

**U.S. Environmental Protection Agency
ENVIRONMENTAL SCIENCE CENTER, FORT MEADE, MARYLAND**

**ESC EP17.05
Environmental Management System Procedure for:**

EMS Audits: Internal, External, and Compliance

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Issued by:

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By:	
Changes:	

1 Purpose

The purpose of this procedure is to provide guidance for the conduct of Environmental Management System (EMS) Audits and Compliance Status checks at the Environmental Science Center (ESC).

2 Scope

The scope of an EMS internal audit is to determine whether or not the environmental management system:

Conforms to planned arrangements for environmental management including the requirements of ISO 14001.

Has been properly implemented, maintained and is functional.

Allows for identification and compliance with legal requirements applicable to identified environmental aspects.

Environmental Management System audits are not full compliance audits. They are system audits to verify the workings of the management system. If compliance data is examined, it is for the purpose of verifying that the environmental programs are sufficient to achieve compliance with legal requirements.

Compliance checks include the annual internal Safety, Health and Environmental management (SHEM) audit performed by the Facility SHEM Managers, and the tri-annual external SHEM audit performed by staff and contractors with the Safety, Health, and Environmental Management Division (SHEMD) from EPA Headquarters.

For the external EMS audit, the ESC will employ a third party auditor (Registrar) to determine conformance of the EMS to ISO 14001:2004. A Registrar approved by the American National Standards Institute Registrar Accreditation Board is retained under contract.

3 Procedures

a) Specific Procedure

EMS Internal Audits will be conducted utilizing an Audit Plan and an EMS Audit Checklist. Audit criteria shall consist of questions and other checks based upon the specified arrangements for the EMS and, which are designed to elicit evidence of conformity with ISO 14001:2004 and all ESC Environmental Management System documentation.

Compliance status can be ascertained during internal EMS audits by evaluating the effectiveness of the Operational Controls (OC) associated with legal requirements. A more detailed review of compliance status is performed during the internal and external

compliance audits.

The EMS auditors will rely on records for information related to the functioning of the EMS and its objective and targets. The EMS auditors will also rely on observations of operating conditions to gauge environmental status and conditions at the site, or project operations.

EMS internal audit findings must be based on objective evidence that is properly corroborated and authenticated. Audit findings shall not be based on hearsay or opinions. Internal EMS audits shall be conducted on an annual basis in order to verify that the system is implemented and functioning. The EMS internal audit will be as complete as possible but, can be focused on certain activities based on their importance and/or results of previous audits.

EMS internal audits will be conducted primarily through the review of records, observations of operations, and interviews with personnel. EMS audits may include sampling compliance data to ascertain whether compliance programs are achieving their intended objectives.

At the conclusion of the EMS internal audit, the Audit Team will review their consensus findings verbally with the EMS Team during an exit briefing. This briefing is an opportunity for questions and clarifications between the Audit Team and the EMS Team.

The EMS Internal Audit Team Leader completes the Environmental System Audit Report. The final report will be sent to the EMS Coordinator by the Audit Team Leader at the conclusion of the audit. The EMS Coordinator will distribute the final report to the EMS Team. The EMS Team will decide appropriate corrective actions and will document those actions in a Corrective Action Response to the Audit Team after receiving the final report. The time frame for both the submission of the final report to the EMS Coordinator and the return of the Corrective Action Response will be negotiated on a per-audit basis to accommodate staff scheduling and the dates of upcoming Manager Reviews and Surveillance Audits.

The **Internal Compliance Audit** is conducted annually by the SHEM Manager and the **External SHEM Division Audit** is conducted tri-annually by Headquarters.

The **External EMS Audit** will be conducted on a routine basis depending on how the Registrar company sets up its contracts. Currently, the audits are held annually and cover one third of the system.

b) Responsibilities

EMS Internal Audit:

Individuals on the Internal Audit Team will have received Internal Auditor training from a qualified EMS expert or have participated in the ESC internal “trainee” procedure. The EMS Team has developed a “trainee” process to allow individuals to participate as internal auditors, even if they have not been able to take any formal training. The first year is spent as an observer on the team which will have at least one experienced auditor as the Team Leader and two other trained auditors. The trainee will help with the documentation as much as possible, learning the procedure as they go. For training purposes, the trainee should work concurrently with one of the core team members, and not independently. The second year, they will be considered an official auditor for ESC, although not qualified to be the Team Leader. The third year, they may participate as the Leader. If a trainee takes the formal internal audit training before the third year, they will then be eligible for participating as the Team Leader.

The EMS Coordinator shall solicit volunteers for the Audit Team and Team Leader but, will ensure that the team consists of members capable of being impartial and objective. Although, anyone may volunteer to participate, it may mean excluding someone who is a key “EMS record holder” or is too involved in daily EMS procedures to be objective .

The Team Leader is responsible for the following:

- writing an Audit Plan prior to each audit
- coordinating and conducting the audit
- compiling an audit report that lists all of the findings of non-conformance to ISO14001 and/or specific compliance issues

The EMS Team will be responsible for follow-through on corrective actions.

The EMS Coordinator will report the results of internal audits to the ESC Board as necessary, at least during periodic management review of the EMS.

EMS External Audits:

After completion of the **EMS External Audits**, it is the responsibility of the EMS Coordinator and the EMS Team to ensure that corrective actions are completed and documented through changes to EMS documents and that any new procedures are communicated to the appropriate individuals.

ESC Compliance Audits:

After completion of the **Internal and External Compliance Audits**, it is the responsibility of the management and the SHEM Manager to ensure that all corrective actions are completed and documented, as appropriate.

While the line management of the ESC has ultimate responsibility for environmental compliance, the SHEM Manager has responsibility for conducting environmental compliance activities. The SHEM Manager relies on information gained through the

network of national EPA SHEM Managers and other sources to ensure that the appropriate compliance requirements are identified. In addition, a tri-annual compliance audit is performed by EPA Headquarters' Safety, Health and Environmental Management Division with assistance from an independent contractor. Corrective actions are coordinated by the SHEM Manager based on the findings of the tri-annual audits. If necessary, the ESC Board, the Facility Manager and/or the SHEM Manager initiate and complete required corrective actions. The SHEM Manager is responsible for all records pertaining to environmental compliance.

4 Documentation

Documentation for the **EMS Internal Audit** will consist of the Audit Plan, Completed Audit Checklist, Final Audit Report, Corrective Action Response and any other supporting documents, as appropriate. (If possible, non-electronic documents, such as the sign-in sheets, should be scanned and saved as an electronic file.) Documentation of the **EMS External Audit** will consist of any reports sent by the auditor and the appropriate Corrective Action Responses. Files will be maintained by the EMS Coordinator on the shared local area network (LAN) and/or in the official files drawer in A207.

Documentation for the **Internal and External Compliance Audits** will be maintained by the SHEM Manager.