

1.0 Purpose

This procedure defines the mechanism for the planning and implementation of internal <u>EMS</u> audits at the <COMPANY NAME>. Compliance Evaluations will be completed according to EP-02, Legal and Other Requirements.

2.0 Scope

This procedure applies to operations of <COMPANY NAME> located at <LOCATION>, that have related environmental aspects.

3.0 Responsibilities

The Lead Internal Auditor is responsible for the overall process of Internal EMS Auditing. Other auditors will be responsible for conducting the audit in the time-frame allotted.

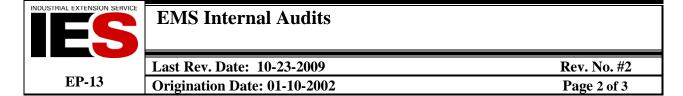
4.0 Forms Used (all are optional)

| EF-13A | EMS Area Audit Preparation Sheet |
|---------|---|
| EF-13B1 | Yearly Audit Schedule |
| EF-13B2 | Daily Audit Schedule |
| EF-13C | Internal Audit Completion Report |
| EF-13D | ISO 14001 Elements - Audit Questions & Findings |
| EF-13E | Audit Questions & Findings |
| | |
| EF-11A | Corrective and Preventive Action Request (CAR) |
| EF-11B | Environmental Corrective Action Request Log |

5.0 Procedure

5.1 Planning

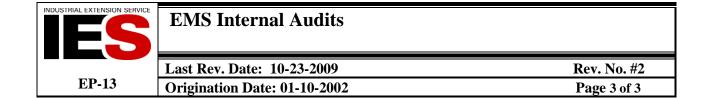
- 5.1.1 The Lead Internal Auditor or designee shall plan, schedule and implement internal EMS audits. The plant will be "broken-down" into separate audit areas
- 5.1.2 The audit calendar schedule will then be determined and documented on Form EF-13B1 and B2. All relevant facility areas will be audited at least once per year
- 5.1.3 The lead auditor will develop checklists of questions for each of the specified areas using a combination form EF-03A, D and E



- 5.1.4 Each auditor will be responsible for conducting the audit in the month designated. This will include
 - contacting the auditee (department supervisor or equivalent),
 - requesting any documents for review prior to the audit
 - Conducting the audit interview
 - Writing up the findings
- 5.1.5 All auditors will be trained
- 5.2 Conducting the Audit
 - 5.2.1 During the audit, the auditor team will record audit information either on Forms EF-13D and E
 - 5.2.1 , and any other paper or electronic media (MS Word, Excel, etc.) as desired. Auditor will document
 - questions or Areas investigated
 - individuals interviewed,
 - Non-Conformances or Observations
 - Other concerns identified
 - Positive Findings (jobs well done, Accomplishments Noteworthy of Merit, etc)
 - 5.2.2 Findings will be recorded and assigned as:
 - NC = Non Conformance;
 - C = Conformance:
 - O = Observation;

The above documented findings will be given a sequential finding number (#).

- 5.2.3 Findings may be number sequentially with the auditors initials followed by the number (i.e., CP-1, CP-2, etc)
- 5.2.4 If multiple audits are being carried out simultaneously, the team of auditors may meet during or after the audit to discuss findings, especially:
 - To assign a sequential finding number (#) to every finding
 - To discuss which findings are nonconformities, which are just observations
- 5.2.5 All findings write-ups will be submitted to the lead auditor
- 5.3 Report
 - 5.3.1 The Lead Auditor will summarize each audit. Form EF-13C may be used



5.3.2 Corrective Action Requests – may be issued for nonconformities according to Procedure EP-11.

5.4 Audit Follow-up

- 5.4.1 The EMR or designee will track the status of all CAR's using the Environmental Corrective Action Request Log (EF-11B) according to EP-11.
- 5.4.2 At least annually, the EMR or designee will summarize system audit results with facility management as specified in EP-015 (Management Review)

6.0 References

ISO 14001:2004, Elements 4.5.5 and 4.5.3

7.0 Related Procedures

- EP-11 Non-conformance and Corrective and Preventive Action
- EP-14 Environmental Management System Management Review

8.0 Records (all are optional)

(See Forms List)

9.0 Revision History

| Revision No. | Description of Change | Page # | Date |
|--------------|-----------------------|--------|----------|
| 1 | Original | 1 | 7/14/08 |
| 2 | Changed Form numbers | all | 10/23/09 |