

WORKSHOP: AUDIT INTERVIEW FOR OBJECTIVE EVIDENCE

The objective of this workshop is to evaluate the audit situations encountered and determine if a nonconformity exists. If you conclude that a nonconformity exists, explain why. If not enough information is provided to determine whether there is a nonconformity, what questions would you ask to obtain the necessary objective evidence?

1. When talking with the environmental management representative (EMR), the auditor asked how the EMS is reviewed to ensure its continuing suitability and effectiveness. The EMR responded that they conduct a management review meeting with the President's staff annually. The auditor requested documentation regarding the last review meeting. The EMR had to get the information from his files and returned with the EMS Review Report which was dated 3 weeks prior to the date of the audit.
2. The auditor then looked at a list of the identified significant environmental aspects that the EMR had previously provided. The auditor asked to look at the solvent usage aspect which was identified for the foil cleaning activities. He requested that they go out into the facility and look at the operation. The EMR hesitantly agreed, "Maybe we can talk with Ken Jones, the laminating line supervisor." Upon entering the cleaning area and meeting Ken Jones, the auditor asked how the foil cleaning is accomplished. Ken was eager to demonstrate the batch cleaning process that is used. The auditor asked Ken how often the solvent is replaced. Ken replied that it is changed out following each coil run. The auditor then asked Ken, "If I was a new employee, where would I go to find out how often to change the solvent?" Ken smiled and showed him the operating procedure for the cleaning line. The auditor then asked Ken to show him where in the procedure the information regarding solvent change out is listed. Ken looked through the procedure but could not find where the information was mentioned.
3. The auditor then asked the EMR about the aspect of bulk storage of chemicals. The auditor wanted to know who is in charge of receiving the chemicals that are stored in the tanks. The EMR said, "We can meet Jill Boyd of Receiving." Prior to heading to the Tank Storage Area, the auditor asked to see the Safety Data Sheets (SDSs) for all of the chemicals stored there. On the way to the storage area, the auditor briefly reviewed the SDSs. The auditor and the EMR arrived at the Tank Storage Area. The auditor was introduced to Jill Boyd who explained the process for the transfer of chemicals. Jill mentioned that the newest tank contains the C172 solvent. The auditor noted that C172 solvent was not in the SDSs he was given and was not on the aspect list. The EMR explained that they had started using C172 solvent after the aspect list was developed.

4. The auditor then asked what happens if there is a release during the filling of any storage tank. Jill Boyd explained exactly what she would do in such an event. The auditor then asked Jill what she would do differently since the tank contained C172 solvent. Jill said she didn't think she had to do anything differently, but she wasn't sure. The auditor asked Jill where she could find this information. Jill mentioned that it might be in the Emergency Response Plan, but that she didn't think it had been updated.

5. Then the auditor showed Jill the list of environmental aspects. He asked Jill if there are any environmental objectives established for the storage of chemicals. Jill said that she wasn't aware of any objectives. She went on to explain that the aboveground storage tanks (ASTs) had been installed to mitigate any potential problems that could be caused by the underground storage tanks (USTs). Jill said that as far as she knew, these tanks were as good as they get, so she didn't really see what other objectives they could have. The EMR mentioned that although they had considered the tank area a high priority and a significant environmental aspect, and had set objectives to improve the secondary containment capacity, management had not approved the program to develop secondary containment in the area. The auditor asked if the objectives were re-evaluated when the new tank was added. The EMR said that they had not set any more objectives since the other ones had not yet been approved.

6. The auditor then asked the EMR how the facility ensures that the pipes, which carry the chemicals from the tanks to the facility, do not leak? The EMR responded that the pipes were tested and inspected at the facilities semi-annual shutdown. The auditor asked when the last inspection was. The EMR responded that they would have to go see the maintenance records. They walked to the Maintenance Department where they met with Mike Smith. Mike showed the inspection and testing records to the auditor. The inspection had occurred in December, three months prior to the audit.