

# *Ministry of Environment – Compliance Audit Program*

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**Saskatchewan!** 

# Safety Share

- Safety at home:
  - Shoveling snow – proper lifting
  - Sharp objects – on counters, in dishwasher
  - Slippery surfaces / ice / sand buildup
  - Improper footwear / slippery soles
  - Poor lighting
  - Stuff left on stairs
  - Heavy backpacks slung on one shoulder
- My challenge to you:
  - when you get home, do a home safety check AND commit to fix what you find !

# Agenda

- Background
- Process
- Results
- Q and A

# Background

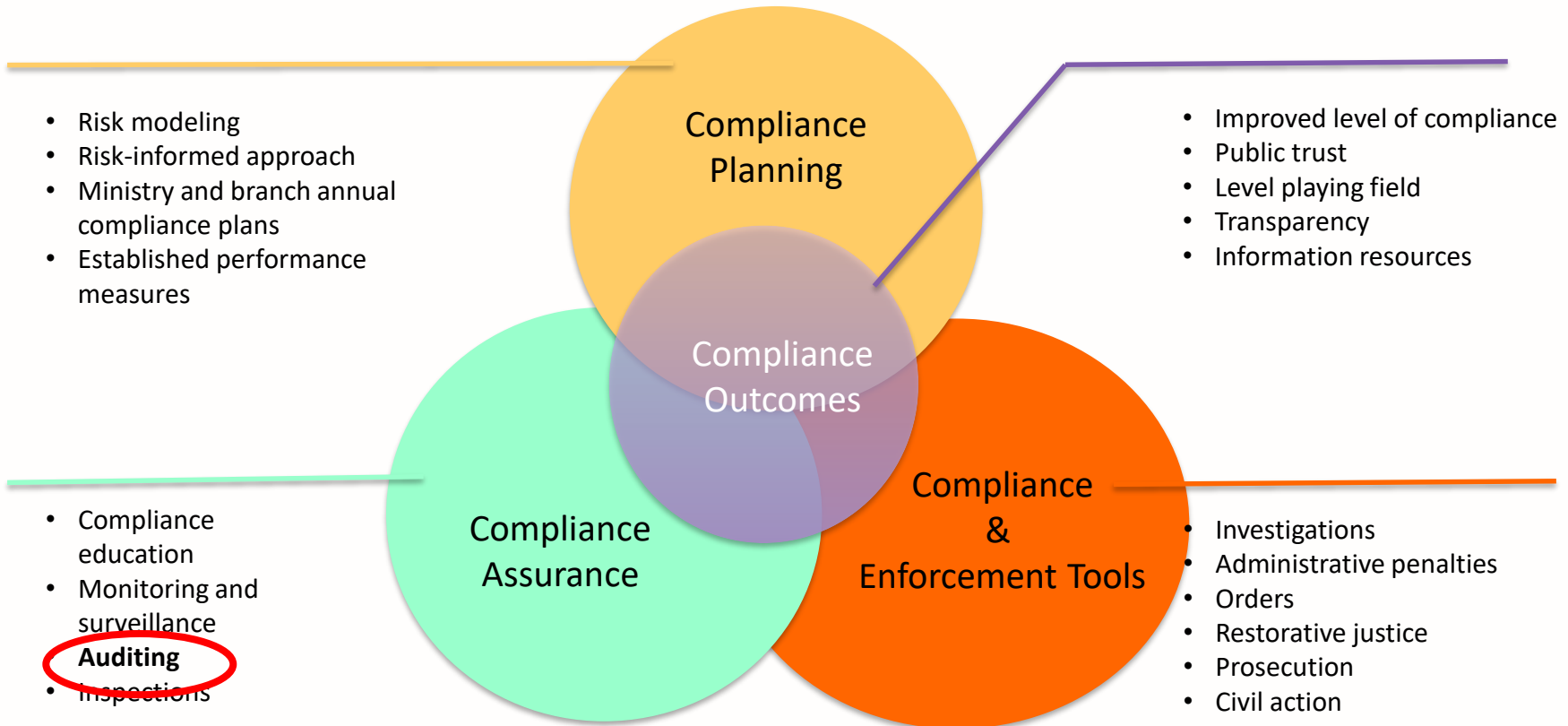
# History

- Ministry Compliance Plan developed in conjunction with the RBR model
  - Modernized legislation
  - Environmental Code
  - Compliance audit model
  - Organizational changes
  - Advancement of information and management technology

# Compliance Assurance

- *If we are allowing more interaction with the environment with less formal scrutiny, how do we ensure compliance?*
  - Compliance education
  - Monitoring and surveillance
  - **Auditing**
  - Inspections

# Compliance Framework



# Why Conduct Compliance Audits ?

- The ministry's compliance audit program addresses *Section 78 of The Environmental Management and Protection Act, 2010*, the Act which replaced *EMPA, 2002* on June 1, 2015.



# What is a Compliance Audit ?

- An audit is a systematic, independent and documented process for obtaining evidence and evaluating it objectively to determine the extent to which selected criteria are fulfilled.
- A ministry compliance audit focuses on environmental regulatory compliance.
- ENV uses compliance audits as one of its regulatory tools to assess the extent to which an Auditee is complying with its legal requirements.

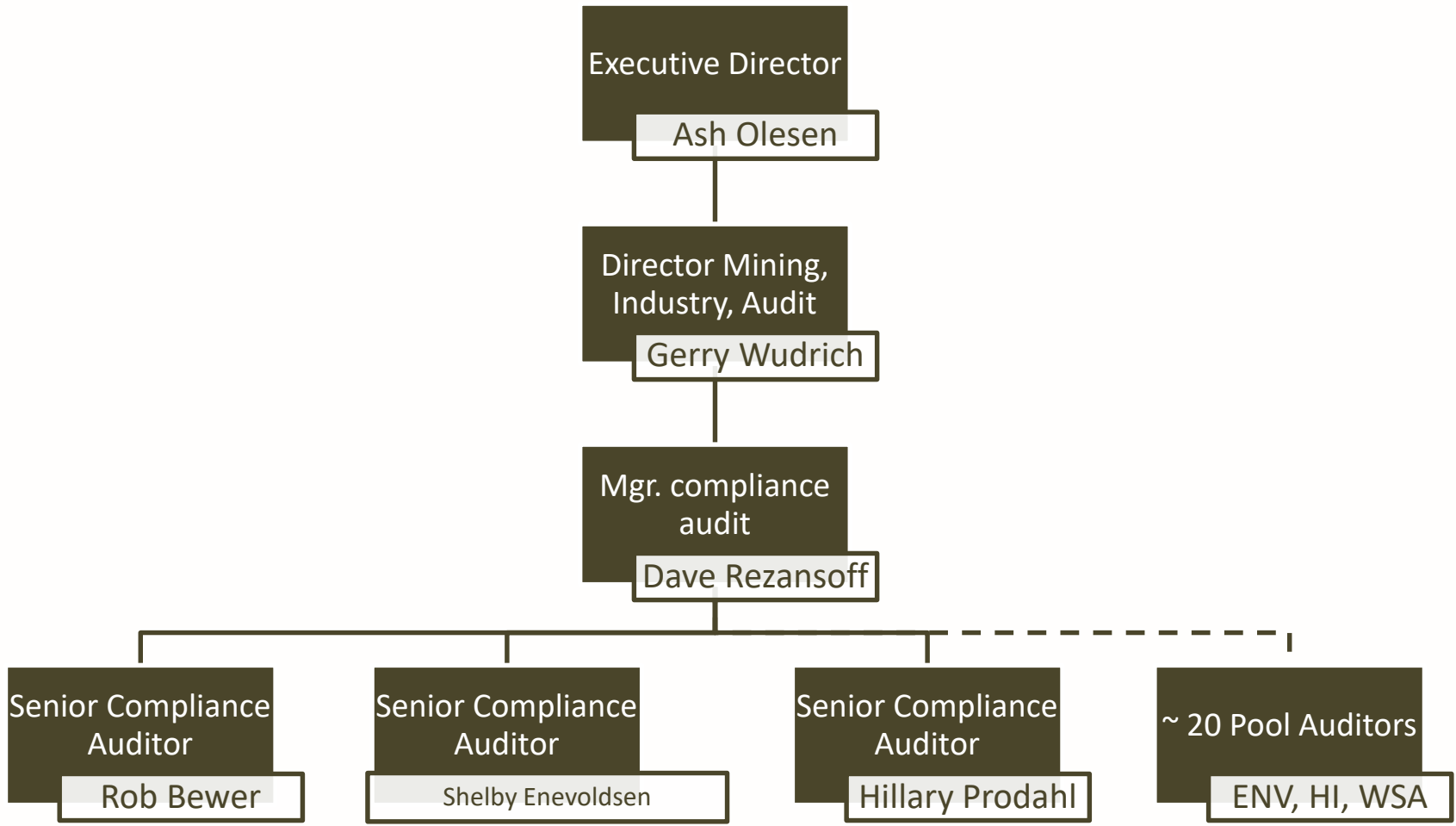
# Program Mandate

- *...to provide independent, objective assurance services to the public of Saskatchewan, ensuring compliance with environmental laws and regulations within the regulated community to protect our environment.*

# Scope

- ENV Compliance Audit can be conducted on anyone who:
  - has been issued a permit, approval or authorization pursuant to any Act or regulation administered by ENV;
  - Engages in an activity governed by an environmental protection plan (EPP); or
  - Is required to comply with the Saskatchewan Environmental Code as enabled by any Act administered by the ENV.
- Limitations:
  - Federal Lands
  - Other provinces

# EPB Compliance Audit Section

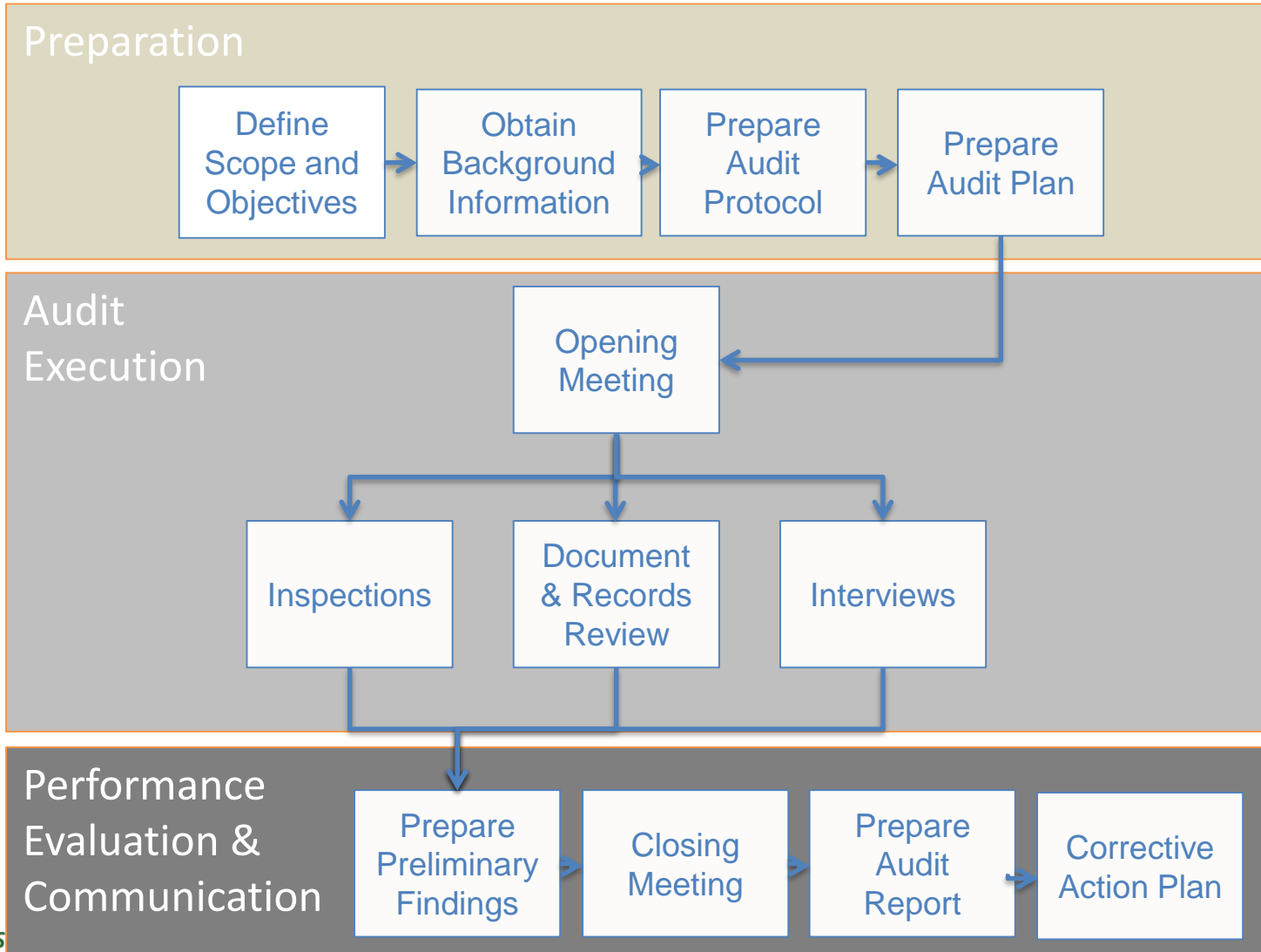


# Compliance Audit Section Services

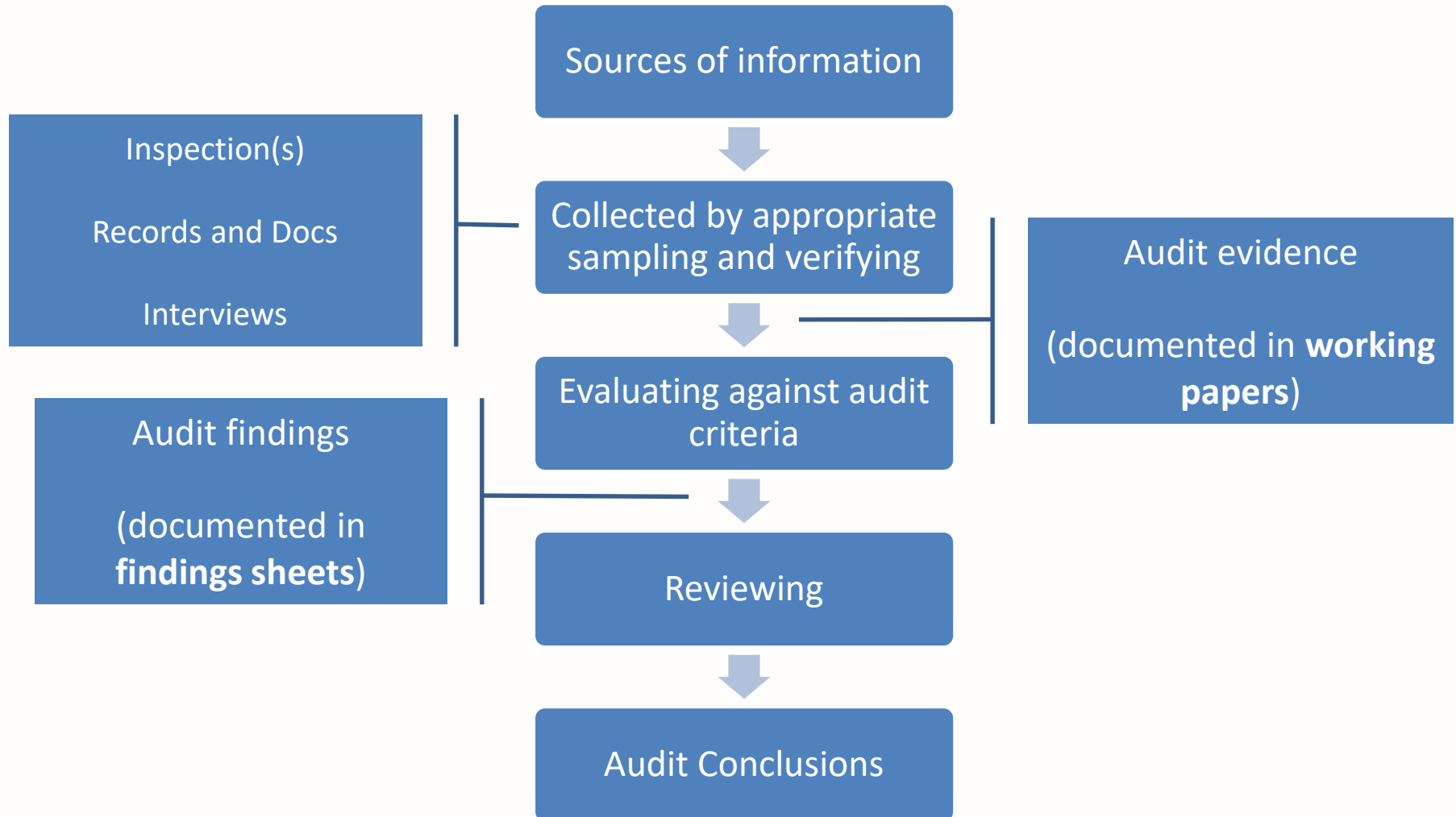
- Compliance auditing
- Training
- Performance monitoring and reporting
- Communication
- Compliance assessment

# Process

# Audit Process



# Collecting Information to Reach Audit Conclusions





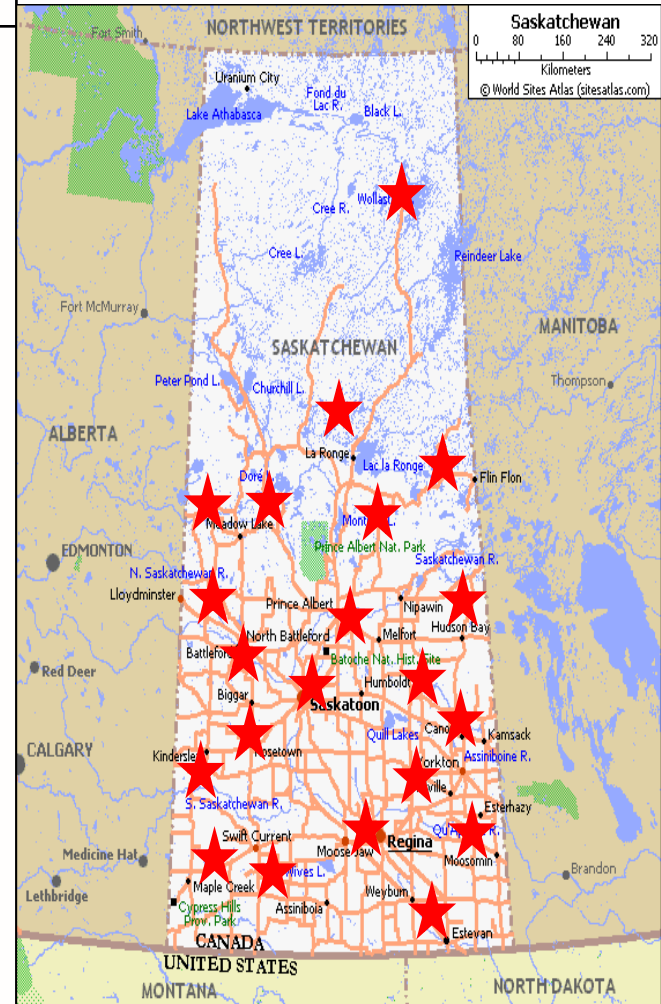
# Typical Finding

<b>Finding #</b>	<b>Protocol Reference</b>	<b>Finding</b>	<b>Condition Expected</b>	<b>Criteria Reference</b>	<b><u>Finding Type</u></b>
MW-01	ABC-2017-01	There are two 5000 L aboveground storage tanks (#s 6001, 6002) that contain gasoline on site, that are not registered with the ministry.	Storage tanks that contain hazardous substances with a capacity of over 4000 L shall be registered with the ministry.	HSWDGR, 9(1)	I

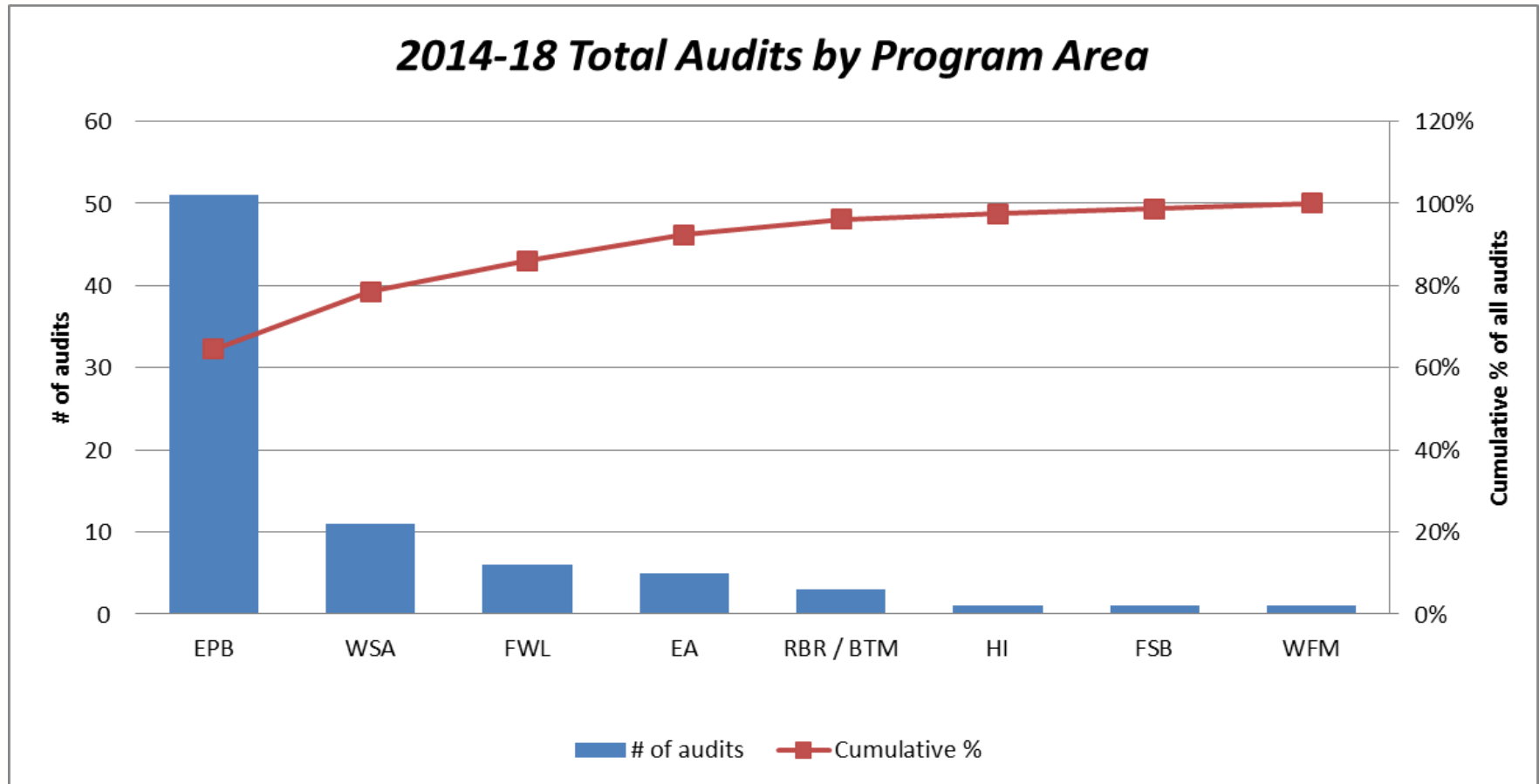
# Results

# Audit Types, Topics and Locations

Field Audits	Desk Audits
<ul style="list-style-type: none"> <li>- Mine sites (oil, potash, coal, uranium, zinc, copper, gold, silver)</li> <li>- Pulp and paper mills</li> <li>- Canola crushing facilities</li> <li>- Steel manufacturing</li> <li>- Salt manufacturing</li> <li>- Farm equipment manufacturing</li> <li>- Forestry operations</li> <li>- Landfills, transfer stations and regional waste management authorities</li> <li>- Industrial landfills</li> <li>- Ethanol facilities</li> <li>- Heavy oil upgraders</li> <li>- Fish farms</li> <li>- Water and wastewater treatment facilities</li> <li>- Aggregate sites</li> <li>- HSWDG facilities</li> <li>- Oil recycling programs</li> <li>- Water / sewage main construction</li> <li>- Chemical manufacturing facilities</li> </ul>	<ul style="list-style-type: none"> <li>- Hydrostatic testing</li> <li>- Sensitive species detection</li> <li>- Hydrostatic testing</li> <li>- Qualified persons submissions</li> <li>- Corrective Action Plan (CAP) accepted solutions submissions</li> <li>- Impacted sites submissions</li> <li>- Discharge and discovery reporting</li> <li>- Contaminated soil disposal at approved locations</li> <li>- Stack emissions testing</li> </ul>



# *...by the numbers...*



# Common Finding Themes

- Permittee awareness of permit / approval conditions, legislation including Code requirements
- HSWDG facility construction / storage / alteration / closure
- Appropriate selection of accepted / alternative solutions
- Waste water pond level management
- Tailings slope stability monitoring and management
- Discharge and discovery reporting
- Halocarbon control
- Emergency preparedness and response plans

# *... it looked OK from the other side...*

- Secondary containment filled with drums and pallets (for many weeks)
  - Unapproved for this method of storage
  - Free storage capacity unavailable in the event of tank overflow / failure



# Program Measures and Trends

- Key program performance measures:
  - % of audits completed vs. approved plan
  - % of corrective actions closed from 2 years ago, and 1 year ago
- Compliance Audit is continuing to improve performance:
  - Focused audit scopes and objectives
  - Diving deeper vs. being “a mile wide and an inch deep”
  - Continuing to audit fewer protocol items resulting in higher noncompliance rates

# Q and A



# Contact Information

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