



9.0 Environmental Self-Audits and EMS Audits

- 9.1 AUTHORITY, RESPONSIBILITY AND CORRECTING NONCOMPLIANCE
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9.1 Authority, Responsibility and Correcting Noncompliance

Keys



Define the authority, responsibility, and methods for investigating and correcting noncompliance with the procedures set forth in the environmental management system. [R 336.2405 (2)(b)(viii)]

Make EMS responsibility part of your employee's job descriptions.

**Compliance vs Conformance?
For the purposes of this manual, these two words have the same meaning. Are you meeting the requirements (e.g. EMS policies and procedures, environmental/legal)?**

You should clearly define the persons (or job titles) responsible for the elements of your EMS. At this point in your system development you should already know what person is responsible for what element or who functions in what role. You need to formalize this for your system documentation and so that people know what their job responsibilities are and to prevent noncompliance with your EMS.

On the following page is a responsibility matrix for Joseph's Forklift and Hauling Company to document the roles their employees will play in their EMS. Also included for your review is an Environmental Responsibility Matrix and a Environmental Responsibilities of Key Environmental and Operations Staff table for Wisconsin Electric - Presque Isle Power Plant which was developed for their EMS. Review these examples and develop your system documentation for authority and responsibility.

Include in your documentation table or chart who is responsible for investigating and correcting noncompliance within the EMS. Procedures for formally identifying a noncompliance and for taking corrective and preventative action should be documented and monitored by the EMS or responsible manager. Noncompliance can occur due to the following reasons:

- EMS procedures are not followed (including work instructions, monitoring, calibration, and recordkeeping requirements),
- Process upsets in significant operations and activities, or
- Violations of environmental/legal requirements.



EXAMPLE 9.1

Joseph's Forklift and Hauling Company

EMS Responsibility Matrix

POSITION	ROLES												
	EMS Manager	Police Development	Aspects & Impacts	Objectives & Targets	Operations & Activities	Reports & Recordkeeping	Training & Tracking	Emergency Response	Internal Communication	Public Communication	Authority for Investigating and Correcting Noncompliance	Environmental Self-Audits & EMS	
Vice President	L	L	L	L	S	L	S	S	L	L	L	L	
Operations/Shipping/Warehouse Manager		L	L	L	L	S	L	L	S	S	L	L	
Maintenance Supervisor		S	S	S	L	S	S	L	S	S	S	S	
Office Administration – Staff		S	S	S	S	L	L	S	L	S	S	S	
Operator		S	S	S	S			S					

L = Lead Role
S = Supporting Role

7.0 Environmental Structure, Responsibility, and Organizational Control

Date of Issue: 03/23/98

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Table 7-2 Presque Isle Power Plant Environmental Responsibility Matrix

Activity	We Energies Management	VP-Fossil Operations	Production Operations Team	VP-Environmental	PIPP Plant Manager	PIPP IPT Leader (Operations)	PIPP Chief Engineer	PIPP Resource Coordinator	PIPP Environmental	We Energies Corporate Environmental	PIPP Personnel & Security	We Energies Legal Services
Develop and communicate plant environmental policy	S	S		S	L	S	S	S	L	S		
Identify environmental aspects and impacts					S	S	S	S	L	L		
Define legal and regulatory requirements – Federal				L					S	L		S
Define legal and regulatory requirements – Michigan				L					L	S		S
Determine objectives and targets	S		S	S	L	S	S	S	L	S		
Define operating policies, procedures and responsibilities	S		S	S	S	L	L	L	L	S		
Obtain operating permits									S	L		S
Comply with permit requirements	S	S	S		L	L	L	L	L	S		
Maintain environmental monitoring and control systems					L	L	L	L	L	S		
Define nonconformance boundaries and corrective action					L	L	L	L	L	S		
Define and conduct training					S	S	S	S	L	S	L	
Establish / implement recordkeeping systems					S	S	S	S	L	S	L	
Prepare / submit regulatory reports		S							S	L		S
Respond to environmental exceedances		S			L	L	L	L	L	S		
Respond to environmental emergencies					L	L	L	L	L	S		S
Coordinate internal communications		S	S	S	L				L	S		
Coordinate external communications		S		S	L	S	S	S	S	L		S
Monitor / report environmental performance				S	L	S	S	S	L	S		
Conduct audits and track results	L	S	S	S	S				S	L		
Management review of environmental performance	L	L	L	L	S	S	S	S	S	S		
Review, revise and publish updated EMS and procedures		S	S	S	L	S	S	S	S	L		

Key: L = Lead responsibility
S = Supporting responsibility



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Table 7-3

**Presque Isle Power Plant
Environmental Responsibilities of Key
Environmental and Operations Staff**

Position	Responsibilities
President, We Energies	<ul style="list-style-type: none"> • Overall company planning and goal setting • Work with Vice President—Fossil Operations, to ensure that adequate human and financial resources are available to comply with all applicable laws and regulations. • Provide for the periodic review of plant operations, including environmental performance as indicated by regulatory compliance audits and EMS reviews.
Vice President-Fossil Operations	<ul style="list-style-type: none"> • Legally responsible party for PIPP; ultimate responsibility for compliance with all laws and regulations • Signatory authority • Ensure that adequate human and financial resources are available to meet all environmental goals, including but not limited to regulatory compliance • Approve overall plant environmental goals • Conduct periodic (monthly) plant performance reviews, including environmental performance • Provide resources to allow periodic compliance and EMS audits • Lead management review of plant environmental operations at least annually
FO Production Operations Team	<ul style="list-style-type: none"> • Overall environmental evaluation and planning for all FO plants • Approve action plans to address environmental issues at one or more FO plants • Input to developing and approving environmental factors in the FO Balanced Business Scorecard
Vice President-Environmental	<ul style="list-style-type: none"> • Establish corporate environmental policies • Oversee company and business unit environmental programs and practices • Assist Vice President- O and PIPP Plant Manager in assuring that adequate human and financial resources are available at the plant • Ensure alignment of PIPP policies and procedures with remainder of FO and corporate facilities • Support development of plant performance goals • Facilitate the conduct of periodic compliance and EMS audits • Assist in management review of plant environmental operations



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| Team Leader Upper Peninsula Generation (Plant Manager) | <ul style="list-style-type: none">• Responsible for day-to-day environmentally compliant operation of the plant• Responsible for identification of and compliance with all legal and regulatory requirements• Responsible for providing adequate human and financial resources to operate in an environmentally sound manner• Responsible for reporting and certifying compliance under Title V of the Clean Air Act. |
| PIPP Environmental Staff
(3 Environmental Specialists) | <ul style="list-style-type: none">• Identify, track, and evaluate applicable Michigan environmental laws; maintain and distribute copies of state and local laws and regulations• Identify environmental aspects and potential impacts• Coordinate environmental support activities with WE environmental staff as appropriate for efficient and compliant operation• Communicate environmental regulatory information to plant staff and leadership team, and WE environmental staff• Gather and report environmental monitoring data to plant management, WE environmental staff and regulatory agencies (as requested or per regulatory requirements)• Conduct daily, weekly, monthly, quarterly or annual reviews of environmental data and prepare summaries as necessary• Interface with local regulatory agency staff (as requested or per regulatory requirements)• Provide technical leadership and assistance to plant operating staff |
| We Energies Environmental Staff | <ul style="list-style-type: none">• Track and report on legal and regulatory requirements, with emphasis on federal, coordinating with PIPP environmental on Michigan requirements• Provide technical guidance and environmental leadership to plant environmental and operating staff• Review results of environmental monitoring• Primary interface with state and federal regulatory officials• Lead the preparation, renewal and modification of permits• Provide leadership in determining and providing training• Provide input in determining objectives and targets• Evaluate plant environmental performance and provide feedback on performance improvements• Responsible for reporting and certifying compliance under Title V of the Clean Air Act² |

² Includes the specific responsibilities of the Designated Representative (DR) and Alternate Designated Representative (ADR).



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PIPP Environmental Management System Documentation

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|---------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Chief Engineer (Environmental Coordinator) ³ | <ul style="list-style-type: none">• Manage the overall conduct of PIPP environmental staff• Provide first-line management of environmental information and issues related to PIPP• Plant interface with local and regional state environmental officials• Review environmental monitoring and performance data• Provide environmental summary information to plant management team, WE environmental, and PIPP environmental steering committee |
| Integrated Production Team (IPT) Leader (Operations) | <ul style="list-style-type: none">• Ensure that all operating staff have received appropriate environmental training, are competent, and operate the plant in accordance with all permits and regulatory requirements• Take appropriate action as necessary, include reducing plant operations, in order to maintain regulatory compliance• Identify and report on operations (and operational changes) that may have an environmental aspect and impact• Provide operational information to plant management team and PIPP environmental steering committee |
| Team Leader (Fuels) | <ul style="list-style-type: none">• Maintain and operate the fuel and by-product handling system in compliance with all permit and regulatory requirements• Identify and report on operations that may have an environmental aspect or impact• Oversee the day-to-day operations of any contractors and other outside parties handling, transporting or otherwise managing fuel, combustion products, or other bulk materials for either WE or other third parties on the WE plant site or environs |
| IPT Leaders | <ul style="list-style-type: none">• Be knowledgeable and trained in the operation of the plant in compliance with all permits and regulatory requirements• Take appropriate action as necessary, including reducing plant operations, in order to maintain regulatory compliance• Identify and report on operations (or operational changes) that may have an environmental aspect and impact |
| Team Leader (Chemical) | <ul style="list-style-type: none">• Ensure that all operating chemical, wastewater, and laboratory staff have received appropriate environmental training and are competent• Maintain and operate the plant water treatment, wastewater treatment, and laboratory in compliance with all permits and regulations• Take appropriate action as necessary, including recommending reducing plant operations, in order to maintain regulatory compliance• Identify and report to the IPT Leader any operational changes that may result in a change in environmental aspects or impacts |

³ The plant Environmental Coordinator position (presently held by the plant's Chief Engineer) is involved with all plant environmental activities, responsible for communicating and coordinating the plant's environmental activities with other operating plants within the We Energies system.



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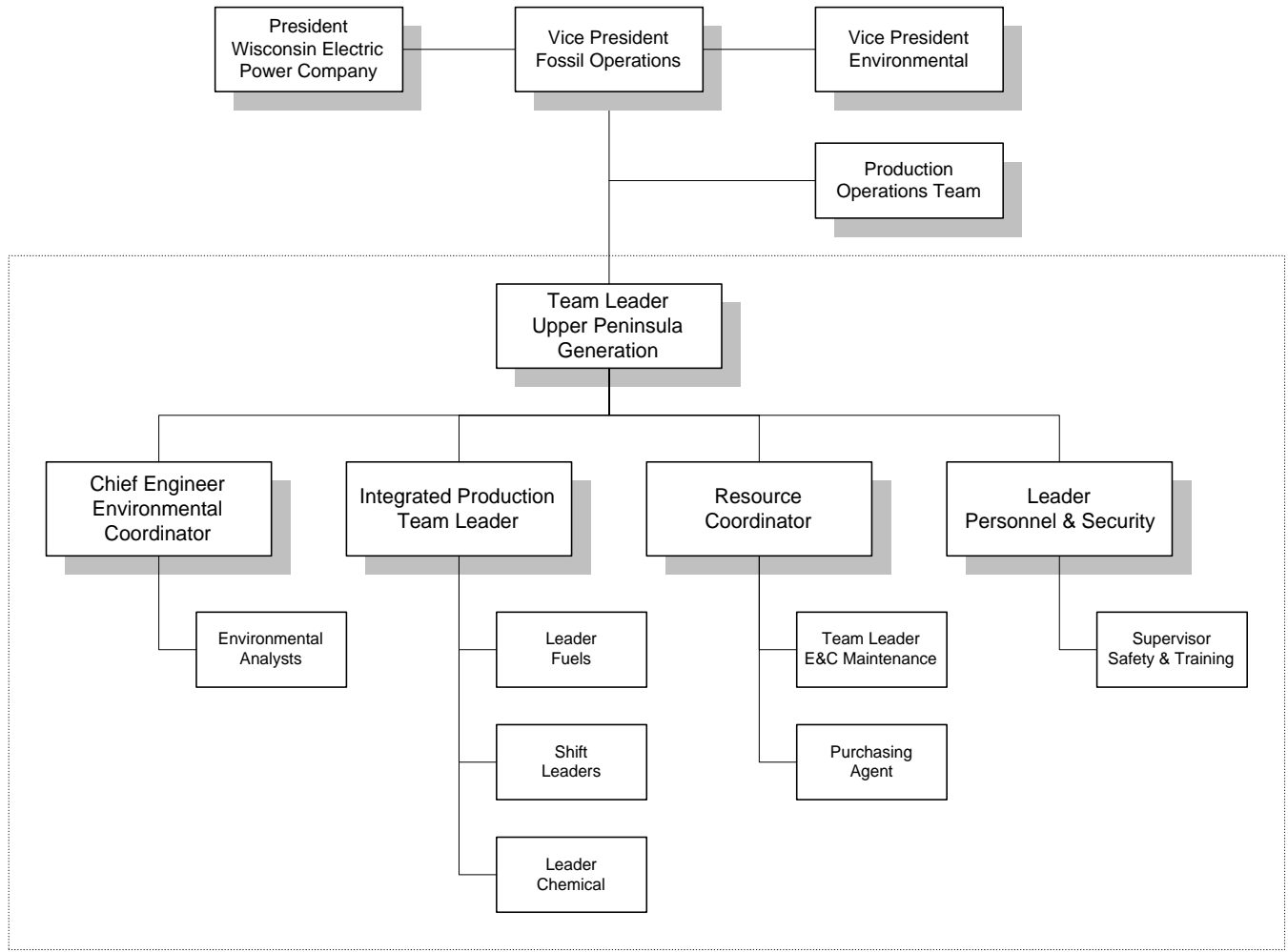
Date of Revision: 09/15/03

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| Resource Coordinator (Maintenance) | <ul style="list-style-type: none">• Ensure that all maintenance staff have received appropriate environmental training, are competent, and maintain the plant in accordance with all permits and regulatory requirements• Maintain all plant equipment, including monitoring and measuring equipment, within appropriate manufacturer specifications or standards set by the plant• Identify and report to the Plant Team Leader any changes in maintenance or plant condition that may result in a change in environmental aspects or impacts |
| Team Leader (Maintenance) | <ul style="list-style-type: none">• Ensure that adequate maintenance staff resources are available for maintaining the environmental monitoring and measuring equipment• Maintain all plant monitoring and measuring equipment within appropriate manufacturer specifications or standards set by the plant• Report to the Resource Coordinator any operational or equipment changes that may result in a change in environmental aspects or impacts |
| Human Resources Team Leader | <ul style="list-style-type: none">• Ensure that adequate training resources and time are available to maintain environmental technical competency• Ensure that security staff have received appropriate training adequate to monitor changes in site conditions or activities that may affect compliance |
| Human Resources Consultant / Safety Training | <ul style="list-style-type: none">• Work with plant and corporate environmental staff in identifying appropriate environmental training for all plant staff• Establish with Chief Engineer staff environmental competency levels for all positions• Conduct or otherwise secure adequate resources to provide all required training identified for plant staff |
| Senior Sourcing Specialist & Logistics Team Leader | <ul style="list-style-type: none">• Assure that products or services purchases by the plant are reviewed in a manner that seeks to minimize the potential environmental aspects and impacts |

7.0 Environmental Structure, Responsibility, and Organizational Control

Figure 7-1

Presque Isle Power Plant
Key Positions and Teams with Environmental Accountability





9.2 EMS Procedure for Investigating and Correcting Noncompliance

A procedure for investigating and correcting noncompliance must be developed for your EMS. Noncompliance events or occurrences can be detected through monitoring and measuring requirements in your EMS procedures, through auditing, or through other observations. The procedure should include:

- Methods for identifying noncompliance and the cause,
- Define authority and responsibility for correcting noncompliance,
- Planning and implementation of corrective actions,
- Review and modification of procedures to prevent reoccurrence of the noncompliance,
- Perform necessary training on new procedures/practices resulting from corrective action findings, and
- Documentation of noncompliance and corrective action.

On the following page is a procedure for Investigating and Correcting Noncompliance for Joseph's Forklift and Hauling Company's EMS. Also, included for your review is a Non-conformance, Corrective, and Preventive Action procedure for Denso Mfg. Michigan, Inc., which was developed for their EMS. Review these examples and develop your procedure for your system documentation.



EXAMPLE 9.2

Joseph's Forklift and Hauling Company

EMS Procedure No. EMS-8 Investigating and Correcting Noncompliance

I. Purpose

This procedure is to define authority, responsibility, and methods for investigating and correcting noncompliance for Joseph's Forklift and Hauling Company.

II. Scope

This procedure contains provisions to initiate and complete corrective action due to noncompliance identified within the EMS and to review corrective actions for effectiveness.

III. Definitions

Corrective Action - Action taken to correct a specific problem.

Noncompliance - Deviation from procedure defined by the EMS, process upset or violation of environmental or legal requirement.

IV. Procedures

A. Identify Authority and Responsibility

Identify employees responsible for each element of the EMS. Identify personnel responsible for correcting noncompliance and reviewing noncompliance. Include this in a responsibility matrix.

B. Identifying Noncompliance

Employees that discover a deviation from procedures (EMS, operations and activities, work instructions, monitoring, calibration, etc.), a process upset to a significant operation or activity, or a violation of an environmental/legal requirement, is to immediately report it to their supervisor. The supervisor will initiate corrective action.

C. Implementation of Corrective Action

Supervisors are responsible for completing the EMS Corrective Action Form No. 8-1 and for taking the appropriate steps to correct the noncompliance. The supervisor will take the following steps:

- a. identify the area of noncompliance,
- b. identify the problem,
- c. analyze the problem for potential corrections,
- d. decide on the corrective action,
- e. decide on an implementation timeline and assign tasks, and
- f. implement corrective action.

The EMS Corrective Action Form No. 8-1 is to be submitted to the EMS Manager who will receive the corrective action for effectiveness, and initiate changes in procedures if necessary to prevent reoccurrence of the noncompliance. All corrective actions are to be assigned a number for reference and logged on the EMS Corrective Action Log No. 8-2 for documentation purposes and for annual review of reoccurring problems.

V. Records

A list of roles and responsibilities for the EMS will be kept and updated as necessary for reference.

Corrective actions initiated are to have an EMS Corrective Form No. 8-1 and be logged on the EMS Corrective Action Log No. 8-2.

VI. Updates and Reviews

Corrective actions taken and methods used for corrective action will be reviewed annually, or upon the addition of new environmental/legal requirements and process changes.

VII. Responsibilities

Only supervisors and the EMS Manager can initiate and log a corrective action. It is the responsibility of all employees to bring to their attention any areas of noncompliance that they identify.

VIII. Related Documentation

EMS Corrective Action Form No. 8-1

EMS Corrective Action Log No. 8-2

Written by: Jill Jones **Date:** August 28, 1999

Reviewed by: Chris Joseph **Date:** August 30, 1999

Issue Date: 8-30-99

Version #: 1

EMS Corrective Action Form No. 8-1
Joseph's Forklift and Hauling Company
CAF Request No. _____

<u>CAF Requested by:</u>	
<u>Date Requested:</u>	
<u>Location or Area of Problem:</u>	
<u>Problem:</u>	
<u>Problem Analysis:</u>	
<u>Corrective Action Initiated:</u>	
<u>Date:</u>	
<u>Review of Effectiveness:</u>	<u>Changes as Result of Corrective Action:</u>

Signature of Manager: _____

Date: _____

DENSO MFG. MICHIGAN, Inc. One Denso Rd., Battle Creek, MI		Standard Reference: ISO 14001(96) Chapter 4.5		Environmental Manual Non-conformance, corrective, and preventive action		Page 1
Issue Date: 3/10/98	Revision Date: 9/19/02	Approved: A. Staltmanis	Checked: K. O'Shei	Written: M. Myszka	Number: EN-EM-452-01	

1.1 PURPOSE

This procedure identifies the method for handling and investigating non-conformance, taking actions to mitigate any impacts, and completing corrective and preventive action.

1.2 SCOPE

This procedure applies to all departments and activities at DMMI.

1.3 RESPONSIBILITY

All associates, temporaries, contractors, and interns are responsible for reporting non-conformance or non-compliance issues to their management, as the issues are discovered. Management is responsible for notifying the Environmental Section of those issues. The Environmental Section is responsible for issuing an ENCARG (Environmental Correction Action Report) form as needed.

1.4 ACTIONS AND METHODS

1.4.1 ISO 14000 Non-conformance derived from internal audits

Non-conformance, corrective, and preventive actions found during internal audits are handled by Procedure #EN-EM-454-01, Internal EMS Audits. CARs (Corrective Action Requests) are issued as the result of the determination of non-conformances found during EMS internal audits. The issuing of CARs is covered under work instruction EN-EM-454-01-PE04, Analyzing EMS Audit Findings and Devising Recommendations.

1.4.2 Regulatory Non-compliance

Regulatory non-compliance issues can be identified by the Environmental Engineering Section, or by DMMI Management. When a non-compliance issue arises, the Environmental Engineering Section may issue an Environmental Corrective Action Report (ENCARG) Form, Form 4.5.2, as needed

1.4.3 ENCARG Form

Any member of the Environmental Engineering Section may issue an ENCARG form for any of the following circumstances:

1. An environmental non-compliance issue,
2. An environmental issue that has the potential for non-compliance.
3. An actual or potential non-conformance issue.

DENSO MFG. MICHIGAN, Inc. One Denso Rd., Battle Creek, MI		Standard Reference: ISO 14001(96) Chapter 4.5		Environmental Manual Non-conformance, corrective, and preventive action		Page 2
Issue Date: 3/10/98	Revision Date: 9/19/02	Approved: A. Staltmanis	Checked: K. O'Shei	Written: M. Myszka	Number: EN-EM-452-01	

The ENCARG system is a progressive activity, intended to be used in the event of significant issues. It is not intended for use for daily problem solving or troubleshooting. Examples of significant issues include:

- Any formal external non-compliance or non-conformance notice,
- Any activity which can result in a systematic failure,
- Repetitive non-compliance or non-conformance activities,
- An action or non-action which can directly result in environmental harm,
- An activity, that without formal action, would not be corrected.

* ENCARGs can be issued at 2 levels (A & B). Level A ENCARGs are for significant or systematic issues, which indicate or require executive review. Such a review will be conducted at a monthly Environmental Meeting, as the schedule permits. Level B ENCARGs are for less significant issues. Level B ENCARGs will be reviewed by the Environmental Engineering management (Manager or greater) within 30 days of being completed. The ENCARG level will be decided by its issuer. *

The Environmental Engineering Section is responsible for completing Section #1 on the ENCARG form and submitting it to the appropriate Department Manager. The appropriate Department Manager is responsible for ensuring that sections #2 through #7 are completed, the form has written, checked, and approval signatures, and that the form is returned to the Environmental Engineering Section by the due date on the top of the form. The Environmental Engineering Section is responsible for checking the corrective actions, and completing the evaluation box in Section #6. Countermeasures will be evaluated according to procedure #EN-EM-452-01-PE10, Countermeasure Audits. **

1.5 REFERENCES

Procedure #EN-EM-454-01, Internal EMS Audits

Procedure #EN-EM-453-01, Records

**

Procedure #EN-EM-452-01-PE10

* ENCARG database on Lotus Notes *

1.6 RECORDS

Records produced from this procedure are handled per Records Procedure #EN-EM-453-01.

Environmental Corrective Action Report (ENCAR)

The Environmental Engineering Section is to complete all shaded areas and Section #1

ENCAR Number	Issued by
ENCAR Issue Date	ENCAR Due Date
Responsible Department	
<p>1. Problem Description:</p> <p>Date and Time: _____ Previous Occurrence: ____yes ____no</p> <p>Description and/or Diagram of Problem:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>	
<p>2. Immediate Action(s):</p> 	
<p>3. Cause and Effect Diagram:</p> <div style="text-align: center; margin-top: 20px;"> </div>	

4. Occurrence Analysis

Current:	Revised:
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5. 5 - Whys

Occurrence	1	2	3	4	5
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Non-Detection	1	2	3	4	5
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6. Countermeasures:

	Date Completed	Env. Section Evaluation	Audit Method

7. Across-Line Actions:

	Date Completed	Env. Section Evaluation	Audit Method

Written/Date	Checked/Date	Approved/Date	Returned to
	→	→	→ Environmental Engineering



9.3 Environmental Self-Auditing

Keys



Establish a procedure to provide for regular voluntary environmental self-audits and promptly correct any violations that are found. [R 324.1505 (2)(b)(iii)]

Auditing resources:

- **Environmental Science and Services Division (ESSD) at (800) 662-9278**
- **Visit the EPA webpage at www.epa.gov**
- **Industry and professional associations/ societies**
- **Legal council**
- **Environmental consultants**
- **RETAP**

Environmental self-audits are a requirement of a C3 EMS. Continuous environmental compliance is the goal. Audits are a valuable tool to assess your regulatory compliance status in addition to being used to update environmental and legal requirements in your EMS. Auditing tools in your EMS must have a mechanism to promptly address and correct any violations of applicable environmental requirements. For your EMS, you need to establish a systematic method to audit your facility. Auditing can be done in a number of different ways. Some suggestions for auditing are:

- Develop internal protocols specific to your company and operations. Many larger companies have their own internal audit teams and internal audit protocols. Smaller companies probably do not have these kinds of resources, but check with your industry associations. Many of them have developed auditing guidance for their specific industries.
- Hire an environmental consultant to audit your facility. This can be expensive for a small company. So to alleviate costs, hire a third party every three years or at a regular interval to balance internal auditing checks you are doing.
- Many regulatory agencies have developed self-auditing guides to help industry. Check the Environmental Protection Agency's webpage and with the MDEQ for auditing guidance.
- Small businesses can also take advantage of the Retired Engineers Technical Assistance Program (RETAP). (This is a group of retired engineers that offer their services to small businesses.)





9.4 C3 EMS Auditing

Keys



Third party auditors can also be used to audit a system. Third party audits for ISO 14001 systems are common.

The entire Environmental Management System needs to be audited periodically to identify any “nonconformances” or noncompliance between your EMS requirements and actual practices and measurements. An EMS audit is an important tool to determine whether your EMS is being properly maintained and implemented. Otherwise, you have spent a lot of time, effort and maybe even some money and have received little benefit.

The EMS audit should proceed according to the protocols that you develop. These protocols should include auditing all the elements required by the type of EMS you have implemented. For a C3 EMS, the following elements need to be audited:

- Environmental policy,
- Environmental program development,
- Operations and activities of significant environmental impact,
- Environmental reports and recordkeeping,
- Environmental training and tracking,
- Emergency preparedness and response,
- Internal communication,
- Public communication,
- Environmental self-audits, and
- EMS audits.

The audit should be conducted by a senior facility operations manager or functional manager (e.g., finance, quality) who may be involved in, but is not responsible for the EMS. Auditing needs to be objective and someone who deals with the system on a day to day basis may not recognize a noncompliance.

Following is a protocol developed for a C3 EMS that you can use to audit your C3 EMS developed by this manual.



ENVIRONMENTAL AUDIT REPORT: PRIVILEGED DOCUMENT

Form No. EMS 9-1 C3 EMS Audit

This form is intended as a guide for planning and conducting a C3 environmental management system audit. It may require additions, revisions or other modifications in order to meet the needs of facility-specific audit objectives, industrial settings or other special circumstances.

The Environmental Science and Services Division (ESSD) of the MDEQ oversees the requirements of the Clean Corporate Citizen (C3) program. An environmental management system (EMS) is required by this program. The rules for an acceptable EMS per the program are contained in the Clean Corporate Citizen General Program Rules (R 324.1501 to R 324.1511). This audit form audits an EMS according to the C3 rules.

Basic Definitions:

Applicable environmental requirements - means Article II and Chapters 1 and 3 of Article III of Act No. 451 of the Public Acts of 1994, as amended, being Sec. 324.3101 to 324.21551, 324.30101 to 324.36507, and 324.60101 of the Michigan Compiled laws, the administrative rules promulgated pursuant to Article II and Chapters 1 and 3 of Article III, and permits, order, and other legally binding documents issued pursuant to Article II and Chapter 1 and 3 of Article III.

Clean Corporate Citizen (C3) - means a person who operates an establishment that has demonstrated environmental stewardship and a strong environmental ethic by voluntarily meeting the criteria set forth in this part and who has been designated a clean corporate citizen by the department.

Continuous improvement - continually review systems, operations, and activities to improve processes, correct deficiencies, and develop more efficient systems.

Environmental management system - means the part of an overall management system that addresses environmental concerns through the allocation of resources, assignment of responsibilities, and ongoing evaluation of practices, procedures, and processes to achieve sound environmental performance.

ISO 14001 - means a standard adopted by the International Organization for Standardization to prescribe uniform requirements for the purpose of certification or registration of an environmental management system.

Pollution prevention - means eliminating or minimizing the initial generation of waste at the source or utilizing environmentally-sound on-site and off-site reuse or recycling. Waste treatment, release, or disposal is not considered pollution prevention.

Responsible official - means an individual, as defined in R336.1118 (h)(i) to (iv), who has the authority to sign and certify to, on behalf of an applicant for a Clean Corporate Citizen designation, the truth, accuracy, and completeness of the application.

Waste - means any material, energy, or other resource that is not incorporated into a product, such as surplus, obsolete, off-specification, contaminated, or unused material, and includes air emissions, water discharges, hazardous waste, and solid waste.

ENVIRONMENTAL AUDIT REPORT: PRIVILEGED DOCUMENT

A. EMS GENERAL SURVEY

For baseline information, answer the following questions regarding the environmental management system (EMS) at your facility.

	Yes	No
Do you have a C3 environmental management system?		
If No , do you have an ISO 14001 EMS? <i>(If the system is certified, it will meet the requirements of the C3 program.)</i>		
If you answered Yes to either of the above questions, this auditing form can be used to determine if your EMS meets the requirements of the C3 EMS and to determine system efficiency according to the program.		
If you answered No to either of the above questions, but you do have an EMS that you would like to compare to the C3 EMS, continue with this audit.		

B. ENVIRONMENTAL POLICY

	Yes	No	Remarks
1. Has an environmental policy been developed for the EMS? [MI R 324.1505(2)(b)(i)]			
2. Does the environmental policy contain the following six items? [MI R 324.1505(2)(b)(i)(A)-(F)]			
a. Articulates the Clean Corporate Citizen's mission and values.			
b. Emphasizes continuous improvement.			
c. Promotes pollution prevention.			
d. Acknowledges the importance of communication with the public.			
e. Emphasizes compliance with relevant environmental laws and regulations.			
f. Recognizes that every individual at the company can contribute to environmental improvement.			
3. Is the environmental policy approved by a responsible official or adopted under a corporate environmental policy?			
4. Has the environmental policy been communicated to the employees and all interested parties?			

If any of the above answers is No, a noncompliance exists according to the requirements of a C3 EMS. A corrective action should be initiated per EMS requirements.

ENVIRONMENTAL AUDIT REPORT: PRIVILEGED DOCUMENT

C. ENVIRONMENTAL PROGRAM DEVELOPMENT

	Yes	No	Remarks
1. Has an environmental program and procedures been identified to do the following? [MI R 324.1505(2)(b)(ii)(A)-(B)]	█	█	
a. Have the aspects of a facility's activities, products and services that have significant impacts been identified?			
b. Have objectives and targets been identified for the activities, products and services of significant impact?			
c. Do the objectives and targets meet the requirements of the facility's environmental policy?			
d. Has a procedure(s) been developed to identify aspects, impacts, objectives, and targets for the EMS?			
2. Does the system documentation indicate that aspects, impacts, objectives, and targets are being assessed and implemented according to the procedure requirements?			
3. Does system documentation indicate that progress is being made toward achieving the objectives and targets?			
4. Are aspects, impacts, and objectives and targets reviewed and updated at regular intervals or when changes occur in facility operations?			

If any of the above answers is No, a noncompliance exists according to the requirements of a C3 EMS. A corrective action should be initiated per EMS requirements.

D. ENVIRONMENTAL SELF-AUDITING

	Yes	No	Remarks
1. Is a procedure in place to do regular voluntary environmental self-auditing for the facility? [MI R 324.1505(2)(b)(iii)]			
2. Do the procedures for environmental self-audits contain the following?	█	█	
a. Type the general scope of audits.			
b. Frequency of audits.			
c. Method of reporting audit results.			
d. Mechanism to promptly address any discovered violations of applicable environmental and legal requirements?			
3. Does system documentation indicate that environmental self-auditing is being carried out according to the procedure requirements?			

ENVIRONMENTAL AUDIT REPORT: PRIVILEGED DOCUMENT

	Yes	No	Remarks
4. Does system documentation indicate that all identified violations or noncompliance issues are (promptly) corrected?			

If any of the above answers is No, a noncompliance exists according to the requirements of a C3 EMS. A corrective action should be initiated per EMS requirements. As best management practice, auditing of the EMS should be included in the Environmental Self-Auditing.

E. OPERATIONS AND ACTIVITIES OF SIGNIFICANT ENVIRONMENTAL IMPACT

	Yes	No	Remarks
1. Have procedures been written and implemented for all operations and activities of significant impact? [MI R 324.1505(2)(b)(iv)]			
2. Do the procedures contain provisions to meet the following four requirements? [MI R 324.1505(2)(b)(iv)(A)-(D)]			
a. Monitor the operations and activities.			
b. Assure that the operations and activities remain within acceptable parameters.			
c. Include provisions to implement prompt correction if a deviation occurs.			
d. Systematically review records and report on environmentally related actions relative to the operations and activities.			
3. Does system documentation indicate that all procedures for operations and activities are being carried out according to the procedure(s) requirements?			

If any of the above answers is No, a noncompliance exists according to the requirements of a C3 EMS. A corrective action should be initiated per EMS requirements.

F. ENVIRONMENTAL RECORDS AND RECORDKEEPING

	Yes	No	Remarks
1. Have the following types of best management practices been implemented to establish reporting and recordkeeping for the EMS?			
a. Have the types of records to be kept been identified?			
b. Has a system been developed to identify and index the records?			
c. Has a method been developed to track records and results?			
d. Is there a method to remove obsolete records?			

ENVIRONMENTAL AUDIT REPORT: PRIVILEGED DOCUMENT

	Yes	No	Remarks
2. Has a procedure been developed to establish necessary reporting and recordkeeping that documents the environmental status of all operations and activities? [MI R 324.1505(2)(b)(v)]			
3. Does the system documentation indicate that reporting and recordkeeping has been implemented according to the procedure requirements?			

If any of the above answers is No, a noncompliance exists according to the requirements of a C3 EMS or a best management practice may need to be implemented for document control. A corrective action should be initiated per EMS requirements.

G. ENVIRONMENTAL TRAINING AND TRACKING

	Yes	No	Remarks
1. Have procedures been developed to identify and track the environmental training needs of all personnel who have responsibility for activities that have significant environmental impact? [MI R 324.1505(2)(b)(vi)]			
2. Do the procedures for training and tracking contain provisions to do the following?			
a. Identify the type and frequency of training.			
b. Identify who needs training.			
c. Provide for a system to track training of employees.			
d. Provide for review and updating of training requirements.			
3. Are the appropriate environmental and legal training requirements covered by or included in the procedures? (e.g., SPCC, PIPP, SWPPP, Air Malfunction Abatement Plans, OSHA, etc.)			
4. Is training on EMS procedures included in facility training and tracking requirements?			
5. Does the system documentation indicate that training and tracking is being developed and implemented according to the procedure(s) requirements?			

If any of the above answers is No, a noncompliance exists according to the requirements of a C3 EMS. A corrective action should be initiated per EMS requirements.

ENVIRONMENTAL AUDIT REPORT: PRIVILEGED DOCUMENT

H. EMERGENCY PREPAREDNESS AND RESPONSE

	Yes	No	Remarks
1. Have procedures been developed to respond to and report, as appropriate, accidents, malfunctions, spills, upsets, and other emergency situations? [MI R 324.1505(2)(b)(vii)]			
2. Do the procedures and/or emergency response plans contain provisions to do the following?			
a. Provide for notification and reporting of spills/accidents internally and externally.			
b. Provide for mitigation or clean-up of associated environmental impacts.			
c. Provide for incident review for appropriate response and prevention of occurrence.			
3. Are the appropriate environmental and legal requirements for the facility covered by or included in the procedures? (e.g., SPCC, PIPP, Air Malfunction Abatement Plans, etc.)			
4. Are the following best management practices part of the procedures and/or emergency response plans?			
a. Arrangements made with the local emergency response providers.			
b. Practice and train for emergency response actions.			
c. Appropriate emergency response equipment kept and employees trained on location and use.			
5. Does system documentation indicate that all procedures for emergency preparedness and response are being carried out according to the procedure requirements?			

If any of the above answers is No, a noncompliance exists according to the requirements of a C3 EMS or a best management practice may need to be implemented. A corrective action should be initiated per EMS requirements.

ENVIRONMENTAL AUDIT REPORT: PRIVILEGED DOCUMENT

I. AUTHORITY, RESPONSIBILITY AND CORRECTION OF NONCOMPLIANCE

	Yes	No	Remarks
1. Has authority and responsibility for the elements of the EMS been defined and documented?			
2. Has a method or procedure been developed for investigating and correcting noncompliance with the procedures set forth in the EMS? [MI R 324.1505(2)(b)(viii)]			
3. Do the procedures for correcting noncompliance contain the following?			
a. Methods for identifying noncompliance and the cause.			
b. Implementation of corrective actions.			
c. Review and modification of procedures to prevent reoccurrence of the noncompliance.			
d. Define authority and responsibility for correcting noncompliance.			
e. Documentation of noncompliance and corrective action.			
4. Does system documentation indicate that correction of noncompliance is being carried out according to the procedure requirements?			

If any of the above answers is No, a noncompliance exists according to the requirements of a C3 EMS or a best management practice may need to be implemented for document control. A corrective action should be initiated per EMS requirements.

J. INTERNAL COMMUNICATION

	Yes	No	Remarks
1. Have procedures been developed and implemented for internal communication of the EMS and environmental issues across functional groups at the facility? [MI R 324.1505(2)(b)(ix)]			
2. Do the procedures for internal communication contain provisions to do the following?			
a. Identify the method and type of communication.			
b. Identify the initiator and recipient of the communication.			
c. Provide for review and updating for communication efficiency.			
3. Does system documentation indicate that internal communication is being carried out according to the procedure requirements?			

If any of the above answers is No, a noncompliance exists according to the requirements of a C3 EMS or a best management practice may need to be implemented. A corrective action should be initiated per EMS requirements.

ENVIRONMENTAL AUDIT REPORT: PRIVILEGED DOCUMENT

K. EXTERNAL COMMUNICATION

	Yes	No	Remarks
1. Have procedures been developed and implemented for external communication of the EMS and environmental issues with the public? [MI R 324.1505(2)(b)(x)]			
2. Do the procedures for external communication contain provisions to do the following?			
a. Identify the method and type of communication.			
b. Identify the initiator and recipient of the communication.			
c. Provide for review and updating for communication efficiency.			
3. Does the procedure include a pathway for dialogue with the public on environmental issues?			
4. Does system documentation indicate that external communication is being carried out according to the procedure requirements?			

If any of the above answers is No, a noncompliance exists according to the requirements of a C3 EMS or a best management practice may need to be implemented. A corrective action should be initiated per EMS requirements.

ENVIRONMENTAL AUDIT REPORT: PRIVILEGED DOCUMENT

L. SUMMARIZE AUDIT RESULTS

1. Review each section of the audit guidance form. Summarize your conclusions regarding the facility's compliance status with the EMS requirements. Were any discrepancies, exceptions or noncompliance issues observed? List as part of the summary.

2. List any areas of improvement that your facility needs to pursue in regard to environmental management.

Signature of Auditor: _____

Date: _____

ENVIRONMENTAL AUDIT REPORT: PRIVILEGED DOCUMENT

M. CORRECTIVE ACTION PLANNING

EMS Corrective Action Form?	Yes	No
List the items found in this audit that you feel require corrective action. Theses can include: 1) Areas of noncompliance, 2) Areas for improvement, and/or 3) Areas where you are not sure if you are in compliance and need further information.		
List Areas For Corrective Action:		

Signature: _____

Date Completed: _____



9.5 EMS Procedure for Environmental Self-Auditing and EMS Auditing

Keys



Two different types of audits are combined in this procedure:

- **Environmental Self-Audits** – to determine compliance with environmental regulations.
- **EMS Audits** – to determine if your system is operating according to the procedures that were developed.

These two types of audits do not necessarily have to be combined into one procedure. Instead you can complete a separate procedure for each audit type.

A procedure for Environmental Self-Auditing and EMS Auditing must be developed for your EMS. The procedure should include:

- the responsible party for conducting the audits,
- the type and scope of the audits,
- the frequency of the audits,
- a method for reporting the audit results, and
- correction of noncompliance found by the audits.

On the following page is a procedure for conducting Environmental Self-Auditing and EMS Auditing for Joseph's Forklift and Hauling Company. Also included for your review is a Compliance and EMS Auditing procedure for Wisconsin Electric - Presque Isle Power Plant and a Legal Review that Denso Mfg. Michigan, Inc. developed for their EMS. Review these examples and develop your procedure for doing your environmental compliance audits and your EMS audits.



EXAMPLE 9.3

Joseph's Forklift and Hauling Company

EMS Procedure No. EMS-9 Environmental Self-Auditing and EMS Auditing

I. Purpose

This procedure is to establish and maintain Environmental Self-Auditing and EMS Auditing procedures for Joseph's Forklift and Hauling Company.

II. Scope

This procedure contains provisions to conduct audits for environmental compliance and to assess the function of the EMS.

III. Definitions

Environmental Self-Audit - an environmental audit is voluntary, internal evaluation of a facility (or activity) regulated by environmental laws, conducted after March 18, 1996. The audit must be conducted in a reasonable amount of time, but must not exceed six months, and is designed to:

- identify past or current noncompliance,
- prevent noncompliance or improve compliance,
- identify an existing or potential hazard, contamination, or adverse environmental condition, or
- improve an environmental management system or process.

EMS Audit - an audit to evaluate system efficiency, review policy, evaluates objectives and targets, procedures, and identify/correct noncompliance in the system.

IV. Procedures

A. Environmental Self-Audits

Annual environmental self-audits are to be conducted to assess environmental compliance and performance. All information (e.g., interviews, notes, testing, observations) that are generated as a result of the audit and the audit report are to be labeled "ENVIRONMENTAL AUDIT REPORT: PRIVILEGED DOCUMENT" and all requirements under the Michigan auditing law Part 148 are to be followed to gain privilege and immunity. An audit report is to be generated for each audit and is to contain the following information:

- Date of audit,
- Audit team members,
- Objective and scope of audit,
- Method and results of audit,
- Summary and follow-up items.

Every third year, a qualified outside environmental auditor is used to evaluate environmental compliance at Joseph's Forklift and Hauling Company.

Follow-up items recommended in an audit are to be promptly initiated. All violations discovered by an environmental audit are to be written up on the EMS Corrective Action Form No. 8-1 and distributed to the appropriate supervisor for correction. All necessary disclosures of violations are to be made to the MDEQ by the EMS manager.

B. EMS Audits

Annual EMS audits are to be conducted to evaluate system efficiency, review policy, evaluate objectives and targets, update procedures, and correct noncompliance in the system. The EMS audit is to cover the following elements:

- Environmental policy,
- Environmental program development,
- Operations and activities of significant environmental impact,
- Environmental reports and recordkeeping,
- Environmental training and tracking,
- Emergency preparedness and response,
- Internal communication,
- Public communication,
- Environmental self-audits, and
- EMS audits.

Form No. EMS 9-1, C3 EMS Auditing will be used to audit the EMS. The protocol form will be used as the audit report. All system noncompliance identified will be documented on EMS Corrective Action Form No. 8-1 and distributed to the appropriate supervisor for correction.

V. Records

Auditing reports and documentation generated as a result of this procedure are to be kept in the EMS files for reference.

VI. Updates and Reviews

Auditing methods will be reviewed and updated annually, or upon the addition of new environmental/legal requirements and process changes.

VII. Responsibilities

Updating of auditing procedures must be coordinated and approved by the EMS Manager.

VIII. Related Documentation

EMS Corrective Action Form No. 8-1

Form No. EMS 9-1, C3 EMS Auditing

Joseph's Forklift and Hauling Company internal auditing protocols and checklists.

Written by: Jill Jones

Date: August 29, 1999

Reviewed by: Chris Joseph

Date: August 31, 1999

Issue Date: 8-31-99

Version#: 1

14.0 COMPLIANCE AND EMS AUDITING

14.1 Purpose

The purpose of this policy is to outline those procedures used to periodically review plant environmental performance, regulatory compliance, and implementation of the environmental management systems.

14.2 Scope

This procedure applies to environmentally related activities at Presque Isle Power Plant (PIPP) and pertains to the periodic review of:

- **Plant environmental performance** related to PIPP-specific targets and objectives associated with environmental aspects and impacts set by the plant or others. (See Chapter 4)
- **Regulatory compliance** with plant environmental permits and all applicable laws and regulations.
- **Conformance to the environmental management systems** adopted by the plant, with an overall goal of continuous improvement. This is also a specific requirement of the plant's C3 designation.

14.3 Procedures

Periodic regulatory compliance and EMS audits will be conducted at the plant. These may occur in accordance with the following criteria or prompts:

- Request by plant or senior management
- Follow up response to a regulatory inspection and finding
- Follow up from a previous audit
- Periodic and routine examination of plant environmental performance by the Environmental Department as part of its on-going compliance assurance program.

Audit objectives include, but may not be limited to the following:

- **Environmental compliance** with all permit and other regulatory requirements. These audits may be either focused or comprehensive reviews. These reviews will also require a commitment by plant management and staff to take specific follow-up action in a timely manner to assure continued regulatory compliance.

- Plant **environmental performance** related to specific performance targets and objectives set by the plant or We Energies' management. One objective of such a review will be to examine the plant's progress in pollution prevention and waste minimization.
- **Management system review** including an evaluation of those components contained in the plant's EMS as described in this manual.

All reviews will be conducted by the We Energies' environmental staff unless otherwise prescribed by plant or We Energies' management. These reviews will contain the following general components:

- Review of background information
- Preliminary or pre-audit meeting
- Facility inspection
- Records and document review
- Staff meetings and/or interviews
- Post-audit meeting(s)
- Draft and summary report
- Follow up actions by the PIPP staff
- Tracking and closure of action items by the We Energies environmental staff and PIPP plant staff.

Any regulatory findings of non-compliance may be communicated to and reviewed by legal staff. This may require very specific follow-up notification and action with regard to one or more regulatory agencies (e.g., MDEQ, EPA).

The communications department may occasionally be required to communicate general summary information on environmental performance to interested external parties. When this occurs it will be in close coordination with the PIPP Plant Manager and corporate environmental and legal staff. No external communications will occur without the review and incorporation of comments from these three parties.

14.4 Responsibilities

General responsibilities relating to the conduct of environmental audits and performance reviews are defined below.



14.0 Compliance and EMS Auditing



Date of Issue: 03/23/98

Date of Revision: 09/15/03

Group	Role and Responsibility
PIPP Staff <ul style="list-style-type: none"> • Plant Manager • Team Leaders • Staff 	<ul style="list-style-type: none"> • Cooperate in the conduct of all reviews • Review all findings, draft and final reports and provide feedback • Develop and suggest follow-up corrective or improvement actions • Follow up on all corrective actions on a timely basis • Communicate results of findings to staff • Communicate results of findings to senior management
We Energies Environmental Department	<ul style="list-style-type: none"> • Work with PIPP staff in scheduling reviews and audits • Conduct audits • Prepare summary of findings, draft and final reports • Support PIPP staff in developing follow-up and corrective actions • Incorporate feedback from PIPP in any suggested corrective action • Identify any regulatory compliance issues to PIPP staff and Legal Services • Seek guidance from Legal Services in developing follow-up actions to any compliance issues identified • Maintain all files and documentation related to reviews • Monitor, track and document closure of all regulatory compliance follow-up actions
Legal	<ul style="list-style-type: none"> • Support We Energies environmental and PIPP staff in reviewing and responding to any regulatory compliance issues identified during an audit
Communications	<ul style="list-style-type: none"> • Communicate (when appropriate) to interested external parties information on PIPP environmental performance

14.5 Related Documentation

Records of all environmental performance reviews and audits will be maintained by the We Energies environmental staff for at least six years. All draft reports, summaries and conclusions shall not be retained once the final documents are completed.

Supporting documentation for this procedure includes:

- Environmental Protection Agency, Policy on Environmental Auditing
- ASTM E 50.04 Standard Provisional Practice for Environmental Regulatory Compliance Audits
- ISO 14010 — Guidelines for Environmental Auditing, General Principles
- ISO 14011 — Guidelines for Environmental Auditing, Audit Procedures — Auditing of Environmental Management Systems



14.0 Compliance and EMS Auditing



Date of Issue: 03/23/98

Date of Revision: 09/15/03

- Environmental Health and Safety Auditing Roundtable, Standard for the Design and Implementation of an Environmental Health and Safety Audit Program
- Edison Electric Institute, Environmental Auditing Protocols and Checklists, Vol. 1–5

DENSO MFG. MICHIGAN, Inc. One Denso Rd., Battle Creek, MI		Standard Reference: ISO 14001(96)		Environmental Manual Legal Review		Page 1
Issue Date: 3/17/98	Revision Date: 8/4/98	Approved:	Checked: K. Dixon	Written: K. O'Shei	Number: EN-EM-454-02	

1.1 PURPOSE

This procedure describes the system for routing and legal review of DMMI Environmental Management System (EMS) Audit Reports to DENSO INTERNATIONAL AMERICA, Inc., (DIAM). The DIAM Legal Department identifies and addresses the potential legal liability issues which might arise in written Environmental Management System (EMS) audit reports.

1.2 SCOPE

This procedure applies to all internal *Category I* and externally prepared EMS audit reports at or for DMMI.

1.3 RESPONSIBILITY

The Environmental Engineering Section is responsible for ensuring that this procedure is followed during DMMI internal *Category I* EMS audits, and by external parties conducting EMS audits for DMMI. The DIAM Legal Department is responsible for reviewing the draft EMS audit reports in a timely manner.

1.4 ACTIONS AND METHODS

DMMI internal *Category I* and external audit report must be sent to DIAM Legal Department for legal review.

1.4.1 Marking of Audit Reports

Draft EMS audit reports, internal *Category I* or external, are clearly marked "DRAFT" and "PRIVILEGED AND CONFIDENTIAL" on each page in red. All final EMS audit reports, internal *Category I* or external, are clearly marked "PRIVILEGED AND CONFIDENTIAL" on each page in red.

1.4.2 Draft Audit Reports

Draft EMS audit reports must be submitted to the DIAM Legal Department for review. The DIAM EMS Audit Report Legal Review Form, Form 4.5.4(B), will be completed and submitted as a cover sheet to the EMS Audit Reports, according to the Form 4.5.4(B) instructions. The DIAM Legal Department will review the audit report and promptly submit any corrections back to the facility. The party generating the report will make corrections to the draft report based on the Legal Department's review. After corrections have been made, all copies of the draft report will be destroyed.

1.4.3 Final Audit Reports

DMMI will retain one copy of the final EMS audit report according to Procedure #EN-EM-453-01, Records, and forward another copy of the final EMS audit report to the DIAM Legal Department. DMMI will store the report in a manner and location which controls internal access, and avoids external access to any outside parties. The final report will not be shown to or distributed to outside parties, without the prior consent of the DIAM Legal Department.

DENSO MFG. MICHIGAN, Inc. One Denso Rd., Battle Creek, MI		Standard Reference: ISO 14001(96)	Environmental Manual Legal Review			Page 2
Issue Date: 3/17/98	Revision Date: 8/4/98	Approved:	Checked: K. Dixon	Written: K. O'Shei	Number: EN-EM-454-02	

1.4.4 External EMS Audits

External parties conducting EMS audits at DMMI must follow this procedure. The Environmental Engineering Section is responsible for providing this procedure to the external auditor for implementation during the EMS audit process.

1.5 REFERENCES

Procedure #EN-EM-453-01, Records
Form 4.5.4(B), DIAM EMS Audit Legal Review Form

1.6 RECORDS

Records produced from this procedure are handled per Records Procedure #EN-EM-453-01.

END

EM454-02.doc

DIAM EMS AUDIT REPORT LEGAL REVIEW FORM

Facility:	Date of EMS Audit:	Date Sent to DIAM:	S E C T I O N 1
Facility Contact Person / Title:			
Phone Number of Facility Contact:		Fax Number of Facility Contact:	
Nice Net:	Direct:	Nice Net: Direct:	
Type of EMS Audit:			
INTERNAL		EXTERNAL	S E C T I O N 2
*This section applies to external EMS audits, and should be completed by the external party conducting the EMS audit.			
Company Conducting the Audit:		Lead Auditor:	
Phone Number of Lead Auditor:		Fax Number of Lead Auditor:	
Name / Title of Team Members:			
<p>STEP 1: (Section 1) This section is to be completed by the facility receiving the EMS audit:</p> <ol style="list-style-type: none"> 1. Enter the facility name where the EMS audit was conducted. 2. Enter the date the EMS audit was conducted. 3. Enter the name and title of the facility contact person (this should be the individual to have direct contact with the DIAM Legal Department). 4. Enter the phone and fax number of the facility contact person (direct number and nice net if available). 5. Identify whether the EMS audit was Internal or External. 6. If the EMS audit is Internal, circle Internal and continue to STEP 3. If the EMS Audit is External, circle External and proceed to STEP 2. <p>STEP 2: (Section 2) This section is to be completed by the external party conducting the EMS audit:</p> <ol style="list-style-type: none"> 1. For external EMS audits, the external party conducting the EMS audit must follow the Legal Review Procedure, EN-EM-454-2. 2. Enter the name of the Auditing Company. 3. Enter the name of the Lead Auditor. 4. Enter the phone and fax number of the Lead Auditor. 5. Enter the names and titles of the Audit Team Members. 6. Proceed to STEP 3. <p>STEP 3: These additional instructions are to be followed by external parties conducting external EMS audits, or by facility associates conducting internal EMS audits:</p> <ol style="list-style-type: none"> 1. Attach this form as a cover sheet to the EMS Audit Report. 2. Mail the EMS Audit Report to: DIAM Legal Department, Attention: DIAM Legal (EMS Audit), 24777 Denso Drive, Southfield, MI, 48986-5133. 			I N S T R U C T I O N S



9.6 Environmental Self-Auditing and EMS Auditing Completion Checklist

Check Box

- 1. Have you defined authority, responsibility and correction of noncompliance?
- 2. Have you developed a procedure to identify, correct and review noncompliance issues?
- 3. Have you developed methods to do regular voluntary environmental audits?
- 4. Have you determined what and how to audit your EMS?
- 5. Have you written a procedure for environmental self-audits and EMS audits for your EMS?



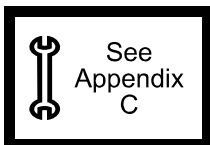


9.7 EMS Summary Checklist

Keys



When you have completed and implemented your EMS, you may decide to apply for the Clean Corporate Citizen (C3) Program. To qualify for the program you must also practice Pollution Prevention (P2) and have a good environmental compliance history. Appendix C contains the application form and other information describing the application process.



This completes your EMS development using this manual. Complete the following checklist to review the elements of the EMS that were developed.

Check Box

Yes No

- 1. Do you have a signed environmental policy and is it still applicable to the system you have developed?
- 2. Have you identified your aspects and impacts, and are there any more that were identified during EMS development that now need to be added?
- 3. Have you set objectives and targets for your significant impacts and do they still support your environmental policy?
- 4. Have you developed and implemented procedures for your operations and activities of significant impact, and have they been reviewed since implementation to see if they are functioning?
- 5. Have you identified what records to keep and control, and whether the procedure for recordkeeping is effective?
- 6. Have you identified your training needs and implemented training and tracking of your employees?
- 7. Have you identified your emergency preparedness and response requirements and emergency response plans and implemented procedures for emergency response?
- 8. Have you identified how to internally communicate with your employees and is it working?
- 9. Have you identified how to communicate externally and have you implemented the procedure to externally communicate?
- 10. Have you identified how to correct noncompliance and who is responsible for correcting noncompliance?
- 11. Have you developed how you are going to conduct Environmental Self-Audits and EMS Audits?
- 12. Do management and your employees have a better feel for how their activities impact the environment?

