

**BMP Element 16 — Internal BMP Audit
City of Richmond Public Utilities – Wastewater Treatment**

Date of Last Review 11/12/16	Revision 14	Revised By Biosolids Team	Revision Date 10/28/15	Supersedes all previous versions
		Approved By Biosolids Supervisor	Approval Date 10/28/15	

Purpose

The Internal BMP Audit is used to periodically analyze the BMP to determine whether the City is effectively implementing its Biosolids Management Policy, program requirements, and program goals and objectives.

Scope

This procedure applies to the entire biosolids value chain and the BMP.

Responsible Staff

The Superintendent II designates an internal audit team to conduct the internal audit. The Utility Plant Superintendent I & II, Deputy Director II, Biosolids supervisor and Utility Plant Supervisors will ensure resources are available to conduct the audit.

They will review and approve the audit results. The project manager analyst participates on the internal audit team. Contractors are responsible for participating in internal audits of their biosolids related activities.

Procedure

1. The overall scope of the internal audit covers the biosolids value chain and includes contractor biosolids-related activities, in accordance with their service agreements.
2. The Utility Plant Superintendent II recruits the internal audit team. The Biosolids value chain staff is notified of the impending audit prior to the audit start date. Notification covers the scope, schedule, and other pertinent information.
3. The BMP internal audit team is composed of two to three individuals from various work groups within the wastewater plant. One or more audit team members may be from another agency or an independent contractor. No internal audit team member may audit an area over which he or she has direct control as part of his or her regularly assigned

Print date:
4/17/2017

WARNING! This document should be checked against the electronic version to make sure it is the newest version when printed.

- duties. The internal audit team designates a lead auditor and identifies that person as lead auditor on all audit documents.
4. The internal audit is conducted according to the current version of the National Biosolids Partnership's Guidance.
 5. The Public Utilities Deputy Director II and the Utility Plant Superintendent I & II, shall ensure audit training and resources are provided to internal audit team members. At a minimum, one member of the internal audit team will have received training from either the NBP or another source acceptable to the BMP Team. The remainder of the internal audit team, at minimum, receives training consisting of review of general auditing techniques provided by a certified auditor or another source acceptable by the BMP team, the NBP, or the internal audit lead auditor.
 6. Internal audit is conducted every year and covers all BMP elements. Results of the internal interim audit must be summarized in a report that is made available to the BMP team, management, interested parties, and the NBP.
 7. The specific scope of each internal audit may vary. Each internal audit may examine any or all activities related to the biosolids value chain. However, every internal audit must investigate whether the program is conforming to the biosolids policy and program requirements, and whether it is making progress toward goals and objectives. The internal audit team develops the audit scope based on these required elements as well as the following:
 - A. The potential environmental impacts of biosolids activities;
 - B. Results of previous audits, including third-party audits;
 - C. Changes or modifications to processes or procedures; and
 - D. Changes in requirements stipulated by applicable environmental laws and regulations (local, state, and federal).
 8. The internal audit team is responsible for ensuring audit protocols and procedures are in place to focus on the objective evidence relating to the biosolids program. Specific duties include, but are not limited to:
 - A. Developing the audit schedule. The specific audit activities are scheduled with tentative time frames by the internal audit team and are given to the Biosolids Supervisor no later than one week prior to the audit. Each internal audit includes an opening meeting with the BMP Team, a schedule for interviews and transaction testing, a summary meeting with the Biosolids Supervisor, and a closing meeting with the BMP Team;
 - B. Determining the method for conducting the audit, including assigning audit responsibilities and determining appropriate methods for collecting objective evidence;

- C. Using [checklist](#) form and [report](#) for all internal audits as template, a copy is saved on P drive/BMP Biosolids/Element16;
 - D. Using standard forms such as corrective action request forms, audit assessment forms, or developing new forms if necessary.
 - E. Determining how corrective and preventive actions will be verified for effectiveness, in accordance with Element 14.
9. Auditors conduct a closing meeting to discuss identified nonconformance and/or deficiencies with the BMP. At this time, the BMP Team may present any final evidence concerning the audit findings.
10. The lead auditor is responsible for writing the internal audit report itemizing all findings and identifying them as major nonconformance, minor nonconformance, or opportunities for improvement. A summary of these findings is presented in the Biosolids Management Program Performance Report. This report is posted on the City of Richmond, Department of Public Utilities Biosolids' Website.
11. The BMP Team summarizes the internal audit results, including the internal audit report, recommended corrective actions, and a schedule for corrective actions. Audit results are given to the Deputy Director II and the Utility Plant Superintendent II for their review and approval.
12. Nonconformance identified in the internal audit is addressed using procedures in Element 14.
13. The Biosolids Supervisor ensures internal audit records are maintained on the City's server. These records should include:
- A. Description of each audit's scope, schedule, protocol and methodology;
 - B. Identification of the lead auditor and his/her qualifications;
 - C. The Internal Audit Report; and
 - D. Other records that describe the content and conduct of the internal audit, as necessary.