

City of Grand Rapids
Environmental Management System for Biosolids
Annual Internal Audit
Covering 2008 Biosolids EMS Activities

Issued: March 31, 2009

EMS Coordinator: Mike Lunn

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: Conformance	Nonconformance
Element No.	1		Audit Number: 01-2009-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock, WPS-EA		
Audit date(s)	3/20/2009		
List nonconformances:			
1.			
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Comments: Element 1 of the Grand Rapids Biosolids EMS Manual is up to date.			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 03/23/2009 signature: Gary De Kock

Joint review with EMS coordinator: (MM/DD/YYYY) 5/31/09 Initials: MDG

Table 16.1.1 – Internal Auditor’s Minimum Question Checklist

Element 1 Documentation of Biosolids EMS Requirement	Record audit number from worksheet: 01-2009-01	Questions/Considerations	Auditor Notes
Document the EMS for Biosolids in an EMS Manual or equivalent set of program documents that describe, at least at a general level, the applicable policies, programs, plans, procedures, and management practices in the EMS.	Can you show me your Biosolids EMS manual?	Yes, located at http://sapesd01/EMS/default.aspx	
Approve the EMS Manual by a level of the organization’s management with the authority to commit people and resources to biosolids management activities.	Has your Biosolids EMS manual been approved by the department Director?	Yes, all 17 are signed by the Environmental Services Manager	
Contain, in the EMS Manual, the organization’s Biosolids Management Policy and EMS Procedures required by the EMS Elements.	Can you show me your Biosolids Management Policy? Can you show me the elements of your policy identified in Table 1.1 of your EMS manual?	Yes, Element 2, page 1-2 of manual Yes, Elements 1-17 of manual	
Contain or cross-reference, in the EMS Manual, public participation, communications, and emergency preparedness and response programs and plans required by the EMS Elements.	Can you show me some examples of how you have cross referenced public participation in your manual? Can you show me some examples of how you have cross referenced communications in your manual? Can you show me some examples of how you have cross referenced emergency preparedness and response programs and plans in your manual?	Yes, Element 6 to Elements 2, 5, 7 and 12 Yes, Element 9 to Elements 6 and 7 Yes, Element 11 to Element 12 and Plant O&M Manual	
Cover, in the EMS Manual, all applicable, relevant, and selected critical control points for biosolids management activities throughout the biosolids value chain.	Were Critical Control Points, as identified in the Manual of Good Practice – Appendix F, for biosolids management activities throughout the biosolids value chain considered during program development?	Yes, Element 3, Table 3.1 Critical Control Points	
In the EMS Manual, include or cross-reference all operational controls, procedures, processes, and other management methods used to achieve and maintain compliance with legal and other requirements.	Can you provide examples showing how operational controls, procedures, processes, and other management methods used to achieve and maintain compliance with legal and other requirements are cross referenced in the EMS manual?	Yes, Element 4 to Element 3	
In the EMS Manual, describe those biosolids management activities assigned to and performed by contractors.	Does the EMS manual state which Biosolids management activities are assigned to contractors?	Yes, Element 7 Table 7.1 Roles and Responsibilities – Internal EMS Team	
Contain in the EMS Manual must be documentation of support for the NBP letter of understanding.	Does the EMS Manual contain documentation of support for the NBP letter of understanding?	Yes, Element 1, pages 5-7, Figure 1.1 – Letter of Understanding	

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u>	Nonconformance
Element No.		2	Audit Number: 02-2009-01
Provide lead auditor first followed by auditor assistants along with classifications		Gary De Kock, WPS-EA	
Audit date(s)		3/20/2009	
List nonconformances:			
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Comments: Element 2 of the Grand Rapids Biosolids EMS Manual is up to date.			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 03/23/2009 signature: Gary De Kock

Joint review with EMS coordinator: (MM/DD/YYYY) 3/31/09 Initials: WMS

Table 16.1.2 – Internal Auditor’s Minimum Question Checklist

Element 2 Biosolids Management Policy		Record audit number from worksheet: 02-2009-01	
Requirement	Questions/Considerations	Yes, Element 2, pages 1-2	Auditor Notes
Establish a Biosolids Management Policy that commits the organization to following the principles of conduct set forth in the Code of Good Practice and may include other biosolids commitments the organization voluntarily chooses to adopt.	Does the biosolids EMS commit our organization to the “Code of Good Practice”?	Yes, Element 2, pages 1-2	
Communicate the policy to employees, contractors, and all interested parties.	Can you show me how the biosolids management policy was communicated to employees, contractors, and interested parties?	Yes, Employees and Contractors- see Training Records/Programs drawer in maintenance conference room. Interested Parties – see Public Participation in Planning folder in office of EMS Coordinator, covered in plant tour PowerPoint, covered at annual industrial users meeting.	
Incorporate the policy into the organization’s biosolids programs, procedures, and practices.	Can you show me some examples of how the biosolids management policy has been incorporated into programs, procedures, and practices?	Compliance, Element 5 Table 5.1 Goals and Objectives, Goal 5 – Environmental Assessment Compliance, Element 5 Table 5.1 Goals and Objectives, Goal 4 – Maintenance Emergency Response, Element 11 Table 11.1 Emergency Response Information – Contractor	
Maintain a pretreatment program consistent with state and federal regulations identified in the NPDES permit.	Can you show an SOP used to insure compliance with a state or federal regulation?	Yes, http://sapesd01/LAB/default , SOP 2701 IPP Annual Inspections	
Monitor mercury in the plant influent and effluent and maintain existing pollutant minimization plan (PMP) practices and procedures identified in the NPDES permit.	Can you show me results from your mercury monitoring of the plant influent or effluent?	Yes, T:\EPD\Ipp\Annual Report-IPP, Hg\Annual Report 2008\Mercury Report 2008	
Develop contract dewatering specifications and contracts which emphasize product handling and final disposal.	Can you show me language in your dewatering specifications which emphasizes product handling and final disposal?	Yes, procedures in EMS Coordinator’s office	



Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: Conformance	Nonconformance
Element No.	3		Audit Number: 03-2009-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock, WPS-EA		
Audit date(s)	3/20/2009		
List nonconformances:			
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Comments: Element 3 of the Grand Rapids Biosolids EMS Manual is up to date.			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 03/23/2009 signature: Gary De Kock

Joint review with EMS coordinator: (MM/DD/YYYY) 3/31/09 Initials: WMS

Table 16.1.3 – Internal Auditor’s Minimum Question Checklist

Element 3 Critical Control Points	Record audit number from worksheet: 03-2009-01	
Requirement	Questions/Considerations	Auditor Notes
Identify and document the critical control points of the organization’s biosolids management activities throughout the biosolids value chain, consistent with those identified in the National Manual of Good Practice and other authoritative sources.	Was Appendix F in the Manual of Good Practice considered when identifying your critical control points? Were all critical control points identified in Appendix F, which were applicable to our operation, implemented in your biosolids EMS?	Yes, Element 3 Table 3.1 Critical Control Points Yes, Element 3 Table 3.1 Critical Control Points
Identify potential or actual environmental impacts at each critical control point.	Have potential or actual environmental impacts for each critical control point been identified? Is the list complete?	Yes, Element 3 Table 3.1 Critical Control Points, Column 3 - Environmental Impacts Yes
Keep up-to-date information on the organization’s critical control points.	Is up to date information maintained on Critical Control Points (CCP)?	Yes, Element 3 Table 3.1 Critical Control Points, Column 4 – Monitoring and Measurement (Example - annual inspections records in IPP Office) Element 7 Figure 7.2 Schedule of Annual Biosolids Activities, CCP Annual Review
Maintain records that link each critical control point and its potential environmental impacts with the corresponding operational controls.	Are records maintained which link critical control points, environmental impacts, and operational controls?	Yes, Element 3 Table 3.1 Critical Control Points, Column 4 - Monitoring and Measurement (Example - SIU permits in IPP Office)
For organizations that have successfully completed a third party verification audit, provide notification to the NBP (and assigned third-party verification auditor) following any operational change that requires a change to the identified critical control points or environmental impacts associated with the critical control points.	Have you had any operational changes that required a change to the identified critical control points or environmental impacts associated with the critical control points?	No

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	4	Audit Number:	04-2009-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock, WPS-EA		
Audit date(s)	3/20/2009		
List nonconformances:			
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Comments: Element 4 of the Grand Rapids Biosolids EMS Manual is up to date.			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 03/23/2009 signature: Gary De Kock

Joint review with EMS coordinator: (MM/DD/YYYY) 3/31/09 Initials: MDG

Table 16.1.4 – Internal Auditor’s Minimum Question Checklist
 Element 4 Legal and Other Requirements

Record audit number from worksheet: 04-2009-01		Auditor Notes	
Requirement	Questions/Considerations		
Establish a procedure for identifying and tracking legal (federal, state, and local) and other requirements applicable to its biosolids management activities.	Is a procedure in place for tracking changes in legal and other requirements?	Yes, Element 4 Figure 4.1 Annual Legal and Other Requirements Document Review	
Establish and maintain records of applicable legal and other requirements.	Are records of legal and other requirements maintained? Is the list complete?	Yes, Element 4 Table 4.1 Legal and Other Requirements, Column 2 - Location Yes, Element 4 Figure 4.1 Legal and Other Requirements	
Include a management process for incorporating changes and new requirements into the elements of the EMS.	Is a process in place for incorporating changes and new requirements into the EMS manual?	Yes, Element 4 Figure 4.1 Annual Legal and Other Requirements Document Review	
The City will utilize a variety of sources for identifying, tracking, analyzing, and interpreting the various legal and other requirements which impact the Biosolids value chain.	Can you document that you have monitored the National Biosolids Partnership website for information which may have impacted your program?	Yes, regular emails to office of WPS-EA	
On a quarterly basis, internal EMS team members will review Table 4.1 and submit a “Quarterly Legal and Other Requirements Document Review” form to the EMS coordinator.	Show your latest review forms.	Legal reviews are in the office of the EMS Coordinator	

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.		Audit Number:	05-2009-01
5	Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock, WPS-EA	
	Audit date(s)	3/20/2009	
List nonconformances:			
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Comments: Element 5 of the Grand Rapids Biosolids EMS Manual is up to date.			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 03/23/2009 signature: Gary De Kock

Joint review with EMS coordinator: (MM/DD/YYYY) 3/31/09 Initials: MDG

Table 16.1.5 – Internal Auditor’s Minimum Question Checklist

Element 5 Goals and Objectives		Record audit number from worksheet: 05-2009-01	
Requirement	Questions/Considerations	Auditor Notes	
Establish and periodically review measurable biosolids program goals and objectives for biosolids management activities.	Are goals and objectives established? Are goals and objectives periodically reviewed? Do they support the four NBP outcome areas?	Yes, Sharepoint >EMS >EMS Documents Yes, Sharepoint >EMS >EMS Documents Yes, Element 5 Table 5.1 Goals and Objectives, Key Outcomes	
Reflect, in program goals and objectives, identified priorities for improving environmental performance of biosolids management activities based on critical control points, identified or potential environmental impacts, legal and other requirements, and applicable best management practices as defined in the National Manual of Good Practice and various authoritative sources on biosolids management (e.g., Water Environment Federation Manuals of Practice).	Do the goals and objectives identified in Table 5.1 reflect a commitment on the part of the City to improving the environment or biosolids quality?	Yes, Element 5 Table 5.1 Goals and Objectives, column 5	
Consider, in developing program goals and objectives, input from interested parties developed through proactive public participation.	Is there evidence that input from interested parties was considered in developing goals and objectives?	Yes, Goals and Objectives Annual Review in Sharepoint >EMS >EMS Documents	
Integrate goals and objectives with other elements of the EMS and biosolids management activities.	Are goals and objectives integrated with other elements of the EMS?	Yes, Element 17 Table 17.1 Periodic Management Review of Performance Report and Element 15, page 1	
Develop program goals and objectives using SMART criteria (i.e., be Specific, Measurable, Achievable, Relevant, and Time-bounded).	Is there evidence that a SMART criterion was used to select goals and objectives? Does each goal and objective meet SMART criteria requirements?	Yes, see Form 5.1 Goals & Objectives Annual Review, Compliance check list Yes, Element 5 Table 5.1 Goals and Objectives Annual Review folder in Sharepoint >EMS >EMS Documents	
Update program goals and objectives on a regular basis.	Are goals and objectives regularly updated?	Yes, see Goals and Objectives Annual Review in Sharepoint >EMS >EMS Documents	
Establish an action plan that describes those improvement activities it is pursuing to achieve biosolids program goals and objectives. Designate, in the action plan, schedules, milestones, resources, and responsibilities for achieving biosolids program goals and objectives.	Are action plans in place for each goal? Does each action plan contain schedules, milestones, resources, and responsibilities to achieve the objectives?	Yes, see Action Plan file in Sharepoint >EMS >EMS Documents Yes, see Action Plan file in Sharepoint >EMS >EMS Documents	

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.		Audit Number:	
6	Gary De Kock, WPS-EA		06-2009-01
	Provide lead auditor first followed by auditor assistants along with classifications		
	Audit date(s)		3/20/2009
List nonconformances:			
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Comments: Element 6 of the Grand Rapids Biosolids EMS Manual is up to date.			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 03/23/2009 signature: Gary De Kock

Joint review with EMS coordinator: (MM/DD/YYYY) 3/31/09 Initials: mg

Table 16.1.6 -- Internal Auditor's Minimum Question Checklist

Element 6 Public Participation in Planning		Record audit number from worksheet: 06-2009-01	Auditor Notes
Requirement	Questions/Considerations		
Select and implement a proactive public participation approach to involve interested parties in its Biosolids Management Program and EMS planning process.	Is there evidence that a proactive process was selected and implemented to seek public participation near the beginning of the EMS planning process?		Yes, process selected and documented in Element 6, see Public Participation in Planning folder in office of EMS Coordinator
Reflect, in the selected approach, the organization's commitments to the ten principles in the Code of Good Practice, including a plan for independent third-party verification of conformance with the EMS Elements.	Does element 6 commit the City to the Code of Good Practice? Does element 6 include information on the third party verification audit?		Yes, Element 6, page 1-2 Yes, Element 6, page 2
Select an approach that is consistent with the degree of current public interest, history of public involvement, method of biosolids management, and related local circumstances.	Is the City's approach to public participation consistent with the degree of current public interest in the City's biosolids program?		Yes documentation in Public Information Requests folder in office of EMS Coordinator, informational needs are being met
Provide interested parties with meaningful opportunities to express views and perspectives relative to biosolids management activities, including concerns about environmental impacts, biosolids program performance, and potential areas for improvement.	Were opportunities provided for interested parties to provide input into the biosolids EMS? Did it include environmental impacts? Did it include biosolids program performance? Did it include potential areas for improvement?		Yes, internet feedback option, invitations to comment mailed to interested parties Yes, included in mailing Yes, included in mailing Yes, included in mailing
Consider input from interested parties in initially developing program goals and objectives during EMS implementation and in updating them as part of periodic review of biosolids management program performance.	Did the City consider input from interested parties when initially developing its program goals and objectives? Did the City consider input from interested parties when updating them as part of its periodic review of biosolids management program performance?		Yes documented in Public Participation in Planning folder in office of EMS Coordinator Yes documented in Public Participation in Planning folder in office of EMS Coordinator as request for 2008 Goals and Objectives feedback
The City will maintain information related to the Biosolids management program and processes on the City's internet website.	Can you show the Biosolids information on your website?		Yes, http://www.ci.grand-rapids.mi.us/4143
The City offers plant tours which can be customized to meet the needs of the group.	Can you show how information relating to Biosolids is communicated during plant tours?		Yes, see T:\EPSPD\WWTP tour PowerPoint - New\current tours\Tour-General
Records will be maintained to document the City's responsiveness to public input and requests for information regarding the Biosolids EMS.	Can you show your records in regard to public input?		Yes, documentation in Public Participation folder in office of EMS Coordinator
A list of interested parties must be created.	Can you show your up to date list of interested parties?		Element 6, Table 6.2 - Interested Parties is up to date

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u>	Nonconformance
Element No.	7	Audit Number:	07-2009-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock, WPS-EA		
Audit date(s)	3/20/2009		
List nonconformances:			
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Comments: Element 7 of the Grand Rapids Biosolids EMS Manual is up to date.			

"I have conducted an internal audit of the Biosolids EMS element noted above."
 Lead Auditor (MM/DD/YYYY) 03/23/2009 signature: Gary De Kock

Joint review with EMS coordinator: (MM/DD/YYYY) 3/31/09 Initials: MDK
 2009 Internal EMS Audit Elements 1-7.doc

Table 16.1.7 – Internal Auditor’s Minimum Question Checklist

Element 7 Roles and Responsibilities	Record audit number from worksheet: 07-2009-01	Auditor Notes
Requirement	Questions/Considerations	
<p>Establish and maintain records of the assigned roles and responsibilities for the Biosolids Management Program and activities. These records shall define and document roles and responsibilities of employees for performing biosolids management activities and EMS functions.</p>	<p>Can you show examples of how responsibilities have been assigned for the biosolids EMS?</p>	<p>Yes, Element 7, Table 7.1 Roles and Responsibilities – Internal EMS Team</p>
<p>Appoint an individual with overall responsibility for ensuring that Biosolids Management Program and EMS are implemented and maintained.</p>	<p>Has an EMS coordinator who has overall responsibility for the biosolids EMS been assigned?</p>	<p>Yes, Element 7, Table 7.3 Internal EMS Team</p>
<p>Provide the human, technical, and financial resources necessary to effectively execute these responsibilities.</p>	<p>Can you provide evidence of adequate staffing to carry out assigned responsibilities? Can you provide evidence of adequate maintenance and instrumentation services to carry out assigned responsibilities? Can you provide evidence of adequate financial resources to effectively execute these responsibilities?</p>	<p>Yes, Element 7, Table 7.1 Roles and Responsibilities – Internal EMS Team Yes, lab instrument log books and Maximo records Yes, “Water and Sewer Rate Study” at http://www.ci.grand-rapids.mi.us/126</p>
<p>Define and document the roles and responsibilities of contractors retained to perform various biosolids management activities and EMS functions through Service Agreements.</p>	<p>Have roles and responsibilities of contractors been defined in their service agreements?</p>	<p>Yes, service agreement in office of EMS Coordinator</p>
<p>The organizational chart shown in Figure 7.1 shows the reporting structure in place at the Grand Rapids facility.</p>	<p>Is your organizational chart up to date?</p>	<p>Element 7, Figure 7.1 - Organizational Chart is up to date</p>
<p>The contractor is responsible for following policies and procedures they develop which are necessary to ensure that operations are conducted in a safe and environmentally sound manner.</p>	<p>Is your contractor prepared to respond to emergency situations? Does your contractor have a safety program?</p>	<p>Yes, Spill Response Plan in office of Project Manager for contractor Yes, in office of Project Manager for contractor</p>

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one:	Conformance	Nonconformance
Element No.	(8) - Training			8-2009-01
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Acting WPS-OPS)			Audit Number:
Audit date(s)	3/17/09			
List nonconformances:				
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General awareness training files were found to be in good order as well as individual training files. New or reassigned employees have all been given the general awareness training.				

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/20/09 signature: [Signature] _____

Joint review with EMS coordinator: (MM/DD/YYYY) 3/31/09 Initials: mg _____

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Table 16.1.8 - Internal Auditor's Minimum Question Checklist Element 8 Training	Requirement	Record audit number from worksheet	Auditor Notes
Establish and maintain a training program to ensure that employees responsible for specific biosolids management activities and for the implementation of various EMS functions are competent in performing their assigned tasks and duties. The training program shall provide general awareness of the EMS and how each employee's assigned roles and responsibilities relate to the entire biosolids value chain.	Include in the training program new or reassigned employees.	Did all employees receive general awareness training? What records support this training?	Yes. WPS-MAINT keeps annual files of the attendance sheets for the general awareness training.
		What actions are taken with new employees?	New employees and new contractor employees are all given general awareness training.
Maintain records of individual employee training delivered and completed.		What training records do you maintain?	All training associated with employees and contractors is kept track of in file folders by the WPS-MAINT and appears to be in good order.
Require that contractors establish their own training programs consistent with their roles and responsibilities in biosolids management activities as defined through Service Agreements.		What training records do you maintain?	Awareness training and other training copies are maintained by the contractor at their location.

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one:	Nonconformance
Element No.		(9) – Communication & Public Outreach	Audit Number:
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Acting WPS-OPS)	<input checked="" type="radio"/> Conformance	9-2009-01
Audit date(s)	3/18/09		
List nonconformances:			
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"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/20/09 signature: [Signature]

Joint review with EMS coordinator: (MM/DD/YYYY) 3/31/09 Initials: mg

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Table 10.1.9 – Internal Auditor’s Minimum Question Checklist	Element 9 Communication and Public Outreach	Requirement	Questions/Considerations	Record audit number from worksheet	Auditor Notes
		<p>Establish and maintain a proactive Communications Program that provides ongoing information about the Biosolids Management Program and EMS to interested parties and the public, consistent with local circumstances, the method of biosolids management, public communications history, and degree of current interest in its Biosolids management activities.</p> <p>Include a procedure for receiving inquiries and requests for information from interested parties about its biosolids management activities and EMS. The procedure shall define a process for assuring a timely and complete response to inquiries by interested parties.</p>	<p>How is information about the biosolids EMS communicated to employees and other interested parties?</p> <p>How can interested parties request information about the City’s biosolids EMS?</p> <p>How do you assure that information is provided promptly?</p> <p>How do you track requests for information?</p>		<p>Information about EMS is communicated to employees through discussion amongst each other as well as communicated through Sharepoint. Biosolids EMS is also available to the public and other interested parties through the GRCITY US website under (Environmental Protection). Information is also integrated into our tours as well as certain construction projects.</p>
		<p>At a minimum, make the following information about the organization’s Biosolids management program and activities available to interested parties:</p> <ul style="list-style-type: none"> a) the Biosolids Management Policy; b) applicable legal and other requirements; c) biosolids program goals and objectives for continual improvement; d) the periodic Biosolids Management Program Performance Report; and e) a detailed report of the independent, third party EMS verification audit results. 	<p>Is the Biosolids Management Policy available to interested parties?</p> <p>Are legal and other requirements available to interested parties?</p> <p>Is the periodic biosolids management program performance report available to interested parties?</p> <p>Is third party audit and verification audit results available to interested parties?</p>		<p>Through the internet or via direct phone conversation. Through the use of the Public Request For Information Form, which is incorporated in element #9. This form is completed and reviewed by the EMS Coordinator. The EMS coordinator keeps a file in a folder of the requests for information. One request for information was found in this folder during the audit.</p>
		<p>Define roles and responsibilities of outside contractors in the Communications Program.</p>	<p>Is there evidence of how contractors are to handle requests for information in element 9?</p>		<p>Yes via the City Website or via telephone. Yes via the City Website and provided if requested. Yes via the City Website and provided if requested. Yes. Reports for 2006 thru 2008 are posted on the City Website and provided if requested. Verification and interim audits are on the City Website and available upon request.</p>
		<p>Communicate relevant information about biosolids management activities and the Biosolids Management Policy, and all seventeen elements of the EMS to employees and outside contractors, consistent with assigned roles and responsibilities.</p>	<p>Is there evidence that information about the biosolids EMS is communicated to employees and contractors?</p>		<p>RFI’s are coordinated through the WPS-OPS as stated in element #9.</p>
		<p>Completion of Public Request for Information Form each time information is sent to the public.</p>	<p>Review Public Request for Information Forms completed in the last year for completeness.</p>		<p>Yes. All the training is tracked. Training attendance sheets are maintained by the WPS-MAINT. One RFI was reviewed and was fully completed.</p>

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u>		Nonconformance
Element No.		(10) – Operational Controls of Critical Ctrl Points	Audit Number:	10-2009-01
	Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Acting WPS-OPS)		
	Audit date(s)	3/19/09		
	List nonconformances:			
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"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/20/09 signature: [Signature]

Joint review with EMS coordinator: (MM/DD/YYYY) 3/31/09 Initials: MHG

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u>	Nonconformance
Element No.		(11) - Emergency Preparedness & Response	Audit Number:
	Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Acting WPS-OPS)	11-2009-01
	Audit date(s)	3/19/09 & 3/20/09	
	List nonconformances:		
1.			
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<p>Comments: Equipment list in "operations emergency procedures" in 3100 series section of SOP's is up to date and current. Several lift stations were updated with onsite generators. Two portable generators were eliminated due to obsolescence. Four new generators were purchased for redundancy and added protection.</p>			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/20/09 signature: [Signature]

Joint review with EMS coordinator: (MM/DD/YYYY) 3/31/09 Initials: mg

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Table 16.1.1 – Internal Auditor's Minimum Question Checklist

Element 1.1 – Emergency Preparedness and Response	Requirement	Questions/Considerations	Record audit number from worksheet	Auditor Notes
	Establish and maintain Emergency Preparedness and Response Plans and Procedures to assure effective response to accidents and emergency situations associated with Biosolids management activities.	Are emergency procedures in place to deal with Biosolids related emergencies? Are they maintained?		Yes Emergency procedures are in place to deal with emergencies related to biosolids and are maintained in Sharepoint. Reviewed associated SOP's. Emergency equipment is also listed in 2100 series SOP's on Excel spreadsheets. Equipment is up to date for pumps and generators.
	Review and evaluate the effectiveness of emergency preparedness and response procedures, including communications systems, and revise them as necessary.	How effective are the procedures?		Opportunities for improvement exist for SOP #3510, which could reference new SOP#3107 (Emergency Pumping Procedures). It would be beneficial to mention this pumping SOP on page (6) of SOP #3510 where the pump inventory is referenced. The procedures have been tested and have proven effective in the past.
	Have all emergency response equipment on site or readily available within a minimum response time.	Is equipment readily available?		Equipment is always readily available and are checked monthly in Maximo by operations. Repairs or problems are addressed quickly.
	Require contractors to establish and maintain Emergency Preparedness and Response Plans and Procedures to assure effective response to accidents and emergency situations associated with biosolids management activities.	Have contractors implemented emergency response procedures? Are they maintained?		Yes Synagro has SOP's to cover emergencies related to biosolids. Reviewed their critical control points related to truck loading, truck cover, transport to landfill, landfill contracts, odor control and truck washing procedure. Manuals and training is up to date and are maintained

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u>	Nonconformance
Element No.	(12) - EMS Documentation & Document Control	Audit Number:	12-2009-01
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Acting WPS-OPS)		
Audit date(s)	3/20/09		
List nonconformances:			
1.			
2.			
3.			
4.			
5.			
6.			
7.			
Comments:	SOP's are tested and periodically updated with improvements if changes are found to be needed.		

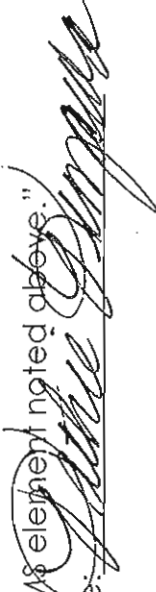
"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/20/09 signature: [Signature]

Joint review with EMS coordinator: (MM/DD/YYYY) 3/31/09 Initials: mg

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one:	Conformance	Nonconformance
Element No.	13			Audit Number: 13-2009-01
Provide lead auditor first followed by auditor assistants along with classifications	Kathie Kuzawa - WPS, Maintenance			
Audit date(s)	March 11 - 23, 2009			
List nonconformances:				
1.				
2.				
3.				
4.				
5.				
6.				
7.				
<p>Comments: Room for improvement: Column to the left should read "planned", not "planned". This was submitted in 2006 as room for improvement - please change!</p>				

"I have conducted an internal audit of the Biosolids EMS element noted above."
 Lead Auditor (MM/DD/YYYY) 03/24/2009 signature: 

Joint review with EMS coordinator: (MM/DD/YYYY) 3/31/09 Initials: WKS

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Table 16.1.13 – Internal Auditor’s Minimum Question Checklist

Element 13 Monitoring and Measurement Requirement	Questions/Considerations	Record audit number from worksheet: 13-2009-01	Auditor Notes
<p>Establish and maintain regular monitoring and measurement procedures and practices for all biosolids management activities to assure compliance with applicable legal and other requirements, measure biosolids program performance at critical control points, and track progress toward achieving program goals and objectives.</p>	<p>Are procedures in place to conduct regular monitoring and measurement practices for all Biosolids management activities?</p>	<p>YES - The responsible party monitors: 1 - the progress/status of the various goals (inclusive of action plan items, regulatory and legal requirements that are associated with the goals) on a continual basis and submits a Quarterly Legal and Other Requirements Document Review (see figure 4.1), Action Plan Status Worksheet (see figure 5.1), CCP Periodic Review (see figure 3.1) and a Quarterly Progress Report (table 13.1), Compliance Inspection of Contractors Activities (see form 10.2 for each contractor). Annually, operational controls are reviewed for each CCP (see form 10.1), goals and objectives are reviewed (see form 5.2), internal audit is performed (see element 16) and a meeting is held with the department director to review prior years activities.</p>	
<p>Record monitoring and measurement results and maintain records as established in the record keeping procedures under Element 12.</p>	<p>Provide examples of monitoring and measurement data?</p>	<p>Monitor construction project status in regards to constructing new Biosolids storage tanks and dewatering facilities during 2008 and 2009, measure number of corrective versus preventive work orders in CMMS, track and maintain NPDES permit compliance tracking spreadsheet to track and monitor progress towards implementing odor control improvements in Preliminary treatment building during 2008.</p>	<p>YES - See records in WPS – Op office.</p>
<p>Require contractors to establish and maintain regular monitoring and measurement procedures and practices for all their assigned biosolids management activities, as defined in their service agreement.</p>	<p>Have contractors implemented regular monitoring and measurement procedures for activities they are responsible for? Provide example data?</p>	<p>Is there an action plan for each objective? Was it created by the assigned supervisor and/or contractor? Has each objective been assigned to a supervisor? Are the roles of the appropriate supervisor and/or contractor spelled out in element 7, "Roles and Responsibilities"?</p>	<p>Q1 and Q2, YES – See tables 13.2, quarters 1, 2, 3 and 4 of 2008. YES – 2008 objectives were assigned to a supervisor and 2009 objectives have been assigned (see table 5.1). YES – see table 7.1, Roles and Responsibilities</p>
<p>At a minimum, each action plan must meet contain: (a) schedule, (b) milestones, (c) resources required, (d) human resources required and their responsibilities.</p>	<p>Does each action plan contain: (a) schedule, (b) milestones, (c) resources required, (d) human resources required and their responsibilities?</p>	<p>Has a complete Progress Report been submitted within 30 days of the end of each calendar quarter for each objective? Are the roles of the appropriate supervisor</p>	<p>YES – see table 13.2 Action Plan</p>
<p>Appropriate Supervisor or contractor to submit a Progress Report, which will contain "Action Plan – Quarterly Progress Report" (see figure 13.1) and the "Action Plan Status</p>	<p>Are the roles of the appropriate supervisor</p>	<p>submitted reports for each 2008 goal. YES – see table 5.1 Goals and Objectives.</p>	

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Element 13 Monitoring and Measurement Requirement	Questions/Considerations	Record audit number from worksheet: 13-2009-01	Auditor Notes
Worksheet" (see figure 5.1) to the EMS coordinator within 30 days following the end of the calendar quarter for each objective.	and/or contractor spelled out in element 7, "Roles and Responsibilities"?		
Require "Action Plan - Quarterly Report" to contain activities that took place during the previous calendar quarter and any planned activities for the future.	Does "Action Plan - Quarterly Report" contain activities that took place during the previous calendar quarter and any planned activities for the future?		<i>Room for improvement: Column to the left should read "planned", not "planned". This was submitted in 2006 as room for improvement - please change!</i>
Require "Action Plan Status Worksheet" to reflect any changes in the "Action Plan" as per "plan, do, check, act" policy or any other techniques used to assess performance warrant. The document revision date shall reflect changes made in policy.	Was "Action Plan" modified appropriately per items included in "Action Plan Status Worksheet" and/or "Action Plan - Quarterly Report"? Do the revision dates reflect what appears to be conveyed in any and all reports?		YES - Checked files in EMS Coordinators file cabinet under goals. YES - Action plans were modified appropriately (i.e., when goals were complete or tabled) and modifications in the element and/or associated forms is detailed in EMS document revision history under each element. YES
EMS Coordinator will schedule a meeting with the appropriate supervisor or contractor following the receipt of a written progress report.	Is this role of the EMS coordinator included in element 7, "Roles and Responsibilities"? Were meetings scheduled by the EMS Coordinator following receipt of the written progress report?		YES

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one:	
Element No.	Conformance	Nonconformance	Audit Number:
14			14-2009-01
Provide lead auditor first followed by auditor assistants along with classifications			
Kathie Kuzawa - WPS, Maintenance			
Audit date(s)			
March 11 - 23, 2009			
List non-conformances:			
1. A summary of all non-conformances was not included in the Biosolids Program Performance Report (issued Feb 2009).			
2. Reviewed 2008 Non-conformances found in EMS Coordinators office - Non-conformance 2008-2 does not have an "Actual Completion Date" specified on form.			
3.			
4.			
5.			
6.			

Comments: Room for improvement Check Table 16.1.13 - Internal Auditor's Minimum Question Checklist - Element 14, Question 6 and 7 are the same question. I have deleted the redundant question from my checklist.

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 03/24/2009 signature: 

Joint review with EMS coordinator: (MM/DD/YYYY) 3/31/09 Initials: mg

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Table 16.1.14 – Internal Auditor’s Minimum Question Checklist

Element 14 Nonconformance’s: Preventive and Corrective Action Requirement	Questions/Considerations	Record audit number from worksheet: 14-2009-01	Auditor Notes
Develop and implement a procedure to investigate any noncompliance with applicable regulatory requirements and/or nonconformance with internal EMS procedures identified during routine monitoring and measurement or periodic internal EMS audits.	Show me the procedure you use to respond to nonconformance incidents?	See Element 16 - item 8.d, table 16.1 - Internal Auditors Worksheet and Element 14.	
Develop and implement a procedure to identify the cause and take actions to correct the nonconformance.	What process is used to correct the nonconformance?	Under the direction of the EMS Coordinator, an "Investigation Committee" is formed to investigate the nonconformance. As part of the continual improvement process the committee utilizes various methods (i.e., root cause analysis) to avoid future non-conformances. The committee will normally be given 5 days to investigate the non-conformance and The investigation committee, in coordination with the EMS coordinator and the affected workgroups, will oversee implementation of a "Corrective Action Plan" and will submit a completed "Non-conformance – Investigation Committee Report Form" and "Corrective Action Plan" to the EMS Coordinator once the corrective action has been implemented and the nonconformance has been corrected.	
Develop and implement a procedure to document the necessary corrective actions taken to prevent a recurrence.	How is nonconformance data tracked?	Non-conformance data is tracked by maintaining all records on any nonconformance including all relevant data and investigation committee reports along with recommendations and supporting documentation (including summary information of any nonconformance incidents) in the City’s "Periodic Biosolids Program Performance Report" and table 14.2.	
Develop corrective action plans to address non-conformances identified during routine monitoring and measurement and identify the nonconformance, the root cause(s), and the corrective action being taken. In the corrective action plans, identify changes to policies, programs, plans, operational controls and monitoring/measurement procedures to prevent future non-conformances.	Is a corrective action plan system in place? How does it work?	YES - (see figure 14.1 and table 14.2). Each non-conformance is given a specific identification number and assigned a team to investigate the non-conformance. The Investigation findings, the root cause of the non-conformance, the resolution and associated corrective actions as well as the dates the non-conformance was discovered, the expected date of resolving the non-conformance as well as the actual completion date of the corrective action is tracked on the form. Any retraining of staff that is implemented as a result of the non-conformance is tracked also.	YES - Same answers as above
Establish formal corrective action plans to address finding of internal EMS audits and audits conducted by third parties. Document corrective action plans and describe what actions will be taken to address the audit findings, the	Is a corrective action plan system in place? How does it work?		

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Element 14 Nonconformance's: Preventive and Corrective Action Requirement	Questions/Considerations	Record audit number from worksheet: 14-2009-01	Auditor Notes
<p>individuals responsible, the estimated completion date, and required resources to develop and implement corrective and preventive action. Include recommended changes to policies, programs, plans, operational controls and monitoring/measurement procedures to prevent future non-conformances. Document these changes in the corrective action plan and in the EMS Manual and other relevant EMS documentation.</p>	<p>How is progress tracked?</p>	<p><i>Room for improvement Check Table 16.1.13 – Internal Auditor's Minimum Question Checklist - Element 14, Question 6 and 7 are the same question. I have deleted the redundant question from my checklist. Table 14.1 and table 14.2 track the findings and recommendations of the non-conformance committee and tracks the progress as the non-conformance is resolved.</i></p>	
<p>(If a non-conformance has been identified) The non-conformance investigating committee will normally be given 5 days to conduct their investigation. The committee chair may request additional time by submitting a request to the EMS Coordinator.</p>	<p>(If a non-conformance has been identified) Was the non-conformance investigation completed in 5 days? If not, was a written request for a time extension given to the EMS Coordinator?</p>	<p>YES - Non-conformances that have been identified in 2008 (2) were investigated within the 5 day time limitation.</p>	
<p>(If a non-conformance has been identified) The preliminary non-conformance report shall include the date the non-conformance occurred, all committee meeting dates, personnel interviewed and date interview took place, root cause analysis report, supporting documentation, recommended corrective action, recommended system changes, other observations and date corrective actions took place.</p>	<p>(If a non-conformance has been identified) Are all of the criteria included in the report? Are all recommended changes incorporated in the appropriate policies and/or elements? Is committee chairs responsibilities outlined in "Role and Responsibilities"(element 7)?</p>	<p>YES – All of the criteria as listed is included in the report (see figure 14.1)</p>	
<p>The EMS Coordinator will review the findings of the committee, include summary information in the Biosolids Program Performance, report and review same with the Department Director during the last quarter of the calendar year. Any non-conformance issues will be resolved within 2 weeks or as soon as practical.</p>	<p>How is the EMS Coordinators review of the report with the committee and subsequent review with the Department Director documented? Was a summary of the non-conformance report included in the Biosolids Program Performance Report? Were the non-conformances resolved within the desired time frame? Were any affected training programs modified? Did retraining take place as needed? Are responsibilities outlined in</p>	<p>The EMS Coordinators review of the report with the committee and subsequent review with the Department Director is documented in table 14.2. NO – see pages 6 – 7 Biosolids Program Performance Report NO – Reviewed 2008 internal audit non-conformances found in EMS Coordinators office - Non-conformance 2008-2 does not have an "Actual Completion Date" filled in on figure 14.1. YES – Contractors training schedule was amended - additional training given for new SOP. YES</p>	<p>Page 10 of 16 Reviewed w/ Corrected Auditor and Form/Not a NC</p>

mf
 3/31/09
 Reviewed w/ Corrected Auditor and Form/Not a NC

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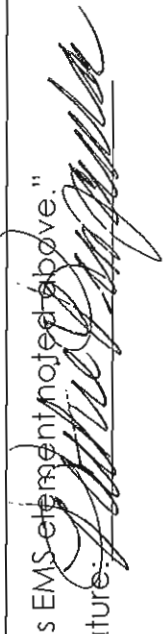
Element 14 Nonconformance's: Preventive and Corrective Action Requirement	Questions/Considerations	Record audit number from worksheet: 14-2009-01	Auditor Notes
	"Roles and Responsibilities" (element 7)?	YES - See figure 7.2	

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: Conformance		Nonconformance	
Element No.				Audit Number:	
15				15-2009-01	
	Provide lead auditor first followed by auditor assistants along with classifications	Kathie Kuzawa - WPS, Maintenance			
	Audit date(s)	March 11 - 23, 2009			
List nonconformances:					
1.					
2.					
3.					
4.					
5.					
6.					
7.					

Comments: Room for improvement; In regards to "Question/Consideration", in table 16.1.15, first row, insert "or interim" after third party. Action Plan measurement data on Annual Summary Report - How do we have a greater than 100% compliance with the NPDES Permit? Should this be 100%?

"I have conducted an internal audit of the Biosolids EMS element noted above."
 Lead Auditor (MM/DD/YYYY) 03 / 24 / 2009 signature: 

Joint review with EMS coordinator: (MM/DD/YYYY) 3 / 31 / 09 Initials: mkj

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Table 16.1.15 – Internal Auditor’s Minimum Question Checklist

Element 15 Periodic Biosolids Program Performance Report	Record audit number from worksheet: 15-2009-01	Auditor Notes
Requirement	Questions/Considerations	
<p>Complete a periodic written Biosolids Management Program Performance Report (at least annually), summarizing the performance of the biosolids management program. The report shall contain appropriate summaries of monitoring, measurements data collected as part of the action plans and other results that demonstrate the performance of the biosolids program relative to its goals, objectives and legal requirements, including those biosolids management activities conducted by contractors. The report shall also provide summaries of performance relative to other voluntary adopted requirements, the organization's progress toward achieving its Biosolids program goals and objectives, and a summary of its independent third party EMS verification audit results.</p>	<p>Has a Biosolids management program performance report been completed? If so, review for inclusion of requirements. Does it include a summary of third party or interim audit?</p>	<p>YES – Issued February - 2009 YES - Reviewed – Summary of: <i>Action Plan monitoring data - Included</i> <i>Action Plan measurement data - Included but, how do we have a greater than 100% compliance with the NPDES Permit?</i> <i>Progress towards goal - Included</i> <i>Legal requirements - Included</i> <i>Objectives - Included</i> <i>Overall program performance - Included.</i> YES – Room for improvement; In regards to "Question/Consideration", in table 16.1.15, first row, insert "or interim" after third party.</p>
<p>Make the periodic Biosolids Management Program Report available to employees, contractors, interested parties and the public. The organization shall have the flexibility of using other methods, including electronic methods such as a biosolids program web page, in addition to or in lieu of a written periodic performance report.</p>	<p>Has the report been made available to employees, contractors, interested parties and the public?</p>	<p>YES</p>
<p>The Biosolids Management Program Report will take place annually in the first quarter of the year. The Biosolids Management Program Report shall be performed by the EMS Coordinator with assistance from the EMS internal team.</p>	<p>Was the Biosolids Management Program Report written during the first quarter of the year?</p>	<p>YES – Issued February - 2009</p>
<p>The Biosolids Management Program Report will be reviewed by the department director as part of the periodic management review during the first quarter of the year.</p>	<p>Was the Biosolids Management Program Report reviewed during the first quarter of the year during the periodic management review?</p>	<p>Sent e-mail to Director - Have you done this yet?</p>

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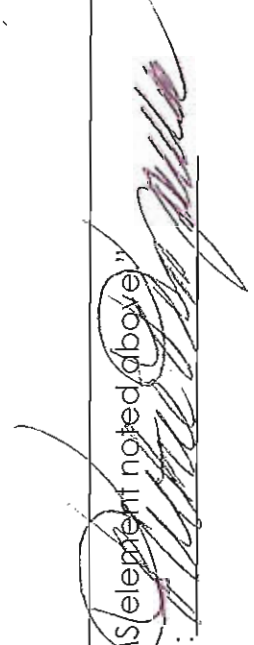
Element 15 Periodic Biosolids Program Performance Report Requirement	Questions/Considerations	Record audit number from worksheet: 15-2009-01	Auditor Notes
The final Biosolids Management Program Report shall be issued during the second quarter of the year.	Was the final Biosolids Management Program Report issued during the second quarter of the year?		<i>Cannot answer until end of 2nd quarter or until report is finalized, whichever comes first. I will amend audit worksheet at that time. How do I know it is final???</i>

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: Conformance		Nonconformance	
Element No.	16	Audit Number:	16-2009-01		
Provide lead auditor first followed by auditor assistants along with classifications	Kathie Kuzawa - WPS, Maintenance				
Audit date(s)	March 11 - 23, 2009				
List nonconformances:					
1.					
2.					
3.					
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5.					
6.					
7.					
Comments					

"I have conducted an internal audit of the Biosolids EMS (element noted above)"

Lead Auditor (MM/DD/YYYY) 03/24/2009 signature: 

Joint review with EMS coordinator: (MM/DD/YYYY) 3/31/09 Initials: WKJ

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Table 16.1.16 – Internal Auditor’s Minimum Question Checklist

Element 16 Internal EMS Audit Requirement	Record audit number from worksheet: 16-2009-01	Auditor Notes
<p>Establish and maintain an internal audit program to periodically analyze the EMS for biosolids and determine whether it is effectively meeting its biosolids management policy, program requirements and biosolids program goals and objectives. The internal EMS audit program shall define the scope, frequency, and methodology of the audits, assign responsibility for conducting the audits and communicating their findings, and designate individuals to whom these findings are to be conveyed. The internal audit shall also evaluate the organization’s performance relative to established biosolids program goals, objectives and performance measures. The internal EMS audit program shall cover all the organization’s biosolids management program activities including those performed by contractors.</p>	<p>Has an internal audit program been implemented? How are findings communicated? Does it include contractor activities?</p>	<p>YES – See Element 16 Findings for the Internal Audit are communicated in various ways. A summary of the Internal Audit is included in the Periodic Program Performance Report which is reviewed with the Department Director and then shared with employees, contractors and interested parties. The findings of each auditor are also communicated to the EMS Coordinator during the joint review of the Auditors Worksheet.</p>
<p>Report internal EMS audit results to the organization’s management in a way that they can take action to make necessary modifications to the EMS and biosolids management program. The person responsible for the biosolids management program shall develop, or delegate the development of, a comprehensive corrective action plan addressing each nonconformance identified by the internal audit.</p>	<p>Is there a system in place to respond to issues identified during the internal audit process?</p>	<p>YES – If any deficiencies are found (1) a Corrective Action Plan is written by the EMS Coordinator for each non-conformance identified, (2) - Other issues raised by the auditor in the comments section of the worksheet will be discussed and may or may not result in a Corrective Action Plan based on the outcome of the discussion, (3) - EMS Coordinator will oversee the addressing of all deficiencies and include summary information on non-conformances in Element 14.</p>
<p>Maintain, at a minimum, the following documents and records, as applicable, relating to its audit program: a) description of audit methodology, protocol, scope, and schedule; b) identification of lead auditor(s), qualifications, and description of roles and responsibilities of auditors, management representatives, and others that may participate in, review, or be expected to act upon the audit; and</p>	<p>Is the audit methodology identified? Is the audit schedule identified? Is the lead auditor identified? Are corrective action plans issued for non-conformances?</p>	<p>YES – See Element 16, Audit Steps and Tables 16.10 – 16.17. YES – Reference Element 7 Roles and Responsibilities – Figure 7.2 “Schedule of Annual Biosolids Activities” YES – Reference Element 7 Roles and Responsibilities – Table 7.1 “Roles and Responsibilities – Internal EMS Team” and Table 7.3 “Internal EMS Team” YES – See table 14.2 “Non-Conformance Investigation Worksheet” and figure 14.1 “Corrective Action Plan”.</p>

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Element 16 Internal EMS Audit Requirement	Record audit number from worksheet: 16-2009-01	Questions/Considerations	Auditor Notes
c) Corrective and/or preventive action plans prepared resulting from an audit, and any related changes made to policies, plans, procedures, and work practices that occur as a result of an audit's findings, evaluation, or follow-up actions.			
Internal audit will be conducted annually during the first quarter of the calendar year.		Has the internal audit been completed during the first quarter of the calendar year?	YES - see in Sharepoint, under Interim Audit 2008
Each member of the City Internal EMS team will be responsible for auditing selected elements of the EMS. Internal EMS team members may assign responsibility to staff within their scope of authority once they have been trained as auditors.		Have all elements been assigned to a City Internal EMS team member? Are those responsibilities reflected in "Roles and Responsibilities" (element 7)? If team members have assigned responsibility to other staff members, have those persons been trained as auditors?	YES YES - Reference Element 7 Roles and Responsibilities – Table 7.1 "Roles and Responsibilities – Internal EMS Team" and Table 7.3 "Internal EMS Team.
Each internal auditor will be trained and provided with an internal auditor's worksheet along with the minimum conformance requirements.		Were the auditors provided with an internal auditor's worksheet along with the minimum conformance requirements?	YES

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one:	Conformance	Nonconformance
Element No.	17			17-2009-01
Provide lead auditor first followed by auditor assistants along with classifications	Kathie Kuzawa - WPS, Maintenance			
Audit date(s)	March 11 - 23, 2009			
List nonconformances:				
1.				
2.				
3.				
4.				
5.				
6.				
7.				
Comments:				

"I have conducted an internal audit of the Biosolids EMS element noted above.

Lead Auditor (MM/DD/YYYY) 03/24/2009 signature: 

Joint review with EMS coordinator: (MM/DD/YYYY) 3/31/09 Initials: mkj

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Table 16.1.17 – Internal Auditor’s Minimum Question Checklist

Requirement	Questions/Considerations	Recorder audit number from worksheet: 17-2009-01	Auditor Notes
<p>At intervals the management determines appropriate, review the EMS and its performance relative to policy commitments, goals, objectives and established performance measures to ensure its continuing stability, adequacy and effectiveness. The management review shall address the possible need for changes to policy, the goals and objectives, the Biosolids management program and other EMS elements based on internal EMS audit results, external verification EMS audits by third parties, changing circumstances, and the commitment to continual improvement. The management review shall be documented. Any changes to policies, plans, procedures and work practices that are made as a result of the review shall also be documented.</p>	<p>Are management reviews conducted? At what frequency? What is covered during the management review? Is the management review documented?</p>	<p>YES - Annually. - The Management Review includes: Review of the annual periodic Biosolids Program Performance Report, conformance with policy commitments, possible need for changes to the policy, non-conformance incidents, review progress towards achieving current Biosolids EMS goals and objectives and any new goals and objectives, review internal audit results, review interim audit results, if conducted, changing circumstances such as major process changes which may require, updates to the Biosolids EMS critical control points and other elements of the System, documented commitment that opportunities for continuous improvement and other system improvements are being investigated and implemented - The ESD Director review will be documented in the periodic management review of performance report, <i>see table 17.1.</i></p>	
<p>Maintain, at a minimum, the following related to its management reviews: a) schedule and scope for review; b) documentation of findings, evaluation, and follow-up actions; and c) documentation of changes to policies, plans, procedures, practices and other EMS elements that occur as a result of the management review findings, evaluation, or follow-up actions.</p>	<p>Is the scope of what will be reviewed during the management review identified? How are findings documented? How is input from the management review responded to?</p>	<p>- see item #3 above - documented in table 17.1 - Follow-up actions as needed and responses to same are recorded in table 17.1</p>	
<p>Assign a lead person or persons to be responsible for organizing and conducting the review.</p>	<p>Has an individual been assigned lead responsibility for conducting the management review?</p>	<p>YES – see figure 7.2</p>	