

DRAFT EXAMPLE

ACTIVITY / PROJECT PLAN

Compliance with the Transportation Requirements for Special Waste

South Coast Region

Prepared By: _____ Date: _____
Project Manager

Approved By: _____ Date: _____
Project Sponsor

Note: Appendix 1 summarizes the responsibilities of the Project Manager and Project Sponsor.

1. Project Objectives

The South Coast Region will undertake an audit of compliance with the transportation requirements of the *Waste Management Act, B.C Reg. 63/68*. The focus of the audit will be to determining compliance with the transportation requirements only. The audit will be limited to the northern part of Vancouver Island, the area north of Nanaimo.

The audit of transportation of special waste on the northern part of Vancouver Island is being used as a pilot audit to develop and test the audit methodology before undertaking similar audits in other parts of the region. It will also serve as a key mechanism in the ministry compliance and enforcement strategy for obtaining assurance of compliance levels in this area. The overall objective of such audits is to increase compliance rates with the BC Reg. 63/88 requirements for the transportation of special waste.

Project Objectives:

- Succinctly state the purpose of the project, focusing on what will be different because this project has been undertaken.
- Include relevant context/ background information and the rationale for the project (i.e., why the project is necessary). This information should reinforce the business reasons for undertaking the project.
- The objectives should be clearly stated and must be agreed to by the project sponsor and any working or steering groups.
- The objectives should be specific, attainable, measurable and clearly stated so that the intent is understood and the results can be measured.

2. Project Scope

The audit will examine all of the BC Reg. 63/88 requirements related to the transportation of special waste. This includes:

- Acceptability of the containers used to transport the special waste as to design and construction and its compatibility with the special waste being transported
- Keeping the container closed during transport
- Compliance with requirements for labpack containers
- Compliance with requirements for transport using plastic and labpacks
- Use of appropriate packing materials
- Appropriate securing of containers being used to transport the special waste

In addition to the compliance aspects, the audit will also examine and comment on the following items that may come to the auditors' attention:

- Improvements for the transportation of special waste; and
- Improvements to management controls (e.g., manifesting requirements).

Project Scope:

- State what work, processes, or activities are "in scope" and "out of scope".

3. Roles and Responsibilities

Name	Role	Responsibility
D. Jones	Project Sponsor	Overall responsibility. See Appendix 1
J. Doe	Project Leader (contracted resource @ \$90/hr)	See Appendix 1 Also: <ul style="list-style-type: none"> • Develop and finalize findings and conclusions in conjunction with the audit team • Referral of substantive non-compliance enforcement section • Delivery of a draft audit report in conjunction with the audit team Review, discuss and consider comments on the draft report • Finalize and submit the final report • Organize and chair all pre and post audit meetings.
B. Bragg J. Smith	Auditors	Lead auditors responsible conducting audits, and specifically will be responsible for the quality of audit data and the data summary report.
R. Roberts	Audit Assistant (Naniamo)	Will assist Auditors in undertaking the audit work, as required.
Other ministry staff (TBD)	Audit Assistants	Assist with the audit including identification of activities subject to audit, obtaining documents in support of the activities subject to audit, assisting with field-work, and follow-up of issues identified by audit team.

Roles and Responsibilities:

- Identify project lead, team members and other key resources across the Ministry (and potentially other agencies if there is shared responsibility for the project).
- Identify area of representation, function and role on the project team.
- Identify internal roles and responsibilities among sections, divisions and region/Victoria work units.
- In addition to the core team, identify members of steering committees, advisory committees and other groups involved in the project.

4. Methodology

The audit will focus on the transport of special waste over the following 3 time periods:

1. June 15 – 20, 2004
2. Oct. 15 – 20, 2004
3. Jan. 15 – 20, 2005

A standardized audit checklist will be developed by the project team prior to conducting the audits. The auditors will complete the checks at selected weigh scale sites (see appendix Y) during the testing periods. Specific work will also be undertaken of “known” special waste movements. If any areas are not fully addressed within the checklists, additional procedures will have to be developed. The team leader is responsible for reviewing and approving any additional procedures before their implementation.

5. Key Stakeholders

Special Waste Transporters

Transporters have not been subject to regular compliance inspections by the Ministry; therefore, questions may arise as to the purpose of the inspections.

Special Waste Licensing and Manifest Section – Victoria

May have impacts upon the resources of the licensing section in regards to addressing compliance and licensing issues identified as a result of the inspections.

Conservation Officer Service – depending upon the level of significant non-compliance detected, referral of non-compliance may impact upon available resources.

Ministry of Public Safety and Solicitor General (Motor Vehicle)

Motor Vehicle inspectors deal with the transport of dangerous goods. Need to consult with Motor Vehicle to make them aware of the program as it may result in questions from the transport industry. May be opportunities for partnerships with PSSG.

Key Stakeholders

- Highlight stakeholders (internal and external) whose interests must be considered throughout the project.
 - i.e. a) who are you inspecting?
 - b) who has an interest in your results?
- Briefly summarize their interests, expectations and any potential issues or concerns.

6. Potential Issues or Constraints

Initial discussions with weigh scale operators indicate that there will be difficulties with the quality of the paper work that accompanies special waste transport. This will require gathering data that will allow us to conclude whether there is any correlation between non-compliance and the paperwork issues.

Another issue that will require addressing is the risk that the rate of compliance will increase during the period the audit is scheduled, as parties will know an audit is underway and therefore ensure compliance. We will need to address this through not “publicizing” our work as to when it is scheduled and when it is underway.

Auditors unless provided with statutory authority will not have the ability to require transporters to comply with their requests. Therefore, complying with the audit will be on a voluntary basis.

Specialists in various disciplines such as chemical engineers may be required to evaluate findings. These resources could be ministry staff or other contractors. The need for these resources will be discussed for approval in advance. Additional staff or contract resources may be required in assisting with audit work.

Ministry staff may need to respond on short notice to address significant issues of non-compliance (see Appendix 2) and issue orders pursuant to the provisions of the Waste Management Act to preclude the continuation of a high-risk activity. Conservation Officers and EERO's would be the first responders to address significant non-compliance.

Potential Issues or Constraints:

- Identify and communicate key issues that may affect the project results and develop a clear plan to address the concerns.
- Detail the types of barriers or risks to successfully completing the project and identify activities/ deadlines which may affect the success of the project.
- Highlight contingencies to address issues of significant non-compliance or immediate threats to the environment/ human health.

7. Project Milestones

Project Milestones	Timeline for Completion	Responsibility
Consultation with other agencies – e.g. weigh scale operators – about project requirements	May 15	J. Doe
Finalize project charter, budget and logistics	May 30	Audit team, J. Doe
Convene team – population identification, risk assessment, compile sample packages, preliminary sampling and risk confirmation; finalize sampling plan	June 7 - 11	Audit team
Conduct Audits	1. June 15 – 20, 2004 2. Oct. 15 – 20, 2004 3. Jan. 15 – 20, 2005	B, Bragg, J. Smith, R. Roberts, other staff as required
Analysis of findings and development of exit letters to discuss findings and recommendations with respective transporters; schedule face-to-face visits where warranted.	1. June 21 – 30, 2004 2. Oct. 21 – 30, 2004 3. Jan 21 – 30, 2005	J. Doe, Audit Team
Final compilation and analysis of all audit results. Draft summary report.	Feb. 2005	J. Doe
Finalize summary report	March 2005	J. Doe
Final signoff of report	Mar 31/05	D. Jones

Project Milestones:

- Establish the major milestones for the project and the schedule at which each of these milestones must be met.
- At the outset of the project an initial time estimate should be made for each phase or activity.
- Once a more detailed project plan is prepared (if necessary), this section should be updated to update the project schedule.
- Establish any review points at which the project requires further authorization.

8. Analysis and Reporting

As this is a pilot audit, the primary audience will be EP and COs staff in other regional offices.

The primary report will provide a concise assessment of compliance with the *Waste Management Act* requirements. This document will set out the level of compliance/non-

compliance by functional areas. An assessment will be provided by each functional area of the items that may constitute significant non-compliance requiring enforcement actions or other appropriate compliance actions (e.g., prevention activities). As this is a pilot audit, the report will contain a section on “lessons learned” to assist other regions with the design of their audits.

The secondary reporting objective will be a separate report (in the form of a management letter) that will comment on the following items that may come to the auditors’ attention:

- Improvement for the transportation of special waste; and
- Improvements to management controls.

Reporting:

- Briefly describe the primary reporting documents and their purpose.

9. Budget:

Project Expense	\$	Source
Contract expenses – J. Doe	\$4,000	Region base budget
Travel for auditors	\$2,500	Region base budget
Total	\$6,500	

Weekly reporting of audit expenditures will be made to the project sponsor. Anticipated overruns and shortfalls will be reported immediately.

Budget Resources:

- Summary of high level budget requirements for current and future fiscal years.
- Identify funds currently secured for the project, and the unsecured funds necessary to complete the project (unsecured funding should also be identified under *Potential Issues or Constraints*).

Appendix 1

Roles and Responsibilities

Project Sponsor

- In order for projects to succeed the role of the sponsor is critical
- The sponsor's role is to provide:
 - Strategic guidance and direction
 - Champion the project within division, business area (s) or stakeholder organizations
 - Ensure resources are available
 - Resolve cross-ministry and cross-divisional issues
 - Approves key deliverables (upon request)
 - Ensures communications are appropriate and timely
- Sponsors shape and define the scope but do not have day-to day responsibilities for project planning and implementation

Project Manager

- Provides day-to-day project management, overall business direction to a project and sets priorities
- Ensures resources are available for project
- Effectively manages the project, the project team and the project activities to successful completion, including
 - Developing the project charter/plan (scope, deliverables)
 - Managing all aspects of the project plan implementation
- Custodian of the time, scope, quality and costs aspects of the project
- Custodian of the project deliverables
- Risk management, issues tracking and resolution
- Monitors overall progress
- Stakeholder identification and management
- Sets the climate for the team
- Resolves inter-project issues

Appendix 2

Example of Significant Non-compliance

Significant Non-compliance

- Evidence of special waste being spilled to the environment during transport
- Incompatible special wastes being packaged and transported together
- Transporting special waste without the appropriate licenses/manifests
- Inappropriate manifesting of special wastes to evade the regulation
- Inappropriate packaging/containers that would likely result in a release of the special waste to the environment or cause harm or injury to a person prior to the shipment reaching its final destination