



Division of Operations Environmental Implementation Procedure
Bureau: Highway Maintenance

Date: 05/10/2017

Procedure EIP-14
EMS Evaluation

Revision: 3.2

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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:

Commissioner/Division Director:

- Encourage & facilitate the appropriate implementation and review of Departments EMS.

Office of Stewardship and Compliance (OSC):

- Develop an Internal EMS Audit Protocol and an EMS Audit Checklist.
- Assist Bureaus in implementing corrective and preventative actions resulting from evaluation findings.
- Report EMS audit findings to NHDOT management and Bureau Administrator/District Engineers

Bureau Administrator/District Engineer:

- 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 facilitate 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.

Safety and Environmental Coordinator:

- Participate in and cooperate during internal EMS evaluations.
- Coordinate district efforts to address findings from internal EMS audits by means of corrective and preventative actions.

Bureau Employees:

- Participate in internal EMS audits as applicable.



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DOCUMENTS AND RECORDS:

- EIP-14-Form 14a EMS Audit Checklist
- EIP-14-Form 14b Findings Tracking Log
- EIP-14-Form 14c Audit Follow-up, Implementation Action Plan

PROCEDURE:

1. OSC will evaluate the bureau's EMS at least once every three years, to determine if it is being properly implemented and maintained and to ensure it continues to conform to the EMS Standard.
2. OSC will systematically evaluate all EMS elements and the current status of EMS implementation using the EMS Audit Checklist (EIP-14-Form 14a) for internal EMS evaluations.
3. OSC will audit all sixteen of the checklist's numbered elements within the 3-year audit period. Some elements will be audited only once in the 3-year cycle; other elements will be audited annually. General awareness of the Department's Environmental Policy and awareness of the Bureau's EMS will be audited continuously.
4. OSC will report audit findings to the EMS Coordinator, and recommend actions to address each instance of nonconformance using the Audit Follow-up, Implementation Action Plan (Form 14c).
5. The Bureau EMS Coordinator will use 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 closing the findings from EMS audit will be documented.
6. The Bureau EMS Coordinator confirms that all EMS documentation or operational controls are modified as needed to achieve EMS conformance. These changes will be documented and communicated to affected employees, onsite service providers, and contractors as appropriate.
7. OSC will report results of EMS audits and the status of EMS conformance, including any action plans currently in progress to NHDOT upper management, Bureau management and the EMS Coordinator. The annual Management Review (see EIP-16: Management Review) is an appropriate forum for reporting on the status of EMS conformance.



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- 8. 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.

Approved:  _____ Name <u>STATE MAINT ENG</u> _____ Title Date <u>10/4/17</u> _____	Revision #: <u>3.2</u> Revision Date: <u>5/10/17</u> Supersedes Revision #: <u>3.1</u>
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