



Ashworth Leininger Group routinely develops customized compliance-based Environmental Management Systems (EMS), Environmental Management Information Systems (EMIS), and Safety Management Systems (SMS) for a broad spectrum of our client base – from Fortune 50 companies to highly specialized manufacturing operations. While each EMS project poses unique challenges, we have found that customized computer-based compliance tools are best developed through the following process and with the following objectives:

- Working with our client, we establish a clear understanding of applicable compliance requirements, staff and resource availability, existing systems, technical capabilities of the organization, and expectations of stakeholders;
- We provide possible system alternatives that are consistent with all criteria for consideration;
- ALG is a Microsoft Partner and typically utilizes software such as Word, Excel, and Access for system design; however, we often team with software engineers who are experienced in other applications;
- We focus on using technology and software to support efficient and effective compliance rather than allowing technology and software to dictate the design of the compliance tool;
- We ensure that systems are usable and understandable to those staff that will be responsible for working with them on a day-to-day basis. This ensures that the systems are actually used and fulfill their purpose in supporting compliance activities. ALG supports this outcome through focused training in system use and maintenance.

While each facility is unique, ALG has determined that it is critical to develop facility-specific systems using basic templates. Years of experience and development have gone into producing these templates and making them as user-friendly and complete as possible. These templates ensure that all federal, state, local, and company compliance requirements and those responsible for performance are captured and identified.



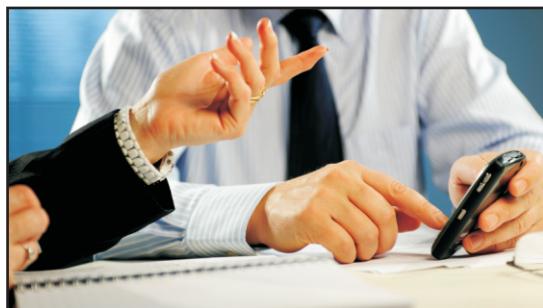
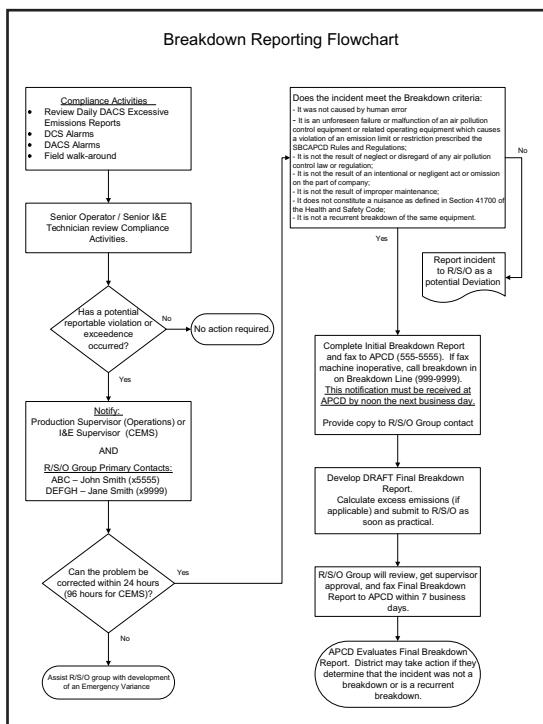
## EMS, EMIS, and SMS Services

Typically, a system is comprised of five main components:

- **Compliance Calendar:** The calendar is the main document used by staff to identify what compliance activities need to be performed in a given month, who has been assigned responsibility for each activity, which procedure should be used to perform the activity, and what documentation needs to be prepared and maintained in the site specific filing system.
- **Procedures Section:** For each activity, the appropriate procedure for completion is developed.
- **Detailed Regulatory Requirements (DRA):** In order to identify the compliance requirements for a given facility, all applicable regulations and permits are analyzed in detail and then documented.
- **Detailed Company Requirements (DCR):** In addition to the regulatory requirements, a detailed analysis of company requirements is also performed and documented.
- **Process Flow Diagrams:** For each regulated unit, a process flow diagram is developed to help plant staff better understand the regulatory and company requirements.

In our experience, compliance-based management and information systems are typically over-designed, complicated, difficult and time-consuming to use, and therefore are difficult to integrate into existing operations. The root causes for these outcomes are a lack of understanding of the user interface and the over use of complicated and exotic technical approaches. ALG has been successful in the past because these issues are addressed early in the process with full involvement of the client, especially those staff members who will be responsible for using the system for day-to-day compliance activities. The best measure of success has been that where ALG systems have been implemented, overall compliance improves significantly and the systems are used routinely by facility staff. Some of our EMSs have been in place for over ten years; some of the EMISs have been in place for over twelve years. In those locations where systems have been implemented, the system is used for performing compliance auditing and eliminates the need for developing separate audit protocols.

Our compliance systems are very effective training tools, as compliance requirements have been clearly and completely delineated. Also important is the fact that at those locations where staff turnover is high, new staff have a tool available for training and immediate compliance execution.



#### ALG's onsite compliance assistance experience includes the following:

- Developed and implemented facility-specific EMSs for an international company with 80+ US and Mexican facilities, which has been in place for over ten years. The EMS is used by plant staff having little or no formal environmental training and typically perform other jobs such as maintenance, engineering, quality assurance and human resources. Overall compliance has improved significantly with little residual compliance exposure.
- Developed EMIS recordkeeping tools for a company with locations in various California air quality districts for tracking material usage and VOC and TAC emissions. Each tool was tailored to address facility specific regulatory requirements.
- Developed EMIS Fleet management tools to assist a multi-site California company in preparing fleet inventories for California Off Road Rules. The tool was also helpful in allowing the client to evaluate different compliance scenarios and identifying an approach that was cost effective and efficient.
- Developed RECLAIM data management tools.
- Developed EMS tools for compliance with complex Federal NSPS and MACT standards. These systems include individualized applicability charts, requirement summary tables, task lists and recordkeeping forms utilized by environmental, engineering, maintenance and clerical staff.
- Developed a compliance calendar for a southern California manufacturing company to identify environmental monitoring requirements and reporting deadlines. The calendar assisted the company in managing tasks that were required to be performed as frequently as daily or weekly to annually and beyond.

## About Ashworth Leininger Group

Ashworth Leininger Group (ALG) is an environmental management consulting firm located in the Los Angeles, California area, with satellite offices located in California (San Francisco Bay Area and San Diego), Colorado and North Carolina. For more than 15 years, ALG has assisted clients in securing local, state, and federal air permits; addressing complex air quality compliance issues; conducting environmental audits; preparing periodic air quality emissions and toxic release inventory reports; and assessing facility impacts on local and regional air quality.

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