



NBP Guidance for Biosolids EMS Interim Audits

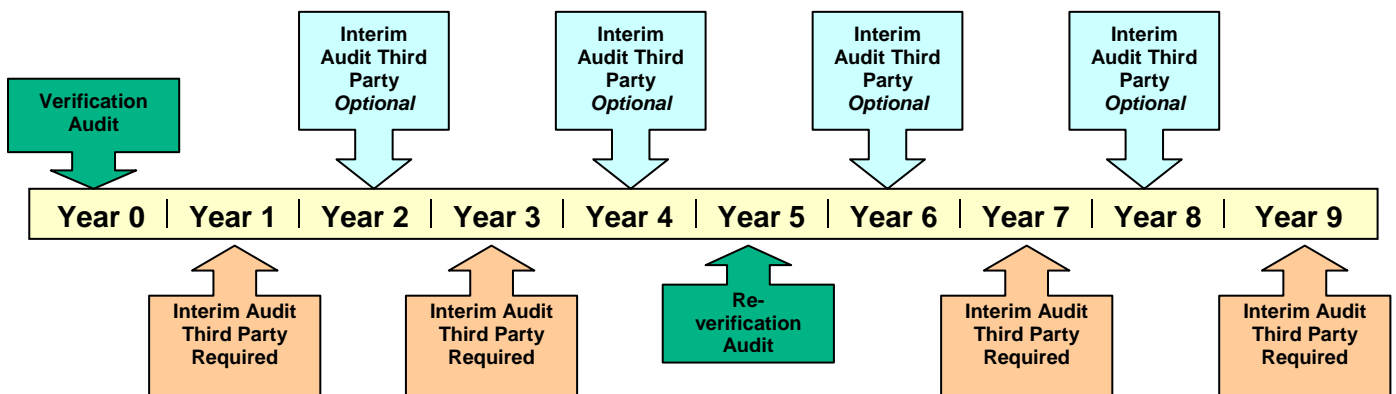
Introduction

This fact sheet has been prepared for agencies participating in the NBP Environmental Management System (EMS) Program. It includes a description of the process for scheduling and planning interim audits, which is required to retain EMS Verification and NBP Certification. The information in this fact sheet is also presented in Chapter 11 of the *NBP Biosolids EMS Guidance Manual*.¹

After receiving Third Party EMS Verification and NBP Certification, agencies must complete annual interim audits to maintain verification and certification status. Interim audits are used to assess the continued health of the agency's Biosolids EMS. These audits must include a prescribed audit scope and follow an audit plan that has been agreed upon between the agency and third party audit company. Each interim audit should be scheduled to be completed prior to the annual Verification anniversary date for the Biosolids EMS.

Interim Audit Schedule

An accredited NBP third party audit company must conduct at least two of the four annual interim audits required between Verification and Re-verification audits. The agency may substitute internal audits for the third party interim audits in years two, four, six and eight provided that the scope of these audits is consistent with NBP requirements and that the third party audit company agrees that an independent audit is not needed to ensure the EMS is functioning properly. The pattern for verification and interim audits is as follows.



Verification and Interim Audit Schedule Pattern

¹ The updated version of the *Biosolids EMS Guidance Manual* is available on NBP's website, www.biosolids.org.

Note that the timing of optional years for substituting an internal audit for a third party interim audit shifts after year 5. Internal audits may be substituted in the year immediately following the year 5 Re-verification audit. For years ten and on, the verification and interim audit cycle matches that from years 5 through 9.

Interim Audit Request

Each year, the agency should submit an “Interim Audit Request Form” to the NBP as an application, even during the years when substituting an internal interim audit for the third party interim audit, as this form provides NBP and the third party auditor notification of the agency’s intent to substitute. Agencies should submit the form approximately 3 months in advance of the desired audit date to allow sufficient time for third party auditor scheduling and contract coordination. The Interim Audit Request Form includes the following information:

- a) Agency contact information
- b) Current EMS Verification date
- c) A summary of significant changes to biosolids management practices and/or Biosolids EMS since the previous audit, including any:
 - Change in the scope of the EMS
 - Organizational change involving top management and/or EMS management responsibilities
 - Addition of new facilities or operations that cause changes in critical control points or environmental impacts
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 - Addition of new contractor or expanded role of existing contractor
 - Change in relations with interested parties that causes the Communications program to change
 - Other changes in biosolids management practices that the organization feels need to be included in the audit
- d) Completed Corrective / Preventive Action Requests from the previous third party audit
- e) Confirmation that interested parties have been notified of the intended interim audit and offered an opportunity to comment on and/or receive further information about the audit
- f) Request for either Third Party Audit or declaration of intent to substitute an internal interim audit for the third party interim audit

After receiving the “Interim Audit Request Form”, the NBP EMS Program Manager will check it for completeness. If the agency indicates intent to substitute an internal audit during an eligible year, the NBP will notify the third party audit firm of the agency’s intent. If a third party interim audit is requested, then the NBP will contact the assigned third party audit company to develop an interim audit scope, schedule, cost proposal and written audit plan. Information provided in the Interim Audit Request Form will be forwarded to the third party audit company. The NBP will reach agreement with the audit company and will work with the agency to assure that scope of work is acceptable and determine an appropriate schedule. The NBP will issue a notice to proceed to both the audit company and the agency when the application is complete.

Any nonconformances found during third party interim audits require correction in the same manner as required for verification audits.

The results of each interim audit, including internal audits that are substituted for third party interim audits, must be communicated to NBP and fully publicly disclosed.

Interim Audit Scope

The scope of each interim audit should be described in a four year-audit plan that has been agreed to by the agency and third party audit company. At a minimum, the interim audit must include the following.

1. Each interim audit must include a review of:
 - a) The organization's progress toward goals and objectives;
 - b) EMS outcomes in the areas of environmental performance, regulatory compliance, interested party relations, and quality biosolids practices;
 - c) Open nonconformances or corrective action requests from the previous third-party audit;
 - d) The management review process; and
 - e) Corrective and preventive action process, based, in part, on corrective/preventive action taken following internal audits and third party audits.

2. Examination of:
 - a) Individual EMS Elements, including others not specifically referenced above, such that all remaining EMS Elements are audited by the third party audit company and/or the agency (if the agency substitutes internal audits) at least once during the four-year interim audit period.

Audit Plan

The written plan for each interim audit should identify:

- The EMS Elements to be audited;
- Facilities and operations to be included in the audit;
- The plan for fulfilling the "Interim Audit Scope" requirements noted above; and
- The audit schedule.

More Information

For general guidance and assistance pertaining to interim audit preparation, please contact Pete Machno for technical support at peterm7@prodigy.net or 1-800-613-4502, or Gene DeMichele for administrative (contract) information at edemichele@wef.org or 703-684-2438.