

Kathie Kuzawa
EMS Coordinator
City of Grand Rapids
Environmental Protection Services
1300 Market Ave. SW
Grand Rapids, MI 49503-4880

October 13, 2011

Subject: Results of Re-verification Audit

Dear Ms. Kuzawa,

Thank you for your hospitality and exceptional level of cooperation in completing the re-verification audit conducted October 11 – 13, 2011. It was a pleasure working with you, Dave, Gary and the rest of the Wastewater Treatment staff. I could not have completed this effort without the exceptional level of cooperation of you and the staff.

The objective of the re-verification audit was to provide a comprehensive evaluation of the conformance of you biosolids management program with the National Biosolids Partnership standards.

To summarize there were no major non-conformance, 7 minor non-conformances, 9 opportunities for improvement, and 3 positive commendations.

The following are the findings based on this audit. Corrective action plans for minor nonconformances should be submitted to me no later than 30 days from today.

The findings of the re-verification audit are presented below:

Positive Observations

Grand Rapids has established an excellent training program to encourage all employees to understand the critical control points. The active participation of employees in creating training videos aided those who made the videos as well as captured the attention of fellow employees. The viewing of the six videos during the annual BMP refresher training set a new attendance record.

The City has prepared several exemplary environmental protection "TIPs" publications. These TIPs are short quarter page color handouts that explain what individual citizens can do to help control pollution associated with wastewater generation. The TIPs developed to date include "proper grease disposal," proper medicine disposal', "disposable not flushable" (for convenience wipes), and "rain water is not wastewater."

The sewer maintenance crew is almost a full year ahead of its schedule to routinely clean all sewer lines 24-inch and smaller.

Findings

Overall – Opportunity for improvement – consider encouraging the use of the terms “solids” and “biosolids” in place of the term “sludge,” and consider beginning to refer to the Biosolids Environmental Management System (EMS) as the Biosolids Management Program (BMP).

Element 1.7 – Minor nonconformance – The City of Grand Rapids Element 1 – Documentation of Biosolids EMS does not include a description of the relationship of the City of Grand Rapids with the Grand Valley Regional Biosolids Authority (GVRBA) and the biosolids value chain critical control points that are under the control of this authority.

Element 5.1 – Opportunity for improvement – Review the status of the objective associated with preparation of the TIP leaflet scheduled to be produced in 2011.

Element 5.5 – Opportunity for improvement – the Grand Rapids biosolids value chain related goals, objectives and programs established in the wastewater treatment “lean” process have not been incorporated into the goals, objectives and programs of the biosolids management program. Additionally, the BMP takes no credit for the detail cost tracking and savings attributable to improved operations resulting from the accomplishment of biosolids goals and objectives. And finally, the City has established a mercury pollution minimization program to comply with NPDES permit requirements, but has not included it as a goal/objective with regulatory compliance outcomes.

Element 6 – Opportunity for improvement – The list of interested parties contact information identified in Table 6.2 of the Grand Rapids Biosolids Management Program Element 6 procedure does not identify the NBP or the lead auditor as interested parties to receive formal communications.

Element 8.1 and 8.3 – Minor nonconformance – the standard requires the City to establish and maintain a training program to ensure that employees responsible for specific biosolids management activities and for the implementation of various BMP functions are competent in performing their assigned tasks and duties. The City of Grand Rapids BMP Element 8 – Training procedure # 10 indicates training schedules by job classification have been developed which cover recommended and mandatory training of employees. Also, records of training must be maintained. Other than for the EMS itself there is no organized or centralized comprehensive training schedule by job classification containing recommended and mandatory training of employees relative to their responsibilities for specific biosolids management activities (wastewater treatment, biosolids value chain, critical control points, operational controls, monitoring and measurement, etc.) Also, consider using the specific name of the training session subject on the sign in sheets for biosolids training records.

Element 9 – Opportunity for improvement – Review Element 9 (and 6) procedure to update its contents and specifically define how the City will increase public involvement in determining biosolids goals and objective.

Element 10.1 – Minor nonconformance – There is no SOP for routine operation of the new centrifuges defining optimum operating parameters and conditions such as polymer dosage, centrate clarity and/or foaming, centrate recycling or capture, centrifuge speed, concentrated solids pumping, etc.

Element 10.5 – Opportunity for improvement – The contractor, Cordes Trucking Inc's Vehicle Inspection Plan – 2009-1 does not attach the truck inspection log sheet as a figure or table as part of the procedure (plan). Additionally, two of the truck drivers did not have the vehicle inspection plan with them in their trucks.

Element 11.1, 11.2 and 11.3 – Minor nonconformance – The City has established an excellent emergency preparedness and response plan for liquids and solids releases throughout the city collection system and associated with lift station failures. However, except for the contractor's spill control plan, there is no emergency preparedness plan for addressing solids or biosolids releases at various critical control points throughout the wastewater treatment plant. Also, there has been no evaluation of the effectiveness of such a plan (e.g. spill drill), and there is no inventory of emergency response equipment on site or readily available (e.g. booms, pumps, kitty litter, brooms, shovels, spill kits, etc.)

Element 12 – Opportunity for improvement – Element 12 procedure related to document control does not clearly indicate that the EMS Document Revision History as it appears in each document is no longer used to record document changes but instead Sharepoint automatically records the history of changes to each document. Consider including in the last revision history entry to all element documents entered on 3/28/2008 that this is the last entry in this format and all future document revision histories will be documented in sharepoint. Additionally some of the description of changes recorded in the sharepoint revision history are not described in sufficient detail. Also consider specifically identifying in the history of revisions those document changes that result from audit findings.

Element 14.6 – Minor nonconformance – The City of Grand Rapids BMP manual Element 14 – Nonconformances, preventive and corrective actions procedure # 3 indicates that whenever a nonconformance occurs an investigation report will be prepared using Table 14.2 form and a corrective action plan will be developed using Figure 14.1. The latter figure is used to identify the resolution or corrective action and the actual completion date of that action. Nonconformance number 2011-1 indicated the corrective action as found in Figure 14.1 had been completed before it actually was.

Element 15 – Opportunity for improvement – the periodic biosolids program performance report for 2010 did not present the specific details of the nonconformances identified in the third party interim audit.

Element 15 – Opportunity for improvement – Consider including costs and savings associated with biosolids operations and the BMP in the periodic biosolids program performance report.

Element 16 – Minor nonconformance – The City of Grand Rapids BMP manual Element 16 – Internal EMS Audit procedure # 5 does not represent the current members and responsibilities of the audit team.

Element 17.2 – Minor nonconformance – the management review has not maintained a schedule and scope for the review and documentation of changes to policies, plans, procedures, practices and other BMP elements that occur as a result of the management review findings, evaluation, or follow-up actions.

The draft final report will be sent to you within the next week for your comments. Discussions between the Department's Biosolids EMS Coordinator and the third party auditor resulted in the following tentative agreement regarding the next interim audit schedule:

Year 6 (internal/third party) – Elements 5, 6, 9, 14, 16

Year 7 (internal/third party) – Elements 1, 10, 12, 13

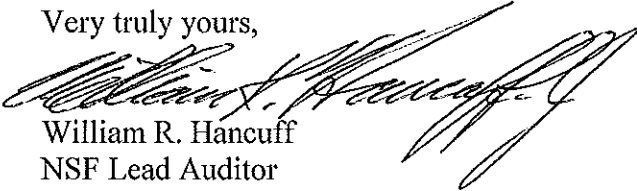
Year 8 (internal/third party) – Elements 3, 8, 15, 17

Year 9 (internal/third party) – Elements 2, 4, 7, 11

The results of the re-verification audit of the City of Grand Rapids Biosolids Management Program are positive and it is the decision of NSF that the City maintain its BMP "Certification" status.

As a reminder the NBP EMS system is one of continuing improvement and the results of the audit are intended to provide value added to the system. I believe this goal was accomplished.

Very truly yours,


William R. Hancuff
NSF Lead Auditor

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AUDIT ATTENDANCE SHEET

COMPANY NAME: City of Grand Rapids

LOCATION (Plant # and/or City/State): Environment Protection Services Dept.

TYPE OF AUDIT: Re-verification

OPENING MEETING DATE: 11 Oct. 2011 CLOSING MEETING DATE: 13 Oct. 2011

NAME (Printed)	TITLE/POSITION	OPENING MEETING (Initials)	CLOSING MEETING (Initials)
<i>William R. Hancock</i>	<i>Lead Auditor</i>	<i>WH</i>	<i>WH</i>
<i>Kathie Kuzawa</i>	<i>EMS Coordinator - SWMS</i>	<i>KK</i>	<i>KK</i>
<i>Gary De Kock</i>	<i>Wastewater Plant Supervisor</i>	<i>GOK</i>	
<i>Patty Chapman</i>	<i>Environmental Assessment Supervisor</i>	<i>PC</i>	
<i>Timothy Dyer</i>	<i>Operations Utility Supervisor</i>	<i>TD</i>	<i>TD</i>
<i>David Harris</i>	<i>Operations Utility Supervisor</i>	<i>DH</i>	<i>DH</i>
<i>Dan Simola</i>	<i>Sewer Mx Utility Supervisor</i>	<i>DS</i>	
<i>Mike Lunn</i>	<i>ESD MANAGER</i>	<i>ML</i>	<i>by phone</i>
<i>Gary De Kock</i>	<i>Wastewater Plant Supervisor</i>		<i>GOK</i>