?							
Environmental Coordinator or designee: Date:							Inspector: Date:	

Remarks:

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ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN

**FORM No.
C-EF 018.F**

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**OPERATION ENVIRONMENTAL COMPLIANCE AUDIT
WORKER SAFETY**

REV. No.
001

Element		Macaé Merchant Power Plant Inspection					Verification	
N#	Description	YES	NO	Accumulated Verifications	Corrective Measure	Date of Completion	Status	Date
1.	Are all new workers trained before starting work at the plant?							
2.	Do all workers know the escape routes and their meeting point in case of an emergency?							
3.	Is an emergency communication chart, visible and in good condition, posted onsite?							
4.	Do all employees know how to respond in case of an emergency?							
HSE Supervisor or designee: Date:							Inspector: Date:	

Remarks:

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