

Metro Wastewater Reclamation District  
Environmental Management System for Biosolids

**Element 16: Internal EMS Audit – Background**

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**BACKGROUND**

This Element ensures that the Metro District established and maintains an internal audit program to periodically analyze the EMS for Biosolids and determine effectiveness in meeting biosolids management policy, program requirements, and program goals and objectives.

The Audit Plan includes a summary of the District Auditor's training, audit protocols, audit schedules and the audit report content.

The District uses the protocols developed by its Internal Auditor that meets the requirements established by the National Biosolids Partnership. The internal EMS Audit Plan is designed to be as rigorous as the third-party audit process.

The internal EMS audit program will cover all of the District's biosolids management program activities, from planning to final disposition.

Contractors are limited to construction-related and maintenance facilities activities for the District's infrastructure, Robert W. Hite Treatment Facility (RWHTF) and the METROGRO Farm facilities. To minimize any negative impacts to the high quality of biosolids produced by the District, the Project Impact Checklist procedure followed by project initiators and Department Project Managers includes a review and signoff by the EMS Coordinator. Engineering Project Managers will be responsible for overseeing construction activities to ensure the environmental issues are followed through.

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**GENERAL DESIGN OF AUDIT PLAN**

The District's Internal EMS Audit Plan includes protocols designed to evaluate conformance with each of the individual Elements as contained in this EMS for Biosolids Manual and dictated by NBP requirements for conducting audits.

As the internal audit will serve as a substitution for the interim third party audits in years 2, 4, 6, and 8, the audit must include, at the very least, a review of progress toward goals and objectives, EMS outcomes (environmental performance, regulatory compliance, interested party relations, and quality practices), corrective and preventative actions for nonconformances, and the management review process.

**EMS AUDITOR**

The District will utilize the Internal Auditor currently on staff to conduct the EMS Internal Audit. General statement of duties, organizational responsibilities, typical duties, and minimum and desired qualifications for the position can be found in the Internal Auditor job description. A copy of the Internal Auditor job description can be obtained from the District's Human Resources Division.

**EMS INTERNAL AUDIT SCHEDULE**

Internal audits are conducted at least once every two years and scheduled based on the District's internal audit schedule. The scope of the audit will be based on the guidelines of what the NBP Guidance Manual and Third-Party Verification documents require for conducting an internal EMS Audit.

If the EMS Coordinator or Workgroup see a gap or a trend in a specific area, they may request to have the Internal Auditor do a review. A review is an informal audit and the results are not required to be reported to the District's Audit Committee or in the Biosolids Program Performance or Management Review reports.

**AUDIT PROTOCOLS AND CHECKLISTS**

The District's Internal Auditor will utilize audit protocols and checklists as set forth in the Metro Wastewater Reclamation District *Internal Audit Policy and Procedure Manual* as well as the NBP Environmental Management System Program *Third-Party Verification Auditor Guidance*.

The protocols will use a combination of document/records review, employee interviews and site observations and look at both the individual elements as well as the link of key transactions from beginning to end. The document review will test if EMS requirements are being met on paper. The employee interview and transaction assessments will determine if the EMS is working.

**AUDIT REPORT**

These will include the following sections in the final Audit Findings Report:

- Title page and Table of Contents

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- Executive Summary
- List of findings with description
- Management review and analysis

Copies of the report will be forwarded to each Department Head and the District Manager with the original to the EMS Coordinator.

**CORRECTIVE ACTION AND MANAGEMENT REVIEW**

The EMS Coordinator will prepare a corrective action plan, with input from the EMS Workgroup when appropriate, to address all audit findings as stated in Element #14: Nonconformance Procedure of this EMS Manual. Appropriate EMS Workgroup members will be assigned corrective actions as they pertain to their area of expertise. A summary of the internal EMS Audit will be addressed in the Biosolids Program Performance and Management Review reports.

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**PURPOSE**

To summarize the Metro District's internal EMS audit program.

**SCOPE**

This procedure applies to all EMS Elements, its Policy and Mission statements by auditing for healthiness and effectiveness of the EMS for Biosolids Program.

**REFERENCES**

- NBP National Manual of Good Practice
- Element #14: Nonconformance & Corrective & Preventive Actions - Procedure
- Element #15 and #17: EMS Program Performance and Management Review Report
- Metro Wastewater Reclamation District *Internal Audit Policy and Procedure Manual*

**DEFINITIONS**

**EMS Audit (Internal)** – a systematic internal audit process for objectively evaluating whether an organization's environmental management system for biosolids conforms to the requirements of Code of Good Practice, its Biosolids Policy and the EMS Elements.

**EMS Audit (Third-Party Verification)** – a systematic, structured audit of the organization's biosolids EMS performed by a qualified independent third party auditor using a standardized protocol to verify.

**RESPONSIBLE PERSONS**

- EMS Coordinator
- EMS Workgroup
- Metro District Internal Auditor
- Department Heads

**RELATED TRAINING**

For related training, please refer to Element #8 of this manual.

**PROCEDURAL STEPS**

1. The EMS Coordinator will request an EMS internal audit in August (Year 2: elements 2, 5, 7, 8, 14, 15, and 17; Year 4 elements 1, 5, 11, 12, 14, 15/17) prior to the year the audit is to be conducted.

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2. The District's Internal Auditor will submit a proposed audit schedule to the District Manager for the EMS internal audit then notify the EMS Coordinator of the approved schedule.
3. The District's Internal Auditor will conduct all preliminary audit planning and scheduling, the actual audit, and report audit findings in accordance with the Metro Wastewater Reclamation District *Internal Auditing Policy and Procedures Manual* and the NBP requirements for conducting an audit.
4. A preliminary report of audit findings will be forwarded to the Director of RR&R and the EMS Coordinator for review and action.
5. The EMS Coordinator will draft a management response, with input from the EMS Workgroup as appropriate, as outlined in Element #14: Nonconformance – Procedure found from internal or external audits.
6. The EMS Coordinator will recommend then coordinate any additional training that may be necessary with Human Resources staff.
7. The Auditor will follow-up on open action items within six (6) months.
8. Once all action items are complete the Internal Auditor will close out the audit.
9. All audit reports and related documents will be filed in the appropriate Record Series Code and maintained by the Internal Auditor.
10. Audit Summaries will be communicated to employees and interested parties via the Internet, Intranet, and as part of the EMS Program Performance Management Review report.