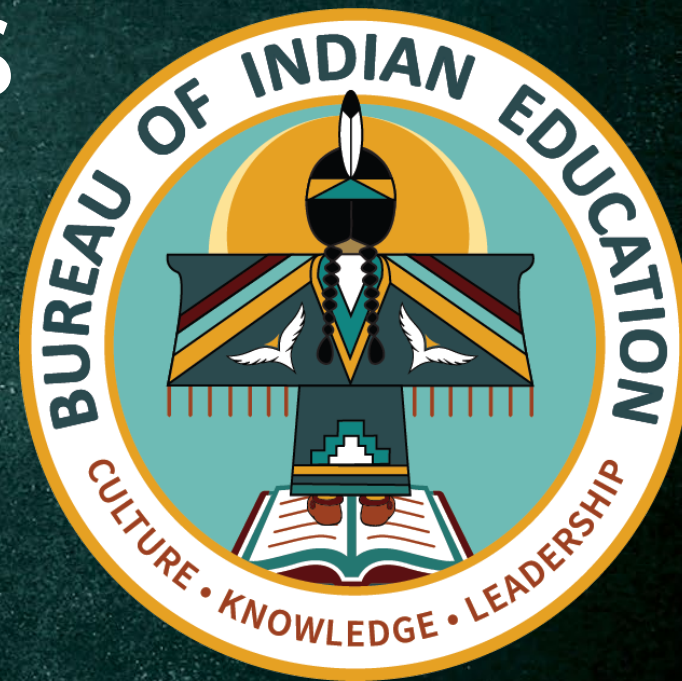




U.S. Department of the Interior
Bureau of Indian Education

.....

ENVIRONMENTAL MANAGEMENT ASSESSMENT PERFORMANCE AUDIT AWARENESS





OBJECTIVE

To provide an understanding of what to expect during an EMAP audit and what BIE's expectations of their facilities are before, during, and after an EMAP audit.

MEETING TIPS FOR ONLINE TRAINING

- ❖ 1). Place yourself on “Mute” to prevent background noise.
- ❖ 2). Use the “Chat with all” feature to ask questions.
 - ❖ Note: All participants will be able to see your comments or questions.
- ❖ 3). Every participant will receive a certificate of completion.





INSTRUCTOR INTRODUCTION

EMAP AUDIT TEAM

David Gilbert
Vice President
Lead Auditor

Andrea Elenz
Project Manager
Auditor



WHITETAIL
ENVIRONMENTAL, LLC

Ivory Bibbs
Auditor

Jason Vanzant
Auditor

Traci Warholic
Auditor

Austin Caughey
Auditor

Tom Smith
Auditor

BIE BRANCH OF ENVIRONMENTAL MANAGEMENT (BIE BEM) WHO WE ARE...

Albuquerque Office

John Clymo, Program Manager, Supervisory Environmental Protection Specialist

Candace DeSantis, Lead Environmental Protection Specialist

Karlisa Benally, Environmental Protection Specialist

Priscilla Avila, Environmental Protection Specialist

Henryetta Price, Environmental Protection Specialist

Rochelle Mariano, Program Support Assistant

Bloomington Office

Russell Brigham, Environmental Protection Specialist

Doug Yocum, Environmental Protection Specialist

Gallup Office

Karmen Billey- Badonie, Environmental Protection Specialist



AGENDA

- ❖ Overview and History
- ❖ Purpose and Scope
- ❖ EMAP Audit Process
- ❖ Audit Preparation and Tips



REQUIREMENTS

- ❖ Indian Affairs Manual, Part 59, Chapter 2, requires periodic environmental compliance assessment of operations and activities at Indian Affairs owned facilities and operations.
- ❖ Contract requires EMAP Auditors to be qualified independent auditors (Part 59 Indian Affairs Manual Chapter 2, 1.6.E; and 515 Departmental Manual Chapter 2, Environmental Auditing, 2.6.C).
- ❖ In the Grant Assurances, Public Law 100-297, Tribes give permission to BIE to enter school premises for audits. Tribes agree to fully cooperate with auditors and conduct corrective and/or preventive actions to remedy any audit findings.



OVERVIEW



Environmental

- Air, Water, Land, Waste



Management

- Environmental roles



Assessment

- Review and support



Performance

- Continual Improvement



HISTORY OF EMAP PROGRAM

- ❖ EMAP audits previously administered by BIA
- ❖ 2011 Compliance Agreement and Final Order with U.S. Environmental Protection Agency
 - ❖ Regulator non-compliance at BIE funded schools
- ❖ Transition of Environmental Program oversight from BIA to BIE started in October 2022





PURPOSE OF THE EMAP AUDIT

- ❖ Monitor and verify compliance with federal, state, local, and tribal environmental regulations, where applicable
- ❖ Provide site-specific technical assistance
 - ❖ Promote improved environmental performance at BIE facilities
 - ❖ Educate and promote awareness of environmental compliance and pollution prevention, and sustainability
- ❖ Enhance implementation of BIE's Environmental Management Systems (EMS)

EMAP AUDITS

- ❖ This is BIE's first year to conduct EMAP audits after the transition of environmental program oversight from BIA to BIE
 - ❖ Establishing a new baseline under BIE's EMAP Program
- ❖ The initial EMAP audit of a BIE facility is called a baseline EMAP audit
- ❖ It encompasses a review period of 3 years leading up to the date of the audit
 - ❖ (i.e., a baseline audit scheduled for June 12, 2024, would review documents from June 12, 2021 to June 12, 2024)
- ❖ Baseline audits of all BIE schools will occur from FY24 through FY26
- ❖ After the baseline audit, an EMAP audit occurs at each facility every 3 years
- ❖ EMAP auditor must be independent from the facility being audited

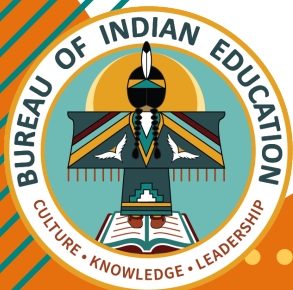
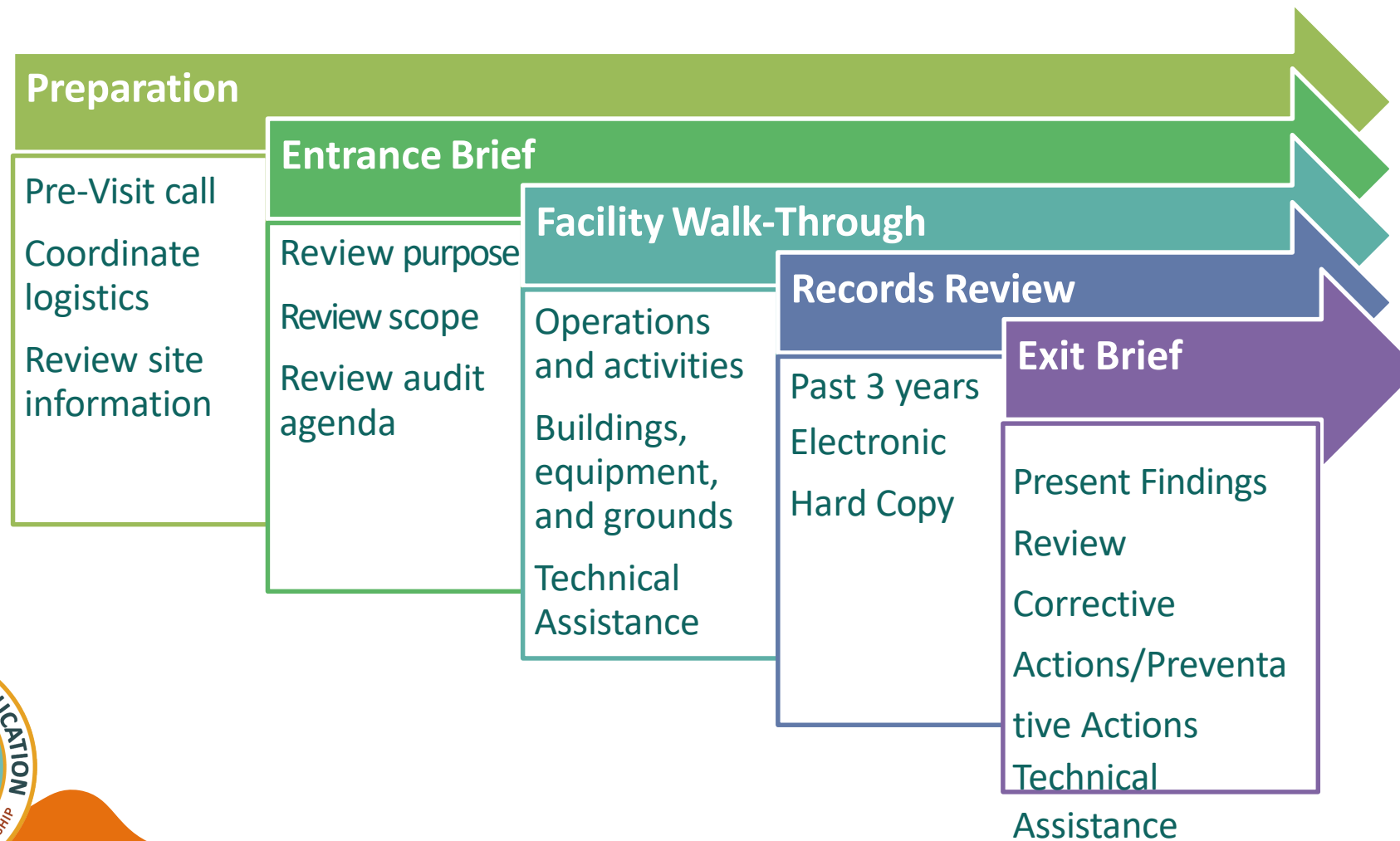


SCOPE

- ❖ **Who:** BIE owned and/or operated facilities
 - ❖ Excluded: Tribally-owned and -operated and residential
- ❖ **What:** Environmental regulations identified in the US TEAM Guide and other local and tribal regulations



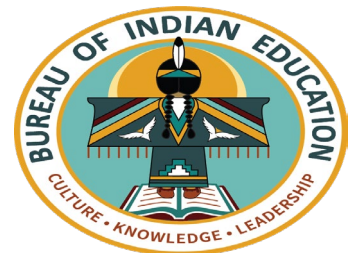
EMAP AUDIT PROCESS OVERVIEW



EMAP PRE-VISIT ACTIVITIES

- ❖ The Auditor will provide prior notification of your school's EMAP audit via Teams meeting invite according to the schedule below:
 - ❖ Bureau Operated Schools – “14 calendar days”
 - ❖ Navajo Bureau Operated Schools – “14 calendar days”
 - ❖ Tribally Controlled Schools – “30 calendar days”
 - ❖ Navajo Controlled Schools – “30 calendar days”
 - ❖ Secondary Institutions – “14 calendar days”

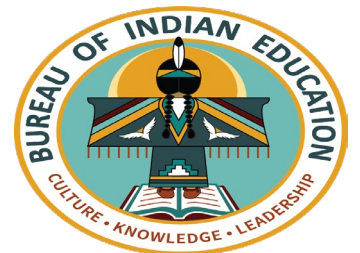
- ❖ The meeting invite will be sent to your school's Senior Line Official, e.g., Principal and/or Superintendent, your school's Education Program Administrator, and other school representatives



EMAP PRE-VISIT ACTIVITIES

❖ Pre-Visit Teams Meeting Objectives:

- ❖ Confirm audit date
- ❖ Develop site specific audit plan (identify scope and audit areas such as air emissions, hazardous materials, POL, etc.)
- ❖ Arrange audit logistics
- ❖ Explain audit purpose and process
- ❖ Identify key participants for school

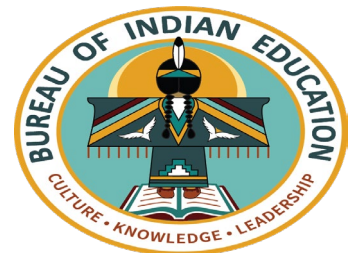




EMAP PREPARATION TIPS

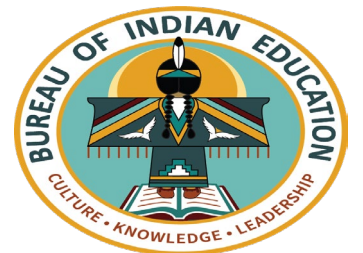
PREPARATION TIPS - COMMUNICATE

- ❖ Communicate with the auditor before the audit
- ❖ Communicate with all staff involved in audit
- ❖ Ensure availability of staff for audit
- ❖ Discuss process and ask questions



PREPARATION TIPS - PREPARE RECORDS

- ❖ Obtain, locate, and update records
 - Hard copy files
 - Files from others (i.e., Facility Management or Region)
- ❖ The Auditor will help you identify which records to prepare during the Pre-Visit meeting



PREPARATION TIPS - COMMON RECORDS

Air

- U.S. EPA boiler notifications
- Refrigerant servicing
- Engine certifications
- Generator maintenance

Asbestos

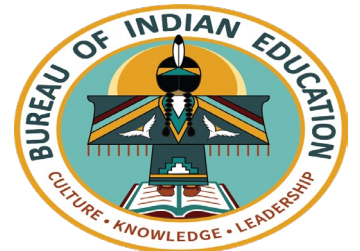
- Asbestos Management Plan
- 3-yr re-inspection
- Notifications
- 6-month surveillances
- Training
- Abatement info

Drinking Water

- Monitoring schedule
- Sampling Results
- Consumer Confidence Reports
- Sanitary Surveys & corrective actions
- Operator certifications

Emergency Planning

- Tier II reports
- Chemical inventories
- Safety Data Sheets



PREPARATION TIPS - COMMON RECORDS

Oil/SPCC

- SPCC Plan
- Training
- Inspections

Pesticides

- Applicator certifications
- Manifests

Waste

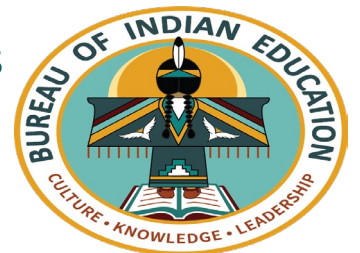
- Manifests
- Procedures
- Waste Characterizations

Wastewater

- Permit
- Operation and maintenance plan
- Inspections
- Operator certifications

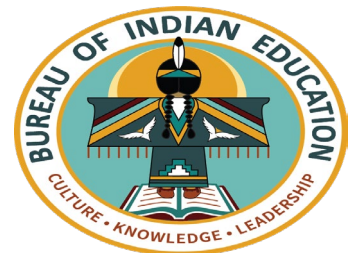
Inspections

- U.S. EPA or other regulatory agency inspections
- Sanitary survey and corrective actions



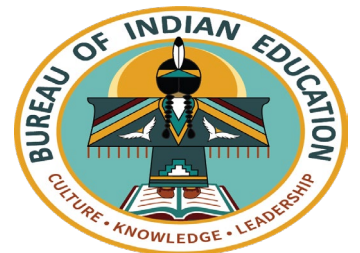
PREPARATION TIPS - UNDERSTAND ROLES & RESPONSIBILITIES

- ❖ Who is your Facility Manager?
- ❖ Who is responsible for facility maintenance?
 - ❖ Tribe vs BIE
- ❖ Who has access to MAXIMO?
- ❖ Who orders your chemicals, products, etc.?
- ❖ Who will correct EMAP findings?



EMAP AUDIT TIPS RECAP

- ❖ Communicate with your auditor and staff
- ❖ Prepare records
- ❖ Document environmental roles & responsibilities
- ❖ Review audit reports
- ❖ Review compliance requirements



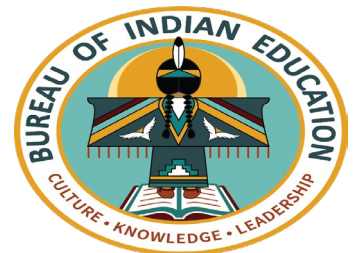
EMAP SITE VISIT

1. Entrance Brief

- ❖ Audit purpose, scope, and schedule
- ❖ Senior Line Official, e.g., Principal or Senior School Representative as well as key management and operation staff should attend

2. Records and Document Review

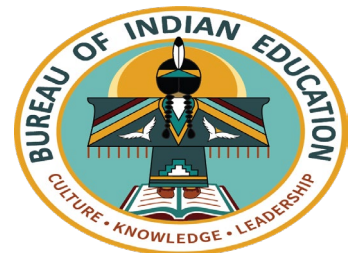
- ❖ Review key environmental documents and records (SOPs, Training records, Inventories, Permits, etc.



EMAP SITE VISIT Cont.

3. Facility Walkthrough

- ❖ Interview managers and staff
- ❖ Observe key operations
- ❖ Document findings
- ❖ Provide technical assistance



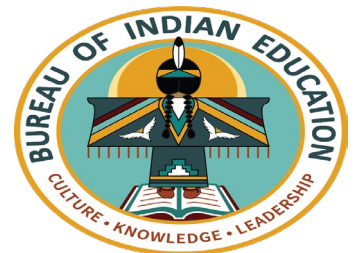
EMAP SITE VISIT

4. EMAP Report Preparation

- ❖ Develop findings and recommendations

5. Exit Brief

- ❖ Present audit finding to school management
- ❖ Review the corrective action process
- ❖ Senior Line Official, e.g., Principal or Senior School Representative as well as key management and operation staff should attend



EMAP FACILITY WALKTHROUGH

The site tour covers:

- ❖ Maintenance shops
- ❖ Storage areas
- ❖ Treatment facilities
- ❖ Treatment units
- ❖ Containment areas
- ❖ Waste areas
- ❖ Processing areas
- ❖ Construction sites
- ❖ Tanks (both above ground and underground)
- ❖ Spray booths
- ❖ Incinerators, boilers
- ❖ Disposal sites
- ❖ Staging sites
- ❖ Operations or operational areas that may impact the environment and/or are subject to environmental permits












When a building or specific area is not accessible, the facility should explain why these areas cannot be toured, and the Auditor should note the building number or other reference specific to this site to be reported in the EMAP Report.

AUDIT AREAS

- ❖ Air Emissions
- ❖ Hazardous Materials
- ❖ Hazardous Waste
- ❖ Pesticides
- ❖ Petroleum, Oil and Lubricant Management (POL)
- ❖ Solid Waste
- ❖ Storage Tanks
- ❖ Toxic Substances
- ❖ Wastewater
- ❖ Water Quality
- ❖ Other (as applicable)
 - ❖ Pollution Prevention

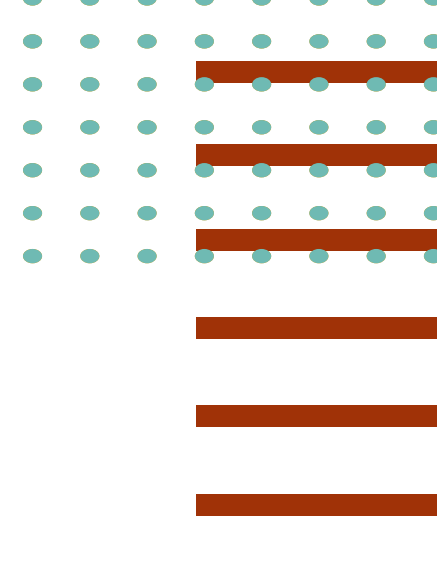
Note: Select sustainability initiatives, NEPA, CERCLA, Cultural and Natural Resources will be audited at the Bureau programmatic level as part of EMS Conformance Audits.

AUDIT AREAS

Image	Area	Findings
	Air Emissions	0 Negative Findings
	Hazardous Materials	1 Negative Findings
	Hazardous Waste	1 Negative Findings
	Other	0 Negative Findings
	Pesticides	0 Negative Findings
	Petroleum, Oil, and Lubricants (POL)	2 Negative Findings
	Solid Waste	0 Negative Findings
	Storage Tanks	0 Negative Findings
	Toxic Substances	1 Negative Findings
	Wastewater	0 Negative Findings
	Water Quality	0 Negative Findings

FINDING PRIORITY RANKINGS

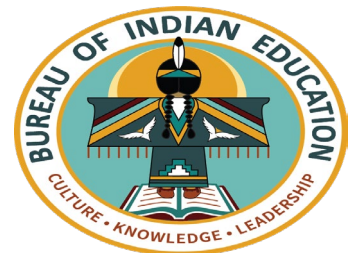
Finding Priority Rankings are related to liability and risk. The rankings assist in deciding which findings should be addressed first, and which should receive funding priorities for Corrective Actions. Audit finding priorities may also be used to track progress in completing Corrective Actions (e.g., high priority findings should not be ignored at the expense of addressing low priority findings.)



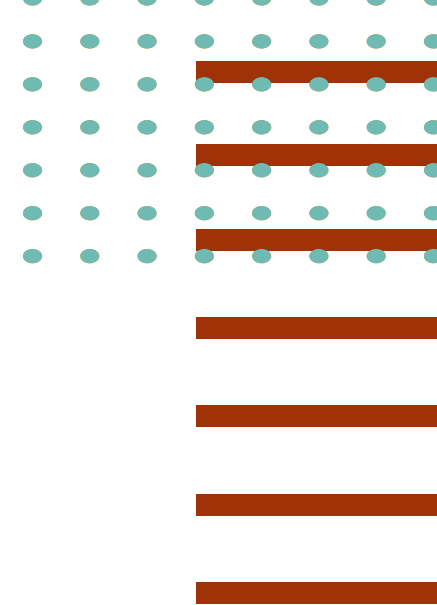
Priority Ranking	Description
High-severity (Priority 1)	High likelihood of immediate threat to the safety of human health and/or the environment or cessation of the facility's operations and could result in an enforcement action. These findings require immediate attention
Medium-severity (Priority 2)	Possible threat to human health, safety and/or the environment and could result in an enforcement action. These findings require action, but not necessarily immediate attention.
Low-severity (Priority 3)	Administrative in nature, even though it could result in temporary or occasional instances of noncompliance.
Positive	Occurrences which are above and beyond compliance, and/or recognize a process, tool, or methodology which may be used by others to improve compliance and/or strengthen environmental performance

EMAP AUDIT FINDINGS

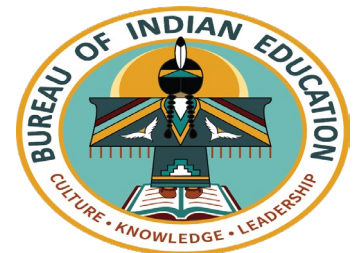
- ❖ The audit findings are specific to “federal, state, local and tribal” regulatory requirements implementing environmental statutes
- ❖ Each audit finding has an associated regulatory citation, finding type, a priority ranking, a root cause, status (open, in-progress, closed), finding description (with photos if applicable)



EMAP AUDIT FINDINGS Cont.



- ❖ Recommended corrective action and technical support
- ❖ Corrected on site deficiencies will be documented as a corrected deficiency and will be closed



EMAP AUDIT FINDINGS

Finding: Containers of hazardous chemicals in the workplace are required to be labeled, tagged, or marked with specific information.

Finding Type: New	Priority: Priority 2 - Medium-severity	Root Cause: Lack of Training
Reference Type: Federal	Reference #: HM.1.3.US	Reference Code: (29 CFR 1910.1200(b)(3)(i), 1910.1200(b)(4)(i), 1910.1200(b)(5), 1910.1200(b)(6), and 1910.1200(f)(6) through 1910.1200(f)(10))
Status: Open	Technical Assistance Provided: No	Location of Concern: No
Auditor Description/Location/Building: Numerous secondary containers located throughout the school were not properly labeled.		
Recommended Corrective Action: All secondary containers of hazardous materials/substances must be labeled with the product name and it's physical and health hazards.		
Photos		



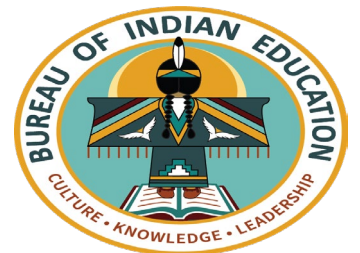
Unlabeled container



Unlabeled container.

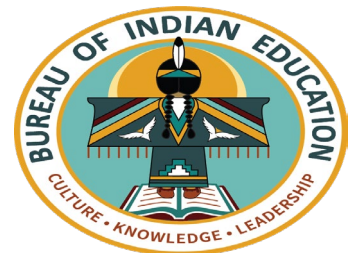
EMAP REPORT

- ❖ The EMAP Report provides the Senior Line Official with information regarding the environmental compliance status of program operations under his/her management














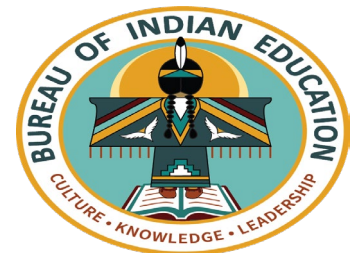
EMAP REPORT

- ❖ The audit report will include:
 - ❖ An overall EMAP score (red, yellow, green)
 - ❖ Individual program area scores (red, yellow, green)
 - ❖ Audit findings with priority rankings (including positive findings)
 - ❖ Regulated asset inventory with map (Storage tanks, propane tank, wastewater lagoon, etc.)
 - ❖ “Location(s) of concern”






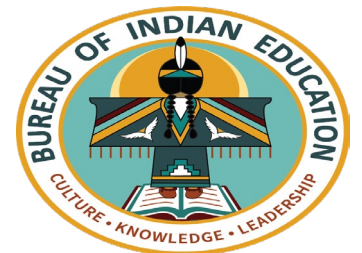
EMAP REPORT - ENVIRONMENTAL AREA SCORES

Image	Area	Findings
	Air Emissions	0 Negative Findings
	Hazardous Materials	1 Negative Findings
	Hazardous Waste	1 Negative Findings
	Other	0 Negative Findings
	Pesticides	0 Negative Findings
	Petroleum, Oil, and Lubricants (POL)	2 Negative Findings
	Solid Waste	0 Negative Findings
	Storage Tanks	0 Negative Findings
	Toxic Substances	1 Negative Findings
	Wastewater	0 Negative Findings
	Water Quality	0 Negative Findings



EMAP REPORT - ASSET INVENTORY

Asset Type	Building	Comments	Lat/Long	Image
Emergency Generators	Behind elementary school cafeteria	350-gallon diesel	Lat: 35.51174881 Long:-83.29697634	
Emergency Generators	Behind football arena	185-gallon diesel	Lat: 35.51406066 Long:-83.29571022	
Emergency Generators	Behind Central Office	36-gallon diesel	Lat: 35.51558035 Long:-83.29595595	



AFTER THE AUDIT

Exit Briefing

Review findings

Corrective
Actions/P
reventativ
e Actions

Technical Assistance

Correct findings

Provide training

Address root
cause

Follow-Up Visit

60 to 90 days
later

Review findings

Technical
assistance



TECHNICAL ASSISTANCE TIPS

- ❖ Take advantage of auditor's expertise
- ❖ Ask questions
- ❖ Develop/customize standard operating procedures
- ❖ Prioritize assistance – address P1 and P2 first
- ❖ Engage all staff and senior management



EXIT BRIEF



- ❖ Purpose is to review audit process and scope, audit findings, and corrective action process.
- ❖ Attendance by School's Senior Line Official (Superintendent, Principal) is a priority.
- ❖ Audit findings presented by topic and accompanied by photos.
- ❖ Last face-to-face contact during initial audit between Auditor and Senior Line Official; any open issues are resolved.

EXIT BRIEF CONTINUED



- ❖ Presence of others (e.g., BIE Branch of Facility Management representative) is recommended to maximize educational opportunities and awareness of corrective action process.
- ❖ If Senior Line Official is not available for on-site Exit Briefing, briefing can be conducted virtually within one week of completing the Audit.
- ❖ DRAFT Audit Report may be provided to school staff.

EXIT BRIEF TIPS

- ❖ Understand the findings
- ❖ Listen carefully and ask questions
- ❖ Discuss and prioritize corrective actions
- ❖ Assign and document tasks and responsibilities
- ❖ Identify resources needed
- ❖ Develop corrective action plan



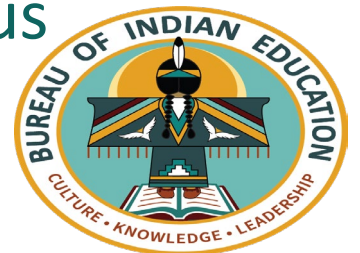


POST-AUDIT ACTIVITIES

- ❖ Audit report finalized and delivered to school and BIE 15 days after site visit
- ❖ **Follow-up visits** required for schools with Priority 2 or higher ranked findings
- ❖ Follow-up visits occur 60 to 90 days from date of the initial audit
- ❖ Auditor determines status of corrective actions, provides technical assistance for implementing corrective action
- ❖ The auditor will track your school's audit documents using the BIE EMAP Audit Tool and corrective action tracker. This tool audit helps automate the audit process. The tool will maintain all timelines and prompt the auditor to initiate follow-up audits and close corrective actions.

BIE BRANCH OF ENVIRONMENTAL MANAGEMENT POST-AUDIT ACTIONS

- ❖ Identify non-compliance trends across BIE
- ❖ Provide targeted guidance and training to address specific school needs
- ❖ Identify and advocate for funding or other resources to support school-level environmental compliance
- ❖ Support annual reporting of bureau-level compliance status





QUESTIONS?



BIE BEM PROGRAM CONTACTS



Harold John Clymo

Program Manager, Supervisory Environmental
Protection Specialist

Albuquerque Office

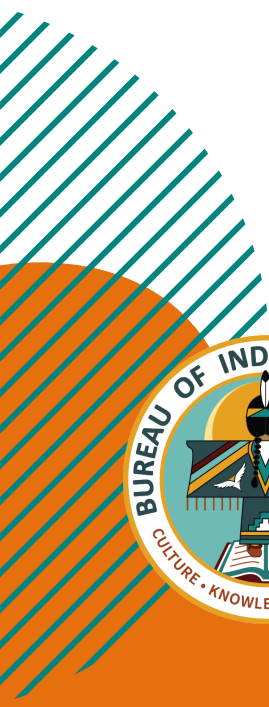
Harold.Clymo@bie.edu

Candace DeSantis

Lead Environmental Protection Specialist
Contracting Officer's Representative

Albuquerque Office

Candace.Desantis@bie.edu



Mvto HiyHiy LemLmts Wado
DaWaEh Miigwech Wopila
Pinangigi Wimblahoho
Quyana Baasee AnaaBasee HiriweTudahe
Ahéhee Pilamiya
Nya:Weh Aho
Thank You Tansi

