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1. Select an auditor to conduct an internal EMS audit.
2. Review and revise the EMS based on:
 - a) Changes to the Biosolids EMS plans and procedures submitted during the year
 - b) Changes submitted from the departments that support biosolids activities
 - c) Changes to the Biosolids Management Policy
 - d) Changes to the goals and objectives
 - e) Compliance/Noncompliance with legal and other requirements
 - f) Management changes and recommendations
 - g) Third-party verification audit results
 - h) Changes in contractor requirements
 - i) Changes in public participation program
 - j) Changes to the communication program
3. Selected auditor conducts the internal audit of the EMS. Some tools which may be helpful include:
 - a) Interview representatives from departments that support biosolids activities
 - b) Conduct facility tours and include critical control points
 - c) Use third-party verification audit results
 - d) Use management review report
 - e) Include the activities of the contractor in the internal EMS audit
4. Internal auditor completes audit and turns in a detailed and comprehensive internal EMS audit report and recommendations to the EMS coordinator.
5. Distribute the internal audit report to the management review team.
6. Review and revise internal EMS audit program based on:
 - a) Scope of audit
 - b) Frequency
 - c) Methodology
 - d) Annual audit report