

Metro Wastewater Reclamation District
Biosolids Management Program

Element 16: Internal BMP Audit – Plan

Revision: 10	Revision Date: 06/10/13	Approved By:
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BACKGROUND

This Element ensures that the Metro District established and maintains an internal audit program to periodically analyze the Biosolids Management Program (BMP) 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 (NBP). The internal BMP Audit Plan is designed to be as rigorous as the third-party audit process.

The internal BMP audit program will cover a number of BMP Elements, as approved by the third party auditor, to ensure all of the District's biosolids management program activities, from planning to final disposition, are covered in a five-year period.

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 RR&R Technical Services Officer. District 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 BMP Audit Plan includes protocols designed to evaluate conformance with each of the individual Elements as contained in this BMP 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, BMP outcomes (environmental performance, regulatory compliance, interested party relations, and quality practices), corrective and preventative actions for nonconformances, and the management review process.

BMP AUDITOR

The District will utilize the Internal Auditor currently on staff to conduct the BMP 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.

BMP 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 BMP Audit.

If the RR&R Project Coordinator or BMP Team identifies 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 BMP 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 BMP *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 BMP requirements are being met on paper. The employee interview and transaction assessments will determine if the BMP is working.

AUDIT REPORT

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

- Title page and Table of Contents
- Executive Summary

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- 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 RR&R Project Coordinator.

CORRECTIVE ACTION AND MANAGEMENT REVIEW

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

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PURPOSE

To ensure the Metro District has established and maintains an effective internal audit program.

SCOPE

This procedure applies to the District's BMP Elements and its Policy and Mission statements.

REFERENCES

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

DEFINITIONS

BMP 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 BMP Elements.

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

RESPONSIBLE PERSONS

- RR&R Project Coordinator
- BMP Team
- Metro District Internal Auditor
- Department Heads

RELATED TRAINING

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

PROCEDURAL STEPS

1. The RR&R Project Coordinator will request a BMP internal audit in August prior to the year the audit is to be conducted. The Elements to be audited are approved by the third party auditor and can be found in third party audit documents.
2. The District's Internal Auditor will submit a proposed audit schedule to the District Manager for the BMP internal audit, and then notify the Director of RR&R and the RR&R Project Coordinator of the approved schedule.

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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, RR&R Technical Services Officer and the RR&R Project Coordinator for review and action.
5. The RR&R Project Coordinator will draft a management response, with input from the BMP Team as appropriate, as outlined in Element #14: Nonconformance – Procedure found from an audit.
6. The RR&R Project 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 BMP Performance Management Review report.