

**NATIONAL BIOSOLIDS PARTNERSHIP  
THIRD INTERIM AUDIT REPORT**

**City of Grand Rapids  
Environmental Protection Services Department  
Grand Rapids, Michigan**

**Grand Rapids, Michigan**

**Audit conducted by**

**NSF-International Strategic Registrations**

**William R. Hancuff, Lead Auditor**

**References:**

**National Biosolids Partnership (NBP) *EMS Elements*  
NBP *Third Party Verification Auditor Guidance – November 2001*  
(*Latest Revision August 2007*)  
NBP *Code of Good Practice*  
City of Grand Rapids *Environmental Protection Services*  
*Biosolids EMS Manual – July 2005*  
(*Latest Revisions Approved October 2009*)**

**Final Report – November 20, 2009**

## **INTRODUCTION**

The purpose of the Biosolids Environmental Management System (EMS) interim audits is to verify through regular reviews the system's health and effectiveness between verification audits. The third party on-site interim audits provide independent reviews and supports credibility between re-verification audits. The goal of the third party interim audit is to collect and evaluate objective evidence related to a portion of the EMS such that over the course of the four interim audits conducted between verification audits all 17 elements are covered. The audits determine whether the MWRDGC biosolids EMS is functioning as intended, that practices and procedures are conducted as documented, and that the EMS as implemented conforms to the NBP's EMS Elements, the Code of Good Practice and the EMS program objectives.

## **RECOMMENDATION**

The results of the Grand Rapids third interim audit and review of corrective actions are positive and it is the recommendation of the audit team that the City of Grand Rapids, Michigan, Environmental Protection Services Department Biosolids EMS continue with their "Verification" status.

## **AUDIT SCOPE**

The primary objective of the third interim audit was to ensure the environmental management system health by reviewing:

- Progress toward goals and objectives,
- Corrective and preventive action requests and responses.
- Actions taken to correct minor non-conformances,
- Management review process, and
- EMS outcomes (environmental performance, regulatory compliance, interested party relations, and quality practices)

The first four items identified above involved reviewing procedures, activities, processes and products that have general requirements found in the NBP standard elements 5, 14, 15, 16 and 17. The fifth item, EMS outcomes, had the potential of involving other NBP standard elements, namely: 1, 2, 4, 6, 9, 10 and 13.

In addition to evaluation of the system as outlined above; the present interim audit scope included the review and verification of the maintenance and implementation of the Grand Rapids biosolids EMS relative to standard elements 3, 10, and 13.

The NSF- International Strategic Registrations, Ltd. (NSF-ISR) conducted a third party interim audit of the Grand Rapids Biosolids Environmental Management System. The on-site audit team consisted of Dr. William R. Hancuff, Lead Auditor and was conducted from October 27 through and including October 28, 2009.

The physical biosolids facilities included in the interim audit and visited during the included the Grand Rapids Wastewater Treatment Plant's newly constructed facilities; i.e. the centrifuges, biosolids blending tanks, biosolids silos and truck loading facilities.

The following individuals were interviewed as part of the audit process:

Randall Fisher – Environmental Services Manager  
Mike Lunn – Environmental Services, Assistant Manager and EMS Coordinator  
Kathie Kuzawa – Wastewater Treatment Plant Supervisor/EMS Team member  
Gary DeKock – Wastewater Plant Supervisor/EMS Team member  
David Harris – Wastewater Plant Supervisor/EMS Team member  
David Schipper – Michigan Department of Environmental Quality – Regional  
Environmental Quality Analyst – Field Operations Division  
Tom Kent – City of Wyoming, Utilities Department Supervisor  
Nick Klug – Operator I  
Jared Gabinski – Plant Assistant I  
Roger Miller - Shift Supervisor  
Kathy Makarewicz – Operator I  
Marc Barton – Water Pollution Control Officer  
Andrew Meyer – Operator I  
Sandy Buchner – Chemist II  
Samuel Vandenberg – Lab Technician I  
Charlie Cortez – Cortez Hauling Company

## **DOCUMENTATION REVIEW**

Document review was conducted during the interim audit. Documents included EMS element procedures, Standard Operating Procedures, reports and records. During the on-site audit these documents were reviewed to verify conformance with the National Biosolids Partnership (NBP) *EMS Elements* using the most current NBP *Third Party Verification Auditor Guidance*. Additionally interviews were conducted with various personnel to obtain supplemental objective evidence on the effectiveness of the implementation of the EMS. Attachment 1 summarizes the documents and other objective evidence associated with each element that was considered during the interim audit.

## **INTERIM AUDIT FINDINGS**

The third interim audit generally addressed elements 5, 14, 15, 16 and 17, as well as outcome related elements 1, 2, 4, 6, 9, 10 and 13. In addition the audit specifically included the review and verification of the maintenance and implementation of the Grand Rapids Biosolids EMS relative to standard elements 3, 10, and 13.

The audit included review of the latest versions of the EMS elements as contained in the Grand Rapids EMS Manual with revisions as recently as October 2009 and employed the most recent version of the NBP *Third Party Verification Auditor Guidance* dated August 2007. The interim audit found no major non-conformance, 2 minor non-

conformances and 7 opportunities for improvement. There were also 4 commendations or positive findings.

The following is a review of the positive observations made during the interim audit. Minor non-conformances and opportunities for improvement follow and are generally listed by item number, which correspond to each Element's minimum conformance requirement, in the sequence of the NBP standard elements.

### **Positive Observations**

The Environmental Protection Services Department's Wastewater Treatment Plant personnel involved in biosolids management should be recognized for their outstanding achievements, and the exceptional features of their Biosolids Management System. The following is a summary of those positive items observed during the audits.

Commendations:

- There was an excellent discussion of progress made in improving operations of activities at each of the critical control points in the biosolids value chain in the 2007 and 2008 Periodic Biosolids Program Performance Report.
- Laboratory personnel demonstrated an exceptional knowledge of the biosolids EMS policy, mission statement, critical control points, operational procedures and goals and objectives and outcomes.
- The City maintains an exemplary Biosolids EMS manual that continuously improves through frequent updates and upgrades.
- The shift to using Share point has improved document control.

And finally, the hard work and dedication of the EMS management team must be acknowledged. While maintaining the EMS verification goal is obviously a team effort the effectiveness of guidance provided by the Assistant Director assured maintenance of this common goal.

### **Minor Nonconformances**

Item 5.5. Not all of the goals and objectives were developed using the SMART (Specific, Measureable, Achievable, Relevant and Time-bound) criteria.

Item 8.1. The training program providing general awareness of the EMS and how each employee's assigned roles and responsibilities relate to the entire biosolids value chain is not fully effective.

### **Opportunities for Improvement**

Element 5.5 – Minor non-conformance. Not all of the goals and objectives were developed using the SMART (Specific, Measureable, Achievable, Relevant and Time-bound) criteria.

Element 8.1 – Minor non-conformance. The training program providing general awareness of the EMS and how each employee's assigned roles and responsibilities relate to the entire biosolids value chain is not fully effective.

Element 1.7 – Opportunity for improvement. Consider mentioning specifically in the Element 1 procedure those biosolids management activities assigned to and performed by contractors, such as biosolids loading and transportation.

Element 10.1 – Opportunity for improvement. Consider preparing a schedule for completing all new SOPs associated with recently construction critical control points and the abandonment of all old SOPs that are no longer needed.

Element 10.1 – Opportunity for improvement. The operational controls column in Table 3.1 – Critical control points, does not reference SOP 3209 – Primaries, taking tanks in and out of service.

Element 10.1 – Opportunity for improvement. SOP 3609 – GVRBA Cake Silo and Load Out Operation does not clearly explain the details of high level loading.

Element 10.5 – Opportunity for improvement. Cordes Trucking Company does not currently have an SOP for Vehicle Inspection, which references the inspection checklist form.

Element 15.2 – Opportunity for improvement. In the Periodic Biosolids Program Performance Report when presenting the organization's progress toward achieving its biosolids program goals and objectives consider presenting them as they relate to each of the required outcome areas. Also, consider presenting other accomplishments not associated with goals and objectives separately in the report.

Element 17.1 – Opportunity for improvement. When completing Table 17.1 – Periodic Management Review of Performance Report consider including a more complete description of the review of the progress on goals and objectives. If the Periodic Biosolids Program Performance Report is used in this review it is not currently referenced in the review summary as being employed to provide details on goals, objectives, and performance measures.

In order to address the above minor non-conformances, the City of Grand Rapids, Michigan Environmental Protection Services Department will prepare a non-conformance investigation report and will implement corrective actions according to their EMS procedures to provide continual improvements to their biosolids program.

## **CITY OF GRAND RAPIDS ENVIRONMENTAL PROTECTION SERVICES DEPARTMENT WASTEWATER BIOSOLIDS COMMENTS**

The City of Grand Rapids took on the challenge of establishing a Biosolids EMS over three years ago. During this period the management has been greatly involved with the EMS while staff has been on the periphery. This became extremely apparent when Dr. Hancuff interviewed some of the staff during the audit. Occasional training just isn't enough, it is now time for Grand Rapids to go the next level and change the culture of the department to fully engage staff at all levels. We appreciate Dr. Hancuff's ability to audit and provide benchmarking at the same time.

### **OUTCOMES MATTER**

The City of Grand Rapids, Michigan Environmental Protection Services Department Wastewater Biosolids Program established four major groups of biosolids EMS goals and objectives for 2008 consisting of 4 goals, and for 2009 consisting of five goals. These goals were developed through input from the internal EMS Team. The City's Wastewater Biosolids goals for its EMS were established cognizant of each of the four outcome focal points of the NBP program as identified below:

1. Environmental Performance,
2. Regulatory Compliance,
3. Relations with Interested Parties, and
4. Quality Biosolids Management Practices.

While it is not a requirement to attain all objectives established, it is a critical part of the system to make progress towards the overall goals. The Department's performance relative to each of the above groups is addressed below.

In the Environmental Performance area, the Department established one primary goal and one related goal for 2008. The primary goal was to have the City maintain wastewater plant equipment in top operating condition, specifically to maintain a 75% or greater ratio of preventive maintenance versus corrective maintenance in 2008. This same goal was carried over and refined for 2009. The objective was to maintain the same 75% ratio but specifically for three individual skilled trades (maintenance, electricians, and technicians.)

The primary goal for 2008 was also expanded, refined and included in a new objective for 2009. It is to improve the performance by improving the tracking the individual job classifications functions, namely UMM I, UMM II, Electrician I, Electrician II, Instrument Technician, Plant Assistants and Utility Crew Leader, and to maintain an average of 100 man-hours per person in maintenance activities for these job classifications.

These objectives are tracked using the plant Computer Maintenance Management System (CMMS) to maximize proactive maintenance practices geared toward minimizing equipment downtime.

Proper equipment operation results in lower potential for process upsets, which can decrease the quality of the biosolids product and lower effluent quality. Below optimum biosolids production can increase the fuel consumption associated with the transportation of biosolids to the landfills and the resultant inefficient use of natural resources. Additionally, plant upsets result in lower effluent quality and more contaminants being discharged to the receiving waters.

The City maintained a ratio of substantially greater than 80% for 2008 and for the first three quarters of 2009, although certain individual job classifications did not meet this overall goal. The objective is to improve these individual classification performances to meet the system-wide goal by the end of 2009 and establish a new target of performance for 2010.

There were two other objectives related to environmental performance that were established in 2008. They were to complete an odor study, which is discussed further in the relations with interested parties' outcome; and to commence construction of new biosolids storage and dewatering facility, the completion of which was carried over as a goal in 2009. The latter are further discussed in the quality management practices outcome area.

In the Regulatory Compliance area, the City established one primary goal in both 2008 and 2009. For 2008 it was to maintain 100% compliance with the NPDES permit. The City reported that they had no noncompliance issues throughout 2008. Because of its continued high performance in this area, it was determined by the City that there was little opportunity for continual improvement so a new goal in regulatory compliance area was established for 2009.

The objective is to update the laboratory Chemical Hygiene Plan (CHP) which is out of date and does not comply with current regulations. It is the goal to revise the CHP to meet the requirements of MIOSHA part 431 by the end of the 2009 calendar year. Progress on this objective has been made but it is currently behind schedule.

Another goal related to regulatory compliance was discussed previously in the Environmental Performance Outcome, i.e. maintaining a 75%, or greater, ratio of preventive maintenance verses corrective maintenance in 2008 and 2009.

In the Relations with Interested Parties area, the City established two objectives for 2008; one originated in 2007 and was continued into 2008. It was to complete a plant odor control study and use the results to reduce odors associated with the plant. The study analyzed odor emissions from all plant treatment processes to help identify sources, Sources were ranked and included recommended abatement technologies and budgetary information. It was decided by the City commissioners not to fund any of the odor control

projects at this time, since they felt the impact to residential areas was restricted to very rare occasions.

The second objective for 2008 related to relations with interested parties was divided in two and carried over as a goal for 2009. The first is to complete construction of the new biosolids storage tanks. The use of these new tanks would provide improved odor controls. The second is to complete construction of the new biosolids dewatering facilities, which will also improve odor controls. Construction of both of these projects is completed and they are scheduled to be fully operational by the end of 2009.

In the Quality Biosolids Management Practices area, the City established four objectives in 2008, all of which have already been discussed in other outcome areas above. They were:

- Maintaining a 75% or greater ratio of preventive maintenance verses corrective maintenance in 2008.
- Maintaining 100% compliance with the NPDES permit in 2008.
- Commence construction of new biosolids storage and dewatering facilities.
- Complete odor control study to identify improvements that may be implemented in the future.

As was previously reported the City has met or exceeded these goals.

For 2009 the goal to maintaining a 75% or greater ratio of preventive maintenance verses corrective maintenance was expanded into two goals which improve the scope of tracking these maintenance practices. Also completion of construction of the new biosolids storage and dewatering facilities were carried over as a goal and completed in 2009.

The City is continuing its efforts in these all of these major outcome areas and will establish new goals and objectives for 2010.

## **CONCLUSIONS AND RECOMMENDATIONS**

The results of the third interim audit are positive. The review and approval of the corrective action plans for each of the non-conformances identified during the interim audit has been completed. The full implementation of the corrective actions for the minor non-conformances must be completed in accordance with their proposed schedules and closure will be verified during the next third party external audit.

As was mentioned previously, an EMS is a continuous improvement process. The results of this and future audits will provide value added to the system and should be viewed as an overall opportunity to improve. Every audit is a snapshot in time, and does not, or cannot, identify each and every area for improvement. And yet, while no single



audit identifies all of the areas for improvement the results of each audit provide an additional incremental step in the overall system's improvement.

Discussions between the Department's Biosolids EMS Coordinator and the third party auditor resulted in the following tentative agreement regarding the final interim audit schedule:

Year 4 (internal/third party) – Base elements plus 5, 11, and 12.

## **Attachment 1**

### **Documents and Other Object Evidence Reviewed During the Third Interim Audit**

#### Element 1. Documentation of EMS for Biosolids

- City of Grand Rapids, Michigan Environmental Protection Services Department Biosolids Environmental Management System Manual – Updated October 2009.
- EMS Element 2 containing Biosolids Mission Statement and Code of Good Practice.
- Joint Biosolids Management Project Agreement – Grand Valley Regional Biosolids Authority (GVRBA), City of Grand Rapids, Michigan and City of Wyoming, Michigan – July 1, 2009.

#### Element 2. Biosolids Management Policy

- EMS Element 2: Biosolids Management Policy contains Biosolids Mission Statement and Code of Good Practice.
- Interviews with Randall Fisher and Mike Lunn.

#### Element 3. Critical Control Points

- EMS Element 3 – Critical Control Points.
- EMS Table 3.1 Biosolids Critical Control Points – lists operational controls related to each critical control point
- Interviews with Mike Lunn, Gary DeKock, Kathie Kuzawa, David Harris, Nick Klug, Jared Gabinski, Roger Miller, Kathy Makarewicz, Marc Barton, Andrew Meyer, Sandy Buchner, Samuel Vandenberg.
- Critical Control Point Identification Placards for: Collection System, Solids Screening & Grit Collection, Odor Control, Scum, Primary Treatment, Secondary Treatment, Raw Sludge Storage, Centrifuge Dewatering, Truck Loading/Cover/Transport/Wash, Landfill (Power Generation), Landfill.
- Field review of new solids blend tank and centrifuges.
- Spot check operations controls in SOPs.

#### Element 4. Legal and Other Requirements

- EMS Element 4: Legal and Other Requirements
- EMS Table 4.1 Legal and Other Requirements – Applicable Requirements
- Interviews with pretreatment staff – Gary DeKock and Marc Barton
- Interview with State regulators - David Schipper – Michigan Department of Environmental Quality – Regional Environmental Quality Analyst – Field Operations Division.

## Element 5. Goals and Objectives for Continual Improvement

- EMS Element 5: Goals and Objectives.
- Table 5.1 – Biosolids Goals and Objectives for 2008 and 2009
- Figure 5.1 – Action Plan Status Worksheets for Goals and Objectives established for 2009.
- Figure 5.1 – Action Plan Status Worksheet.
- Form 5.1 – Goals and Objectives Annual Review for 2009.
- Form 5.2 Public Participation – Annual Goals and Objectives Selection review for new goals to be established for 2009.
- Reviewed Quarterly progress reports for each goal and objective action plan.
- Assessment of outcomes in the four critical areas.
- Access and evaluation of website.
- Interviews with Mike Lunn , Kathie Kuzawa, Gary DeKock, and David Harris.
- Letter to interested parties requesting input into goals and objectives for 2009

## Element 6. Public Participation in Planning

- EMS Element 6: Public Participation in Planning.
- Table 6.2 Interested Parties Contact Information.
- Environmental Protection Tip # 1 – Proper grease disposal (English & Spanish)
- Environmental Protection Tip # 2 – Proper medicine disposal (English & Spanish)
- Environmental Protection Tip # 3 – Disposable not flushable (English & Spanish)
- News Article – “Grand Rapids, Wyoming biosolids partnership turns sewage into energy By the Grand Rapids Press, August 16, 2009.

## Element 7. Roles and Responsibilities

- EMS Element 7: Roles and Responsibilities.
- Table 7.1 – Roles and Responsibilities – Internal EMS Team.
- Table 7.2 – Roles and Responsibilities grouped by Biosolids Value Chain Component.
- Table 7.3 – Internal EMS Team – Name and Contact Information.
- Interviews with Randall Fisher, Mike Lunn, Gary DeKock, Kathie Kuzawa and David Harris
- Joint Biosolids Management Project Agreement – Grand Valley Regional Biosolids Authority, City of Grand Rapids, Michigan and City of Wyoming, Michigan – July 1, 2009.
- Figure 7.1 – Organization Chart for Environmental Services Department – March 2009 and October 2009.
- Figure 7.2 – Schedule of Annual Biosolids Activities.

## Element 8. Training

- EMS Element 8: Training.

- Interviews with Operations staff – David Harris, Nick Klug, Jared Gabinski, Roger Miller, Kathy Makarewicz, Marc Barton, Andrew Meyer, Sandy Buchner, and Samuel Vandenberg.
- Interview biosolids transportation contractor – Charlie Cortez – Cortez Hauling Company.

#### Element 9. Communications

- EMS Element 9: Communication and Public Outreach.
- Figure 9.1 Public Request for Information Form.
- Interviews with Randall Fisher and Mike Lunn.
- Environmental Protection Tip # 1 – Proper grease disposal (English & Spanish)
- Environmental Protection Tip # 2 – Proper medicine disposal (English & Spanish)
- Environmental Protection Tip # 3 – Disposable not flushable (English & Spanish)
- News Article – “Grand Rapids, Wyoming biosolids partnership turns sewage into energy By the Grand Rapids Press, August 16, 2009.

#### Element 10. Operational Control of Critical Control Points

- EMS Element 10: Operational Control of Critical Control Points.
- Form 10.1 – Annual Operational Controls Review.
- Form 10.2 – Contractor Compliance Inspection.
- EMS Table 3.1 Biosolids Critical Control Points – lists operational controls related to each critical control point.
- Interviews with Mike Lunn, Gary DeKock, Kathie Kuzawa and David Harris
- Interviews with Operations staff – David Harris, Nick Klug, Jared Gabinski, Roger Miller, Kathy Makarewicz, Marc Barton, Andrew Meyer, Sandy Buchner, and Samuel Vandenberg.
- Interview biosolids transportation contractor – Charlie Cortez – Cortez Hauling Company
- SOP 3119 – Portable Toilet Operations – 10/13/09 Ver 4
- SOP 3209 – Primaries – Taking Tanks in & out of service – 9/29/09 Ver 1
- SOP 3601 – Start up of GVRBA Dewatering Centrifuges – 10/22/09 Ver 1
- SOP 3602 – Blended Sludge Tank Operation – 10/7/09 Ver 2
- SOP 3605 – Shut down of GVRBA Dewatering Centrifuges – 10/22/09 Ver 1
- SOP 3606 – Odor Minimization Plan GVRBA Facilities – 10/22/09 Ver 1
- SOP 3608 – GVRBA WAS Sludge Storage Tank Operation – 10/26/09 Ver 1
- SOP 3609 – GVRBA Cake Silo and Truck Load Out Operation – 10/22/09 Ver 1
- SOP 4102 – Preventive Maintenance – 12/11/08 Ver 4
- Siemens – Training Manual – Dewatering Centrifuge Equipment Section 11344 GVRBA Dewatering Facility
- SOP – Cordes Trucking Inc. Policy and Procedure for Biosolids Truck Loading Procedures
- SOP – Cordes Trucking Inc. Policy and Procedure for Biosolids Safety Plan
- SOP – Cordes Trucking Inc. Policy and Procedure for Truck Washing Plan
- SOP – Cordes Trucking Inc. Policy and Procedure for Biosolids Spill Plan

#### Element 12. EMS Documentation and Document Control

- Review EMS Manual revisions and change logs.
- Reviewed Operations SOPs, Maintenance SOPs, Laboratory SOPs and contractor SOPs,

#### Element 13. Monitoring and Measurement

- EMS Element 13: Monitoring and Measurement.
- Table 13.1 – Action Plan – Quarterly Progress Report.
- Table 13.2 – Action Plan (for planning goals and objectives)
- Table 13.2 – Action Plans for Goals and Objectives established for 2009.
- Reviewed Biosolids Centrifuge Performance sheets for last two weeks of October 2009.
- Reviewed Daily PO4 Data Sheets for October 2009.
- Interviews with Mike Lunn, Gary DeKock, Kathie Kuzawa and David Harris
- Interviews with Operations staff – David Harris, Nick Klug, Jared Gabinski, Roger Miller, Kathy Makarewicz, Marc Barton, Andrew Meyer, Sandy Buchner, and Samuel Vandenberg.
- Reviewed monitoring and measurement requirements in SOPs for plant operations.
- Reviewed laboratory SOPs for appropriate analyses references.
- Reviewed quarterly progress reports used for tracking goals and objectives.

#### Element 14. Nonconformances: Preventive and Corrective Action

- EMS Element 14: Nonconformances: Preventive and Corrective Action.
- Figure 14.1 Corrective Action Plan.
- Table 14.1 Nonconformance Summary and Response Time.
- Table 14.2 Nonconformance Investigation Worksheet.
- Interviews with Mike Lunn.
- Table 14.2 – Nonconformance Investigation Worksheets for two nonconformances for 2008
- Table 14.2 – Nonconformance Investigation Worksheets for two nonconformances for 2009

#### Element 15. Periodic Biosolids Program and EMS Performance Report

- EMS Element 15: Periodic Biosolids Program Performance Report.
- Interview with Randall Fisher and Mike Lunn
- 2007 Periodic Biosolids Program Performance Report. Issued February 2008
- 2008 Periodic Biosolids Program Performance Report. Issued February 2009 (revisions March 2009, September 2009 and October 2009)

#### Element 16. Internal EMS Audit

- EMS Element 16: Internal EMS Audit.
- Table 16.1 – Internal Auditor’s Worksheet (including question checklist).
- Interviews with Randall Fisher and Mike Lunn.
- Reviewed EMS completed checklists for internal audit (covering all 17 elements)  
Issued March 25, 2008
- Reviewed EMS completed checklists for internal audit (covering all 17 elements)  
Issued March 2009

#### Element 17. Periodic Management Review of Performance

- EMS Element 17: Periodic Management Review of Performance.
- Table 17.1 – Periodic Management Review of Performance Report for 2008
- Table 17.1 – Periodic Management Review of Performance Report performed on  
4/30/2008
- Table 17.1 – Periodic Management Review of Performance Report performed on  
3/31/2009
- Interviews with Randall Fisher and Michael Lunn.

## Attachment 2

### National Biosolids Partnership Appeals Process

Biosolids organizations that participate in the National Biosolids Partnership (NBP) Environmental Management System (EMS) Program are required to undergo an EMS verification audit by an independent, third party auditor assigned by the NBP and yearly interim audits. The purpose of the EMS audit is to determine whether or not the organization's EMS conforms with -- that is, meets the requirements of -- the NBP program, as defined in the EMS Elements<sup>1</sup>. The spirit of these requirements includes a well-documented program and meaningful opportunities for interested party involvement.

The NBP provides an appeals process for biosolids organizations and interested parties that disagree with the findings of a third party EMS audit. The verification appeals process involves an Appeals Board; representing a balance of biosolids management interested parties, including an environmental advocacy group, and wastewater industry professionals. An appeal must be submitted within 30 days of the audit company's official verification decision or interim audit decision.

To submit an appeal before the Appeals Board, the petitioner must set forth the specific EMS element(s) and requirements that is believed to have not been evaluated and/or implemented consistent with NBP requirements as reflected in the EMS Elements, along with the objective evidence to support that claim. For example, a petitioner may believe that a major nonconformance exists but was not found by the auditor. In this case, the petitioner would need to identify in the petition the specific EMS element believed to be out of conformance and why.

To submit an appeal, petitioners must fill out and submit the standardized appeals petition form that is available on the NBP website at <http://www.biosolids.org>. A formal appeal must be submitted within 30 days of the verification decision or interim audit decision by the audit company.

The Board's Administrative Officer receives all appeals petitions on behalf of the Board and conducts a basic completeness check. Upon completion of this check, the petition is either forwarded to Appeals Board members or back to the petitioner with incomplete areas documented. Petitions should be sent via certified, return receipt requested mail to:

The NBP EMS Appeals Board, Attention: Board Administrative Officer, c/o  
Water Environment Federation, 601 Wythe Street, Alexandria, VA 22314

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<sup>1</sup> The *EMS Elements* and other program materials are available on the NBP website at <http://www.biosolids.org>.

The Appeals Board will examine the facts, interview parties involved, deliberate the case, and then make a determination as to whether a major nonconformance does or does not exist. Appeals cases vary in complexity. As a result, the time required for the Board to evaluate a case and make a decision might vary. However, the overall Board target for processing an appeal is approximately four months.