

The Evolution of EHS Auditing from Regulatory Compliance to Continuous Improvement

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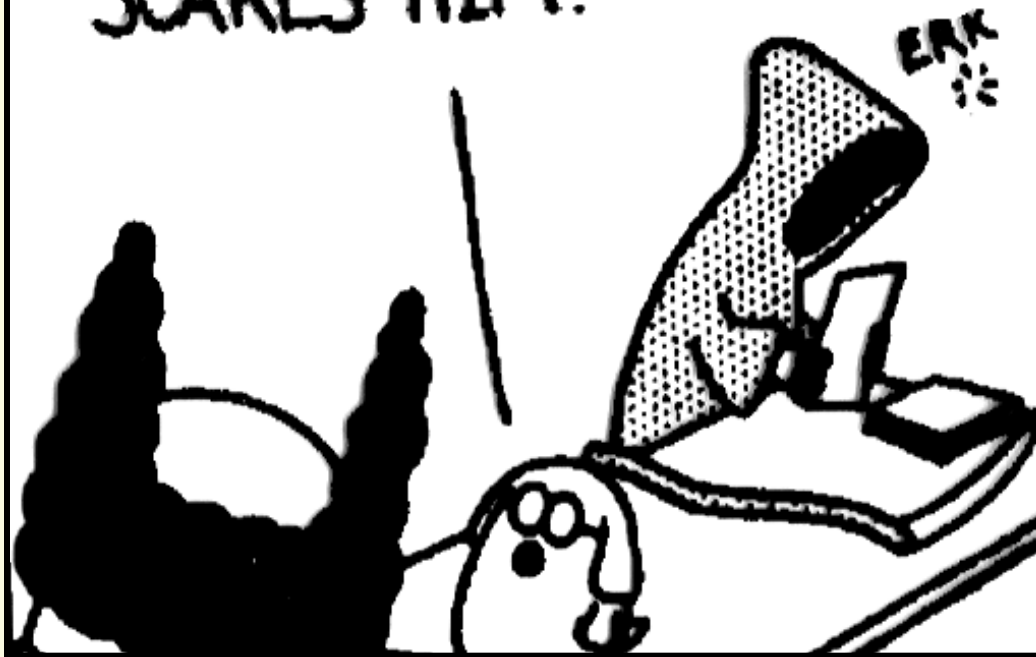
President

EHS Management Partners, Inc.

MY CONSULTANT WILL
AUDIT YOUR COMPANY
TO MAKE SURE THERE
ARE NO SURPRISES
BEFORE I BUY IT.



I USE HIM BECAUSE
HE'S SEEN SUCH
HIDEOUS THINGS
THAT NOTHING
SCARES HIM.



AAAAAEEII!!
OOOUWAA
WAA!!

THAT'S NOT
THE SOUND
YOU WANT
FROM YOUR
AUDITOR.



Top Five Signs That it is Time to Schedule an EHS Audit

- You've been in town so long your spouse has started to recognize you on sight.
- It's been over two months since you have worked a 60 hour week.
- One of the plant manager's has actually returned one of your follow-up calls.
- Your boss says, "We've got all the plants in compliance, so you should be able to take on some new responsibilities, right?"

And... the Number One Sign That it is Time for an Audit...

? The EHS staff at the plants are showing signs of working on their own priorities.

Introduction

? Where we have been:

- Legal Liability Concerns
- Compliance Driven
- “Binary” design
- Attorney directed
- Punitive Follow-up

Diminishing Returns - Why?

☐ Finite Goal - Compliance

☐ Redirection of Priorities

☐ The “Learned” Response

Design to Drive - Continuous Improvement

- ❑ Compliance is not the End-Point
- ❑ Other Issues than Compliance
- ❑ Assessment of Significance

Design to Drive - Continuous Improvement

Improvement is Incremental

Goals less than Full Compliance

Evaluation of Local Issues

Design to Drive - Continuous Improvement

Root Cause Assessment

Assessor/Partner

Participation and Communication

Legal Issues

? The Traditional Approach...

- Directed by Legal
- Communication Restricted
- No Assessment of Significance
- Only Corrective Action- Full Compliance

? ... Will Not Work in Continuous Improvement Model

Legal Issues

? Assessment Vs. Audit

- Audit - Carries legal implications -
- Assessment - Routine Management Function

? Product of Assessment - Action Plan, not Findings

EHS Assessment Tool Design

Open-ended Questions:

- How effective is...?
- How well developed is...?
- To what extent has the facility...?

Impossible to answer “Yes” or “No”

EHS Assessment Tool Design

Implementation Levels

- Five Levels
- Specific to each Question
- Describe typical evidence found by the Assessor

EHS Assessment Tool Design

Generic Implementation Level Definitions

Level One -

- No attention to the area.
- No evidence of activity or recognition of the EHS management area addressed by the question.

EHS Assessment Tool Design

Generic Implementation Level Definitions

Level Two -

- Serious lack of attention to the area.
- Some evidence of recognition, but implementation has been minimal;
- May have “just started”.
- Most of the requirements have not been addressed and/or there is little documentation of activity.

EHS Assessment Tool Design

Generic Implementation Level Definitions

Level Three -

- Area has addressed, but not in a consistent, complete or continuous manner.
- Most of the requirements have been completed and documented, but some specific areas still need to be addressed, communicated, or documented.

EHS Assessment Tool Design

Generic Implementation Level Definitions

Level Four -

- Area has been addressed in a well-developed and effective manner.
- Procedures/policies for implementation are documented and communicated within the organization.
- There is evidence of a good understanding of the requirement throughout the organization.

EHS Assessment Tool Design

Generic Implementation Level Definitions

Level Five -

- Area has been addressed in an outstanding manner, representing a sustained “best-of-class” approach that is fully documented; or, particularly effective and innovative approaches.

EHS Assessment Tool Design

[?] Management Categories

- Used to Establish Assessment Scope
- Used to Summarize Results

[?] Guidance Section

- Helps Assessor evaluate Questions, Select Implementation Level

Assessment Process

Typical Assessment Steps

- Conduct interviews, review documents, site inspections
- Enter data into database
- Review results
- Determine priorities, set new goals
- Develop Action Plan

EHS Assessment Application

The screenshot displays the main menu of the EHS Assessment Application. At the top, it says "Main Menu". Below this is a blue header bar containing the logo for "EHS Management Partners, LLC" with the tagline "Serving the Needs of EHS Managers" and a red question mark icon. The main title of the application is "Safety Compliance and Management System Assessment Main Menu". The menu consists of four buttons: "Create Facility Assessment" (highlighted with a dotted border), "Edit Facility Assessment", "Reports", and "Maintenance". At the bottom left, the copyright information reads "© Version 5.0 - Copyright 2014 EHS Management Partners, LLC All rights reserved". At the bottom right, there is a small icon of a document with a plus sign.

EHS Assessment Application

Question No: 62 Mgmt Cat: Control of Hazardous Energy ?

Has the site developed an effective program for control of hazardous energy during maintenance operations?

Checklist Assessment | Top-level Question Assessment | Implem. Definitions | Suggested Practices

ChecklistNumber: 8 Are there procedures for temporarily testing machines during lockout procedures?

Toggle Comment

Show NC Only Federal 29 CFR 1910.147(f)(1)

Status: Noncompliant Resp. Cat: C Further Investigation?

Finding/Comment: The written lockout program does not discuss temporarily testing equipment during lockout.

Corrective Action: Update the lockout program to include temporary testing.

Responsibility: Tony Urban Target Date: 9/30/2014 Complete Date:

RootCause Category:

Root Cause:

Record: 1 of 1 No Filter Search

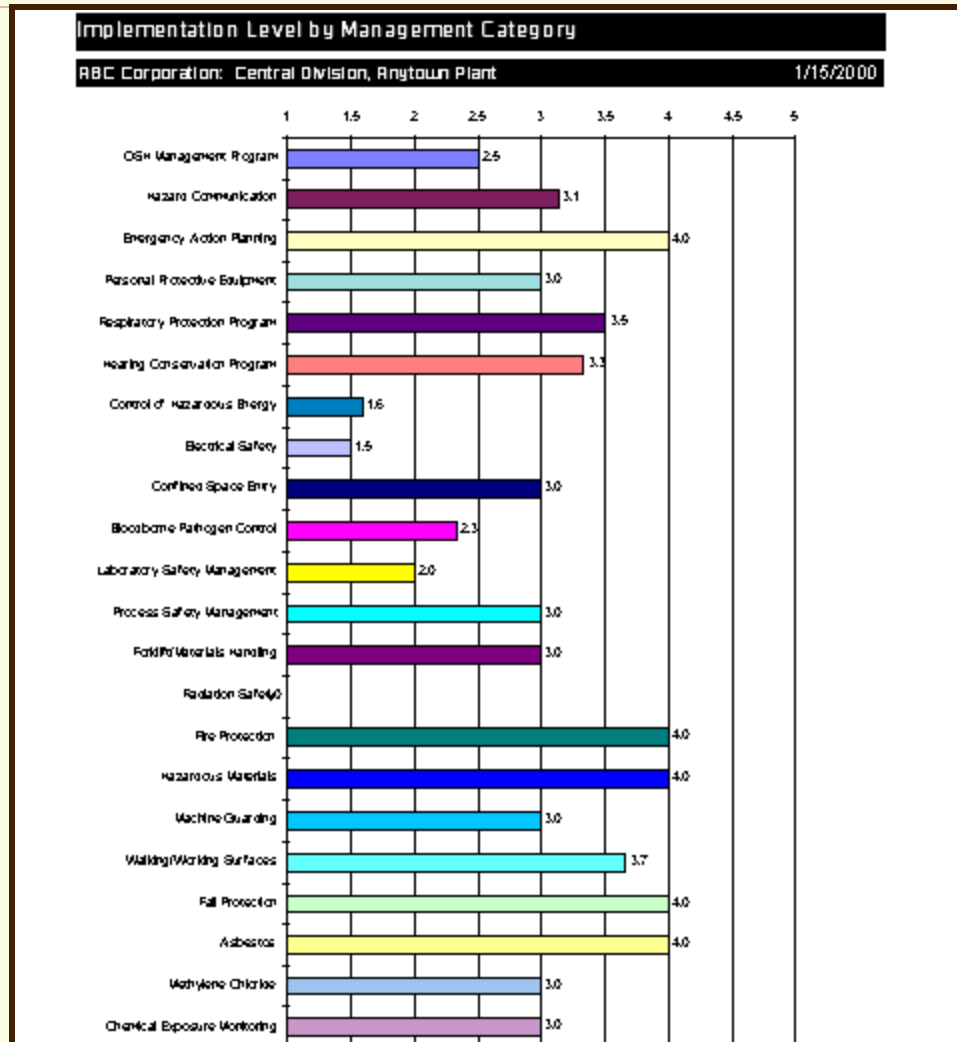
Remove Item

Record: 8 of 11 No Filter Search

Remove Question | Sort by Mgmt Cat | Sort by Quest. No. | Go To | Change Management Category | Close

Record: 1 of 4 No Filter Search

EHS Assessment Application



2/8/2018

Driving Continuous Improvement

- Initial Assessment
- Goal Setting
- Action Plan Development
- Implementation
- Action Validation

Conclusion

☐ Improved Efficiency

☐ Attention to Value