

## Program Improvements for Norfolk Southern's Environmental Auditing Program

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Norfolk Southern has enhanced its environmental audit program by clarifying document definitions, standards, and audit processes. NS developed auditing and compliance tools, identified metrics and key performance indicators, and improved the program's overall management system.

A program manual establishes and defines the purpose and objectives of the program, audit criteria, site selection and scheduling, auditor selection and training, and risk assessment methodology.

Audit tools including protocols and self-assessment checklists were improved or developed. The improved protocols helped confirm accuracy of regulatory, requirement, and company policy-based findings, ensure uniformity and consistency across all audits, and promote verification and quality assurance. The self-assessment checklists allowed facilities to conduct their own compliance assessments, enhance education and awareness of environmental requirements, and provide pre-audit data or system-wide compliance metrics.

A risk evaluation system was also defined. Methodology was established to rank facilities by compliance risk, optimize audit frequency, and identify and prioritize system-wide compliance needs. In addition, metrics and key performance indicators assess and determine the overall health of the environmental audit program and provide valuable summaries to management.