





EMS INTERNAL AUDIT

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1 PURPOSE

This procedure provides processes for auditing the WWTP EMS (requirement of the International Standard ISO 14001 section 4.5.5) in order to control and minimize Environmental Impacts, and obtain a Continuous Improvement.

This procedure establishes minimum requirements for planning, performing, and documenting periodic internal audits of the International Standard ISO 14001 EMS established for the WWTP.

2 SCOPE

This procedure addresses EMS auditing and applies Environmental Audits for the WWTP operations. The International Standard ISO 14001, section 4.5.5 requires internal audits to determine conformance with the Utilities Environmental Policy and compliance with environmental regulations.





3 DEFINITIONS

3.1 EMS Audit

An EMS audit is defined as a planned and documented investigation performed in accordance with written procedures or checklists for the purpose of verifying, by examination and evaluation of objective evidence, that applicable elements of the International Standard ISO 14001 EMS have been developed, documented, and effectively implemented in accordance with specified requirements.

3.2 Lead EMS Auditor

A Lead EMS Auditor is a qualified and trained individual who is authorized to plan, organize, and direct EMS Audits of WWTP sections and activities, to report findings and observations, and to evaluate the adequacy of Corrective and Preventive Action.

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At a minimum, WWTP EMS Auditors shall have received ISO 14001 internal EMS Auditor training and have participated in an internal audit, as an auditor.

3.3 EMS Auditor





An EMS Auditor is defined as a qualified and trained individual who is authorized to perform specific EMS Audit functions under the direction of a Lead EMS Auditor. At a minimum, each auditor must attend a documented training session conducted by the Lead EMS Auditor that presents the detailed requirements of this procedure and discusses their roles in the planned audit.

3.4 EMS Audit Observer

An EMS Audit Observer is an EMS audit team member assigned to observe audit activities under the direction of the Lead EMS Auditor. At the Lead EMS Auditor's discretion, technical observers may be requested to perform specific audit functions in relation to their area of expertise. At a minimum, each observer must attend a documented training session conducted by the Lead Auditor that presents the detailed requirements of this procedure and discusses their roles in the planned audit.

3.5 Finding

A finding is defined as a deficiency or lack of compliance with any element of an EMS. All findings must be formally resolved to assure effective correction of the observed condition and the adoption of system improvements or preventive measures to reduce or preclude the likelihood of recurrence.

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4 RESPONSIBILITY AND AUTHORITY

4.1 The EMS Coordinator

- Is responsible for ensuring internal audits are scheduled and conducted at least annually and that audit results are promptly reported to the Department Director and to the WWTP Director.
- Is responsible for following up on audit findings and to prepare audit report of internal audits for Management Review.
- Is responsible for reviewing EMS audit reports at regular intervals as defined within the EMS Management Review Procedure and to require effective and prompt response(s) from Department Director to any adverse audit findings.

4.2 The Department Director





- The Department Director is responsible for cooperating in scheduling, attending EMS audit meetings, and to correct audit findings within a reasonable time frame or provide documentation as to why an EMS audit correction is not necessary.
- Department Director of audited section or group shall provide time, workspace, and personnel as necessary to support the performance of EMS audits, and are responsible for supervising the prompt and effective resolution of any audit findings.

4.3 The WWTP staff members

The WWTP staff members are responsible for cooperating fully during EMS Audits, understanding they are the drivers for the Continuous Improvement of the EMS.

4.4 The Lead EMS Auditor

The Lead EMS Auditor is responsible to the EMR for the organization, planning, and direction of EMS Audits, as well as the selection, training, and supervision of the audit team. The Lead EMS Auditor prepares audit plans and reports, and is responsible for

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evaluating and recommending any required corrective and preventive action responses resulting from audit findings.

4.5 EMS Auditors

- EMS Auditors are responsible for assisting in audit preparation, conducting audit investigations, and reporting results in compliance with this procedure, under the direction of the Lead EMS Auditor. When requested, audit observers shall assist in audit preparation and in conducting audit activities in areas in which they have specific expertise.

5 PROCEDURE:





The audit process is described in the following steps:

5.1 Audit Scheduling

The EMS Coordinator will develop an EMS Audit schedule each year and publish at least one month prior to the first scheduled audit. Audit frequency may be increased at the discretion of the EMR or when specifically requested by upper management.

5.2 Audit Notification

The Lead EMS Auditor shall notify the EMS Team or Department Director of the audited organization at least one month prior to the projected audit date. The notification to be provided to them includes the names of the key staff in the functional areas being audited, the area to be audited, details of the activities and/or EMS procedures to be reviewed, outstanding EMS findings, if any, and summary reports of any immediate past EMS Audits.

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5.3 Audit Plan and Purpose





The Lead EMS Auditor shall prepare an audit plan. At a minimum, the audit plan shall include the following:

- The audit number (consecutive, by calendar year).
- A statement of the audit objectives; an identification of the specific section areas being audited.
- A discussion of any special emphasis or focus; references to appropriate plans, procedures, or requirements documents.
- The date(s) of the audit, and an identification of the audit team and the members assigned roles.

Records of previous audits and corrective and preventive action requests for the audited organization shall be reviewed prior to preparation of the audit plan. Identification of trends or repeated problems identified during the review shall be reflected in the scope of the audit, as appropriate. Any areas of special emphasis shall also be noted in the audit plan.

Audit team selection shall be based on consideration of the particular areas of emphasis for the audit and the qualifications and capabilities of the prospective team members. Audit team members should be sufficiently independent of the day-to-day management of the audit areas that they are responsible for so that the potential for a conflict of interest is minimized. Completed audit plans shall be submitted to the EMR and affected section managers for review and comment prior to the audit.

The EMS Coordinator will schedule the EMS audit date with the site and will work with the Department Supervisor(s) to accommodate operation needs. The EMS audit plan is to take into account previous EMS audit results, when available, and any identified Environmental Impacts that may have preceded the EMS audit.

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5.4 Audit Checklist Preparation

The Lead EMS shall prepare or direct the preparation of an audit checklist based on the elements of the International Standard ISO 14001. EMS auditors or observers may be assigned the preparation of specific checklist content shall be consistent with the scope of the audit presented in the Audit Plan. Copies of the checklist, the audit plan, and any required reference specifications, procedures, or plans shall be distributed to the Audit Team prior to the audit. The Lead EMS Auditor shall brief the Audit Team on the general scope of the audit and the details for the audit plan, and shall discuss audit checklist assignments prior to the pre-EMS Audit Conference.





5.5 Pre- EMS Audit Conference

The pre-EMS Audit Conference shall be conducted by the Lead EMS Auditor, and shall be attended by the audit team members and appropriate representatives of the audited section. Participation shall be documented. The scope of the audit and duties of the auditors or any technical observers shall be briefly presented. Questions from the audited organization shall be answered, proper lines of communication established, and a time set for the closeout meeting. These requirements may be met via e-mail communications.

5.6 Conducting the Audit

Each auditor shall proceed with the investigations required by their assigned portion of the checklist.

The Audit Team shall meet and report on audit progress as directed by the Lead EMS Auditor. Observed conditions that require immediate corrective action shall be promptly reported to the management of the audited group or organization. Demands on resources and time may not be increased beyond the level presented in the opening meeting without first discussing and obtaining approval of such requests from the affected section manager.

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When the checklist items have been completed, the audit team shall meet and present their potential findings to the Lead EMS Auditor. The Lead EMS Auditor shall review the auditor’s input, obtain additional clarification where required, and prepare or direct the preparation of a draft list of potential findings.

5.7 Post- EMS Audit Conference





A draft list of potential findings and observations shall be presented to representatives of the audited organization in a brief post-EMS Audit Conference. Participation shall be documented. Discussion shall generally be limited to the presentation of findings and the clarification of any misunderstandings. These requirements may be met via e-mail communications.

5.8 Audit Report Preparation

After the post-audit meeting, the auditors shall prepare final copies of their completed checklist sections and submit them to the Lead EMS Auditor. The Lead EMS Auditor shall prepare a formal audit report, which shall include the following items: a brief description of the audit scope; the identification of the Audit Team and key personnel contacted from the audited organization; a general statement summarizing the effectiveness of the EMS; and a brief discussion of any findings.

5.9 Review of Corrective/ Preventive Action Responses and Audit Closeout

The Lead EMS Auditor shall participate in the development of corrective and preventive actions as necessary to ensure that each finding or observation has been adequately addressed. When proposed corrective actions have been determined to be acceptable, the Lead EMS Auditor shall notify the EMR and the affected section managers that the audit is considered to be closed.

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5.10 Audit Documentation

Once the audit has been closed, the Lead EMS Auditor shall forward a complete copy of the audit documentation to the environmental records. At a minimum, audit documentation shall include copies of the audit notification memo, the audit plan, audit opening and closing meeting participation sheets, the completed audit questionnaire, the audit report, copies of any closed forms, and an audit closeout memorandum.

5.11 External Audit/Compliance Verification

Audit Requirements:

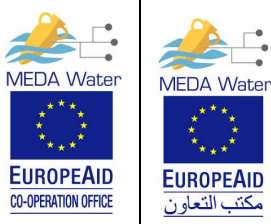
- The EMS Coordinator or assigned person is to administer the compliance audit activities. Notification has to be sent to staff, and he/she shall hold a meeting with the External Auditor to clarify the purpose of the Audit, and areas or functions to be inspected.
- The type of External Audits are listed as follows and is not exhaustive:
 - ISO 14001 certification and surveillance audits.
 - Internal City Initiated Audit.
 - External Compliance Audit.
- During the course of the audit, a department representative shall accompany the Auditor(s), and answer general questions about the section activities, processes and services.
- During the audit and exit meeting, the WWTP department representative(s) should neither agree nor disagree to carry out any recommendations or requirements necessitating a capital appropriations request or budget approval process prior to implementation.
- The Auditing parties will submit their findings in writing. Findings should be written in a factual manner that does not reflect conjecture, supposition or unwarranted conclusions. Findings should be marked “Confidential”, and forwarded to respective WWTP Department Director who will ensure that distribution is limited to only those persons with a specific need for the information. A copy of the report must be forwarded to the EMR.

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- After the site receives a written audit report from the auditor, and any clarification needed, the respective WWTP Department Director, EMR and other representatives will discuss the recommendations and requirements with affected site management. Department Director should develop a corrective action plan.

5.12 All External audit reports and corrective action plans shall be retained as required

A corrective action reminder will be transmitted to the Department Supervisor if the site has not responded with a corrective action or correction plan.

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EMS NON-CONFORMITY/OBSERVATION REPORT (NOR)	FINDING (Check One)
	<ul style="list-style-type: none"> - Major Non-conformity - Minor Non-conformity - Observation
Purpose: This form is used to report non-conformances and observations identified during EMS internal audits. Type or clearly. Complete one form for each Non-conformity or observation.	
Section A. AUDIT IDENTIFICATION AND SCOPE	
1. Auditee:	2. EMS Audit Number/Date:
3. ISO 14001 Requirement (Include sub clause no.):	4. Auditor NOR Number:
5. Auditor (s)	6. Auditor Signature:
Section B. DESCRIPTION OF FINDINGS AND CORRECTIVE MEASURES	
The auditor shall describe all of the facts surrounding the Non-conformity or reportable observation. Each Non-conformity must be addressed with a corrective action. Observations shall be reported and revisited during the next audit.	
1. Details of Finding:	
2. Proposed Method of Correction	
Section C. VERIFICATION/ CLOSURE	
Upon completion of the NOR, the auditor shall sign the form and obtain & signature of acceptance from the department head or individual responsible for the area.	
1. Auditor Signature/Date:	2. Projected Corrective Action Completion Date: (To be mutually agreed upon by the auditor and auditee)
3. Actual Completion Date of Corrective Action:	4. NOR Received by EMS Manager (Signature/Date)
5. Corrective Action Verification and Acceptance (Signature/Date): (To be completed by the EMS Coordinator upon closure)	
6. Comments:	