

12 Conduct Audits and Correct Problems

What

EMS internal audits assess whether your EMS is adequate and verify that your EMS plans are being followed. By identifying and reporting EMS deficiencies to your management, you are able to:

- Maintain management's focus on the environment;
- Improve the EMS and its performance; and
- Ensure the cost effectiveness of the system.

Your EMS must include a well-defined process for ensuring that:

- Problems are identified;
- Root causes are investigated;
- Corrective and preventive actions are assigned and implemented; and
- Actions are tracked and their effectiveness verified.

Who

Select and train EMS internal auditors on an ongoing basis. Commercial EMS auditor training is available, but it may be less expensive to coordinate with local businesses, community colleges, or other organizations to sponsor an auditor training course.

Train auditors on auditing techniques, the concept of management systems, and, if possible, on environmental regulations, facility operations, and environmental science. While some auditor training can take place on the job, make sure that an experienced auditor takes part in your facility's first few EMS audits.

Auditors should be independent of the activities being audited. If your facility has a quality management system, you may want to think about

using your internal quality auditors as EMS auditors. See Sample Form 10: Sample Internal Audit Checklists for samples of checklists you can customize to conduct your own internal audits.

Why

EMS internal audits ensure that your system will continue to work well in the face of accidents, emergencies, changing rules, staff turnover, etc. By regularly evaluating your EMS, you will be able to identify which parts of the EMS are working well and which need improvement. Your EMS needs to change as your facility adapts and grows. You will need a nonconformance, corrective, and preventive action process to deal with system deficiencies.

How

To ensure an effective EMS internal audit program:

- Develop internal audit procedures;
- Determine how often you will conduct audits;
- Select and train your auditors; and
- Keep records of your audits.

Conduct internal audits at least once a year. Auditors base their evaluation on interviews with employees, observations, and documentation instead of just going down a list and making sure that all documentation is in place.

Work with your EMS Coordinator to determine the questions and observations that will tell you if your EMS is reducing risk, improving environmental performance, and facilitating compliance. Review the sample internal audit checklists provided below. Once you have gathered all the information and drawn conclusions, present a report to top management. The EMS Team can work with top management to make any needed changes to the EMS.

The steps to develop a well-defined process for your EMS include:

- Identify the problem;
- Find the root cause;

- Come up with a solution;
- Implement the solution;
- Document the solution;
- Communicate the solution; and
- Evaluate the effectiveness of the solution.

Preventing problems is generally cheaper than fixing them after they occur. Start thinking about problems as opportunities to improve!

Sample Form 10: Sample Internal Audit Checklists

Environmental Policy

Questions	Findings/Observations
1. Do you know the facility's Environmental Policy?	
2. What are the keywords of the Policy?	
3. How does the Policy relate to your job?	
4. What is your understanding of the facility's EMS and your role?	
ADDITIONAL QUESTIONS:	

Environmental Aspects

Questions	Findings/Observations
(Look for documentation of planning/evidence of implementation)	
1. Are you aware of the aspects and the significant environmental aspect in your department?	
2. What are they?	
3. Where can they be found?	
ADDITIONAL QUESTIONS:	

Goals

Questions	Findings/Observations
1. Do you know what the goals for the significant environmental aspects are?	
2. Where can these be found?	
3. What is the status or progress on the goals with which your department is involved?	
ADDITIONAL QUESTIONS:	

Training, Awareness, and Competence

Questions	Findings/Observations
1. Have you received awareness training on the facility's environmental management system and the significant environmental aspects in your department?	
2. Have you received training on your role and responsibility to conform with the facility's: a. Environmental Management System b. Emergency preparedness and response	
3. Are you aware of the potential consequences of departure from your environmental work practices (environmental impact)?	
ADDITIONAL QUESTIONS:	

Communication

Questions	Findings/Observations
1. Have you received information on the facility's Environmental Management System and significant environmental aspects?	
2. How (e.g., facility newsletter, department meetings, training, posters, pocket cards)?	
3. Do you have an example?	
4. If you had a concern about the EMS or any environmental concern, what would you do?	
ADDITIONAL QUESTIONS:	

Document Control

Questions	Findings/Observations
1. Do you have access to current versions of your department's action plans, procedures, and/or environmental work instructions?	
2. Where are they kept?	
3. If there are any postings in the department check to see if they are current.	
ADDITIONAL QUESTIONS:	