



The Third-Party Auditors Are Scheduled. **What Are The Top 10 Things I Can Do As An EHS Professional To Prepare?**

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◆ What is an audit?



The audit is a systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.

How is the auditing process organized?



The process of auditing is essentially a linear sequence:

Preparation

- Audit schedule
- Audit plan
- Set up the Audit

The Audit Days

- Opening Meeting
- Collect objective audit evidence
- Audit nonconformities, issues and comments
- Closing meeting

Afterwards

- Audit report
- Close out



What are the qualifications of the auditors?



Environmental Professional is someone who possess the specific education, training, and relevant experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases of hazardous substances and/or petroleum products on, at, in, or to a property.



- Professional engineer/geologist
- CHMM
- QEP
- CSP
- CPEA
- ISO Credentials
- Internal standard

Attributes of the Auditor



Auditing can be stressful

An audit can be stressful, both on the auditor and on the auditee. The auditor may be away from home in an unfamiliar environmental and industry. The auditor must be alert, thinking about the next step, analyzing the previous response, reviewing evidence, etc.



Desirable attributes of the Auditor

- Ethical and professional
- Tenacious, but Patient
- Objective
- Punctual
- Observant and perceptive
- Able to communicate effectively

Top 10 Things You Can Do to Prepare

1. Have your operational documents together.

Permits

- NPDES/NOEC
- Wastewater discharge
- Air – Title V
- Equipment permits
- RCRA
- Dams
- Water withdraw
- Radiation
- Local/State

Plans

- SWPPP
- SPCC
- Waste Management
- Contingency plans
- Hazard Communication
- H&S
- Dust mitigation

Reports and Records

- EPCRA TRI/T2
- DMRs
- Spills
- OSHA logs
- Equipment maintenance
- Training records
- Monitoring records

Legal Documents

- Consent decrees
- Consent orders
- NOVs
- Response to NOVs
- Other regulatory communications

2. Know how to show compliance with your permits and plans.

General vs. site-specific permit conditions

Regulatory feedback on permit compliance, letters, warning, NOVs, Consent Decrees, other communication

Sampling and analysis reports, frequency, labs

Proactive or sentinel monitoring to anticipate when you're going to be out of compliance and take action.

You aren't expected to know everything about everything at the facility.

Depending on your role, you may be able to address some of the auditor's questions, but your colleagues will need to be present. Assemble the team for the audit day.

Who are the key personnel who can offer specific information?

◆ 3. Have your facility experts available.



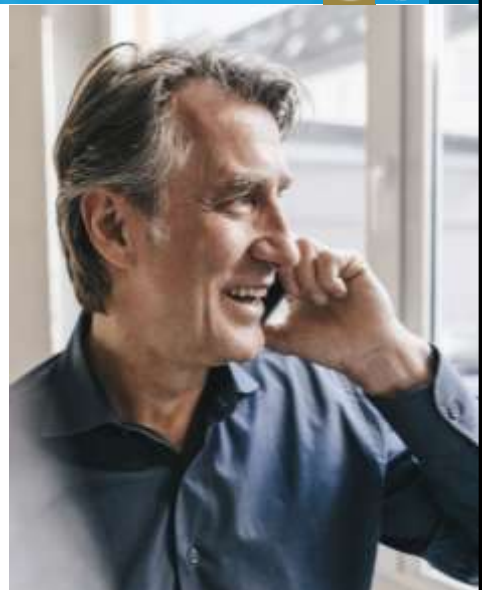
◆ 4. Coordinate with the auditing team.



Insist on coordinating with the auditing team as early as you can in the process.

Be proactive in your communication, become an engaged participating member of the process.

Last minute arrangements can be stressful on both parties.



4. Coordinate with the auditing team.



Ask questions about:

- Schedule
- Purpose for the audit
- What parts of the facility do they want to see
- Specific areas of interest
- Scope
 - Environmental compliance
 - Health and safety review
 - Process safety management

5. Have safety/security orientation materials together for the opening meeting.

Auditors, like any visitor, will need to go through your safety and security orientation.

Be ready for the auditor to ask for access to every portion of the facility. Some places have advanced training and security checks that need to be considered well ahead of time.

Do your visitors need an escort?



6. Communicate internally about the audit.

You'll want to let folks working on the floor know there will be visitors.

Auditors may want to ask questions of folks on the floor about specific processes or work practices.

Discussions between auditors and floor workers are best initiated by the escort.



You may or may not know the reason for the audit.

Rumors between staff can travel quickly on the floor. Careful messaging with the staff is essential.

Auditors should have a response that's appropriately general in case they are asked directly.

7. Know how to explain your work.

Environmental compliance mental model for auditing can be organized by:

- What comes into the facility?
- What happens to it?
- What leaves the facility?

The audit is about the processes, procedures, and practices at the facility.



7. Know how to explain your process.

Health and safety mental model for auditing can be organized by:

- What are the hazards?
- What are the exposures?
- What are the controls?



7. Know how to explain your process.



Floor plans are very helpful to the auditor – both to understand the process and to record notes.

Even an emergency evacuation map is helpful if there is no other plan available.

7. Know how to explain your process.

Culture is King.

Housekeeping is a proxy for culture.

8. Tidy up your facility.

If you have some advanced notice, work with floor staff to tidy up the facility.

Housekeeping is a KEY indicator to auditors about the state of the facility – including compliance and work practices.

Pay special attention to known problem areas before the auditors show up and bring those areas into compliance.

Auditors look everywhere and ask what's behind every door.

You won't get to everything, but some efforts will pay dividends for you and the audit team.

Don't purposely leave small things undone to distract the auditors. Adopting an attitude of "*We'll give them something to find.*"

8. Tidy up your facility.



10. Be ready to be open and honest.

Don't actively hide or divert auditors away from problem areas. We're going to find them.

Answer questions honestly, your responses are going in reports that others will read – maybe even your bosses.

Telling auditors your challenges could help bring attention to them and get them resolved.

Be open to suggestions for improvement or coaching. Auditors have seen a lot, leverage their experiences.



◆ Setting Expectations



Audits are not a “gotcha” scenario.

Auditors are developing an objective assessment of your facility. Auditors should be operating in good faith.

Auditors should be friendly and strive to build a cooperative relationship.

May offer coaching or share experiences from previous facilities.

◆ Outcomes and next steps of the audit



A close-out meeting should occur at the facility. Action items assigned to the facility for additional information.

Auditor can discuss preliminary findings and objective evidence that supports them.



Auditors may call back for additional information or clarifications.

A written report will be produced for the end client.



Questions?

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