

# FORT NOVOSEL

## Environmental Document

ENV-P003: Internal Auditing  
(12 APRIL 2023)

Approved by: *Melissa Lowlavar*

### 1.0

#### PURPOSE

The purpose of this procedure is to ensure internal compliance audits are conducted in an effective and timely manner by Fort Novosel personnel. Implementation of this environmental procedure will ensure the periodic review of Fort Novosel's compliance with all applicable legal requirements. Additionally, periodic internal audits will address the need for modifications to environmental policy, procedures and work instructions.

### 2.0 SCOPE

The audits will cover the Fort Novosel environmental program and will include necessary and sufficient information for management to assess whether the installation is in compliance with applicable legal requirements and for making decisions or authorizing actions that need to be taken by Fort Novosel personnel to ensure the continual improvement of its environmental program.

### 3.0 DEFINITIONS

Term	Definition
Compliance Audit	An audit to evaluate compliance with Army, State and Federal regulations and other legal requirements that apply to environmental media as part of the installation's commitment to compliance. The compliance audit can encompass single or multiple environmental program elements.
Corrective and Preventive Action (CA/PA)	Action taken to eradicate the cause of or prevent a noncompliance
Environmental Documentation	Any environmental related documentation that is pertinent to the area being audited, including but not limited to relevant environmental procedures, forms and work instructions.
Environmental Performance Assessment System (EPAS)	Army multi-media assessment program designed to identify non-compliance with environmental regulations (compliance audit). EPAS is also used to provide suggestions for both immediate and long-term corrective actions and to indicate resources needed for implementation.

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Term	Definition
Internal Audit	A systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the regulatory compliance status of the facility/organization.
Internal Compliance Audit Team	Personnel assigned to conduct internal compliance audits by the Installation Admin (EPAS Program Manager) that have successfully completed program specific training.
Lead Auditor	Person who has successfully completed program specific training and is approved by the Installation Admin (EPAS Program Manager) to conduct and lead internal audits.
Noncompliance	A non-fulfillment of a specified legal or regulatory requirement supported by objective evidence.
Objective Evidence	Information which can be proven true, based on facts that are obtained through observation, measurement, test or other means.
Observation	An undesirable practice that cannot be directly referenced as a requirement of Fort Novosel procedures and/or regulatory requirements. If the practice is left unchecked, it could lead to a finding of noncompliance.
WEBCASS	Web Compliance Assessment and Sustainment System (WEBCASS)

#### 4.0 RESPONSIBILITIES

Role	Responsibility
Lead Auditor	<ul style="list-style-type: none"> <li>• Prepares and maintains a schedule for internal audits</li> <li>• Conducts an in brief and reviews the audit scope and schedule</li> <li>• Maintains internal audit results</li> <li>• Provides audit summary results and applicable CAR / PAR status information to the Installation Admin (EPAS Program Manager)</li> <li>• Conducts an out brief upon completion of the audit to summarize findings and observations, both positive and negative</li> </ul>

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Role	Responsibility
	<ul style="list-style-type: none"> <li>Ensures the appropriate commanders, directors or supervisors of the activities assigned are audited</li> </ul>
Commanders, Directors and/or Supervisors of the Activity Being Audited	<ul style="list-style-type: none"> <li>Make applicable personnel and records available during the scheduled locations, dates and times coordinated for the audit.</li> <li>Ensure the pertinent process owners take action on CARs/PARs assigned to them</li> </ul>
Installation Admin (EPAS Program Manager)	<ul style="list-style-type: none"> <li>Assigns and approves internal auditors</li> <li>Reviews final audit report and communicates results to management</li> <li>Coordinates with appropriate commanders, directors or supervisors for development of the audit schedule</li> </ul>
Internal Compliance Audit Teams / Installation Users	<ul style="list-style-type: none"> <li>Performs pre-audit preparations</li> <li>Conducts the audit and documents the findings</li> <li>Conducts quarterly compliance inspections</li> <li>Conducts program specific inspections required for regulatory compliance (i.e., bulk oil storage container inspections, stormwater discharge inspections)</li> </ul>
DPW-ENRD Program Managers	<ul style="list-style-type: none"> <li>Track findings resulting from program specific inspections required for regulatory compliance</li> </ul>
Installation Organizations	<ul style="list-style-type: none"> <li>Conduct program specific inspections of applicable activities</li> </ul>

## 5.0 PROCEDURE

### 5.1 Quarterly Compliance Inspections

#### 5.1.1 Audit Scope

Fort Novosel conducts quarterly Environmental Compliance Assistance Visits of organizations determined by the Installation Admin (EPAS Program Manager) and/or Quarterly Compliance Inspection Program Manager that may have potential environmental impacts.

#### 5.1.2 Audit Schedule

The DPW-ENRD Quarterly Compliance Inspection Program Manager will determine the schedule for inspections each quarter. The program manager will communicate with the Quarterly Compliance Inspection Auditor(s) regarding schedule development to ensure it

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will not conflict with other DPW-ENRD activities, such as training. The schedule will be documented and maintained by the Quarterly Compliance Inspection Program Manager. The schedule will be **unannounced** to the organizations being inspected.

#### 5.1.3 Audit Team

The Quarterly Compliance Audit Team is determined by the Installation Admin (EPAS Program Manager). The team is usually composed of the Quarterly Compliance Inspection Program Manager and one contractor who supports DPW-ENRD. Additional government or contractor personnel may be assigned to assist with quarterly Environmental Compliance Assistance Visits as necessary to complete the inspections. The audit team members will all be competent in conducting the audits.

#### 5.1.4 Audit Checklist

Quarterly Environmental Compliance Assistance Visits will be conducted using USAACE Form 2717, *Environmental Compliance Inspection Checklist*. This checklist will be reviewed at least annually to ensure continued applicability to installation operations.

#### 5.1.5 Evaluation

The Quarterly Compliance Audit Team Auditor(s) will collect objective evidence through interviews, records review and physical inspections at each location. The auditor(s) will document inspection findings using the Compliance Inspection Database that includes the questions from USAACE Form 2717, *Environmental Compliance Inspection Checklist*.

#### 5.1.6 Audit Results

The Auditor(s) will send the Summary Findings Report for review to the Quarterly Compliance Inspection Program Manager, the Installation Admin (EPAS Program Manager), and other program managers with findings identified in their program areas. The program managers and the Installation Admin (EPAS Program Manager) will submit comments or concurrence to the auditor(s) and/or the Quarterly Compliance Inspection Program Manager for each report. The auditor(s) will document comments in the database, incorporate comments into the report, and submit a revised report for concurrence.

After receiving concurrence from all Program Managers and the Installation Admin (EPAS Program Manager), the auditor(s) will finalize the report within the database. The auditor(s) will notify the Quarterly Compliance Inspection Program Manager that the report has been finalized and is ready for distribution to the subject organization.

The database will generate a submittal letter for the report. The Quarterly Compliance Inspection Program Manager will route the report and cover letter through DPW-ENRD

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as appropriate, then for signature to the DPW-ENRD Chief. The signed report will be sent to the inspected organization.

#### 5.1.7 Corrective Action

The inspected organization is responsible for conducting a root cause analysis and developing appropriate corrective actions for any identified findings. The organization will submit information regarding implemented corrective actions according to the date indicated on the report letter. The organization/facility may utilize USAACE Form 2742, *Quarterly Inspection Corrective Actions*. Verification of implementation of any corrective actions will be completed during the subsequent quarterly Environmental Compliance Assistance Visit.

## 5.2 Internal EPAS

### 5.2.1 Audit Scope

The internal EPAS is an installation wide assessment of compliance with environmental regulations. Because it is impractical to observe every installation facility during the time frame allotted for this audit, the internal EPAS locations that are assessed will be determined in a manner that gives a representative sample of the installation activities.

### 5.2.2 Develop Audit Schedule

In accordance with Army Regulation 200-1, Section 16-1(c)(1), the internal EPAS will be conducted annually unless an external EPAS or external installation wide agency inspection is conducted for that calendar year. The Lead Auditor will develop a schedule for the internal EPAS that includes a representative sample of all installation activities. Once approved by the Installation Admin (EPAS Program Manager), the schedule will be distributed to all auditors and to installation organizations.

### 5.2.3 Identify and Assemble Audit Team

Each audit shall be performed by qualified personnel as selected by the Installation Admin (EPAS Program Manager). To assure objectivity, the audit team will include personnel not directly responsible for the area(s) being audited.

### 5.2.4 Audit Checklist

The EPAS will utilize the TEAM guides and applicable supplements maintained by the Army Environmental Command. The auditors are responsible for reviewing applicable checklists during the audit. The TEAM guides are also available to the auditors through WEBCASS.

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#### 5.2.5 In Brief

The Lead Auditor will conduct an in brief and review the audit scope and schedule. The in brief will include a summary of findings from previous internal audits.

#### 5.2.6 Evaluation

The Internal Audit Team will collect objective evidence through interviews, records review and physical inspections. Annual installation wide EPAS findings will be documented on USAACE Form 2717, *Environmental Compliance Inspection Checklist*.

#### 5.2.7 Audit Results

The Internal Audit Team will forward photographs and documented findings on USAACE Form 2717, *Environmental Compliance Inspection Checklist*, to the Lead Auditor for technical review. The Lead Auditor will verify the findings are correctly documented and will submit findings into WEBCASS for approval by the Installation ICAP Admin (Environmental Chief) and/or the Installation Admin (EPAS Program Manager). In an event where deemed necessary, the Lead Auditor may utilize USAACE Form 2705, *Internal Audit Findings*, to submit findings for approval.

The Installation ICAP Admin (Environmental Chief) and Installation Admin (EPAS Program Manager), will receive notifications from WEBCASS when the audit findings have been submitted for review and approval. The Installation ICAP Admin (Environmental Chief) and Installation Admin (EPAS Program Manager) will submit comments or approval to the Lead Auditor for each finding. The Lead Auditor will incorporate any comments and submit a revised finding for approval. Once approved, the Installation Admin (EPAS Program Manager) will then distribute reports to the subject organization.

If no findings are identified at one of the areas inspected that are also part of the quarterly compliance inspection program, the Internal Audit Team will submit an inspection checklist, USAACE Form 2717, *Environmental Compliance Inspection Checklist*, indicating no negative findings were identified during the EPAS audit to the Installation Admin (EPAS Program Manager). The Installation Admin (EPAS Program Manager) or designee will route the submittal letter and the report for signature to the Environmental Chief. The signed report will be sent to the inspected organization.

#### 5.2.8 Corrective Action

The Lead Auditor will suggest a corrective action based on the root cause indicated in the finding. The inspected organization is responsible for implementing an appropriate corrective action for any identified findings. The corrective action may differ from the suggested corrective action. The organization will submit information regarding implemented corrective actions according to the date indicated on the report letter. The

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Installation Admin (EPAS Program Manager) will request periodic updates on the status of corrective actions. Verification of implementation of any corrective actions will be completed during subsequent quarterly Environmental Compliance Assistance Visits and/or an internal EPAS as appropriate.

#### 5.2.9 Out Brief

The Lead Auditor will conduct an out brief at the close of the internal EPAS to summarize the audit activities and findings.

### 5.3 Program Specific Regulatory Inspections

Periodic program specific inspections are required for regulatory compliance. Frequency of these inspections is based on regulatory requirements, which are tracked by program managers.

Program specific inspection findings will be documented in accordance with the regulatory requirements. Forms and records associated with these inspections are listed in Section 6.0.

The results of these inspections may be incorporated into the findings for the Internal EPAS Audit if installation wide issues are noted that need additional emphasis. Program Managers are responsible for tracking findings from program specific inspections.

### 5.4 Documentation

The Installation Admin (EPAS Program Manager) will maintain copies of audit forms, findings and reports for at least three years from the conclusion of the audit.

## 6.0 FORMS AND RECORDS

ADEM Form 500

USAACE Form 2705, *Internal Audit Findings*

USAACE Form 2711, *SPCC Plan Container Inspection Checklist*

USAACE Form 2712, *Washrack Inspection Checklist*

USAACE Form 2717, *Environmental Compliance Inspection Checklist*

USAACE Form 2725, *HWSAA Inspection Checklist*

USAACE Form 2726, *90-HWCAA Inspection Log*

USAACE Form 2728, *STI SP001 Annual AST Inspection Form*

USAACE Form 2737, *Asbestos Physical Assessment*

USAACE Form 2738, *Asbestos Abatement Compliance Checklist*

USAACE Form 2742, *Quarterly Inspection Corrective Actions*

USAACE Form 2745, *Stormwater Outfall Inspection Checklist*

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**7.0 REFERENCES**

Army Regulation 200-1, *Environmental Protection and Enhancement*