



City of Grand Rapids

Environmental Management System for Biosolids Annual Internal Audit

Covering 2010 Biosolids EMS Activities

Issued: April 7, 2011

EMS Coordinator: Kathie Kuzawa

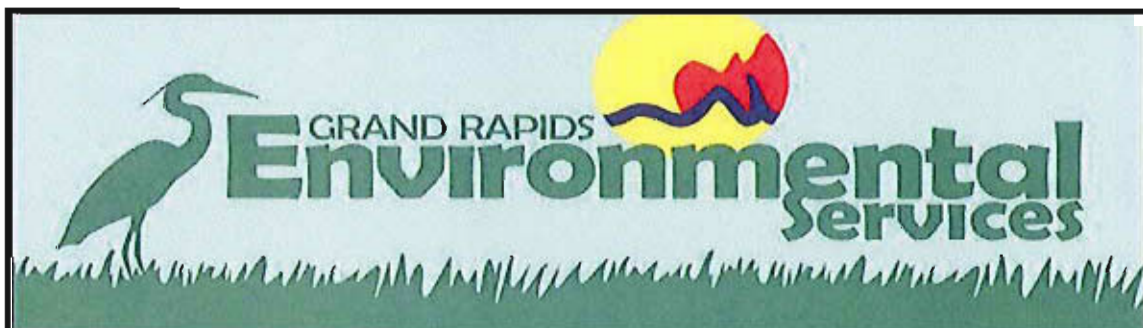


Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: Conformance Nonconformance	
Element No.	1	Audit Number:	01-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock, Wastewater Plant Supervisor		
Audit date(s)	3/31/2011		
List nonconformances:	1. 2. 3. 4. 5. 6. 7.		
Comments: All the audited requirements for Element 1 of the Grand Rapids Biosolids EMS Manual have been met.			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/31/11 signature: Gary De Kock

Joint review with EMS coordinator: (MM/DD/YYYY) 04/05/2011 initials: [Signature]

Table 16.1.1 – Internal Auditor’s Minimum Question Checklist

Element 1 Documentation of Biosolids EMS		Record audit number from worksheet: 01-2011-01
Requirement	Questions/Considerations	Auditor Notes
Document the EMS for Biosolids in an EMS Manual or equivalent set of program documents that describe, at least at a general level, the applicable policies, programs, plans, procedures, and management practices in the EMS.	Can you show me your Biosolids EMS manual?	Yes, located at SharePoint EPSD-Enterprise Site http://sapesd01/EMS/default.aspx
Approve the EMS Manual by a level of the organization's management with the authority to commit people and resources to biosolids management activities.	Has your Biosolids EMS manual been approved by the department Director?	Yes, all 17 are signed by the Environmental Services Manager
Contain, in the EMS Manual, the organization's Biosolids Management Policy and EMS Procedures required by the <i>EMS Elements</i> .	Can you show me your Biosolids Management Policy? Can you show me the elements of your policy identified in Table 1.1 of your EMS manual?	Yes, Element 2, page 1-2 of manual Yes, Elements 1-17 of manual
Contain or cross-reference, in the EMS Manual, public participation, communications, and emergency preparedness and response programs and plans required by the <i>EMS Elements</i> .	Can you show me some examples of how you have cross referenced public participation in your manual? Can you show me some examples of how you have cross referenced communications in your manual? Can you show me some examples of how you have cross referenced emergency preparedness and response programs and plans in your manual?	Yes, Element 6 to Elements 2, 5, 7 and 12 Yes, Element 9 to Elements 6 and 7 Yes, Element 11 to Element 12 and Plant O&M Manual
Cover, in the EMS Manual, all applicable, relevant, and selected critical control points for biosolids management activities throughout the biosolids value chain.	Were Critical Control Points, as identified in the Manual of Good Practice – Appendix F, for biosolids management activities throughout the biosolids value chain considered during program development?	Yes, Element 3, Table 3.1 Critical Control Points
In the EMS Manual, include or cross-reference all operational controls, procedures, processes, and other management methods used to achieve and maintain compliance with legal and other requirements.	Can you provide examples showing how operational controls, procedures, processes, and other management methods used to achieve and maintain compliance with legal and other requirements are cross referenced in the EMS manual?	Yes, Element 4 to Element 3
In the EMS Manual, describe those biosolids management activities assigned to and performed by contractors.	Does the EMS manual state which Biosolids management activities are assigned to contractors?	Yes, Element 7, Table 7.1 Roles and Responsibilities – Internal EMS Team
Contain in the EMS Manual must be documentation of support for the NBP letter of understanding.	Does the EMS Manual contain documentation of support for the NBP letter of understanding?	Yes, Element 1, pages 5-7, Figure 1.1 – Letter of Understanding

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	2	Audit Number:	02-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock, Wastewater Plant Supervisor		
Audit date(s)	3/31/2011		
List nonconformances:	<ol style="list-style-type: none"> 1. 2. 3. 4. 5. 6. 7. 		
Comments:	All the audited requirements for Element 2 of the Grand Rapids Biosolids EMS Manual have been met.		

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/31/2011 signature: Gary De Kock

Joint review with EMS coordinator: (MM/DD/YYYY) 04/05/2011 initials: [Signature]

Table 16.1.2 – Internal Auditor’s Minimum Question Checklist

Element 2 Biosolids Management Policy		Record audit number from worksheet: 02-2011-01
Requirement	Questions/Considerations	Auditor Notes
Establish a Biosolids Management Policy that commits the organization to following the principles of conduct set forth in the Code of Good Practice and may include other biosolids commitments the organization voluntarily chooses to adopt.	Does the biosolids EMS commit our organization to the “Code of Good Practice”?	Yes, Element 2, pages 1-2
Communicate the policy to employees, contractors, and all interested parties.	Can you show me how the biosolids management policy was communicated to employees, contractors, and interested parties?	Yes, Employees and Contractors- see Training Records/Programs drawer in maintenance conference room. Interested Parties – see Public Participation in Planning folder in office of ESD Manager, covered in plant tour PowerPoint, covered at annual industrial users meeting
Incorporate the policy into the organization's biosolids programs, procedures, and practices.	Can you show me some examples of how the biosolids management policy has been incorporated into programs, procedures, and practices?	Compliance, Element 5 Table 5.1 Goals and Objectives Emergency Response, Element 11 Table 11.1 Emergency Response Information - Contractor
Maintain a pretreatment program consistent with state and federal regulations identified in the NPDES permit.	Can you show an SOP used to insure compliance with a state or federal regulation?	Yes, http://sapesd01/SOP/default.aspx , SOP 2701 IPP Annual Inspections
Monitor mercury in the plant influent and effluent and maintain existing pollutant minimization plan (PMP) practices and procedures identified in the NPDES permit.	Can you show me results from your mercury monitoring of the plant influent or effluent?	Yes, T:\EPSD\Ipp\Annual Report-IPP, Hg\Annual Report 2010\Mercury Report
Develop contract dewatering specifications and contracts which emphasize product handling and final disposal.	Can you show me language in your dewatering specifications which emphasizes product handling and final disposal?	Yes, on SharePoint GVRBA site, Shared Documents, “Joint Biosolids Management Project Agreement”

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: Conformance Nonconformance	
Element No.	3	Audit Number:	03-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock, Wastewater Plant Supervisor		
Audit date(s)	3/31/2011		
List nonconformances: 1. 2. 3. 4. 5. 6. 7.			
Comments: All the audited requirements for Element 3 of the Grand Rapids Biosolids EMS Manual have been met.			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3 / 31 / 2011 signature: Gary De Kock

Joint review with EMS coordinator: (MM/DD/YYYY) 04 / 05 / 2011 Initials: [Signature]

Table 16.1.3 – Internal Auditor’s Minimum Question Checklist

Element 3 Critical Control Points		Record audit number from worksheet: 03-2011-01
Requirement	Questions/Considerations	Auditor Notes
Identify and document the critical control points of the organization’s biosolids management activities throughout the biosolids value chain, consistent with those identified in the National Manual of Good Practice and other authoritative sources.	Was Appendix F in the Manual of Good Practice considered when identifying your critical control points? Were all critical control points identified in Appendix F which were applicable to our operation implemented in our biosolids EMS?	Yes, Element 3 Table 3.1 Critical Control Points Yes, Element 3 Table 3.1 Critical Control Points
Identify potential or actual environmental impacts at each critical control point.	Have potential or actual environmental impacts for each critical control point been identified? Is the list complete?	Yes, Element 3 Table 3.1 Critical Control Points, Column 3 - Environmental Impacts Yes
Keep up-to-date information on the organization's critical control points.	Is up to date information maintained on Critical Control Points?	Yes, Element 3 Table 3.1 Critical Control Points, Column 4 – Monitoring and Measurement (Example - annual inspections records in IPP Office) Element 7 Figure 7.2 Schedule of Annual Biosolids Activities, CCP Periodic Review
Maintain records that link each critical control point and its potential environmental impacts with the corresponding operational controls.	Are records maintained which link critical control points, environmental impacts, and operational controls?	Yes, Element 3 Table 3.1 Critical Control Points, Column 4 - Monitoring and Measurement (Example - SIU permits in IPP Office)
For organizations that have successfully completed a third party verification audit, provide notification to the NBP (and assigned third-party verification auditor) following any operational change that requires a change to the identified critical control points or environmental impacts associated with the critical control points.	Have you had any operational changes that required a change to the identified critical control points or environmental impacts associated with the critical control points?	No

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: Conformance Nonconformance	
Element No.	4	Audit Number:	04-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock, Wastewater Plant Supervisor		
Audit date(s)	3/31/2011		
List nonconformances:	<ol style="list-style-type: none"> 1. 2. 3. 4. 5. 6. 7. 		
Comments:	All the audited requirements for Element 4 of the Grand Rapids Biosolids EMS Manual have been met.		

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/31/2011 signature: Gary De Kock

Joint review with EMS coordinator: (MM/DD/YYYY) 01/05/2011 initials: [Signature]

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: Conformance Nonconformance	
Element No.	5	Audit Number:	05-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock, Wastewater Plant Supervisor		
Audit date(s)	3/31/2011		
List nonconformances:	<ol style="list-style-type: none"> 1. 2. 3. 4. 5. 6. 7. 		
Comments: All the audited requirements for Element 5 of the Grand Rapids Biosolids EMS Manual have been met.			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/31/2011 signature: Gary De Kock

Joint review with EMS coordinator: (MM/DD/YYYY) 04/05/2011 initials: [Signature]

Table 16.1.5 – Internal Auditor’s Minimum Question Checklist

Element 5 Goals and Objectives		Record audit number from worksheet: 05-2011-01
Requirement	Questions/Considerations	Auditor Notes
Establish and periodically review measurable biosolids program goals and objectives for biosolids management activities.	<p>Are goals and objectives established?</p> <p>Are goals and objectives periodically reviewed?</p> <p>Do they support the four NBP outcome areas?</p>	<p>Yes, 2011 folder in SharePoint EPSD-Enterprise Site >EMS >EMS Documents>Annual Goals and Objectives>Goals for Calendar Year 2011</p> <p>Yes, 2011 folder in SharePoint EPSD-Enterprise Site >EMS >EMS Documents>Annual Goals and Objectives>Goals for Calendar Year 2011</p> <p>Yes, Element 5 Table 5.1 Goals and Objectives, Key Outcomes</p>
Reflect, in program goals and objectives, identified priorities for improving environmental performance of biosolids management activities based on critical control points, identified or potential environmental impacts, legal and other requirements, and applicable best management practices as defined in the National Manual of Good Practice and various authoritative sources on biosolids management (e.g., Water Environment Federation Manuals of Practice).	Do the goals and objectives identified in Table 5.1 reflect a commitment on the part of the City to improving the environment or biosolids quality?	Yes, Element 5 Table 5.1 Goals and Objectives, column 5
Consider, in developing program goals and objectives, input from interested parties developed through proactive public participation.	Is there evidence that input from interested parties was considered in developing goals and objectives?	Yes, 2011 folder, Form 5.2 Public Participation – Annual Goals and Objectives Selection, in SharePoint EPSD-Enterprise Site >EMS >EMS Documents>Annual Goals and Objectives>Goals for Calendar Year 2011
Integrate goals and objectives with other elements of the EMS and biosolids management activities.	Are goals and objectives integrated with other elements of the EMS?	Yes, Element 17 Table 17.1 Periodic Management Review of Performance Report and Element 15, page 1
Develop program goals and objectives using SMART criteria (I.e., be Specific, Measurable, Achievable, Relevant, and Time-bounded).	<p>Is there evidence that a SMART criterion was used to select goals and objectives?</p> <p>Does each goal and objective meet SMART criteria requirements?</p>	<p>Yes, see Form 5.1 Goals & Objectives Annual Review, Compliance check list and comments</p> <p>Yes, Element 5 Table 5.1 Goals and Objectives Annual Review in SharePoint EPSD-Enterprise Site >EMS >EMS Documents>Annual Goals and Objectives>Goals for Calendar Year 2011</p>
Update program goals and objectives on a regular basis.	Are goals and objectives regularly updated?	Yes, see quarterly reports in SharePoint EPSD-Enterprise Site >EMS >EMS Documents>Annual Goals and Objectives>2010 Goals-Quarterly Reports
Establish an action plan that describes those improvement activities it is pursuing to achieve biosolids program goals and objectives. Designate, in the action plan, schedules, milestones, resources, and responsibilities for achieving biosolids program goals and objectives.	<p>Are action plans in place for each goal?</p> <p>Does each action plan contain schedules, milestones, resources, and responsibilities to achieve the objectives?</p>	<p>Yes, see SharePoint EPSD-Enterprise Site >EMS >EMS Documents>Annual Goals and Objectives>Goals for Calendar Year 2011</p> <p>Yes, see SharePoint EPSD-Enterprise Site >EMS >EMS Documents>Annual Goals and Objectives>Goals for Calendar Year 2011</p>

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: Conformance Nonconformance	
Element No.	6	Audit Number:	06-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock, Wastewater Plant Supervisor		
Audit date(s)	3/31/2011		
List nonconformances:	<ol style="list-style-type: none"> 1. 2. 3. 4. 5. 6. 7. 		
Comments:	All the audited requirements for Element 6 of the Grand Rapids Biosolids EMS Manual have been met.		

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/31/2011 signature: Gary De Kock

Joint review with EMS coordinator: (MM/DD/YYYY) 04/05/2011 initials: [Signature]

Table 16.1.6 – Internal Auditor’s Minimum Question Checklist

Element 6 Public Participation in Planning		Record audit number from worksheet: 06-2011-01
Requirement	Questions/Considerations	Auditor Notes
Select and implement a proactive public participation approach to involve interested parties in its Biosolids Management Program and EMS planning process.	Is there evidence that a proactive process was selected and implemented to seek public participation near the beginning of the EMS planning process?	Yes, process selected and documented in Element 6, see Public Participation in Planning folder in office of ESD Manager
Reflect, in the selected approach, the organization’s commitments to the ten principles in the Code of Good Practice, including a plan for independent third-party verification of conformance with the EMS Elements.	Does element 6 commit the City to the Code of Good Practice?	Yes, Element 6, page 1-2
	Does element 6 include information on the third party verification audit?	Yes, Element 6, page 2
Select an approach that is consistent with the degree of current public interest, history of public involvement, method of biosolids management, and related local circumstances.	Is the City’s approach to public participation consistent with the degree of current public interest in the City’s biosolids program?	Yes documentation in Public Information Requests folder in office of ESD Manager, informational needs are being met
Provide interested parties with meaningful opportunities to express views and perspectives relative to biosolids management activities, including concerns about environmental impacts, biosolids program performance, and potential areas for improvement.	Were opportunities provided for interested parties to provide input into the biosolids EMS? Did it include environmental impacts? Did it include biosolids program performance? Did it include potential areas for improvement?	Yes, internet feedback option, invitations to comment mailed to interested parties Yes, included in mailing Yes, included in mailing Yes, included in mailing
Consider input from interested parties in initially developing program goals and objectives during EMS implementation and in updating them as part of periodic review of biosolids management program performance.	Did the City consider input from interested parties when initially developing its program goals and objectives? Did the City consider input from interested parties when updating them as part of its periodic review of biosolids management program performance?	Yes documented in Public Participation in Planning folder in office of ESD Manager Yes documented in Public Participation in Planning folder in office of ESD Manager as request for 2011 Goals and Objectives feedback
The City will maintain information related to the Biosolids management program and processes on the City’s internet website.	Can you show the Biosolids information on your website?	Yes, http://www.ci.grand-rapids.mi.us/4143
The City offers plant tours which can be customized to meet the needs of the group.	Can you show how information relating to Biosolids is communicated during plant tours?	Yes, see T:\EPSD\WWTP tour PowerPoint - New\current tours\New Tour 2010
Records will be maintained to document the City’s responsiveness to public input and requests for information regarding the Biosolids EMS.	Can you show your records in regard to public input?	Yes, documentation in Public Information Requests folder in office of ESD Manager
A list of interested parties must be created.	Can you show your up to date list of interested parties?	Element 6, Table 6.2 - Interested Parties is up to date

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	7	Audit Number:	07-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock, Wastewater Plant Supervisor		
Audit date(s)	3/31/2011		
List nonconformances:	<ol style="list-style-type: none"> 1. 2. 3. 4. 5. 6. 7. 		
Comments:	Figure 7.1 – Organizational Chart is dated November 2009. This chart is out of date due to reorganization. <i>per discussion during review - just reference Sharepoint Organizational Chart.</i>		

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/31/2011 signature: Gary De Kock

Joint review with EMS coordinator: (MM/DD/YYYY) 04/05/2011 initials: [Signature]

Table 16.1.7 – Internal Auditor’s Minimum Question Checklist

Element 7 Roles and Responsibilities		Record audit number from worksheet: 07-2011-01
Requirement	Questions/Considerations	Auditor Notes
Establish and maintain records of the assigned roles and responsibilities for the Biosolids Management Program and activities. These records shall define and document roles and responsibilities of employees for performing biosolids management activities and EMS functions.	Can you show examples of how responsibilities have been assigned for the biosolids EMS?	Yes, Element 7, Table 7.1 Roles and Responsibilities – Internal EMS Team
Appoint an individual with overall responsibility for ensuring that Biosolids Management Program and EMS are implemented and maintained.	Has an EMS coordinator who has overall responsibility for the biosolids EMS been assigned?	Yes, Element 7, Table 7.3 Internal EMS Team
Provide the human, technical, and financial resources necessary to effectively execute these responsibilities.	Can you provide evidence of adequate staffing to carry out assigned responsibilities? Can you provide evidence of adequate maintenance and instrumentation services to carry out assigned responsibilities? Can you provide evidence of adequate financial resources to effectively execute these responsibilities?	Yes, Element 7, Table 7.1 Roles and Responsibilities – Internal EMS Team Yes, lab instrument log books and Maximo records Yes, “Water/Sewer Rate Study” at http://www.grand-rapids.mi.us/2678
Define and document the roles and responsibilities of contractors retained to perform various biosolids management activities and EMS functions through Service Agreements.	Have roles and responsibilities of contractors been defined in their service agreements?	Yes, service agreements in office of ESD Manager
The organizational chart shown in Figure 7.1 shows the reporting structure in place at the Grand Rapids facility.	Is your organizational chart up to date?	Element 7, Figure 7.1 - Organizational Chart (November 2009) needs to be updated due to reorganization
The contractor is responsible for following policies and procedures they develop which are necessary to ensure that operations are conducted in a safe and environmentally sound manner.	Is your contractor prepared to respond to emergency situations? Does your contractor have a safety program?	Yes, Spill Response Plan in office of ESD Manager Yes, in office of ESD Manager

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	8 – Training	Audit Number:	8-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock (WPS-EA/WPS-OP) Dave Harris (Utility Supervisor – Operations)		
Audit date(s)	March 11, 2011		
List nonconformances:	1. 2. 3. 4. 5. 6. 7.		
Comments:	All training files are well organized and kept in a file cabinet downstairs. Some of the training has been scanned and is being kept on Sharepoint ESD EMS site, but this is in progress. Not all the training is on Sharepoint, but all records of the training is in the file cabinet maintained by WPS-Maint.		

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/11/11 signature: *Dave J. Harris*

Joint review with EMS coordinator: (MM/DD/YYYY) 04/11/2011 Initials: *[Signature]*

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	9 – Communication & Public Outreach	Audit Number:	9-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock (WPS-EA/WPS-OP) Dave Harris (Utility Supervisor – Operations)		
Audit date(s)	March 12, 2011		
List nonconformances:	1. 2. 3. 4. 5. 6. 7.		
Comments: Performance reports and goals up to date. Biosolids EMS coordinator is working on the 2010 Biosolids performance report for 2010 and goals for 2011 and will be posted soon.			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/12/11 signature: David J. Harris

Joint review with EMS coordinator: (MM/DD/YYYY) 04/11/2011 Initials: [Signature]

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Table 16.1.9 – Internal Auditor’s Minimum Question Checklist

Element 9 Communication and Public Outreach		Record audit number from worksheet: 9-2011-01
Requirement	Questions/Considerations	Auditor Notes
Establish and maintain a proactive Communications Program that provides ongoing information about the Biosolids Management Program and EMS to interested parties and the public, consistent with local circumstances, the method of biosolids management, public communications history, and degree of current interest in its Biosolids management activities.	How is information about the biosolids EMS communicated to employees and other interested parties?	Information about EMS is communicated to employees through discussion amongst each other as well as communicated through Sharepoint. Biosolids EMS is also available to the public and other interested parties through the GRCITY.US website under (Environmental Protection). Information is also integrated into our tours as well as certain construction projects.
Include a procedure for receiving inquiries and requests for information from interested parties about its biosolids management activities and EMS. The procedure shall define a process for assuring a timely and complete response to inquiries by interested parties.	How can interested parties request information about the City’s biosolids EMS? How do you assure that information is provided promptly? How do you track requests for information?	Through the internet or via direct phone conversation. The Public Request For Information Form, which is contained in element 9. This form is completed by ESD employees directly involved with the public and then reviewed and coordinated by the WPS OP / EA, the ESD Manager and EMS Coordinator. The ESD Manager previously kept a folder file in his office, but posted 2010 requests for information on Sharepoint. They were easy to find.
At a minimum, make the following information about the organization’s Biosolids management program and activities available to interested parties: a) the Biosolids Management Policy; b) applicable legal and other requirements; c) biosolids program goals and objectives for continual improvement; d) the periodic Biosolids Management Program Performance Report; and e) a detailed report of the independent, third party EMS verification audit results.	Is the Biosolids Management Policy available to interested parties? Are legal and other requirements available to interested parties? Are goals and objectives available to interested parties? Is the periodic biosolids management program performance report available to interested parties? Is third party audit and verification audit results available to interested parties?	Yes via GRCITY.US Website or via request by phone or email. Yes via the City Website or provided by request. Yes via the City Website or provided by request. Yes. 2006 thru 2009 performance reports are posted on the website, but the 2010 report has not been posted as of March 12, 2010. This information can also be provided personally if requested. Verification and interim audits are on the City Website and available upon request.
Define roles and responsibilities of outside contractors in the Communications Program.	Is there evidence of how contractors are to handle requests for information in element 9?	RFI’s are coordinated through the WPS-EA/WPS-OP as stated in element #9.
Communicate relevant information about biosolids management activities and the Biosolids Management Policy, and all seventeen elements of the EMS to employees and outside contractors, consistent with assigned roles and responsibilities.	Is there evidence that information about the biosolids EMS is communicated to employees and contractors?	Yes. All the EMS training is kept track of. Training attendance forms are maintained by Kathie Kuzawa.
Completion of Public Request for Information Form each time information is sent to the public.	Review Public Request for Information Forms completed in the last year for completeness.	Four public requests for information were reviewed and completed. They were posted in Sharepoint under EMS in a special folder for RFI’s.

Figure 9.1 Public Request for Information Form

PUBLIC REQUEST FOR INFORMATION FORM	
Request date: 8/14/10	Completion date: 8/14/10
Requestor(s) (name, title, organization): Reta Rogers 2144 Horton SE Grand Rapids, MI 49507	
Requestor(s) contact information (telephone) email, mailing address, etc.): 616-890-4062	
City respondent: Dave Harris - Utility Supv. - Ops.	
Nature of request: Inquired about grease trapper. Dropped one off at her location.	
Summary of response: Provided one and thanked her for her concern about fats and oils. She said that she would spread the word to others she knows.	
Method of response (email, (telephone), letter, meeting, etc.): in person.	
Add to interested parties list? Yes / <input checked="" type="radio"/> No If yes, contact by email? Yes / No Email _____	

Submit completed forms to EMS Coordinator

Submitted: (MM/DD/YYYY) 8/14/10

By: Dave Harris

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Figure 9.1 Public Request for Information Form

PUBLIC REQUEST FOR INFORMATION FORM	
Request date: 8/27/10	Completion date: 8/27/10
Requestor(s) (name, title, organization): Dan Schoonmaker, MIBIZ	
Requestor(s) contact information (telephone, email, mailing address, etc.): Dan Schoonmaker – MI-Biz	
City respondent: Mike Lunn	
Nature of request: Information regarding CSO and Plant Projects	
Summary of response: Meet with him for a couple hours and discussed a variety of topics. A 3 part series will appear in MI-BIZ	
Method of response (email, telephone, letter, meeting, etc.): Phone and in person	
Add to interested parties list? No If yes, contact by email? Yes / No Email _____	

Submit completed forms to EMS Coordinator

Submitted: (MM/DD/YYYY) 9/16/2010 By:  Mike Lunn

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Figure 9.1 Public Request for Information Form

PUBLIC REQUEST FOR INFORMATION FORM	
Request date: 9/14/10	Completion date: 9/15/10
Requestor(s) (name, title, organization): Wood TV, Wood Radlo and Fox TV	
Requestor(s) contact Information (telephone, email, mailing address, etc.): Wood TV 291-0378 FOX TV 295-4149 Wood Radio -	
City respondent: Mike Lunn	
Nature of request: Information regarding scum on river.	
Summary of response: Was interviewed with cameras for both TV stations and did sound clip for radio. Posted information on Website and Facebook Page.	
Method of response (email, telephone, letter, meeting, etc.): Phone and in person	
Add to interested parties list? No If yes, contact by email? Yes / No Email _____	

Submit completed forms to EMS Coordinator

Submitted: (MM/DD/YYYY) 9/16/2010 By:  Mike Lunn

Electronic copies on the "Sharepoint" are considered controlled. All other copies are to be considered uncontrolled

Figure 9.1 Public Request for Information Form

PUBLIC REQUEST FOR INFORMATION FORM	
Request date: 9/16/10	Completion date: 9/16/10
Requestor(s) (name, title, organization): Bob Heacox – Grand Haven Resident	
Requestor(s) contact information (telephone, email, mailing address, etc.): Bob Heacox 616-566-8404	
City respondent: Mike Lunn	
Nature of request: Information regarding CSO.	
Summary of response: Spoke with him regarding the CSO project and directed to good sources of information.	
Method of response (email, telephone, letter, meeting, etc.): Phone and In person	
Add to interested parties list? No If yes, contact by email? Yes / No Email _____	

Submit completed forms to EMS Coordinator

Submitted: (MM/DD/YYYY) 9/16/2010 By:  Mike Lunn

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	10 – Operational Controls Of Critical Control Points	Audit Number:	10-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock (WPS-EA/WPS-OP) Dave Harris (Utility Supervisor – Operations)		
Audit date(s)	March 19, 2011		
List nonconformances:			
1.			
2.			
3.			
4.			
5.			
6.			
7.			
Comments:			
<ul style="list-style-type: none"> SOP 3602 (Blended sludge tank operation) was deleted. Tanks no longer used. Added line to SOP 3608 under purpose of SOP to read "when in use." Moved SOP's 3607 and 3608 from centrifuge dewatering to raw sludge storage section of table 3.1. SOP's 3610 thru 3613 were approved and are now accessible to staff. SOP's 3124, 3301, 3510, 3569 and 3601 are checked out and are under review for modifications. 			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/19/11 signature: David J. Haw
4/2/11

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	11 -- Emergency Preparedness & Response	Audit Number:	11-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock (WPS-EA/WPS-OP) Dave Harris (Utility Supervisor - Operations)		
Audit date(s)	March 12, 2011		
List nonconformances:	1. 2. 3. 4. 5. 6. 7.		
Comments:	Contractor has Emergency Biosolids Spill Plan. It is maintained and is effective.		

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/18/11 signature: *David J Harris*

Joint review with EMS coordinator: (MM/DD/YYYY) 04/07/2011 Initials: *DH*

**Cordes Trucking Inc.
Policies and Procedures**

Title	Biosolids Spill Plan	
Policy Number	Spill Plan - 2009-1	
Issued	7/14/09	
Revision No	None	
Approved	Charlie Cordes	

(Copy)

Purpose:


To establish a procedure for the proper clean-up of spills and accidents

Procedure:

Drivers involved in spills should:

- Stay at the scene and immediately ensure that the spill does not present a hazard to traffic
- Park truck to block and prevent traffic from hitting or driving thru spill
- Set out flares and/or triangles to warn motorists of potential hazards
- Contacted the local police department ASAP when the spill is on a public road

Original in
Cordes SOP
Manual at
Cordes.



Contact the Cordes Project manager immediately to direct spill clean up.

IMPORTANT FACTS TO INFORM CLEAN UP PERSONNEL REGARDING BIOSOLIDS CLEAN UP

Never wash biosolids into a storm drain. Take all possible steps to keep biosolids out of drains. Biosolids are non-hazardous. Clean up personnel should use standard cleanliness practices. Keep biosolids from direct contact with eyes, mouth or open wounds. Wash hands prior to eating or smoking.

In the event of a spill, Cordes Trucking, Inc. will take the following action immediately:

- 1) Halt Source of Spill if possible. Use of any leaking or damaged unit, which is causing the spill, will cease immediately. The unit will be repaired before resuming use.
- 2) Contain Spill. In the event large quantities of biosolids have been spilled, straw bales will be used where available to either form a barrier or soak up biosolids.
- 3) Clean up. Depending on the type and amount of biosolids, a variety of equipment may be used to remove the biosolids: vacuum biosolids applicator, front-end loader, wet Vac truck, shovels, squeegees, and brooms. Any biosolids removed from the spill site will be taken to an approved sanitary landfill for disposal.
- 4) Final Clean up. Roadways will be flushed with water and/or swept as necessary to clean. Final clean-up should be completed immediately to the satisfaction of the owner.

- 5) Management of Clean-up Efforts. The project manager shall take immediate charge and initiate clean up activities. Cordes labor shall be used with additional labor secured as needed. The project manager shall communicate with the public on the scene to answer questions and advise of clean up activities.
- 6) Reporting. The project manager shall notify the City of Grand Rapids Utility Supervisor in Operations immediately of any biosolids spills at 616.456.3639 (office) or 616.262.5510 (cellular). The biosolids generator will also be notified as soon as practical. Project manager shall relay any relevant information regarding the spill, including how it occurred and remedial action taken. All spills will be reported immediately to MDEQ and the Health Dept. A written report to these agencies will follow if required.

(COPY)

Cordes Trucking Contact Information

Project Manager: Charlie Cordes (616) 877-9935

OTHER CONTACT INFORMATION:

Generator: City of Grand Rapids WWTP – (616) 456-3813
Gary De Kock - WWTP Supervisor EA / OP
City of GR – WWTP Ops (24 hrs) (616) 456-3639

Regulatory Agency: MDNR-E Hotline (800) 292-4706
(Michigan Department Of Natural Resources & Environment)

BIOSOLIDS SPILL PREVENTION PLAN

Truck drivers shall take the following steps:

- a. Wash or scrape off any biosolids deposited on the outside of the truck/trailer during the loading process before leaving the wastewater treatment plant.
- b. Ensure that end gates are closed and properly latched prior to leaving the wastewater treatment plant.
- c. Ensure that tarps are properly positioned to cover the entire load during transport to the landfill prior to leaving the wastewater treatment plant.

- d. Inspect all tailgate seals periodically and replace as necessary.
- e. Check trailers prior to loading to ensure that tailgates are properly secured.
- f. Check trailers for any leaks or damage that may jeopardize proper loading procedures. Do not load until repairs have been made to the satisfaction of the project manager.
- g. Wash or scrape of any biosolids that may have been deposited on the outside of the trailer during loading.

(Copy)

GRAND RAPIDS, MICHIGAN WASTEWATER TREATMENT PLANT SPILL PREVENTION PLAN

Biosolids are loaded directly into transport (dump trailers) vehicles. Biosolid loading is located such that, if spillage occurs, material is contained on a concrete pad. Should leachate or runoff occur it is contained in the facilities under drain system and returned to the head of the plant for treatment.

Biosolids will be transported to the appropriate landfills utilizing proper haul routes (Market Ave., I-196, U.S. 131, I-96, and local truck routes into the landfills). Other haul routes will be used only if special circumstance's dictate. In the event that special haul routes are necessary city officials will be notified.

Biosolids will be off loaded at each of the designated landfills and handled accordingly within each landfills operational procedures for disposal.

Cache Biosolids transport vehicles shall be maintained in accordance with all applicable Michigan Department of Transportation (MDOT) regulations.

All Biosolids transport vehicles shall carry a copy of the attached *Biosolids Spill Control Plan*, outlining the steps to be utilized for spill containment, cleanup, and reporting.

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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	12 – Documentation & Document Control	Audit Number:	12-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Gary De Kock (WPS-EA/WPS-OP) Dave Harris (Utility Supervisor – Operations)		
Audit date(s)	March 24, 2011		
List nonconformances:	1. 2. 3. 4. 5. 6. 7.		
Comments:	 		

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 3/24/11 signature: *Dave J Harris*

Joint review with EMS coordinator: (MM/DD/YYYY) 04/08/2011 Initials: *DJH*

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Table 16.1.12 – Internal Auditor’s Minimum Question Checklist

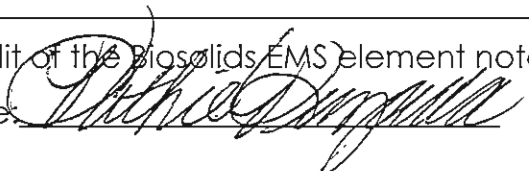
Element 12 EMS Documentation and Document Control		Record audit number from worksheet: 12-2011-01
Requirement	Questions/Considerations	Auditor Notes
Establish and maintain documentation, documents, and records for the Biosolids Management program including the seventeen elements of its EMS.	How is the Biosolids EMS documented? How are records of the Biosolids EMS maintained?	It is documented on the City of Grand Rapids’ website. It is also documented in Sharepoint. SOP’s and EMS Biosolids elements are maintained in Sharepoint.
Establish and maintain document control procedures and practices to ensure that its Biosolids Management program documentation and documents are: a) available and can be easily located, b) created following established document creation protocols, c) kept up to date through periodic reviews and revision (if applicable), d) properly marked with version number, effective date(s), and references to replaced or superseded versions, and e) approved by authorized personnel.	Is there a document control procedure in place? Are documents available and easily located? Do they follow established document creation protocols? Are they kept up to date? Are they marked with revision number? Are they marked with an effective date? Are they approved by authorized personnel?	Yes. Yes. They are located in Sharepoint and are available to employees. Yes. SOP # 1110 addresses this. Yes. Yes. Revisions are tracked in Sharepoint. Yes. Yes.
Establish and maintain records of biosolids management activities and ensure that they are: a) available and can be easily located, and b) retained for the specified period of time	Are records of Biosolids management activities maintained? Are the records available and easily located? Are the records retained for the specified period of time?	Yes. Yes. Yes. Element #12 mentions this in table 12.2.
Establish documentation, document control and record requirements for Biosolids management activities conducted by its contractors in Service Agreements, and incorporate these requirements into its EMS for biosolids.	Have contractors implemented document control procedures? Have requirements for document control procedures been included in service contracts?	Yes. Yes.

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: Conformance Nonconformance	
Element No.	13	Audit Number:	13-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Kathie Kuzawa - SWMS		
Audit date(s)	March 14 - 21, 2011		
List non-conformances:			
<p>Comments: Reviewed Element 13. I found that 2a "Quarterly Legal and Other Requirements Document Review" was not changed to "Annual Legal and Other Requirements Document Review" as it should have been as a result of 2010 annual internal audit. Changed title and cleaned up some language in 1d. Non-conformance 2010-09 needs to be resubmitted with typo's corrected.</p>			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor - 03/22/2011 signature: _____



Joint review with EMS coordinator: (MM/DD/YYYY) 03/22/2011 initials: _____

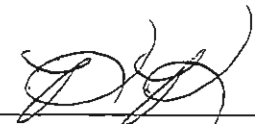


Table 16.1.13 – Internal Auditor’s Minimum Question Checklist

Element 13 Monitoring and Measurement		Record audit number from worksheet: 13-2011-01
Requirement	Questions/Considerations	Auditor Notes
Establish and maintain regular monitoring and measurement procedures and practices for all biosolids management activities to assure compliance with applicable legal and other requirements, measure biosolids program performance at critical control points, and track progress toward achieving program goals and objectives.	Are procedures in place to conduct regular monitoring and measurement practices for all Biosolids management activities?	YES – Procedures for tracking progress towards goals and objectives are in place (<i>Action Plan- Quarterly Progress Report table 13.1 ad figure 5.1 Action Plan Status Worksheet</i>). Reports are given to the EMS Coordinator on a quarterly basis. I reviewed quarterly reports submitted to the EMS Coordinator in EMS file. There is also a means in place if any of the reports are found to be deficient (meeting with EMS Coordinator. Legal requirements that are associated with the goals are to be reviewed annually (in July) and submit a completed report form per Element 13 - CCP Periodic Review (<i>see figure 3.1</i>). Compliance Inspection of Contractors Activities (<i>see form 10.2 for each contractor</i>) is completed on a quarterly basis. Annually, operational controls are reviewed for each CCP (<i>see form 10.1</i>), goals and objectives are reviewed (<i>see form 5.2</i>), internal audit is performed (<i>see element 16</i>) and a meeting is held with the department director to review prior years activities. Reviewed documents on file, they conform to procedure in place.
Record monitoring and measurement results and maintain records as established in the record keeping procedures under Element 12.	Provide examples of monitoring and measurement data?	Man hours in CMMS program - per person, per specific job classification, per specific time frame. Customer Satisfaction - % of Service Requests surveyed, minimum % satisfied with service. Corrective maintenance work orders vs preventive maintenance work hours per CMMS program.
Require contractors to establish and maintain regular monitoring and measurement procedures and practices for all their assigned biosolids management activities, as defined in their service agreement.	Have contractors implemented regular monitoring and measurement procedures for activities they are responsible for? Provide example data?	Where are contractor’s records? E-mailed Dave Harris 3/21/11 – Reviewed with Dave Harris
Require responsible supervisor to create action plan for each objective they are assigned under element 7.	Is there an action plan for each objective? Was it created by the assigned supervisor and/or contractor? Has each objective been assigned to a supervisor? Are the roles of the appropriate supervisor and/or contractor spelled out in element 7, “Roles and Responsibilities”?	Q1 - YES – See tables 13.2, quarters 1, 2, 3 and 4 of 2010. Q2 – We have a lot of “delegates” whom are staff management making the Action Plans and the Quarterly Reports out for the assigned supervisor – language needs to be changed to reflect this (completed 3/23/2011). YES – 2010 objectives were assigned to a supervisor and 2011 objectives have been assigned (<i>see table 5.1</i>). YES – <i>see table 7.1, Roles and Responsibilities</i>

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Element 13 Monitoring and Measurement		Record audit number from worksheet: 13-2011-01	
Requirement	Questions/Considerations	Auditor Notes	
At a minimum, each action plan must meet contain: (a) schedule, (b) milestones, (c) resources required, (d) human resources required and their responsibilities.	Does each action plan contain: (a) schedule, (b) milestones, (c) resources required, (d) human resources required and their responsibilities?	YES – see table 13.2 Action Plan	
Appropriate Supervisor or contractor to submit a Progress Report, which will contain "Action Plan – Quarterly Progress Report" (see figure 13.1) and the "Action Plan Status Worksheet" (see figure 5.1) to the EMS coordinator within 30 days following the end of the calendar quarter for each objective.	Has a complete Progress Report been submitted within 30 days of the end of each calendar quarter for each objective? Are the roles of the appropriate supervisor and/or contractor spelled out in element 7, "Roles and Responsibilities"?	YES – Checked files in EMS Coordinators file cabinet, dates of submitted reports for each 2010 goal were within the specified range or had a non-conformance written except for It appears that there are communication issues when an "assigned supervisor" delegates responsibility to another supervisor. YES – see figure 7.2 "Schedule of Annual Biosolids Activities".	
Require "Action Plan – Quarterly Report" to contain activities that took place during the previous calendar quarter and any planned activities for the future.	Does "Action Plan – Quarterly Report" contain activities that took place during the previous calendar quarter and any planned activities for the future?	YES – Checked files in EMS Coordinators file cabinet under goals and Objectives.	
Require "Action Plan Status Worksheet" to reflect any changes in the "Action Plan" as per "plan, do, check, act" policy or any other techniques used to assess performance warrant. The document revision date shall reflect changes made in policy.	Was "Action Plan" modified appropriately per items included in "Action Plan Status Worksheet" and/or "Action Plan – Quarterly Report"? Do the revision dates reflect what appears to be conveyed in any and all reports?	YES – Action plans were modified appropriately (i.e., when goals were complete or eliminated) and modifications in the element and/or associated forms is detailed in EMS document revision history under each element. YES	
EMS Coordinator will schedule a meeting with the appropriate supervisor or contractor following the receipt of a written progress report.	Is this role of the EMS coordinator included in element 7, "Roles and Responsibilities"? Were meetings scheduled by the EMS Coordinator following receipt of the written progress report?	YES	

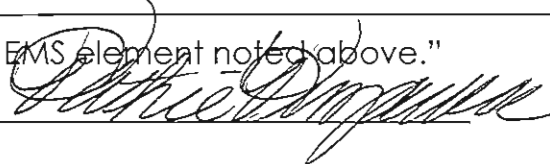
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Table 16.1 Internal Auditor's Worksheet

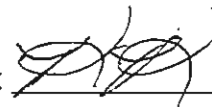
Auditors Worksheet		Circle one: <input type="radio"/> Conformance <input checked="" type="radio"/> Nonconformance	
Element No.	14	Audit Number:	14-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Kathie Kuzawa - WPS, Maintenance		
Audit date(s)	March 24, 2011		
List non-conformances:			
<p>1 - Did find in SOP 1110 that when "Note: The EMS Coordinator must be advised of any changes in current SOP's or of any new SOP's that are associated with a Critical Control Point." Was added to address Non-conformance 2010-10, history was not updated at the bottom of the SOP – Fixed immediately (non-conformance 2011-02).</p>			
<p>Comments: The fact that we did have 10 (ten) "Non-conformances" in 2010 shows that we monitor and report items that do not conform to our EMS elements. Most of the non-conformances appear to be due to lack of familiarity with new or changed roles and responsibilities within the Biosolids EMS Program. Suggest that new methods are implemented to help staff stay on track.</p>			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 03/24/2010 signature: _____



Joint review with EMS coordinator: (MM/DD/YYYY) 03/24/2011 Initials: _____



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Table 16.1.14 – Internal Auditor’s Minimum Question Checklist

Element 14 Nonconformance’s: Preventive and Corrective Action		Record audit number from worksheet: 14-2011-01
Requirement	Questions/Considerations	Auditor Notes
Develop and implement a procedure to investigate any noncompliance with applicable regulatory requirements and/or nonconformance with internal EMS procedures identified during routine monitoring and measurement or periodic internal EMS audits.	Show me the procedure you use to respond to nonconformance incidents?	See Element 14 Procedures 1 thru 11.
Develop and implement a procedure to identify the cause and take actions to correct the nonconformance.	What process is used to correct the nonconformance?	Under the direction of the EMS Coordinator, an “Investigation Committee” is formed to investigate the nonconformance. As part of the continual improvement process the committee utilizes various methods (i.e., root cause analysis) to avoid future non-conformances. The committee will normally be given 5 days to investigate the non-conformance and The investigation committee, in coordination with the EMS coordinator and the affected workgroups, will oversee implementation of a “Corrective Action Plan” and will submit a completed “Non-conformance – Investigation Committee Report Form” and “Corrective Action Plan” to the EMS Coordinator once the corrective action has been implemented and the nonconformance has been corrected.
Develop and implement a procedure to document the necessary corrective actions taken to prevent a recurrence.	How is nonconformance data tracked?	Non-conformance data is tracked by maintaining all records on any nonconformance including all relevant data and investigation committee reports along with recommendations and supporting documentation (including summary information of any nonconformance incidents) in the City’s “Periodic Biosolids Program Performance Report” and table 14.2.
Develop corrective action plans to address non-conformances identified during routine monitoring and measurement and identify the nonconformance, the root cause(s), and the corrective action being taken. In the corrective action plans, identify changes to policies, programs, plans, operational controls and monitoring/measurement procedures to prevent future non-conformances.	Is a corrective action plan system in place? How does it work?	YES - (see figure 14.1 and table 14.2). Each non-conformance is given a specific identification number and assigned a team to investigate the non-conformance. The Investigation findings, the root cause of the non-conformance, the resolution and associated corrective actions as well as the dates the non-conformance was discovered, the expected date of resolving the non-conformance as well as the actual completion date of the corrective action is tracked on the form. Any retraining of staff that is implemented as a result of the non-conformance is tracked also.
Establish formal corrective action plans to address finding of internal EMS audits and audits conducted by third parties. Document corrective action plans and describe what actions will be taken to address the audit findings, the	Is a corrective action plan system in place? How does it work?	YES - Same answers as above Did find in SOP 1110 that when “ <i>Note: The EMS Coordinator must be advised of any changes in current SOP’s or of any new SOP’s that are</i> ”

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Element 14 Nonconformance's: Preventive and Corrective Action		Record audit number from worksheet: 14-2011-01
Requirement	Questions/Considerations	Auditor Notes
individuals responsible, the estimated completion date, and required resources to develop and implement corrective and preventive action. Include recommended changes to policies, programs, plans, operational controls and monitoring/measurement procedures to prevent future non-conformances. Document these changes in the corrective action plan and in the EMS Manual and other relevant EMS documentation.		<i>associated with a Critical Control Point." Was added to address Non-conformance 2010-10, history was not updated at the bottom of the SOP.</i>
Track progress in completing the corrective actions and periodically update to reflect completion.	How is progress tracked?	Figure 14.1 and table 14.2 track the findings and recommendations of the non-conformance committee and tracks the progress as the non-conformance is resolved. Table 14.1 is a summation of the non-conformances and it is part of Element 14.
(If a non-conformance has been identified) The non-conformance investigating committee will normally be given 5 days to conduct their investigation. The committee chair may request additional time by submitting a request to the EMS Coordinator.	(If a non-conformance has been identified) Was the non-conformance investigation completed in 5 days? If not, was a written request for a time extension given to the EMS Coordinator?	<p>NO - Non-conformances that have been identified in 2010 (10) were not all investigated within the 5 day time limitation.</p> <p>Non-conformance (1), Identified 3/11/2010, Investigation complete 3/12/2010 – (typo in table 14.1 date completed and response time backwards) corrected.</p> <p>Non-conformance (2) and (3), Identified 3/21/10 during internal audit, Investigation complete 4/7/10 – delayed due to audit</p> <p>Non-conformance (4), Identified 5/1/10, Investigation complete 5/11/10, Person delegated responsibility for goal by WPS-Ops on vacation and did not submit reports in a timely manner.</p> <p>Non-conformance (5), Identified 8/1/10, Investigation complete 8/11/10, Person delegated responsibility for goal by WPS-Ops on vacation and did not submit reports in a timely manner.</p> <p>Non-conformance (6), Identified 8/1/10, Investigation complete 8/10/10, Person delegated responsibility for goal by WPS-Ops on vacation and did not submit reports in a timely manner.</p> <p>Non-conformance (7) and (8), Identified 8/1/10, Investigation complete 8/19/10, Person delegated responsibility for goal by WPS-Ops on vacation and did not know this responsibility was delegated to them.</p> <p>Non-conformance (9), Identified 11/08/10, corrected 11/08/10 Based on work schedule of staff person and they needed to complete quarterly reports to complete.</p> <p>Non-conformance (10), Identified 11/1/10, corrected 11/24/10. Due to staffing and vacations. Review and meeting with committee did not take place until 11/24. New Operational SOP's associated with critical control points are not listed on</p>

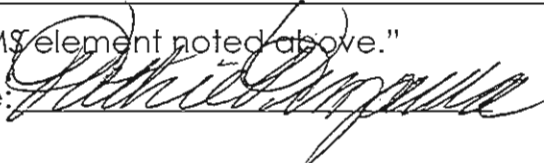
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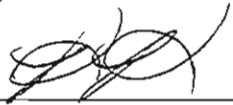
Element 14 Nonconformance's: Preventive and Corrective Action		Record audit number from worksheet: 14-2011-01
Requirement	Questions/Considerations	Auditor Notes
		table 3.1 and obsolete SOP's are listed here.
(If a non-conformance has been identified) The preliminary non-conformance report shall include the date the non-conformance occurred, all committee meeting dates, personnel interviewed and date interview took place, root cause analysis report, supporting documentation, recommended corrective action, recommended system changes, other observations and date corrective actions took place.	(If a non-conformance has been identified) Are all of the criteria included in the report? Are all recommended changes incorporated in the appropriate policies and/or elements? Is committee chairs responsibilities outlined in "Role and Responsibilities"(element 7)?	Yes
The EMS Coordinator will review the findings of the committee, include summery information in the Biosolids Program Performance, report and review same with the Department Director during the last quarter of the calendar year. Any non-conformance issues will be resolved within 2 weeks or as soon as practical.	How is the EMS Coordinators review of the report with the committee and subsequent review with the Department Director documented? Was a summery of the non-conformance report included in the Biosolids Program Performance Report? Were the non-conformances resolved within the desired time frame? Were any affected training programs modified? Did retraining take place as needed? Are responsibilities outlined in "Roles and Responsibilities" (element 7)?	The EMS Coordinators review of the report with the committee and subsequent review with the Department Director is documented in table 14.2. YES NO N/A YES

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one : Conformance Nonconformance	
Element No.	15	Audit Number:	15-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Kathie Kuzawa - WPS, Maintenance		
Audit date(s)	March 31, 2011		
List non-conformances:			
1.			
2.			
3.			
4.			
5.			
6.			
7.			
Comments:			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 03/31/2011 signature: 

Joint review with EMS coordinator: (MM/DD/YYYY) 03/31/2011 Initials: 

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Table 16.1.15 – Internal Auditor’s Minimum Question Checklist

Element 15 Periodic Biosolids Program Performance Report		Record audit number from worksheet: 15-2011-01
Requirement	Questions/Considerations	Auditor Notes
Complete a periodic written Biosolids Management Program Performance Report annually during the first quarter of the year, summarizing the performance of the biosolids management program. The report shall contain appropriate summaries of monitoring, measurements data collected as part of the action plans and other results that demonstrate the performance of the biosolids program relative to its goals, objectives and legal requirements, including those biosolids management activities conducted by contractors. The report shall also provide summaries of performance relative to other voluntary adopted requirements, the organization's progress toward achieving its Biosolids program goals and objectives, and a summary of its independent third party EMS verification audit results.	Has a Biosolids management program performance report been completed? If so, review for inclusion of requirements.	YES (typo on Table 17.1 line 4)
	Does it include a summary of third party or interim audit?	YES
Make the periodic Biosolids Management Program Report available to employees, contractors, interested parties and the public. The organization shall have the flexibility of using other methods, including electronic methods such as a biosolids program web page, in addition to or in lieu of a written periodic performance report.	Has the report been made available to employees, contractors, interested parties and the public?	YES
The Biosolids Management Program Report will take place annually in the first quarter of the year. The Biosolids Management Program Report shall be written by the EMS Coordinator with assistance from the EMS internal team.	Was the Biosolids Management Program Report written during the first quarter of the year?	YES – Issued February - 2010
The Biosolids Management Program Report will be reviewed by the ESD Manager as part of the periodic management review during the first quarter of the year.	Was the Biosolids Management Program Report reviewed during the first quarter of the year during the periodic management review?	YES

Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <input checked="" type="radio"/> Conformance <input type="radio"/> Nonconformance	
Element No.	16	Audit Number:	16-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Kathie Kuzawa - WPS, Maintenance		
Audit date(s)	March 27 - 31, 2011		
List non-conformances:			
1.			
2.			
3.			
4.			
5.			
6.			
7.			
Comments; Room for Improvement; Checked Sharepoint Site – 2010 Internal Audit Documents not posted.			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 03/31/2011 signature *Kathie Kuzawa*

Joint review with EMS coordinator: (MM/DD/YYYY) 03/31/2011 Initials: *JK*

Table 16.1.16 – Internal Auditor’s Minimum Question Checklist

Element 16 Internal EMS Audit		Record audit number from worksheet: 16-2011-01
Requirement	Questions/Considerations	Auditor Notes
<p>Establish and maintain an internal audit program to periodically analyze the EMS for biosolids and determine whether it is effectively meeting its biosolids management policy, program requirements and biosolids program goals and objectives. The internal EMS audit program shall define the scope, frequency, and methodology of the audits, assign responsibility for conducting the audits and communicating their findings, and designate individuals to whom these findings are to be conveyed. The internal audit shall also evaluate the organization’s performance relative to established biosolids program goals, objectives and performance measures. The internal EMS audit program shall cover all the organization’s biosolids management program activities including those performed by contractors.</p>	<p>Has an internal audit program been implemented? How are findings communicated? Does it include contractor activities?</p>	<p>YES – See Element 16 Checked Sharepoint Site – 2010 Internal Audit Documents not posted. Findings for the Internal Audit are communicated in various ways. A summary of the Internal Audit is included in the Periodic Program Performance Report which is reviewed with the ESD Manager and then shared with employees, contractors and interested parties. The findings of each auditor are also communicated to the EMS Coordinator during the joint review of the Auditors Worksheet.</p> <p>YES</p>
<p>Report internal EMS audit results to the organization’s management in a way that they can take action to make necessary modifications to the EMS and biosolids management program. The person responsible for the biosolids management program shall develop, or delegate the development of, a comprehensive corrective action plan addressing each nonconformance identified by the internal audit.</p>	<p>Is there a system in place to respond to issues identified during the internal audit process?</p>	<p>YES – If any deficiencies are found (1) a Corrective Action Plan is written by the EMS Coordinator for each non-conformance identified, (2) - Other issues raised by the auditor in the comments section of the worksheet will be discussed and may or may not result in a Corrective Action Plan based on the outcome of the discussion, (3) - EMS Coordinator will oversee the addressing of all deficiencies and include summary information on non-conformances in Element 14, table 14.1.</p>
<p>Maintain, at a minimum, the following documents and records, as applicable, relating to its audit program:</p> <ul style="list-style-type: none"> a) description of audit methodology, protocol, scope, and schedule; b) identification of lead auditor(s), qualifications, and description of roles and responsibilities of auditors, management representatives, and others that may participate in, review, or be expected to act upon the audit; and 	<p>Is the audit methodology identified? Is the audit schedule identified? Is the lead auditor identified? Are corrective action plans issued for non-conformances?</p>	<p>YES – See Element 16, Audit Steps and Tables 16.10 – 16.17. YES - Reference Element 7 Roles and Responsibilities – Figure 7.2 “Schedule of Annual Biosolids Activities” It is also stated in Element 16 “on an annual basis” “completed during the first quarter”. YES - Reference Element 7 Roles and Responsibilities – Table 7.1 “Roles and Responsibilities – Internal EMS Team” and Table 7.3 “Internal EMS Team YES – See table 14.2 “Non-Conformance Investigation Worksheet” and figure 14.1 “Corrective Action Plan”.</p>

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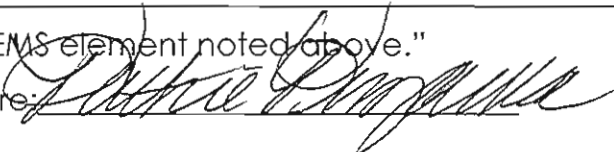
Element 16 Internal EMS Audit		Record audit number from worksheet: 16-2011-01
Requirement	Questions/Considerations	Auditor Notes
c) Corrective and/or preventive action plans prepared resulting from an audit, and any related changes made to policies, plans, procedures, and work practices that occur as a result of an audit's findings, evaluation, or follow-up actions.		
Internal audit will be conducted annually during the first quarter of the calendar year.	Has the internal audit been completed during the first quarter of the calendar year?	YES – Checked Sharepoint Site – 2010 Internal Audit Documents not posted.
Each member of the City Internal EMS team will be responsible for auditing selected elements of the EMS. Internal EMS team members may assign responsibility to staff within their scope of authority once they have been trained as auditors.	Have all elements been assigned to a City Internal EMS team member? Are those responsibilities reflected in "Roles and Responsibilities" (element 7)? If team members have assigned responsibility to other staff members, have those persons been trained as auditors?	YES YES - Reference Element 7 Roles and Responsibilities – Table 7.1 "Roles and Responsibilities – Internal EMS Team" and Table 7.3 "Internal EMS Team.
Each internal auditor will be trained and provided with an internal auditor's worksheet along with the minimum conformance requirements.	Were the auditors provided with an internal auditor's worksheet along with the minimum conformance requirements?	YES


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Table 16.1 Internal Auditor's Worksheet

Auditors Worksheet		Circle one: <u>Conformance</u> Nonconformance	
Element No.	17	Audit Number:	17-2011-01
Provide lead auditor first followed by auditor assistants along with classifications	Kathie Kuzawa - WPS, Maintenance		
Audit date(s)	March 29-31, 2010		
List non-conformances:			
1.			
2.			
3.			
4.			
5.			
6.			
7.			
Comments:			

"I have conducted an internal audit of the Biosolids EMS element noted above."

Lead Auditor (MM/DD/YYYY) 03/31/2011 signature: 

Joint review with EMS coordinator: (MM/DD/YYYY) 03/31/2011 Initials: 

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Table 16.1.17 – Internal Auditor’s Minimum Question Checklist

Element 17 Periodic Management Review of Performance		Record audit number from worksheet: 17-2011-01
Requirement	Questions/Considerations	Auditor Notes
At intervals the management determines appropriate, review the EMS and its performance relative to policy commitments, goals, objectives and established performance measures to ensure its continuing stability, adequacy and effectiveness. The management review shall address the possible need for changes to policy, the goals and objectives, the Biosolids management program and other EMS elements based on internal EMS audit results, external verification EMS audits by third parties, changing circumstances, and the commitment to continual improvement. The management review shall be documented. Any changes to policies, plans, procedures and work practices that are made as a result of the review shall also be documented.	Are management reviews conducted? At what frequency? What is covered during the management review? Is the management review documented?	YES - Annually. - The Management Review includes: Review of the annual periodic Biosolids Program Performance Report, conformance with policy commitments, possible need for changes to the policy, non-conformance incidents, review progress towards achieving current Biosolids EMS goals and objectives and any new goals and objectives, review internal audit results, review interim audit results, if conducted, changing circumstances such as major process changes which may require, updates to the Biosolids EMS critical control points and other elements of the system, document commitment that opportunities for continuous improvement and other system improvements are being investigated and implemented - The ESD Director review will be documented in the periodic management review of performance report, <i>see table 17.1.</i>
Maintain, at a minimum, the following related to its management reviews: a) schedule and scope for review; b) documentation of findings, evaluation, and follow-up actions; and c) documentation of changes to policies, plans, procedures, practices and other EMS elements that occur as a result of the management review findings, evaluation, or follow-up actions.	Is the scope of what will be reviewed during the management review identified? How are findings documented? How is input from the management review responded to?	- see item #3 above - documented in table 17.1 - Follow-up actions as needed and responses to same are recorded in table 17.1
Assign a lead person or persons to be responsible for organizing and conducting the review.	Has an individual been assigned lead responsibility for conducting the management review?	YES , 2 people are assigned the responsibility– see figure 7.2