

"Below is an example of a status report that some companies have used to provide EPA during the course of conducting an audit. The initial report, and subsequent periodic progress reports, have helped identify issues early in the auditing process and assisted in the overall progress of the audit."

dd/mm/yyyy

VIA FAX and EMAIL

Staff Contact

Multimedia Enforcement Division
U.S. Environmental Protection Agency
401 M St., S.W. (2248-A)
Washington, D.C. 20460

Dear Staff Contact:

This letter serves as the first [*monthly*] report on X COMPANY'S implementation of a voluntary compliance assessment focused on [*environmental statutory/regulatory*] requirements at approximately X# of facilities.

Most of the focus to date has been on planning and developing an appropriate infrastructure to support this large project and to keep the information current after the effort is completed. Major tasks completed include the following:

Development of data collection tools (completed *dd/mm/yyyy*)

A questionnaire has been developed to help technical personnel who are not environmental specialists collect the information necessary for a separate, central team of environmental specialists to make compliance determinations. The questionnaire is the basis for a Web-based user interface and input to a database (preloaded with existing EPCRA and SPCC information) that been developed. The system is accessible through the company's intranet, where such field personnel will log in and enter the information from each site audited. The information will be tracked through the user's unique ID number, to allow us to contact the person entering the data if we have follow-up questions. Following extensive testing and user feedback, the Web tool went "live" and training took place for field personnel in April and May.

Assignment of responsibilities (completed *dd/mm/yyyy*)

A core team of twelve individuals has been assembled to manage the rollout and execution of this project. Lead responsibility is with the Operations Director of the corporate Environmental, Health and Safety organization, supported by three Project Managers. Assistance is provided by three “Account Managers”, who represent and help coordinate with the three business units involved in this project. I provide legal advice. Environmental, records management, and other specialists make up the rest of the team. Bi-weekly conference calls are held to discuss status updates, upcoming deadlines, and any issues developing.

The people who will collect the data from the approximately X# of sites have also been identified. To underscore these assigned responsibilities, letters from senior management were distributed to the field in *dd/mm/yyyy* voicing support for the project.

Data Collection Rollout (begun *dd/mm/yyyy*)

A coordinated plan to audit the approximately X# sites was completed *dd/mm/yyyy*. Collection of raw data began in *dd/mm/yyyy* and is estimated to be completed in *dd/mm/yyyy*. As previously discussed, the raw data will be analyzed and corrective action will be initiated on a rolling basis as the raw data comes in. Such analysis will begin shortly, now that most electronic report formats and decision rules for compliance determinations have been finalized.

Integrating Data into Routine Operations (begun *dd/mm/yyyy*)

We are developing a process for folding the information collected with the newly-created tools, described above, into our existing databases, to create a new updated database.

Preparation for Corrective Action (ongoing)

Any corrective action required generally will be performed using trained X COMPANY personnel in the EH&S organization. To facilitate timely completion of corrective action that may be required, we are in the process of selecting and retaining a number of appropriate outside consultants, who would be available for the X COMPANY to use as necessary. Depending on the nature of the corrective action required, such as if it involves preparation of a plan, we may have to request an extension from the 60-day guideline.

dd/mm/yyyy

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Future Monthly Reports (beginning *dd/mm/yyyy*)

Your office requested a monthly report of some kind on or about the 15th of each month. Beginning with the next monthly report, we envision providing you with a primarily quantitative summary of our progress. Specifically, we envision providing two tables such as enclosed here. If you have any comments on that format, please let me know.

Sincerely yours,

X COMPANY

DRAFT
MONTHLY PROGRESS REPORT
VOLUNTARY ENVIRONMENTAL COMPLIANCE ASSESSMENT
[MONTH] 15, 1999

	Facility	Facility	Facility	TOTAL
Sites on initial list				
Sites with data collection completed				
Sites with compliance evaluation completed				
Sites with [environmental statutory or regulatory] noncompliance found				
Sites with [environmental statutory or regulatory] noncompliance found and corrected				
Sites with [environmental statutory or regulatory] noncompliance found				
Sites for which an extension from the 60-day guideline has been requested				

