



City of Grand Rapids
Environmental Services Department
Policies and Procedures

Title: Element 16 – Internal BMP Audit	Created by: Dave Harris Approved by: William R. Kaiser
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General

The City will utilize an internal audit process to monitor its conformance with guidelines specified in the BMP. This process will better enable the City to monitor the biosolids management system and identify areas which need improvement. It is designed to provide an unbiased, internal evaluation of conformance with National Biosolids Partnership (NBP) minimum conformance requirements for each of the 17 Elements as well as identify areas for improvement.

Procedures

- 1) The City will conduct internal audits of the BMP program on an annual basis^A.
- 2) Internal audits will be completed during the first quarter of the calendar year and will address program activities completed during the previous calendar year as well as overall conformity with NBP minimum conformance requirements.
- 3) The audit will be coordinated by the BMP coordinator and the internal BMP team^B. The audit will evaluate performance relative to the 17 elements of the City's BMP program and will include any applicable contractor activities.
- 4) Auditor qualifications
 - a) Lead Auditor
 - i) Description of duties:
 - (1) Overall audit responsibility for assigned elements.
 - (2) Responsible for reporting findings to the BMP Coordinator.
 - (3) May oversee activities of Auditor Assistants.
 - (4) Develop Corrective Action Plans^C.
 - (5) Submit Auditor Worksheets
 - (6) Review Table 16.1.1-17 for conformance with assigned elements.
 - ii) Qualifications:
 - (1) Must have attended NBP BMP 401 training specific to auditor roles and responsibilities or has participated in previous internal audits under the supervision of a lead auditor.
 - b) Auditor Assistant
 - i) Description of duties:
 - (1) Work under the direct supervision of a Lead Auditor.

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- (2) Responsible for reporting findings to the Lead Auditor.
- ii) Qualifications:
 - (1) Attended at least one “Employee General Awareness Training” training session
 - (2) Familiar with critical control points, operational controls, environmental impacts, and legal and other requirements associated with audit assignments.
- 5) Each member of the City internal BMP team will be responsible for auditing selected elements of the BMP. Internal BMP team members may assign tasks to staff within their scope of authority once they have been trained as Auditor Assistants. Current audit responsibilities are as follows:
 - a) *Wastewater Plant Superintendent* – Elements 1,2,3,4,5,6,7
 - b) *Environmental Assessment Supervisor* – Elements 8,9,10,11,12
 - c) *Wastewater/Stormwater Maintenance Supervisor* – Elements 13,14,15,16,17
- 6) Each Lead Auditor will be provided with an internal auditor’s worksheet^D along with an “Internal Auditor’s Minimum Question Checklist”^E for the element(s) that they are auditing.
- 7) All documents and records related to internal audits will be maintained in the City’s BMP files for future reference^F.
- 8) Audit Steps:
 - a) Lead Auditors will complete an auditor’s worksheet^D for each element they are assigned to audit. Specific information contained in the worksheets include:
 - i) The element being audited.
 - ii) The audit number (consists of the element number followed by a hyphen then the calendar year a hyphen followed by the next sequential audit number for the year beginning with 1 annually e.g., 14-2006-01 element: 14, audit year: 2006, audit number: 01)
 - iii) Lead Auditor(s) name and classification followed by Auditor Assistants along with classification.
 - iv) The date or dates of the audit.
 - v) Nonconformance’s identified during the audit.
 - vi) Auditor’s comments. These can include suggestions for program improvement which did not rise to the level of a nonconformance but should be considered to improve program performance or reduce potential for future nonconformance.
 - b) Lead Auditors will be provided with an “Internal Auditor’s Minimum Question Checklist”^E for each element they are auditing.
 - i) Lead Auditors are required to complete the checklist and submit along with the Auditors worksheet to the BMP Coordinator.

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- ii) Auditors may ask additional questions, specific to the element they are auditing. These must be noted on the checklist.
- iii) Auditors shall use the notes section of the checklist to record their findings.
- c) The BMP Coordinator will schedule a meeting with the Lead Auditor(s) to review the results of the audit and decide how to proceed. All nonconformance items will result in issuance of a Corrective Action Plan for each nonconformance item. 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.
- d) Based on step 7.c above the BMP Coordinator will address deficiencies identified through the internal audit process by issuing a corrective action plan for each nonconformance noted in the Auditors worksheet.
- e) Summary information on nonconformances will be maintained in Element 14 Table 14.1 “Nonconformance Summary and Response Time” .
- f) The BMP Coordinator will compile a comprehensive report for each element audited which contains at a minimum the following information:
 - i) Auditors worksheet
 - ii) Internal Auditor’s Minimum Question Checklist
 - iii) Corrective Action Plan (if issued)
- g) The BMP coordinator will include summary information regarding the internal audits in the annual periodic biosolids program performance report. Information from the internal audits will be shared with the ESD Manager annually as part of the periodic management review of performance. This information will include the corrective actions (if necessary) that have already been taken or will be taken to address any nonconformance(s) identified in this process. A summary of the internal audit will be made available to employees and other interested parties utilizing methods specified in Element 9.

References

Appendix A Glossary
Appendix B Tables, Figures, Forms
Appendix C CCP Postings

^A Reference Element 7 Roles and Responsibilities – Figure 7.2 “Schedule of Annual Biosolids Activities”

^B Reference Element 7 Roles and Responsibilities – Table 7.1 “Roles and Responsibilities – Internal BMP Team” and Table 7.3 “Internal BMP Team Name and Contact Information”

^C Reference Element 14 Nonconformance’s: Preventive and Corrective Action - Figure 14.1 “Corrective Action Plan”

^D Reference Table 16.1 “Internal Auditor’s Worksheet”

^E Reference Tables 16.1.1 through 16.1.17 “Internal Auditor’s Minimum Question Checklist”

^F In accordance with requirements identified in Element 12 BMP Documentation and Document Control

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: Conformance Nonconformance	
Element No.		Audit Number:	
Provide lead auditor first followed by auditor assistants along with classifications			
Audit date(s)			
List nonconformances:			
1.			
2.			
3.			
4.			
5.			
6.			
7.			
Comments:			

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

Lead Auditor (MM/DD/YYYY) ___/___/___ signature: _____

Joint review with BMP coordinator: (MM/DD/YYYY) ___/___/___ Initials: _____

Table 16.1.1 – Internal Auditor’s Minimum Question Checklist

Element 1 Documentation of BMP		Record audit number from worksheet:
Requirement	Questions/Considerations	Auditor Notes
Document the BMP for Biosolids in an BMP 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 BMP.	Can you show me your BMP manual?	
Approve the BMP Manual by a level of the organization's management with the authority to commit people and resources to biosolids management activities.	Has your BMP manual been approved by the department Director?	
Contain, in the BMP Manual, the organization's Biosolids Management Policy and BMP Procedures required by the <i>BMP Elements</i> .	Can you show me your Biosolids Management Policy? Can you show me the elements of your policy identified in Table 1.1 of your BMP manual?	
Contain or cross-reference, in the BMP Manual, public participation, communications, and emergency preparedness and response programs and plans required by the <i>BMP Elements</i> .	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?	
Cover, in the BMP 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?	
In the BMP 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 BMP manual?	
In the BMP Manual, describe those biosolids management activities assigned to and performed by contractors.	Does the BMP manual state which Biosolids management activities are assigned to contractors?	
Contain in the BMP Manual must be documentation of support for the NBP letter of understanding.	Does the BMP Manual contain documentation of support for the NBP letter of understanding?	
Accurately describe the process used by the facility to handle solids.	Have fundamental changes been made to the solids handling process that need to be reflected in the process description in this Element?	

Table 16.1.2 – Internal Auditor’s Minimum Question Checklist

Element 2 Biosolids Management Policy		Record audit number from worksheet:
Requirement	Questions/Considerations	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 BMP commit our organization to the “Code of Good Practice”?	
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?	
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?	
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?	
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?	
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?	

Table 16.1.3 – Internal Auditor’s Minimum Question Checklist

Element 3 Critical Control Points		Record audit number from worksheet:
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 our BMP?	
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?	
Keep up-to-date information on the organization's critical control points.	Is up to date information maintained on Critical Control Points?	
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?	
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?	

Table 16.1.4 – Internal Auditor’s Minimum Question Checklist

Element 4 Legal and Other Requirements		Record audit number from worksheet:
Requirement	Questions/Considerations	Auditor Notes
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?	
Establish and maintain records of applicable legal and other requirements.	Are records of legal and other requirements maintained? Is the list complete?	
Include a management process for incorporating changes and new requirements into the elements of the BMP.	Is a process in place for incorporating changes and new requirements into the BMP manual?	
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?	
On an annual basis, internal BMP team members will review Table 4.1 and submit an “Annual Legal and Other Requirements Document Review” form to the BMP coordinator.	Show your latest annual review forms.	

Table 16.1.5 – Internal Auditor’s Minimum Question Checklist

Element 5 Goals and Objectives		Record audit number from worksheet:
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?	
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?	
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?	
Integrate goals and objectives with other elements of the BMP and biosolids management activities.	Are goals and objectives integrated with other elements of the BMP?	
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?	
Update program goals and objectives on a regular basis.	Are goals and objectives regularly updated?	
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?	

Table 16.1.6 – Internal Auditor’s Minimum Question Checklist

Element 6 Public Participation in Planning		Record audit number from worksheet:
Requirement	Questions/Considerations	Auditor Notes
Select and implement a proactive public participation approach to involve interested parties in its Biosolids Management Program and BMP planning process.	Is there evidence that a proactive process was selected and implemented to seek public participation near the beginning of the BMP planning process?	
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 BMP Elements.	Does element 6 commit the City to the Code of Good Practice? Does element 6 include information on the third party verification audit?	
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?	
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 BMP? Did it include environmental impacts? Did it include biosolids program performance? Did it include potential areas for improvement?	
Consider input from interested parties in initially developing program goals and objectives during BMP 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?	
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?	
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?	
Records will be maintained to document the City’s responsiveness to public input and requests for information regarding the BMP.	Can you show your records in regard to public input?	
A list of interested parties must be created.	Can you show your up to date list of interested parties?	

Table 16.1.7 – Internal Auditor’s Minimum Question Checklist

Element 7 Roles and Responsibilities		Record audit number from worksheet:
Requirement	Questions/Considerations	Auditor Notes
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 BMP functions.	Can you show examples of how responsibilities have been assigned for the BMP?	
Appoint an individual with overall responsibility for ensuring that Biosolids Management Program and BMP are implemented and maintained.	Has an BMP coordinator who has overall responsibility for the BMP been assigned?	
Provide the human, technical, and financial resources necessary to effectively execute these responsibilities.	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?	
Define and document the roles and responsibilities of contractors retained to perform various biosolids management activities and BMP functions through Service Agreements.	Have roles and responsibilities of contractors been defined in their service agreements?	
The organizational chart shown in Figure 7.1 shows the reporting structure in place at the Grand Rapids facility.	Is your organizational chart up to date?	
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.	Is your contractor prepared to respond to emergency situations? Does your contractor have a safety program?	

Table 16.1.8 – Internal Auditor’s Minimum Question Checklist

Element 8 Training		Record audit number from worksheet:
Requirement	Questions/Considerations	Auditor Notes
Establish and maintain a training program to ensure that employees responsible for specific biosolids management activities and for the implementation of various BMP functions are competent in performing their assigned tasks and duties. The training program shall provide general awareness of the BMP and how each employee's assigned roles and responsibilities relate to the entire biosolids value chain.	Did all employees receive general awareness training? What records support this training?	
Include in the training program new or reassigned employees.	What actions are taken with new employees?	
Maintain records of individual employee training delivered and completed.	What training records do you maintain?	
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?	
Maintain a training program that indicates training schedules by job classification	Is the training schedule up to date? Do the training records show that all employees have received the scheduled training?	

Table 16.1.9 – Internal Auditor’s Minimum Question Checklist

Element 9 Communication and Public Outreach		Record audit number from worksheet:
Requirement	Questions/Considerations	Auditor Notes
Establish and maintain a proactive Communications Program that provides ongoing information about the Biosolids Management Program and BMP 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.	How is information about the BMP communicated to employees and other interested parties?	
Include a procedure for receiving inquiries and requests for information from interested parties about its biosolids management activities and BMP. The procedure shall define a process for assuring a timely and complete response to inquiries by interested parties.	How can interested parties request information about the City’s BMP? How do you assure that information is provided promptly? How do you track requests for information?	
At a minimum, make the following information about the organization's Biosolids management program and activities available to interested parties: 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 BMP verification audit results.	Is the Biosolids Management Policy available to interested parties? Are legal and other requirements available to interested parties? Are goals and objectives available to interested parties? Is the periodic biosolids management program performance report available to interested parties? Is third party audit and verification audit results available to interested parties?	
Define roles and responsibilities of outside contractors in the Communications Program.	Is there evidence of how contractors are to handle requests for information in element 9?	
Communicate relevant information about biosolids management activities and the Biosolids Management Policy, and all seventeen elements of the BMP to employees and outside contractors, consistent with assigned roles and responsibilities.	Is there evidence that information about the BMP is communicated to employees and contractors?	
Completion of Public Request for Information Form each time information is sent to the public.	Review Public Request for Information Forms completed in the last year for completeness.	

Table 16.1.10 – Internal Auditor’s Minimum Question Checklist

Element 10 Operational Controls of Critical Control Points		Record audit number from worksheet:
Requirement	Questions/Considerations	Auditor Notes
Develop and implement standard operating procedures, work management practices or other appropriate methods at all critical control points throughout the biosolids value chain to effectively manage potential environmental impacts.	Have SOP’s and maintenance practices been implemented at all critical control points identified in Table 3.1? Do they effectively manage the environmental impacts listed in Table 3.1?	
Incorporate all legal and other adopted requirements in the operational controls of critical control points.	Have legal requirements been included in operational controls (SOP’s)?	
Consider applicable best management practices as defined in various authoritative sources on biosolids management (e.g., the National Manual of Good Practice, Water Environment Federation Manuals of Practice, etc.).	What sources were considered when developing operational controls? Are they consistent with NBP guidance?	
Include appropriate preventative maintenance procedures and work management systems for maintaining equipment, instrumentation, vehicles, and other treatment technology and process control systems associated with its biosolids management activities	Is a facility maintenance management system in place? Is it functioning properly? Are records being maintained?	
Require that contractors establish their own operational controls consistent with their roles and responsibilities in biosolids management activities.	Have contractors implemented their own operational controls for processes they are responsible for?	
Develop and implement standard operating procedures for dewatering centrifuges and other key solids processing equipment.	Have SOP’s been implemented for all key solids processing equipment?	

Table 16.1.11 – Internal Auditor’s Minimum Question Checklist

Element 11 Emergency Preparedness and Response		Record audit number from worksheet:
Requirement	Questions/Considerations	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?	
Review and evaluate the effectiveness of emergency preparedness and response procedures, including communications systems, and revise them as necessary.	How effective are the procedures?	
Have all emergency response equipment on site or readily available within a minimum response time.	Is equipment readily available?	
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?	

Table 16.1.12 – Internal Auditor’s Minimum Question Checklist

Element 12 BMP Documentation and Document Control		Record audit number from worksheet:
Requirement	Questions/Considerations	Auditor Notes
Establish and maintain documentation, documents, and records for the Biosolids Management program including the seventeen elements of its BMP.	How is the BMP documented? How are records of the BMP maintained?	
Establish and maintain document control procedures and practices to ensure that its Biosolids Management program documentation and documents are: a) available and can be easily located, b) created following established document creation protocols, c) kept up to date through periodic reviews and revision (if applicable), d) properly marked with version number, effective date(s), and references to replaced or superseded versions, and e) approved by authorized personnel.	Is there a document control procedure in place? Are documents available and easily located? Do they follow established document creation protocols? Are they kept up to date? Are they marked with revision number? Are they marked with an effective date? Are they approved by authorized personnel?	
Establish and maintain records of biosolids management activities and ensure that they are: a) available and can be easily located, and b) retained for the specified period of time	Are records of Biosolids management activities maintained? Are the records available and easily located? Are the records retained for the specified period of time?	
Establish documentation, document control and record requirements for Biosolids management activities conducted by its contractors in Service Agreements, and incorporate these requirements into its BMP for biosolids.	Have contractors implemented document control procedures? Have requirements for document control procedures been included in service contracts?	

Table 16.1.13 – Internal Auditor’s Minimum Question Checklist

Element 13 Monitoring and Measurement		Record audit number from worksheet: 13-2006-01
Requirement	Questions/Considerations	Auditor Notes
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.	Are procedures in place to conduct regular monitoring and measurement practices for all Biosolids management activities?	.
Record monitoring and measurement results and maintain records as established in the record keeping procedures under Element 12.	Provide examples of monitoring and measurement data?	
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.	Have contractors implemented regular monitoring and measurement procedures for activities they are responsible for? Provide example data?	
Require responsible supervisor to create action plan for each objective they are assigned under element 7.	Is there an action plan for each objective? Was it created by the assigned supervisor? 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"?	
At a minimum, each action plan must meet contain: (a) schedule, (b) milestones, (c) resources required, (d) human resources required and their responsibilities.	Does each action plan contain: (a) schedule, (b) milestones, (c) resources required, (d) human resources required and their responsibilities?	
Appropriate Supervisor to submit a Progress Report, which will contain "Action Plan – Quarterly Progress Report" (see figure 13.1) and the "Action Plan Status Worksheet" (see figure 5.1) to the BMP coordinator within 30 days following the end of the calendar quarter for each objective.	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 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?	
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?	
BMP Coordinator will schedule a meeting with the appropriate supervisor following the receipt of a written progress report when issues or progress are a concern.	Is this role of the BMP coordinator included in element 7, "Roles and Responsibilities"? Were meetings scheduled by the BMP Coordinator following receipt of the written progress report?	

Table 16.1.14 – Internal Auditor’s Minimum Question Checklist

Element 14 Nonconformance’s: Preventive and Corrective Action		Record audit number from worksheet: 14-2006-01
Requirement	Questions/Considerations	Auditor Notes
Develop and implement a procedure to investigate any noncompliance with applicable regulatory requirements and/or nonconformance with internal BMP procedures identified during routine monitoring and measurement or periodic internal BMP audits.	Show me the procedure you use to respond to nonconformance incidents?	
Develop and implement a procedure to identify the cause and take actions to correct the nonconformance.	What process is used to correct the nonconformance?	
Develop and implement a procedure to document the necessary corrective actions taken to prevent a recurrence.	How is nonconformance data tracked?	
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?	
Establish formal corrective action plans to address finding of internal BMP audits and audits conducted by third parties. Document corrective action plans and describe what actions will be taken to address the audit findings, the 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 BMP Manual and other relevant BMP documentation.	Is a corrective action plan system in place? How does it work?	
Track progress in completing the corrective actions and periodically update to reflect completion.	How is progress tracked?	
(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 BMP Coordinator.	(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 BMP Coordinator?	
(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.	(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)?	
The BMP Coordinator will review the findings of the committee, include summery 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.	How is the BMP Coordinators review of the report with the committee and subsequent review with the Department Director documented? Was a summery 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 outlines in “Roles and Responsibilities” (element 7)?	

Table 16.1.15 – Internal Auditor’s Minimum Question Checklist

Element 15 Periodic Biosolids Program Performance Report		Record audit number from worksheet: 15-2006-01
Requirement	Questions/Considerations	Auditor Notes
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 BMP verification audit results.	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?	
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.	Has the report been made available to employees, contractors, interested parties and the public?	
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 BMP Coordinator with assistance from the BMP internal team.	Was the Biosolids Management Program Report written during the first quarter of the year?	
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.	Was the Biosolids Management Program Report reviewed during the first quarter of the year during the periodic management review?	
The final Biosolids Management Program Report shall be issued during the first quarter of the year.	Was the final Biosolids Management Program Report issued during the first quarter of the year?	

Table 16.1.16 – Internal Auditor’s Minimum Question Checklist

Element 16 Internal BMP Audit		Record audit number from worksheet: 16-2006-01
Requirement	Questions/Considerations	Auditor Notes
Establish and maintain an internal audit program to periodically analyze the BMP for biosolids and determine whether it is effectively meeting its biosolids management policy, program requirements and biosolids program goals and objectives. The internal BMP 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 BMP audit program shall cover all the organization’s biosolids management program activities including those performed by contractors.	Has an internal audit program been implemented? How are findings communicated? Does it include contractor activities?	
Report internal BMP audit results to the organization's management in a way that they can take action to make necessary modifications to the BMP 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.	Is there a system in place to respond to issues identified during the internal audit process?	
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 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.	Is the audit methodology identified? Is the audit schedule identified? Is the lead auditor identified? Are corrective action plans issued for non-conformances?	
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?	
Each member of the City Internal BMP team will be responsible for auditing selected elements of the BMP. Internal BMP 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 BMP 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?	
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?	

Table 16.1.17 – Internal Auditor’s Minimum Question Checklist

Element 17 Periodic Management Review of Performance		Record audit number from worksheet: 17-2006-01
Requirement	Questions/Considerations	Auditor Notes
At intervals the management determines appropriate, review the BMP 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 BMP elements based on internal BMP audit results, external verification BMP 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.	Are management reviews conducted? At what frequency? What is covered during the management review? Is the management review documented?	
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 BMP elements that occur as a result of the management review findings, evaluation, or follow-up actions.	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?	
Assign a lead person or persons to be responsible for organizing and conducting the review.	Has an individual been assigned lead responsibility for conducting the management review?	