

**ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL
STATE OF HAWAII DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION**

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I. INTRODUCTION

A. Purpose

This Manual provides a roadmap on how the Airports Division addresses Environmental Management System (EMS) element requirements through plans, procedures, and other supporting documents.

B. Background

1. **Required Elements** - On January 30, 2006, the State of Hawaii Department of Transportation (DOT) entered a consent decree (Consent Decree) between the United States Environmental Protection Agency (EPA) and State of Hawaii Department of Health (DOH) which required DOT to develop and implement a Compliance-Focused Environmental Management System for the Airport, Harbors and Highway Divisions. The required twelve elements, for which this manual is based, can be found in Paragraph 15, Appendix E of the Consent Decree, and are identified below:
 - a) Environmental Policy
 - b) Organization, Personnel, and Oversight of EMS
 - c) Accountability and Responsibility
 - d) Environmental Requirements
 - e) Assessment, Prevention, and Control
 - f) Environmental Incident and Noncompliance Investigations
 - g) Environmental Training, Awareness, and Competence
 - h) Environmental Planning and Organizational Decision-Making
 - i) Maintenance of Records and Documentation
 - j) Pollution Prevention / Best Management Practices Program
 - k) Continuing Program Evaluation and Improvement
 - l) Public Involvement / Community Outreach
2. **General EMS** - The Airports Division EMS is based on the "Plan-Do-Check-Act" model which follows these basic principles:
 - a) Plan - Airports Division identifies how its operations might harm the environment, and determines operational controls to reduce harm
 - b) Do - Airports Division implements and maintains the operational controls
 - c) Check - Airports Division assesses whether the methods used in the operational controls to ensure regulatory compliance and reducing environmental harm are proving to be effective
 - d) Act - Airports Division determines what changes are necessary based on the performance assessment of the methods
3. **Implementation Date** - In accordance with the Consent Decree, the Airports Division EMS implementation start date was February 9, 2011.

C. Scope

1. **Maintenance Baseyards** - The scope of the EMS includes all processes, operations, maintenance activities, contractors, and persons working on behalf of the DOT doing official business within the following Airports Division Maintenance Baseyard fence line:
 - a) Hawaii District:
 - (1) Hilo International Airport, DOT Maintenance Baseyard
 - (2) Kona International Airport at Keahole, DOT Maintenance Baseyard
 - (3) Waimea-Kohala Airport, DOT Maintenance Baseyard

- b) Kauai District:
 - (1) Lihue Airport, DOT Maintenance Baseyard
- c) Oahu District:
 - (1) Honolulu International Airport, DOT Maintenance Baseyard
 - (2) Dillingham Airfield, DOT Maintenance Baseyard
 - (3) Kalaeloa Airport, DOT Maintenance Baseyard
- d) Maui District:
 - (1) Kahului Airport, DOT Maintenance Baseyard
 - (2) Kapalua Airport, DOT Maintenance Baseyard
 - (3) Lanai, Airport, DOT Maintenance Baseyard
 - (4) Molokai Airport, DOT Maintenance Baseyard

D. Manual Control and Update

1. **Manual Control** – The current and controlling copy of the Airports Division EMS Manual is located in the DOT network library.
2. **Manual Updates** – Airports Division EMS Manual will be updated by the Division EMS Coordinator or designee. Notification of changes will be sent on an as needed basis.

E. Manual Organization

1. **Introduction** - Provides the purpose, requirements of the EMS and scope of the Airports Division's EMS
2. **EMS Program Elements** – The section is subdivided into twelve sections each representing one of the twelve required elements in which the Airports Division describes how it satisfies the associated elements' requirements.

II. EMS PROGRAM ELEMENTS

A. Environmental Policy

1. **DOT Environmental Policy Statement** – The policy is based on the Director's commitment to achieving compliance with environmental requirements, minimizing the risks to the environment from unplanned contaminant releases, and continual improvement in environmental performance. For current policy see DOT Environmental Policy Statement.
2. **Communication and Availability** – The policy is to be posted at each Airports Division maintenance baseyard in a manner so it can be viewed and inspected by employees, contractors, and persons working on behalf of the DOT.
3. **Policy Review** - The Policy will be annually reviewed by the Director and revised as necessary.
4. **Applicable or Related Procedures:**
 - a) DOT Environmental Policy Statement

B. Organization, Personnel, and Oversight of the EMS

1. **EMS Organization** – The DOT and the Airports Division have an established EMS organization briefly described below:

- a) **Director of Transportation** - The Director of Transportation is the Senior Administration representative responsible for EMS management performance across DOT.
 - b) **Deputy Director of Airports Division** - Senior manager of the Airport Division. See Management Structure
 - c) **EMS Project Manager** - The EMS Project Manager will provide status reports to the Director, provides assistance to the Division EMS coordinator and chairs the EMS Working Group.
 - d) **EMS Working Group** - A group in which Division representatives are appointed by the Director to address specific issues such as developing documents, conducting internal assessments, and reviewing key processes with environmental aspects associated with DOT's activities and operations. See Management Structure
 - e) **Division EMS Coordinator** - The Division EMS Coordinator carries out the functions associated with EMS management for Airports Division. The Division EMS Coordinator is also a member of the EMS Working Group.
 - f) **Airport District Manager**- Person at the district responsible to manage the EMS at the district maintenance baseyards. See Management Structure
 - g) **Airports Division and District Employees, Contractors, and Tenants** - All will be responsible for:
 - (1) Understanding the Environmental Policy;
 - (2) Attending appropriate training;
 - (3) Reporting environmental incidents or problems to supervisors
2. **Communication** - Environmental information and issues may be communicated through the following methods:
- a) **Airports Division** - Environmental information and/or EMS related communications will be incorporated into existing communications methods, such as safety meetings, staff meetings, e-mail, bulletin board postings, and internal memorandums.
 - b) **Contractors, persons working on behalf of the DOT**- Environmental information will be communicated to contractors by project manager.
 - c) **Public inquiries and concerns** - see Informal Public Inquiries, DSM 3.3.
3. **Airports Division EMS Resources** - Contact the Division EMS Coordinator for resources used in developing and sustaining the Airports Division EMS.
4. **Management Review** -The Deputy Director of Airports Division shall personally review and certify as to the status of the EMS biannually. See Management Structure
5. **Applicable or Related Procedures:**
- a) Management Structure
 - b) Airports Division organization chart
 - c) Informal Public Inquiries, DSM 3.3

C. Accountability and Responsibility

- 1. **Accountability DOT** - DOT Employees will be accountable for their respective assigned environmental responsibilities.
 - a) Environmental responsibilities are those tasks and duties assigned to trained employees through either written or verbal means to limit the impacts from activities deemed to have significant aspects, or to ensure environmental compliance.

- b) The EMS audit (see II.K.1) and the Facility Compliance Audit (see II.K.2) are tools to assess whether environmental responsibilities are performed adequately.
- 2. **Accountability Tenants, Contractors, or On-site Service Providers** – Tenants, contractors and on-site service providers shall be compliant with all applicable environmental regulations. Evaluation of environmental compliance may be through:
 - a) Inspections - For tenants, see Inspection of Properties, DSM 8.10.3 and Inspection and Enforcement Manual. For contractors and on-site service providers see contract general provisions.
 - b) Incident reporting - See PPT Library incident reporting.
- 3. **Non Compliance Consequences** – Penalties may be levied against the Airports Division, tenants, contractors, or on-site service providers by a regulatory agency for violations of environmental requirements. Additional consequences to contractors, on-site service providers and tenants:
 - a) For contractors and on-site service providers, see contract general provisions
 - b) For tenants, see Inspection and Enforcement Manual
- 4. **Applicable or Related Procedures:**
 - a) Facility Compliance Inspection
 - b) EMS Audit
 - c) Inspection of Properties, DSM 8.10.3
 - d) Inspection and Enforcement Manual
 - e) PPT Library incident reporting
 - f) Contract general provisions

D. Environmental Requirements

- 1. **Environmental Requirements** – A list of regulatory requirements that may be applicable to Airports Division maintenance baseyards to include federal, state, and local environmental statutes, regulations, enforceable agreements, and permits are found in **Environmental Requirements**. Procedures to identify the specific environmental requirement(s) related to a significant aspect. See Aspects and Impacts.
 - a) EMS Project Manager will annually review environmental requirements, and update as necessary.
 - b) Environmental requirements associated with significant aspects will be communicated to DOT employees using methods described in section II.B.2.a)
- 2. **Compliance Checklist** – Developed to assist the Airports Division’s effort to maintain regulatory compliance. The requirements addressed by Compliance Audit Checklist are based on the Clean Water Act (including compliance with Storm Water and Spill Prevention, Control, and Countermeasure [SPCC] requirements), the Resource Conservation and Recovery Act, and the Emergency Planning and Community Right-to-Know Act. For current checklist see Compliance Checklist.
- 3. **Applicable or Related Procedures:**
 - a) Aspects and Impacts
 - b) Environmental Requirements
 - c) Facility Compliance Audit

E. Assessment, Prevention and Control

- 1. **Operational Assessment** – Identifies activities, operations, products and services within the maintenance baseyard fence line and assess the environmental risk or impact. Activities deemed to have significant environmental impact will be designated as significant aspects. See Aspects and Impacts.

2. **Prevention and Control** – Identifies operational controls, and prevention and correction methods to reduce, evaluate for and prevention of nonconformities, implementing necessary actions, and reviewing their effectiveness, or eliminate the impacts associated with significant aspects. See Operational Controls
3. **Applicable or Related Procedures**
 - a) Aspects and Impacts
 - b) Operational Controls

F. Environmental Incident and Noncompliance Investigations

1. **Environmental Incident Notification** – Airports Division notification procedures for hazardous substance release (or potential for release) or incidents involving hazardous substances (ex, chemical storage fire) can be found in PPT Library.
2. **Noncompliance Notification, Investigation and Correction** – Emergency responses would include procedures for prevention of recurrence, revision following accident or emergency, and periodic testing of procedures. See Facility Compliance Audit
 - a) Applicable or Related Procedures
 - b) PPT Library
 - c) Facility Compliance Audit

G. Environmental Training, Awareness, and Competence

1. **Environmental Training** – For a description of training, employees requiring training, and training objectives, see Environmental Training Matrix.
2. **Training documentation** – Training records will be kept and handled in accordance with Training and Employee Development, DSM 4.11.03.2.
3. **Drills** – Testing and scheduling of drills to include emergency or evacuation drills.
4. **Applicable or Related Procedures**
 - a) Environmental Training Matrix
 - b) Training and Employee Development, DSM 4.11.03.2

H. Environmental Planning and Organizational Decision-Making

1. **Environmental Planning** – Airports District maintenance baseyards to evaluate and determine for significant environmental aspects. And plan review as related to HNL’s SWMPP Sections C and D.
2. **Objectives and Targets** – See Objectives and Targets
3. **Applicable or Related Procedures**
 - a) Objectives and Targets

I. Maintenance of Records and Documentation

1. **Record Maintenance** – All Airport Division EMS documents and records are subject to the DOT records management policy and procedures. See Records Management, DSM 2.3.04.
2. **Document Control** – See Document Control
3. **Request for Records** – For DOT record request policy and procedure see Government Records, Processing Request to Inspect or Copy; Fees, DSM 2.4.
4. **Applicable or Related Procedures**
 - a) Records Management, DSM 2.3.04
 - b) Document Control
 - c) Government Records, Processing Request to Inspect or Copy; Fees, DSM 2.4

J. Pollution Prevention/Best Management Practices Program

1. **Pollution Prevention and Best Management Practices** –BMPs as stipulated in the Inspection and Enforcement Manual. See Compliance Checklist.
2. **Applicable or Related Procedures**
 - a) Compliance Checklist

K. Continuing Program Evaluation and Improvement

1. **EMS Audit** – The EMS Working Group will perform an EMS audit on select maintenance baseyards annually. See EMS Audit
2. **Facility Compliance Inspection** – Airports Division maintenance baseyard personnel shall annually perform an internal compliance inspection using the Compliance Checklist for maintenance baseyards identified in section I.C.1. In addition, an independent (third party) inspection will be conducted every four years. See Facility Compliance Inspection
3. **Applicable or Related Procedures**
 - a) EMS Audit
 - b) Facility Compliance Inspection

L. Public Involvement/Community Outreach

1. List of Airports Division Community Outreach programs can be found in the following programs or plans:
 - a) Storm Water Management Program Plan, Section A

State of Hawaii
Department of Transportation – Airports Division
Environmental Management System

Aspects and Impacts
EMS Procedure

1.0 Purpose and Applicability

This Procedure defines the methods to be used in identifying the environmental aspects and environmental impacts of an activity, product or service at the Airport Division Maintenance Baseyard facilities. This Procedure also provides guidance on the determination of which aspects are significant.

2.0 Definitions

Activity – An event or operation (to include processes) that occurs or has a potential to occur at a maintenance baseyard to have an influence on the environment, both positive and negative, and under control of Airport Division employees.

Environmental Aspect – Element of an organization’s activities, products or services that can interact with the environment

Environmental Impact – Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization’s activities, products or services.

Environmental requirements - A list of regulatory requirements that may be applicable to Airport Division baseyards to include federal, state, and local environmental statutes, regulations, enforceable agreements, and permits.

Significant Environmental Aspect – An environmental aspect with an associated environmental requirement, or has a significant environmental impact.

3.0 Approach

Identify Activities, Products or Services – Maintenance Baseyard Supervisors shall prepare a list of activities to include activities, products and services conducted or produced by contractors or persons working on behalf of the Airports Division within the maintenance baseyard fence line.

- The list can be prepared using a predetermined list of activities.
- Included in the list are operations and waste streams where equipment malfunctions and deterioration, operator errors, or deliberate malfeasance, and discharges or emissions may be causing, or may lead to:
 - a. releases of hazardous waste or other pollutants to the environment
 - b. a threat to human health or the environment
 - c. violation of environmental requirements

Identify Environmental Aspects and Impacts – The Division EMS Coordinator with assistance from the Airport District Manager, or representative, shall identify the corresponding environmental aspects and impacts for each activity.

- This step may be done by reviewing environmental aspects and impacts from a predetermined list of activities.

Identify Significant Environmental Aspects - The Division EMS Coordinator, with concurrence by the Airport District Manager, shall identify significant environmental aspects.

- Environmental impacts will be ranked using an evaluation method factoring severity of impact and probability of occurrence. Those aspects with impact scores of 24 and higher are deemed significant.

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Aspects and Impacts
EMS Procedure

Review Environmental Aspects and Impacts – Annual review of the environmental aspects and impacts.

- Annually the Airport District Manager shall review the list of activities, products, services, aspects, and impacts.
- Any changes are to be noted and submitted to the Division EMS Coordinator.

4.0 Records

Records generated by this procedure may include (record manager in parenthesis):

List of activities, products, services, aspects, and impacts at the Maintenance Baseyard (Airport District Manager).

5.0 Revisions

Date of issue: 11/2009; Revised: 4/2013

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Objectives and Targets
EMS Procedure

1.0 Purpose and Applicability

This procedure defines the process for developing objectives and targets for the significant environmental aspects associated with the EMS.

2.0 Definitions

Indicator – Information or data which is used to measure and track the status and progress of achieving objectives

Objective – An overall environmental performance goal Airport Division has set to achieve that is consistent with the DOT Environmental Policy.

Significant Environmental Aspect – An environmental aspect with an associated environmental requirement, or has a significant environmental impact.

Target – A detailed performance requirement with a specified deadline, quantified where practicable, that are established to meet the objectives.

3.0 Approach

Identified Significant Aspects – The significant environmental aspects should be established prior to this EMS Procedure. The significant environmental aspects should be categorized based on the type of impact to the environment and the similarities of the activities.

Establish Objectives and Targets - The Division EMS Coordinator and Airport District Manager will evaluate the significant aspect to determine an objective and target feasibility procedure. The following are to be considered when establishing objectives and targets:

- applicable laws and regulations, and/or industry standards
- environmental aspects
- technological options
- financial, operational and business requirements
- the views of employees and other interested parties

The objectives and targets are to be in writing, sanctioned by the Airport District Manager, and assigned to appropriate personnel for their attention.

Establish Indicators – Measures to show progress in meeting objectives and targets will be identified and assigned to appropriate personnel for completion. Quantitative measuring is preferred, however, measuring may be qualitative based or show general trends, depending on the objective.

Review of Objectives and Targets - Periodically, as needed, the Division EMS Coordinator will provide a status report on objectives and targets to the EMS Working Group.

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Objectives and Targets
EMS Procedure

4.0 Records

Records generated by this procedure may include (record manager in parenthesis):

Written objectives and targets (Airport District Manager).

5.0 Revisions

Date of issue: 11/2009; Revised: 4/2013

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Operational Controls
EMS Procedure

1.0 Purpose and Applicability

This procedure provides guidance for determining the operational controls applicable to the Airports Division baseyard activities, operations, products and/or services associated with the significant environmental aspects.

2.0 Definitions

Operational Controls - Broadly defined to include technology (e.g. shut off valves) and administrative (e.g. standard procedures) controls. Operational controls are applied to activities, operations, products or services to prevent the environmental aspect they exhibit from becoming an adverse impact. If written, operational controls are to be identifiable, legible, dated, current and accessible.

3.0 Approach

Significant Aspects - Each significant aspect is evaluated in conjunction with its activities, operations, products and / or services to determine the operational controls.

Developing Operational Controls – The Airport District Managers will be responsible to ensure their maintenance baseyards develop and establish operational controls with oversight from the Division EMS Coordinator.

Monitoring Operational Controls – Monitor to ensure the operational controls are functioning properly. Any deficiency or problem found with an operational control will be evaluated. Monitoring equipment requiring accurate output information should be routinely calibrated, such as a veeder-root system.

4.0 Records

Records generated by this procedure may include (record manager in parenthesis):

Operational control documents (Airport District Manager)

5.0 Revisions

Date of issue: 12/2012

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Document Control
EMS Procedure

1.0 Purpose and Applicability

This Procedure ensures the latest versions of the EMS Manual and supporting documents are used by Airports Division personnel.

2.0 Definitions

Supporting document – A written document, to include programs, plans or procedures, referred to by the EMS Manual or deemed essential to maintain the Airports Division EMS.

3.0 Approach

The most up-to-date copy of the EMS Manual is located in the DOTA PPT Library.

When significant updates are made to the EMS Manual, the Airports Division EMS coordinator will notify affected employees via e-mail.

Supporting documents referred in the Airports Division EMS Manual shall be titled, dated, and organized. All documents will be legible and readily identifiable.

Documents shall be maintained and secured by the Airport District Manager for readily identification and retrieval, as well as proper records disposals. All documents must be maintained for at least five years.

For list of supporting documents see Appendix B of the EMS Manual.

4.0 Records

Records generated by this procedure may include (record manager in parenthesis):
N/A

5.0 Revisions

Date of issue: 11/2009; Revised: 12/2012

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Facility Compliance Inspection
EMS Procedure

1.0 Purpose and Applicability

This procedure establishes a standard for conducting environmental compliance audits at Airports Division Maintenance Baseyards. An internal compliance audit is conducted to ensure the maintenance baseyard is in compliance with relevant environmental regulations.

2.0 Definitions

Compliance Inspection – a systematic evaluation of the maintenance baseyard environmental regulatory compliance using the Compliance Checklist.

3.0 Approach

General - Compliance inspections will be conducted at least annually. Airport Division internal compliance inspections will be the responsibility of the Airport District Manager (or representative), and review or participation by the Division EMS Coordinator (or representative) for baseyards identified in the Airports Division EMS manual.

Independent Compliance Inspection – An independent inspection will be scheduled for all baseyards identified in the EMS manual every four years. The EMS Working Group will be responsible to define the audit scope and to secure or solicit an auditor.

Facility Compliance Inspections - Compliance inspections are conducted using the Compliance Checklist at the maintenance baseyards, and should be done through observation, document review and interviews with personnel.

If the discovered noncompliance poses an immediate threat or impact to the environment, the Airport District Manager should be notified immediately and initiate measures to mitigate the impact.

Documenting Noncompliance – Noncompliance found during a facility compliance audit are to be documented using the Noncompliance Documentation Form. Proposed corrective actions will be addressed by the Airport District Manager in consultation with the Division EMS Coordinator (or representative).

Noncompliance Notification – The Division EMS Coordinator (or representative) shall provide prompt notice of all noncompliance to the appropriate regulatory agency. The Airport District Manager shall be responsible for correcting all noncompliance identified within 21 days, unless a legal requirement requires more prompt correction. If it is determined the corrective actions cannot be completed within 21 days, a compliance schedule should be submitted to the EMS Project Manager and to the appropriate regulatory agency.

Copies of completed Compliance Checklist and Noncompliance Documentation Forms will be sent to the Division EMS Coordinator.

4.0 Records

Records generated by this procedure may include (record manager in parenthesis):

Compliance Checklist (District Office)
Noncompliance Documentation Form (District Office)

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**Facility Compliance Inspection
EMS Procedure**

5.0 Revisions

Date of issue: 11/2009; Revised: 4/2013

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EMS Audit
EMS Procedure

1.0 Purpose and Applicability

This procedure establishes a standard for conducting EMS Audits at Airports Division Maintenance Baseyard facilities that have implemented an EMS. An audit is conducted to determine if the EMS is being effectively implemented throughout the facility and to determine if changes are required.

2.0 Definitions

Environmental Management System Audit – Systematic and documented verification process of objectively obtaining and evaluating evidence to determine whether the Airports Division EMS is functioning as intended.

Lead Auditor- The person responsible for leading the audit.

Nonconformance - any failure to meet the requirements of the EMS, any deviation from the procedures contained within the EMS.

3.0 Approach

General - EMS audits will be conducted on selected baseyards on an annual basis. An EMS audit may be focused on selected activities, elements or processes.

For DOT lead EMS audits, the EMS Project Manager will determine the lead auditor. The designated lead auditor is responsible for selecting the audit team, preparing the audit plan, and ensuring that the audit team conducts and completes the audit.

Third party EMS audits may be conducted periodically. The EMS Working Group will be responsible to secure or solicit auditors. Current procurement procedures will be followed in contractor selection and contract development.

Audit Plan – Prior to an audit, an audit plan will be developed addressing the following (at a minimum):

- Document request;
- Audit scope and objectives;
- Audit criteria to be applied;
- Audit schedule – proposed dates and times;
- Protocol for conducting the audit (e.g., interviews, access, coordination, safety)
- Audit report distribution

The Airport District Manager associated with the representative baseyard(s) will be notified prior to the audit.

On-site Audit- EMS audits are conducted primarily through document review and interviews with personnel. The EMS auditors may also rely on records for information related to the functioning of the EMS and its objectives and targets. The EMS auditors may also rely on observations of operating

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EMS Audit
EMS Procedure

conditions to gauge environmental status and conditions if that is appropriate and effective. The lead auditor conducts opening and closing meetings.

The focus of the EMS audit is to ascertain that the EMS has been effectively implemented and is functioning in accordance with established arrangements. Audit findings must be based on objective evidence.

Nonconformance documentation- Nonconformances discovered during the audit will be documented on a Nonconformance Documentation Form and Nonconformance Summary Form. Corrective actions will be documented and implemented. The Division EMS Coordinator will update the status of the Nonconformance Summary Form to track progress in completing nonconformances.

Audit Report – At the completion of each audit, the lead auditor prepares an audit report. The audit report consist of the following (at a minimum):

- Audit plan
- Names of the audit team, audit dates, baseyards covered in the audit, participants at each baseyard location, and general issues encountered during the audit
- Summary of nonconformances found during the audit. To meet this requirement and to expedite the corrective actions, the Lead Auditor may elect to initiate the Nonconformance Documentation Form and Nonconformance Summary Form.

4.0 Records

Records generated by this procedure may include (record manager in parenthesis):

EMS Audit Plan (EMS Project Manager)
Nonconformance Documentation Form (Division EMS Coordinator)
Noncompliance Summary Form (Division EMS Coordinator)
EMS Audit Report (Division EMS Coordinator)

5.0 Revisions

Date of issue: 11/2009; Revised: 12/2012