

Memorandum

To: Internal EMS Team and District Directors

From: David Taylor; Director of Special Projects

Date: June 27, 2005

Subject: Interim Annual EMS Audit Results

An interim audit of the EMS program was recently completed by the internal EMS team. The audit covered the period of October, 2004 to June, 2005. All 17 EMS elements were audited. Each internal EMS team member had responsibility for auditing at least two EMS elements. No individual was assigned audit responsibility for an area that they managed as part of their day to day activities.

A summary of the audit results is shown in Table 1. No major or minor nonconformances were identified. Four opportunities for improvement were identified as noted in Table 1. Completed audit sheets for each individual element are not attached but are available for review upon request. Supporting documentation compiled by the auditors is attached to the completed audit sheets.

The audit demonstrates that our EMS program is functioning in a satisfactory manner. It also demonstrates that the five minor nonconformances and six opportunities for improvement identified during our initial 3rd party verification audit have been adequately addressed.

I was particularly pleased with the fact that the audit of Element 2 noted that we have made significant progress in terms of employee knowledge and understanding of our EMS. All people interviewed during the audit of Element 2 knew that we had an EMS and could explain that it had some affect on how the District manages biosolids. As

expected, there was less knowledge about the specific details of our Biosolids Management Policy. However, individuals who were interviewed demonstrated that their understanding of the EMS incorporated many of the items listed in the policy.

Table 1: Summary of Interim Audit Findings

Element	Auditor	Findings	Required action
1. Documentation of EMS	Laurie Dunn	No nonconformances noted	None
2. Biosolids Management Policy	Laurie Dunn	No nonconformances noted	None
3. Critical control points	Matt Allen	No nonconformances noted	None
4. Legal and other requirements	Laurie Dunn	No nonconformances noted Three opportunities for improvement: <ol style="list-style-type: none"> 1. Specify a minimum frequency for tracking and reviewing regulatory requirements. 2. Ensure that web links target specific documents and not general areas (e.g. NR 204 vs. general section of WDNR administrative code and make sure web links are kept current. 3. Consider keeping hard copies of key documents available and make sure that they are kept up to date-this will help people that don't have web access. 	<ol style="list-style-type: none"> 1. Modify Element 4 to specify a minimum review frequency of once per year. 2. Modify web links in EMS manual to point directly to target documents and review links periodically. 3. Check library database to determine if a hard copy of each key document is available and up to date. If not available, determine if a hard copy is needed-if so, obtain copy.
5. Goals and objectives for continual improvement	Paul Nehm	No nonconformances noted	None
6. Public participation in planning	Mike Northouse	No nonconformances noted	None
7. Roles and responsibilities	Paul Nehm	No nonconformances noted	None
8. Training	Bill Hughes	No nonconformances noted One opportunity for improvement: <ol style="list-style-type: none"> 1. Make sure that contractor drivers place a checkmark next to each individual item on the contractor checklist in addition to signing the checklist. 	<ol style="list-style-type: none"> 1. Send a brief memo to contractor reminding him to have drivers check off each item on the checklist in addition to signing the checklist.
9. Communication	Mike Northouse	No nonconformances noted	None
10. Operational control of critical control points	Matt Allen	No nonconformances noted	None
11. Emergency preparedness and response	Paul Nehm	No nonconformances noted	None
12. EMS documentation and document control	Bill Hughes	No nonconformances noted	None
13. Monitoring and measurement	Matt Allen	No nonconformances noted	None
14. Nonconformances: preventive and corrective action	Ralph Erickson	No nonconformances noted	None
15. Periodic biosolids program and EMS performance report	Ralph Erickson	No nonconformances noted	None
16. Internal audit	Ralph Erickson	No nonconformances noted	None
17. Periodic management review of performance	Ralph Erickson	No nonconformances noted	None