

## **Section B - 6**

### **UNO ENVIRONMENTAL AUDITS**

#### **A. Goals of the UNO Audit Program**

An environmental audit is a management tool for systematically evaluating compliance with the numerous environmental requirements that face UNO today. It is a formal and organized means of identifying and reporting environmental compliance at individual laboratories and, ultimately, University-wide.

Auditing is a critical part of a comprehensive environmental management system intended to verify that components of the system are being implemented and are adequate. Where omissions or inadequacies exist in the system, auditing should identify these shortcomings and bring them to management's attention so that they may be corrected in a reasonable time.

The major advantages of conducting environmental audits include:

1. Increased protection of the environment;
2. Improved information transfer on management requirements to the user;
3. Improved regulatory compliance;
4. Improved public image with both the community and the regulators;
5. Decreased likelihood of significant fines and possible legal action.

The object of any UNO audit is to help the user comply, not to criticize.

#### **B. Elements of the UNO Audit Program**

The EPA has published an Auditing Policy Statement which includes seven elements they consider to be essential to an effective audit program. UNO has adopted these elements as summarized below:

1. "Explicit top management support for environmental auditing and commitment to follow up on the findings."

Top management support is imperative and the single most important element. Uncovering and documenting environmental deficiencies is ineffective if there is not a sincere top level commitment to correct them. The Chancellor is fully committed to identifying and correcting environmental compliance issues.

2. "An environmental auditing function independent of audited activities."

At UNO, audits may be performed or reviewed by Central Administration through the Associate General Counsel. Additionally, outside consultants can be used and are available to provide auditing functions at the direction of the Associate General Counsel.

3. "Adequate team staffing and auditor training."

Auditors should be experienced in environmental regulations, safety regulations, pollution control technologies, facility operations, and auditing practices. While finding an individual with experience in all of these areas is almost impossible, significant experience in at least one area is required when selecting auditors. Auditors should participate in continuing training and education in both technical disciplines and auditing practices.

4. "Explicit audit program objectives, scope, resources, and frequencies."

EHS has prepared a form which outlines the scope and objectives of the survey.

5. "A process which collects, analyzes, interprets and documents information sufficient to achieve audit objectives."

Auditing should be a systematic process designed to collect information which is sufficient, reliable, relevant, and useful. At UNO, audit forms have been developed which ensure accurate information is obtained and documented.

6. "A process which includes specific procedures to promptly prepare candid, clear, and appropriate written reports on audit findings, corrective actions, and schedules for implementation."

At UNO, audit procedures require a plan for corrective action or follow-up.

7. "A process which includes quality assurance procedures to assure the accuracy and thoroughness of environmental audits."

At UNO, off-campus or external evaluations provide periodic independent reviews. These reviews are performed through the Office of the Associate General Counsel. These audits provide top management with information on University-wide compliance issues.

In summary, the UNO audit process should be viewed as a positive management tool which provides the user and UNO with an opportunity to assess environmental impacts and correct any potential problems prior to a regulatory inspection.

Audit findings are documented under a system designed by the Office of the Associate General Counsel. This system assures Attorney-Client privileges. Information resulting from