

**ENVIRONMENTAL MANAGEMENT SYSTEM
OPERATING PROCEDURE**

Internal EMS Conformance Audits

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A. PURPOSE AND APPLICABILITY

The purpose of this Operating Procedure (OP) is to establish a uniform process for assessing the state of conformance of the Region 7 Environmental Management System (EMS), under the Region's Audit Program (EMS 1006.5100.01), to the ISO 14001 international standard. This OP applies to all facets of the Region's EMS scope.

In accordance with the Region's EMS Audit Program, internal audits of the system must be conducted once per EMS cycle unless the EMS Coordinator, with agreement from the Region's Senior Management, determines that an external audit substantially meets the requirements of the Audit Program.

B. DEFINITIONS

All definitions may be found in the document titled *US Environmental Protection Agency Region 7 Safety, Health, and Environmental Management System Terms and Definitions* (SHEMS 1006.9000.02) contained in the EMS Manual. For the purposes of this OP, the following terms apply:

- Auditor
- Corrective Action
- EMS Document
- EMS Record
- Internal Audit
- Nonconformance
- Senior Management

C. PROCEDURAL STEPS

1. The EMS Coordinator will identify the Lead Auditor based on the following criteria:
 - a. If the Lead Auditor is selected from within Region 7, they must have successfully completed an EMS auditing course, the Region's EMS Awareness Training Course, and the current version of the Region's EMS Refresher Training Course. They must also have experience with conducting EMS audits; additional experience as a compliance inspector or conducting quality audits, along with report writing, is desirable. The EMS Coordinator will secure permission from the Lead Auditor's supervisor to participate in the audit and lead the Audit Team.
 - b. If the Lead Auditor is selected from outside Region 7, they must have successfully completed an EMS auditing course or served in the position of EMS Coordinator within their organization for a minimum of 2 years. In addition, they must also have experience with conducting EMS audits; additional experience as a compliance inspector or conducting quality audits, along with report writing, is desirable.
2. The Lead Auditor and the EMS Coordinator will create the Audit Plan (an EMS Document) for the audit in accordance with the Region's Audit Program.
 - a. The Audit Scope will be determined by the EMS Coordinator as defined in the most current version of EMS 1006.5100.01.
 - b. The Audit Schedule may be established by the EMS Coordinator, jointly by the Lead Auditor and the EMS Coordinator, or by the Audit Team at the discretion of the EMS Coordinator.
 - c. The Audit Criteria, derived from ISO 14001:2004(E), are specified in Attachment 1.

3. The Lead Auditor and the EMS Coordinator may identify additional members of the Audit Team based on the scope and complexity of the audit. If additional team members are needed, they will be selected based on the following criteria:
 - a. If the members of the EMS Audit Team are selected from within Region 7, they must have attended the Region's EMS Awareness Training Course and the current version of the Region's EMS Refresher Training course. Completion of an EMS auditing course is highly desirable, as is experience conducting EMS audits, quality audits, and/or compliance inspections. The EMS Coordinator will secure permission for the EMS Audit Team members to participate on the team.
 - b. If members of the EMS Audit Team are selected from outside Region 7, they must demonstrate completion of EMS training comparable to the Region's EMS Awareness Training Course. Experience conducting EMS and/or quality audits or as a compliance inspector is desirable.
4. The Lead Auditor will assemble the Audit Team prior to the scheduled date of the audit to review the Audit Plan and assign roles and responsibilities for the conduct of the audit. Training will be provided to the Audit Team members on auditing techniques and the procedures included in this OP using a competency training program developed by the EMS Coordinator (an EMS document) and provided to the Lead Auditor. These duties may be performed by the EMS Coordinator with concurrence of the Lead Auditor. *NOTE: The EMS Coordinator will not allow the audit to begin until proof of training has been received.*
5. The Lead Auditor will schedule interviews with senior managers, mid-level managers, and other staff, in accordance with the Audit Plan, prior to the audit start date. The Lead Auditor will also complete any logistical arrangements needed to conduct the audit such as securing rooms for the opening and closing conferences, workspace for the audit team, and audiovisual equipment (*i.e.*, digital cameras and projectors). These duties may be performed by the EMS Coordinator with concurrence of the Lead Auditor.
6. The Audit Team will conduct the audit in a fair and impartial manner using document reviews, interviews with specific personnel who have EMS roles and responsibilities (*e.g.*, senior managers and program managers), interviews with the Region's employees and contractors, and visual observation to assess the level of conformance of the EMS. A suggested plan for obtaining objective evidence is included with the audit criteria found at Attachment 1.
7. The Audit Team will meet with the EMS Coordinator (and others at the discretion of the Coordinator) to discuss potential discrepancies noted during the audit. The purpose of this meeting, which can occur one or more times during the audit, is to obtain information/clarifications on the circumstances surrounding the finding that could aid the Audit Team in determining the classification of the finding (a major non-conformance, a minor non-conformance, or an opportunity for improvement). Positive observations and best management practices (BMPs) may also be noted. While the EMS Coordinator may provide input, decision authority as to the classification of a finding rests solely with the Audit Team.
8. A closing meeting will be held in accordance with the Audit Plan to debrief the results of the audit. The EMS Coordinator will be present at the closing meeting; one or more members of Senior Management and one or more members of the various EMS teams may also attend if they so desire.
9. The results of the audit will be documented in an audit report (an EMS document), prepared by the team in accordance with the Audit Plan, using the Audit Report Template (EMS

1006.5200.00). Delivery of the report constitutes the completion of the internal audit process. All notes generated by the Audit Team during the audit will be submitted with the audit report.

10. The EMS Coordinator will review the audit report and develop a disposition memorandum that provides background information on the findings and observations. The memorandum will also identify whether or not they will be followed-up on and, if so, if they will be managed using the Region's Corrective and Preventative Action Process, as defined in the current version of SHEMS 1006.7210.12, or some other mechanism.

D. RECORDS MANAGEMENT

This OP requires the generation of the following records:

<u>Record</u>	<u>Responsible Person</u>	<u>Record Location</u>
Audit Team Training	EMS Coordinator	EMS Working Files
Audit Team Composition	EMS Coordinator	EMS Working Files

This OP may also result in the generation of additional EMS records. Any records created will be managed in accordance with the most current versions of SHEMS 1006.7210.02, *Document Control*, and SHEMS 1006.7210.17, *Records Management*.

E. QUALITY ASSURANCE AND QUALITY CONTROL

The quality assurance and quality control (QA/QC) success of the procedure for assessing environmental compliance, as detailed in this OP, will be determined through the internal and external EMS conformance audit processes. Deficiencies noted during these audits will be managed through the Region's Corrective/Preventive Action Process as defined in the current version of SHEMS 1006.7210.12.

F. REFERENCES

Current versions of the following references are assumed if no date is provided.

1. ISO 14004:2004(E); *Environmental Management Systems – General Guidelines on Principles, Systems, and Support Techniques*; November 15, 2004
2. US EPA R7, *US Environmental Protection Agency Region 7 Safety, Health, and Environmental Management System Terms and Definitions* (SHEMS 1006.9000.02)
3. US EPA R7, *Document Control*, SHEMS 006.7210.02
4. US EPA R7, *Corrective/Preventive Action Process*, SHEMS 1006.7210.12
5. US EPA R7, *Records Management*, SHEMS 1006.7210.17
6. US EPA R7, *EPA Region 7 Environmental Management System Audit Program*, EMS 1006.5100.01
7. US EPA R7, *EMS Audit Report Template*, EMS 1006.5200.00

**ATTACHMENT 1
 Region 7 Audit Criteria**

EMS Element	Audit Criteria	Suggested Plan For Collecting Objective Evidence
Section 4.1 General Requirements (Scope)	An EMS Scope has been developed that clearly identifies the facilities/activities that are subject to the provisions of the EMS.	Locate and review EMS Scope.
Section 4.2 Environmental Policy	An environmental policy has been developed and signed by Senior Management.	Locate and review written policy statement.
	The environmental policy has been communicated to all EPA and on-site contractor personnel.	Review records of communications. Observe signage.
	The policy is available to the public.	Identify and confirm method of public disclosure.
	The policy is appropriate to the nature, scale, and environmental impacts of the facility's operations.	Review policy; determine consistency with activities, products and services covered by the EMS.
	The policy includes a commitment to continual improvement of the EMS.	Review policy; determine consistency with EMS.
	The policy includes a commitment to pollution prevention.	Review policy; determine consistency with EMS.
	The policy includes a commitment to regulatory compliance.	Review policy; determine consistency with completion of compliance assessment(s).
	The policy provides a framework for setting and reviewing objectives and targets.	Review policy; determine consistency with objectives and targets.
Section 4.3.1 Environmental Aspects	Facility maintains a documented procedure for identifying environmental aspects.	Review procedure.
	Procedures adequately cover environmental interactions occurring as a result of the facilities activities, products, and services.	Review lists of activities considered.
	The activities, products and services of suppliers and	<u>Interview</u> EMS Coordinator.

EMS Element	Audit Criteria	Suggested Plan For Collecting Objective Evidence
	contractors (used on site) considered in defining environmental aspects.	<u>Interview</u> EMS Team Members.
	Procedures include the environmental aspects associated with changes in the facilities operations (to include new activities, products or services, or non-routine operations.)	Review procedure. <u>Interview</u> EMS Coordinator.
	Procedure includes identifying significant aspects based on review of potential significant impacts.	Review procedure.
	Inventory of aspects is updated periodically.	Review current/past aspects inventory.
Section 4.3.2 Legal and Other Requirements	Facility has established and maintains a procedure to identify legal and other requirements to which the facility subscribes.	Review procedure.
	Facility maintains a current list of applicable legal and other requirements.	Review list of legal and other requirements.
	Other requirements have been defined, if any exist.	<u>Interview</u> EMS Coordinator.
	The facility has identified how legal requirements apply to its environmental aspects.	<u>Interview</u> EMS Coordinator. Review EMS Manual
	Management Programs (MPs) are in place to ensure that objectives and targets are accomplished.	Locate and review MPs; <u>interview</u> MP Leads.
Section 4.3.3 Objectives, Targets, and Programs	Objectives and targets have been set and are documented.	Review EMS Manual.
	SEAs were considered in setting objectives and targets.	Compare O&Ts to list of SEAs.
	O&Ts are consistent with the policy.	Compare O&Ts to policy commitments.
	If views of interested parties have been expressed, determine if they were considered in setting O&Ts.	<u>Interview</u> EMS Coordinator and review communication.

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	Technological options, financial, operational, and business requirements were considered in setting O&Ts; targets are measurable where practical.	Review meeting minutes. Review MPs.
	Facility has set performance indicators for monitoring/measuring progress toward O&Ts.	<u>Interview</u> EMS Coordinator. Review MPs.
	Objectives and targets are consistent with commitment to pollution prevention, continual improvement and regulatory compliance.	Review O&Ts and policy.
	The facility has developed management programs MPs for achieving O&Ts.	Locate and review MPs.
	MPs designate responsibility for achieving O&Ts at each relevant level/function.	Review MPs.
	MPs include means and timeframes for completion.	Review EMPs & SMPs.
	MPs include specific tasks and are maintained for new developments.	Review MPs and MP Procedure; procedure includes process to modify MPs to conform to new developments.
	MPs are effective for achieving O&Ts derived from legal and other requirements.	Review MPs. <u>Interview EMS Coordinator.</u>
Section 4.4.1 Resources, Roles, Responsibility, and Authority	EMS responsibilities have been assigned, documented, and communicated.	Review EMS documents and correspondence.
	A management representative has been appointed by top management.	Review Roles and Responsibility appointment memos.
	Roles and responsibilities have been effectively implemented.	<u>Select 2 EMS Procedures and identify lead responsibilities; interview responsible individuals.</u>
	Resources have been provided by management to ensure implementation and control of	<u>Interview EMS Coordinator and Senior Staff members on the resources made available to the</u>

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	the EMS.	<u>EMS.</u>
Section 4.4.2 Competence, Training, and Awareness	The facility has identified the EMS-related training needs of its employees and on-site contractors.	<u>Interview</u> EMS Coordinator.
	Awareness training has been established and includes information on policy, EMS purpose, employee's roles.	Review results of training needs analysis.
	Awareness training has been conducted for all employees.	Review training records.
	Awareness training program addresses: <ul style="list-style-type: none"> · importance of conformance to EMS · significant actual or potential environmental impacts · roles and responsibilities for EMS implementation and maintenance · potential consequences of deviations from EMS. 	Review awareness training documents and other materials. <u>Interview</u> staff members to verify success of training program.
	Employees performing tasks which can cause significant impact meet established competency criteria on the basis of education, experience or training.	<u>Interview</u> EMS Coordinator. <u>Interview</u> select supervisors relating to establishing and maintaining competency. <u>Interview</u> select individuals with EMS roles & responsibilities to assess competency; review competency training materials and records.
Section 4.4.3 Communication	The facility has established and maintains procedures for communicating information regarding environmental aspects and the EMS internally.	Review procedure. <u>Interview</u> employees.
	The environmental policy has been distributed to all Division employees.	Review bulletin boards, signage, etc.
	The facility has established and maintains procedures for receiving, documenting, and responding to relevant	Review procedures. Review external communication emails, etc.

EMS Element	Audit Criteria	Suggested Plan For Collecting Objective Evidence
	communications from external interested parties.	
	The facility has made its environmental policy available to the public.	Locate and review policy on public Web site.
	The organization has considered external communication of its significant aspects and has recorded a decision to do it or not.	<u>Interview</u> EMS Coordinator. Review record of decision.
	The organization has established a procedure for communicating with suppliers and contractors.	Review procedures in EMS Manual.
Section 4.4.4 Documentation	The facility has developed the required EMS procedures or has developed appropriate justification for why certain procedures have not been created.	Review EMS Manual. <u>Interview</u> EMS Coordinator.
	The organization has established and maintains information that describes the core elements of the EMS and provides direction to related documentation.	Review EMS Manual.
Section 4.4.5 Control of Documents	The organization has established procedures for controlling all EMS-required documents.	Review procedure.
	Procedure provides for locating EMS documents.	Review procedure and identify documents to ensure in proper location.
	Documents are periodically reviewed and revised by authorized personnel.	Review selected EMS Documents.
	Procedure provides responsibilities for creating and modifying documents; procedure is followed.	Review procedures – procedure specifies retention periods for EMS documents; interview EMS Coordinator.
	A process exists for removing obsolete documents from all points of issue and use or for preventing their unintended use; process is followed.	Review procedure; interview EMS Coordinator.
	Appropriate EMS Documents	<u>Interview</u> employees at targeted

EMS Element	Audit Criteria	Suggested Plan For Collecting Objective Evidence
	are available at all locations where essential operations are performed.	locations; have them demonstrate access.
	EMS Documents are legible, dated, identifiable, and maintained in an orderly manner.	Review selected EMS documents - all EMS documents are stored electronically.
Section 4.4.6 Operational Control	The facility has established and maintains a documented procedure for establishing and maintaining Operational Controls (OCs).	Review procedure.
	OCs have been developed and documented, where appropriate, to manage activities, products and services contributing to SEAs.	Locate and review OCs; compare to list of SEAs.
	OCs have been implemented and are effective.	Review records that demonstrate functioning of operational controls. <u>Interview</u> responsible operators.
	OCs were communicated to individuals tasked with implementing them.	<u>Identify employees whose jobs involve SEAs; interview.</u>
	OCs stipulate operating criteria where appropriate.	Review OCs.
Section 4.4.7 Emergency Preparedness and Response	<i>This requirement has been deferred to the various health & safety-related Regional response plans.</i>	Review MFR documenting deferral.
Section 4.5.1 Monitoring and Measurement	The facility has established and maintains a documented procedure for monitoring and measuring the key characteristics of operations and activities that can have a significant impact on the environment.	Review procedure.
	Monitoring, measuring, and calibration requirements are appropriate for the organization.	Review Monitoring, Measuring, Calibration, and Reporting Table; MPs; and OC Master List.
	Required monitoring equipment	Review monitoring and

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	is calibrated and maintained.	calibration records.
Section 4.5.2 Evaluation of Compliance	A documented procedure has been established and is maintained for periodically evaluating the status of compliance with relevant legal and other requirements.	Review procedure. <u>Interview</u> EMS Coordinator.
	Assessment Team members meet requirements specified in the Assessment Procedure.	<u>Interview</u> EMS Coordinator. Review training records.
	The findings and observations contained in the Assessment Report are evidence-based.	Review Assessment Reports.
	The non-conformances identified in the Assessment Report clear and include the requirement and evidence.	Review Assessment Reports.
	Records of compliance assessments are maintained.	Review assessment reports.
Section 4.5.3 Nonconformity, Correction Action, and Preventive Action	The organization has established procedures for defining responsibility and authorities for handling and investigating non-conformances, mitigating impacts, and initiating and completing corrective and preventative actions.	Review procedure.
	Corrective and preventative actions are appropriate to the magnitude of the problems and resulting impacts.	Review compliance assessment / conformance audit MFRs for disposition of findings and corrective and preventive action forms.
	Corrective and preventive actions are implemented in a timely manner, address the root cause(s), and are reviewed for effectiveness.	Review corrective and preventive action forms.
	Changes in documented procedures resulting from corrective/preventative actions are recorded.	Review records of changes to documents resulting from corrective/preventative actions.
Section 4.5.4 Control of Records	The organization has established a procedure for identifying, maintaining, and disposing of	Review procedure.

EMS Element	Audit Criteria	Suggested Plan For Collecting Objective Evidence
	environmental records.	
	Records are maintained of training activities.	Review records.
	Records are maintained of results of audits and reviews.	Review records.
	Records are legible, identifiable and traceable to the activity, product, or service involved.	Review records.
	Records are retrievable.	Observe process for retrieving records; review representative sample of measuring and monitoring records.
	Records are retained in accordance with established protocol.	<u>Interview</u> EMS Coordinator.
Section 4.5.5 Internal Audit	The facility has established procedures for conducting periodic internal EMS audits.	Review procedure.
	Audit frequency has been specified and adhered to.	Review procedures.
	Audit requirements/criteria have been specified in the Audit Plans.	Review Audit Plans.
	Audit Plans include responsibilities, scope, and methodologies, including how results will be reported.	Review Audit Plans.
	Audit team members meet requirements specified in the Audit Procedure.	Review training records.
	The findings and observations contained in the Audit Report are evidence-based.	Review Audit Reports.
	The non-conformances identified in the Audit Report clear and include the requirement and evidence.	Review Audit Reports.
Section 4.6 Management Review	The facility has established a procedure for management reviews of the EMS.	Review procedure.
	The management review procedure specifies the types of	Review procedure.

EMS Element	Audit Criteria	Suggested Plan For Collecting Objective Evidence
	information and documents that need to be assembled and made available.	
	Management review addresses possible needs for changes in policy, objectives, or other EMS elements.	Review procedure. Review minutes of management review meeting.
	Management review addresses the possible impact of changing circumstances on the EMS.	Review minutes of management review meeting.
	Records/minutes of management reviews are kept.	Review records of management review meeting; results from management reviews are communicated to all Division employees.