



NBP Guidance for Biosolids EMS Interim Audits

Interim Audits occur annually following each Third Party Verification Audit and are used to assess the 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 and communicated to NBP's EMS Manager. Each interim audit must be completed prior to the annual anniversary date of the Verification for their Biosolids EMS.

An accredited Third Party Audit Company conducts at least the first and third annual audit of the four interim audits required between Verification and Re-verification audits. The Agency may use internal audits as the interim audit in years two and four 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.

In preparing for each interim audit, the Agency submits a "Request for Interim Audit" to the NBP that includes the following.

- 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
 - 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 permission to use an internal audit as the interim audit

Following receipt of the “Interim Audit Request Form”, the NBP will check it for completeness. Information provided in the Interim Audit Request Form will be forwarded to the Third Party Audit Company with a request to develop an interim audit scope, budget, and a written audit plan. The NBP staff will negotiate a contract with the local agency for audit services.

Any nonconformances found during interim audits require correction in the same manner as required for Verification Audits.

The results of each interim audit, including internal audits that are used as interim audits, must be communicated to NBP and fully publicly disclosed.

Interim Audit Scope

The scope of each interim audit must include the following.

- 1 Verification of:
 - a) Individual EMS Elements, such that all EMS Elements are audited at least once during the 4 year interim audit period;
 - b) Significant changes, as described in the Interim Audit Request Form; and
 - c) Open nonconformances or corrective action requests from previous Third Party audits.
- 2 Assessment of the effectiveness of the Agency's:
 - a) Review progress that is being made toward the specific Goals and Objectives and review Goals and Objectives process, based on progress towards achieving established goals and objectives.
 - b) Management Review process, based on the results of these reviews;
 - c) Corrective and preventive action process, based in part on corrective / preventive action taken following internal audits and Third Party audits; and
 - d) Communication Program, based in part on input received from interested parties and the Agency's response to that input.
- 3 Examination of EMS outcomes in the areas of environmental performance, regulatory compliance, interested party relations and quality biosolids practices.

Audit Plan

The written plan for each interim audit should identify:

- Those 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.