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Division of Operations Environmental Implementation Procedure  
Bureau: Highway Maintenance

Date: 2/10/11

**Procedure EIP-14**  
**EMS Evaluation**

Revision: 3.1

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**PURPOSE:**

The purpose of this Environmental Implementation Procedure (EIP) is to establish procedures to periodically evaluate Bureau conformance with the EMS through internal EMS audits. Refer to EIP-15: Compliance Evaluation for information about evaluating compliance with legal, regulatory, and other requirements.

**RESPONSIBILITY:**

Office of Stewardship and Compliance (OSC):

- Develop an Internal EMS Audit Protocol and an EMS Audit Checklist.
- Provide oversight and assist Bureaus develop and implement an internal EMS audit program.
- Assist Bureaus in implementing corrective and preventative actions resulting from internal audit findings.
- Report EMS audit findings to NHDOT management.

Director/Bureau Administrator:

- Provide management support and adequate resources to conduct internal EMS audits and to address their findings.

Bureau EMS Coordinator:

- Coordinate with OSC, Bureau management, and the EMS Team to identify an EMS Audit Team to conduct internal EMS evaluations.
- Lead Bureau efforts to address findings from internal EMS audits by means of corrective and preventative actions.
- Track audit findings to closure, and periodically report findings and closure status to OSC and Bureau management.

Bureau Employees:

- Participate in internal EMS audits as applicable.
- Report any identified instances of EMS nonconformance to Bureau management and the EMS Team.

**DOCUMENTS AND RECORDS:**

- EIP-14-Form 14a EMS Audit Checklist
- EIP-14-Form 14b Findings Tracking Log



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**PROCEDURE:**

1. OSC and the Bureau EMS Audit Team evaluate the EMS at least annually to determine if it is being properly implemented, maintained, and confirm it continues to conform to EMS and Administrative Order of Consent (AOC) requirements.
2. OSC will gather a qualified EMS audit team to systematically evaluate all EMS elements and the current status of EMS implementation. The EMS Audit Team will use the EMS Audit Checklist (EIP-14-Form 14a) for internal EMS evaluations.
3. When instances of nonconformance are identified, the Bureau EMS Team should list and describe the corrective and preventative actions needed to correct them (see EIP-13: Nonconformity, Preventative, and Corrective Action). Include a schedule for completion of the actions.
4. The Bureau EMS Coordinator uses the Findings Tracking Log (EIP-14-Form 14b) to track progress toward returning to EMS conformance until each finding is closed. All activities related to the closing findings from EMS audit should be documented.
5. The Bureau EMS Coordinator confirms that all EMS documentation or operational controls are modified as needed to achieve EMS conformance. These changes should be documented and communicated to affected employees, onsite service providers, and contractors.
6. The Bureau EMS Coordinator reports results of EMS audits and the status of EMS conformance, including any action plans currently in progress, at least annually to Bureau management and OSC. The annual Management Review (see EIP-16: Management Review) is an appropriate forum for reporting on the status of EMS conformance.
7. The Bureau EMS Coordinator maintains all documentation and key records generated as part of this EIP in accordance with EIP-9: Documentation, Document Control, and Records Management.



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