

NATIONAL BIOSOLIDS PARTNERSHIP AUDIT REPORT

**Alexandria Sanitation Authority
Alexandria, Virginia**

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*
Alexandria Sanitation Authority EMS Manual
(Core Documents – Various dates)

Draft Report – May 28, 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 Alexandria Wastewater Authority (ASA) Wastewater Treatment Facility 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 Code of Good Practice and EMS program objectives.

RECOMMENDATION

The results of the ASA interim audit and review of their corrective action plans and implementation status are positive, and it is the recommendation of the audit team that the Alexandria Sanitation Authority Biosolids Environmental Management System (EMS), maintain their "Verification" status.

AUDIT SCOPE

The NSF- International Strategic Registrations, Ltd. (NSF-ISR) conducted a third party interim audit of the Alexandria Sanitation Authority's EMS for Biosolids from April 14, 2009 through April 16, 2009. The on-site interim audit team consisted of Dr. William R. Hancuff, Lead Auditor.

The scope of the first interim audit included a review of areas generally related to the organization's progress toward goals and objectives; EMS outcomes (environmental performance, regulatory compliance, interested party relations, and quality practices); actions taken to correct minor nonconformances; the management review process; and corrective and preventive action requests and responses. This review generally includes requirements found in elements 1, 2, 5, 6, 9, 14, 15, 16 and 17.

The specific elements that were audited in their entirety were 2, 5, 6, and 9. Additional elements that were partially audited as they related to outcomes, changes in equipment and processes, and land application sites included Elements 1 and 2.

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

Paul A. Carbary
George Floyd
Joel Gregory

Director of Green Fields
Environmental Programs Coordinator – Green Fields
L-Building Team Leader

INTERIM AUDIT FINDINGS

The interim audit included review of the latest versions of the ASA element procedures and employed the most recent version of the NBP Third Party Verification Auditor Guidance dated August 2007. The interim audit found 5 positive observations, 1 major non-conformance (which included several carryover minor non-conformances), 7 minor non-conformances and 15 opportunities for improvement. The corrective actions associated with a considerable number of minor nonconformances identified during the verification audit were observed to have not been implemented, leading to a systemic major nonconformance associated with the corrective action program. The establishment of processes for preventing and responding to management system nonconformances is crucial to the effectiveness of an organization's biosolids management program.

The National Biosolids Partnership guidelines require that before ASA can have successfully completed the interim audit the major nonconformance must be corrected and its closure verified by the auditor. Corrective action plans were prepared and implemented for the major nonconformance and all of the carryover minor nonconformances. Field verification of the closure of all these findings were verified prior to the preparation of this final report. The major nonconformance and associated minor nonconformances are included in Appendix 2.

The following is a review of the positive observations made during the interim audit. The major non-conformance, minor non-conformances and opportunities for improvement follow and are listed by item number, which correspond to the element minimum conformance requirements found in the Third Party Verification Auditor Guidance. These findings are presented in the sequence of the NBP standard elements.

Positive Observations

The ASA management and all plant personnel involved in the biosolids environmental management system development should be recognized for their outstanding achievements, and the exceptional features of their Biosolids EMS. The following is a summary of those positive items observed during the first interim audit.

Commendations:

- ASA maintains a very strong internal audit team, the internal audit was very thorough and the report well written.
- The Authority retained the services of a public relations firm to provide communications consulting for the development of tools to increase input from the general public and to support the communications element of biosolids EMS

program. This is an outstanding idea that will improve the overall functioning of the public relations and communications elements.

- The requirement to replace the land application contractor's older biosolids hauling vehicle with new trucks will improve the public perception of ASA and the biosolids product.
- The EMS team developed an excellent tool for laying out the EMS Activities Timeline for 2009. The diagram identifies each of the requirements for the EMS elements such as audits, development of goals and objectives, preparation of performance reports, and conduct of management reviews and presents the deadlines associated with each individual task.
- An excellent tracking tool was initiated using Microsoft "Project" to prepare a Gantt chart for following progress on the ASA goals and objectives.

And finally, the hard work and dedication of the EMS Team must be acknowledged. While attainment of the EMS verification goal is obviously a team effort the guidance and direction provided by the Coordinator of Environmental Programs, George Floyd, to ensure accomplishment of this goal must be recognized. The encouragement and active participation of the Director of Green Fields, Paul A. Carbary, and the direct involvement since the outset of the General Manager, Karen L. Pallansch, has ensured the continued success of this program.

Minor Nonconformances

- Requirement 8.4 – The biosolids records did not contain or reference the location of the biosolids contractors training activities.
- Requirement 9 – Section 9.1.4 of the Communications Procedure indicates that the procedure describes regulatory agencies communication; however the procedure does not provide a description of how this is addressed.
- Requirement 12.2 – Minor Nonconformance – The EMS does not provide links or cross references to the locations of EMS documents or records for:
 - Equipment calibration, monitoring and measurement (CMMS)
 - Laboratory testing and inspection (LIMS)
 - Emergency response incident reports
 - Public participation meetings
 - Logs of activities contained in "Operator 10" data views
 - Biosolids activities of contractors

- Requirement 13.4 – The monitoring and measurement procedure does not reference the fact that document 13.2 lists the “ASA Performance Indicators” for operational controls; additionally monitoring and measurement methods and tracking for objectives are not referenced or described in the procedure.
- Requirement 14.5 – The completion of the “Corrective Action Plan” (CAP) form uses very general statements in the description of tasks required to correct the nonconformance. The actual tasks used to identify the root cause and develop the corrective and preventive action plans are not presently captured in the CAPs.
- Requirement 15.1 – Item 2 in section 15.1.4 of Document 15.1 – EMS Element 15, version 03, 2/13/2008 indicates that comments on each land application inspection by the third party inspection consultant shall be included in the report. This is not included in the 2008 performance report. Likewise, the document requires a summary of actions taken as a result of input from the public and interested parties, which was not found in the report.
- Requirement 17.2 – There was no objective evidence that scope for review, findings, evaluations, follow-up actions, changes to policies, plans, practices and other EMS elements resulting from the Management Review have been documented according to the requirements of Document # 17.1, which refers to Element 12 - Documentation. This was a minor finding in the verification audit and the corrective action has not yet been fully implemented. (NOTE: While SOP 4.4.6.36 – “Management Review” dated 9 April 2009, has been developed to address this deficiency a reference to this SOP is not presently contained in the Element procedure nor has the SOP been implemented.)

Opportunities for Improvement

- Requirement 1 – Reference to Maryland Environmental Services (MES) is contained throughout several EMS documents, however this organization is no longer a part of the ASA biosolids program.
- Requirement 1.1 – Clarify in Document 1.1 who the members of the ASA leadership team are.
- Requirement 3.2 – The actual or potential environmental impacts at each critical control point could be more fully developed and presented in Doc 3.2, as was done with the critical control points of the transport and biosolids management/end use in that document table.
- Requirement 5 – Consider adopting the “initiatives” in the draft Biosolids Management Program Performance Report as goals and objectives for 2009.

- Requirement 5 – Consider rewriting this procedure, and any related procedures and/or documents to reflect more accurately the approach that is used for developing and tracking goals and objectives.
- Requirement 5 – Doc 5.3 – “Action Plan Template” is not labeled and its use is not referenced in the procedure of Doc 5.1.
- Requirement 5 – The Microsoft “Project” software is used to track the schedule and milestones associated with the goal and objectives; however it is not referenced as part of the element procedure.
- Requirement 6 – The “List of Interested Parties” is not referenced in the communications element procedure.
- Requirement 6 – The procedure described in Doc 6.1 does not include the Virginia Biosolids Council as a contractor used in outreach programs. It is currently identified in the element 9 procedure, but not the element 6 procedure.
- Requirement 9 – Consider streamlining this procedure.
- Requirement 10.2 – The operational control procedure does not reflect the current approach to ASA provided field inspections of the land application sites.
- Requirement 12 – Consider using “track changes” in the preparation of revisions to procedure documents.
- Requirement 12 – Consider specifically identifying a procedure for keeping a record of previous versions of EMS procedures for historical or archival purposes.
- Requirement 12.2 – Consider developing a numbering system for lower level documentation, such as Operational Guidelines.
- Requirement 15 – The procedure does not identify the specific deadline date for issuance of the EMS Performance Report.

For the minor non-conformances, ASA personnel prepared Work Plans for Corrective Actions and will implement corrective actions according to their EMS procedures to provide continual improvements to their biosolids program. All proposed corrective action work plans were reviewed by the auditor and found to be acceptable and final closure will be completed during the second interim audit. As a further measure to demonstrate continuous improvement the opportunities for improvement will be addressed to the maximum extent possible.

There have been significant improvements in the Authority’s EMS over the past few months as observed by the lead auditor. This level of improvement will undoubtedly continue into the future.

ALEXANDRIA SANITATION AUTHORITY COMMENTS

ASA understands the importance of periodic audits and accepts the challenge of using the audit's findings to improve our Environmental Management System. Based on the conducted interim audit, ASA agrees with the result of the audit and is committed to address all non-conformances. We have the proper resources available and have worked hard to correct our major non-conformance, and we have prepared action plans to address each of the minor non-conformances.

OUTCOMES MATTER

The ASA Biosolids Environmental Management System established one biosolids EMS goal and 4 objectives within that goal. The goal and objectives were developed by the Biosolids EMS coordinator and the EMS Team considering public interest. The ASA Biosolids goal for its EMS was 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 fully attain all objectives established, it is a critical component of the system to make progress towards accomplishing the overall goal. The ASA initially established goals in 2006, and attained, or completed to the ASA desired level, those goals. Subsequently, a single new major goal was established in 2008. The goal and the objectives that were a subpart to that goal were established using Specific, Measurable, Achievable, Relevant, and Time Bound (SMART) criteria.

The goal of ASA's biosolids EMS is to develop the capacity to reuse 100% of ASA's biosolids in an option other than land application. There are four objectives identified under this goal: develop partnerships with ASA's customers that will determine the capacity for local reuse by the end of 2008; initiate a pilot project and develop a marketable biosolids product; incorporate new reuse options into ASA's biosolids EMS and address regulatory requirements for new reuse options; and beneficially reuse 1% of ASA's biosolids in an alternative other than land application by 2009.

The facility's performance relative to each of the above listed outcome groups is addressed below.

In the Environmental Performance outcome area, ASA established an objective of initiating a pilot project and developing a marketable biosolids product. The primary purpose of this objective is to produce an aesthetically pleasing biosolids end product for

use as a soil amendment for urban usage as opposed to farmland agricultural land application. This requires establishing improved environmental performance standards associated with reduction in the odor profile of biosolids; production of a uniform quality product through controlling the texture and moisture content, and ensuring attainment of a maximum carbon to nitrogen ratio. Tasks accomplished to meet this end include: entering into a contract to evaluate a blended product of biosolids and mulch fines (or other mixes) to determine the optimum ratios of blends for texture, odor, composition and overall value; selection of the final blend ratios and product manufacturing process; and development and implementation of a comprehensive long term product analysis and quality control program. The combination of these tasks are over 90% complete.

In the Regulatory Compliance outcome area, ASA established an objective to incorporate new reuse options into ASA's biosolids EMS and address regulatory requirements for these alternatives. Tasks within this objective include addressing all regulatory permitting issues, such as a marketing and distribution permit and modification of the Sludge Management Plan (SMP) for regulatory approval. ASA has determined that there are two options available for use of biosolids as a soil amendment. The first is distribution of the product at no charge and the second is the sale of the final product. Each alternative has separate regulatory requirements. If the product material is distributed free the requirements can be met through alteration of the existing Virginia Pollutant Discharge Elimination System (VPDES) permit to include modification of the ASA's SMP. On the other hand, the option of selling the product requires meeting the regulatory requirements for distribution and marketing and a permit must be issued for that purpose through the Virginia Pollution Abatement Program operated by the Virginia Department of Environmental Quality. Presently the task associated with the modification of the SMP is approximately 50% complete and the application for a distribution and marketing permit is 90% complete. The latter is awaiting the results of a Virginia Tech potting study.

In the Relations with Interested Parties outcome area, ASA established an objective to develop partnerships with ASA's customers that will determine the capacity for local reuse by the end of 2008. Tasks within this objective include: initiating contacts with target customers to gauge interest and obtain specific feedback on product uses and product concerns; calculating approximately the expected quantity that potential customers could logically reuse; developing marketing tools for the product, such as name, packaging, and marketing brochures; and discussing reuse agreements with local government bodies. About 10% progress has been made in contacting target customers and approaching local government bodies, and 50% progress has been made in developing marketing tools.

In the Quality Biosolids Management Practices outcomes area, ASA established two objectives parts of which address this area. The first is to implement the reuse of a portion of ASA's biosolids in an option other than land application. The tasks involved in this objective include: finalizing reuse agreements including costs with local government agencies; developing a transportation and distribution system; distribution of initial production of bagged biosolids product; document distribution and marketing as critical

control point in the biosolids EMS; develop appropriate operational controls for distribution and marketing, and finalize product delivery schedule with local customers. Those tasks that are underlined are most directly related to quality management practice outcomes and a low percentage of accomplishment has been attained to date.

The second objective related to quality biosolids management practices is one previously discussed associated with the environmental performance outcome, namely initiating a pilot project and developing a marketable biosolids product. Quality biosolids management practices that are the focus of this and the previous objective include development of a QA/QC program for blending the final product; development and implementation of appropriate operational controls for this new critical control point; preparation of a comprehensive sampling plan that goes beyond regulatory requirements by analyzing the product for toxicity characteristic leaching procedure (TCLP); pathogens, including enteric viruses and viable helminths; polychlorinated biphenyls (PCBs), organics; and all Section 503 tests applied to the final product. Only a small percentage of accomplishment of this outcome has been attained to the current level of completion of the overall goal.

CONCLUSIONS AND RECOMMENDATIONS

The results of the third party interim audit show the ASA has a fundamentally strong Environmental Management System. The NSF lead auditor reviewed the implementation of the corrective action plan for the major nonconformance and associated minor nonconformances on May 28, 2009. Additionally the corrective action plans for the new minor nonconformances were reviewed and approved at the same time. Therefore, it is the recommendation of the audit team that ASA's Biosolids Environmental Management System (EMS), Alexandria, Virginia retain its "verification" status.

As was mentioned previously, an EMS is a continuously improving process, and retention of verification status is not the end. 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.

Based on discussions between the facility's Biosolids EMS Coordinator and the third party auditor the following interim audit schedule is proposed for the next three years.

The scope of each interim audit will include a review of the organization's progress toward goals and objectives; EMS outcomes (environmental performance, regulatory compliance, interested party relations, and quality practices); actions taken to correct minor nonconformances; the management review process; and corrective and preventive action requests and responses. This review generally includes requirements found in elements 1, 2, 5, 6, 9, 14, 15, 16 and 17.

In order to address each element of the NBP standard over the four years of interim audits the following elements are tentatively scheduled over the period between verification audits:

Year 2 (third party) – Elements 1, 4, and 8

Year 3 (third party) – Elements 3, 10, and 13

Year 4 (third party) – Elements 7, 11, and 12.

Attachment 1

Documents and Other Objective Evidence Reviewed During the First Third Party Interim Audit

Element 1. Documentation of EMS for Biosolids

- Interview with Paul A. Carbary, Director of Green Fields
- Interview with George Floyd, Environmental Programs Coordinator - Green Fields
- 17 EMS Element (Core) documents, various version numbers and effective dates (Constituting ASA's "EMS Manual")
- EMS Element 1 – Documentation of EMS for Biosolids, version 03, 2/22/2009
- "EMS Core Document Oversight" signature page.

Element 2. Biosolids Management Policy

- Interview with George Floyd, Environmental Programs Coordinator - Green Fields
- Document # 2.1 – Biosolids Management Policy, version 02, 9/1/06, containing ASA's Biosolids Policy Statement
- Alexsan.com website (<http://www.alexsan.com/>), Information Center, Biosolids Policy Statement

Element 3. Critical Control Points

- Interview with George Floyd, Environmental Programs Coordinator – Green Fields – note: no new CCPs.

Element 4. Legal and Other Requirements

- Interview with George Floyd, Environmental Programs Coordinator – Green Fields – note: no new legal requirements.
- Interview with Neil Zahradka, Director of Land Application, Virginia DEQ – Central Office – Richmond, VA
- Document # 4.2 – List of Applicable Legal and Other Requirements, version 3, 3/13/2009

Element 5. Goals and Objectives for Continual Improvement

- Interview with Paul A. Carbary, Director of Greenfields
- Interview with George Floyd, Environmental Programs Coordinator - Greenfields
- Document # 5.2 – Goals and Objectives, version 05, 2/19/2008
- Document # 5.3 – Action Plan Template – EMS Goals and Objectives, version ?, undated
- Document # 5.5 – Action Plan Management, version 03, 10/5/2006

- Action Plans for Goals and Objectives as contained in Microsoft Project

Element 6. Public Participation in Planning

- Interview with Paul A. Carbary, Director of Green Fields
- Interview with George Floyd, Environmental Programs Coordinator - Green Fields
- Document # 6.1 – Public Participation in Planning, version 03, 5/3/2007
- Interview with Neil Zahradka, Director of Land Application, Virginia DEQ – Central Office – Richmond, VA
- Virginia Environmental Excellence Program (VEEP) certification by the Virginia DEQ
- Observation that contractor had replace all old vehicles used to transport biosolids with new trucks
- Alexsan.com website (<http://www.alexsan.com/>), Information Center, Public Outreach, Communications and Quality Management Practices

Element 7. Roles and Responsibilities

- Interview with Paul A. Carbary, Director of Green Fields
- Interview with George Floyd, Environmental Programs Coordinator - Green Fields
- EMS Roles and Responsibilities, version 07, 2/6/2008
- Synagro Operation and Maintenance Manual, April 2003
- Synagro Contract for Services, 11/1/07
- Synagro – Alexandria Project Monthly Progress Report – Jan 2009

Element 8. Training

- Solids Processing Biosolids Skills Training, 12/17/2008

Element 9. Communications

- Interview with Paul A. Carbary, Director of Green Fields
- Interview with George Floyd, Environmental Programs Coordinator - Green Fields
- Document # 9.1 – Communication, version 03, 4/30/2007
- Document # 9.2 – External Inquiry Response, version ?, 3/23/2006
- Interview with Neil Zahradka, Director of Land Application, Virginia DEQ – Central Office – Richmond, VA
- <http://www.alexsan.com/>
- EMS Element 9 folder

Element 10. Operational Control of Critical Control Points

- Interview with Paul A. Carbary, Director of Green Fields

- Interview with George Floyd, Environmental Programs Coordinator - Green Fields
- Document # 10.1 – Operational Control of Critical Control Points, version 04, 5/1/2007
- List of Operational Controls, version 01, 3/9/2009
- ASA Exceptional Quality Biosolids Odor Prevention, Assessment and Response Protocol, April 3, 2008.
- Operational Guidance (OG) – Sludge Pre-Pasteurization, version v2, 2/12/2008
- ASA Exceptional Quality Biosolids Odor Prevention, Assessment and Response Protocol, April 3, 2008.
- Synagro Operation and Maintenance Manual, April 2003

Element 11. Emergency Preparedness and Response

- Not specifically covered in interim audit

Element 12. EMS Documentation and Document Control

- Interview with George Floyd, Environmental Programs Coordinator - Green Fields
- Document # 12.1 – Documentation, Document Control and Recordkeeping, version 05, 4/30/2007
- Document # 12.1 – Documentation, Document Control and Recordkeeping, version 06, DRAFT UPDATE
- Review of various documents for version numbers and effective dates
- Document Control Log, version 03, 2/5/2007

Element 13. Monitoring and Measurement

- Interview with George Floyd, Environmental Programs Coordinator - Green Fields
- Document # 13.1 – Monitoring and Measurement, version 02, 9/1/2006

Element 14. Nonconformances: Preventive and Corrective Action

- Interview with Paul A. Carbary, Director of Green Fields
- Interview with George Floyd, Environmental Programs Coordinator - Green Fields
- Document # 14.1 – Nonconformances: Preventive and Corrective Action, version 04, 2/13/2008
- Document # 14.2 – Nonconformance Report Log, version 02, 9/1/2006
- Document # 14.3 – Corrective Action Work Plan Template, version 03, 12/8/2006
- Review of all corrective action work plans (CAPs) for verification audit and a sampling of CAPs for internal audit

Element 15. Periodic Biosolids Program and EMS Performance Report

- Interview with Paul A. Carbary, Director of Green Fields
- Interview with George Floyd, Environmental Programs Coordinator - Green Fields
- Document # 15.1 – Biosolids Management Program Performance Report, version 03, 2/13/2008
- ASA Biosolids Management Program Performance Report Jan 1, 2008 – Dec 31, 2008.
- Synagro – Alexandria Project Monthly Progress Report – Jan 2009

Element 16. Internal EMS Audit

- Interview with Paul A. Carbary, Director of Green Fields
- Interview with George Floyd, Environmental Programs Coordinator - Green Fields
- Interview with Joel Gregory, L-Building Team Leader
- Document # 16.1 – Internal EMS Audit, version 02, 4/20/2007
- Document # 16.1 – Internal EMS Audit, version 04, 4/30/2008
- ASA Internal Audit Report – for audit conducted Feb 2009
- ASA Internal Audit checklist – undated
- Summary of actions taken in response to ASA internal audit
- Work plans for corrective action for internal audit

Element 17. Periodic Management Review of Performance

- Interview with Paul A. Carbary, Director of Green Fields
- Interview with George Floyd, Environmental Programs Coordinator - Green Fields
- ASA Biosolids Management Program Performance Report Jan 1, 2008 – Dec 31, 2008.
- Document # 17.1 – Management Review, version 03, 4/30/2007

Attachment 2
Major Nonconformance and Associated
Carryover Minor Nonconformances

Major Nonconformance

- Requirement 14 – The Nonconformance: Preventive and Corrective Action element has not been fully or effectively implemented.

Minor Nonconformances

- Requirement 1.2 – There was no objective evidence that the Biosolids EMS Manual (ASA’s Core Documents) have been approved “by a level of the organization’s management with the authority to commit people and resources to biosolids management activities.” The procedure does not clearly define who has approval authority for changes in the EMS documents. This was a minor finding in the verification audit and the corrective action has not yet been fully implemented.
- Requirement 6.5 – The procedure described in Document 6.1, which relates to public participation in planning does not adequately describe how the public input is captured from each of the identified outreach programs, and how it might be used in planning. This was part of a minor finding in the verification audit and the corrective action has not yet been fully implemented.
- Requirement 10.1 – Document # 10.1 does not address the fact that “Operational Guidelines” are used for operational controls of each critical control point. There is no mention in this procedure of the inclusion of legal and other requirements in the “Operational Guidelines”. Additionally the procedure does not indicate how “Standard Operation Procedures” (SOPs) are used. This was part of a minor finding in the verification audit and the corrective action has not yet been fully implemented.
- Requirement 12.2 – There was no provision in Document # 12.1 for the organization’s Biosolids Management Program documents to be kept up to date through periodic review, and revision (when applicable). This was part of a minor finding in the verification audit and the corrective action has not yet been fully implemented.
- Requirement 12.2 – Several Biosolids EMS element procedures were found to not be properly marked with the correct version number and/or effective date, as required by requirement 12.2 of the standard and by ASA’s Document # 12.1. This was a minor finding in the verification audit and the corrective action has not

yet been fully implemented; the root cause of this nonconformance was not identified and the corrective action did not address the need to review all EMS documents for this issue.

- Requirement 12.3 – There was no evidence in ASA’s core documents that ASA has a process to ensure that records are available and can be easily located and are retained for a specified period of time. More specifically, there was no description in the Element 12 procedure that referenced the existence of the “Document List” and the list itself does not identify the exact location of all relevant document or records and the precise retention times for each (either legally required or EMS required). This was a minor finding in the verification audit and the corrective action has not yet been fully implemented.
- Requirement 13.1 – The procedure Doc # 13.1 does not adequately address the details of a tracking system to follow progress made on Goals and Objectives, and included in reports made at monthly EMS team meetings. This was a minor finding in the verification audit and the corrective action has not yet been fully implemented.
- Requirement 14.6 – The procedure for tracking progress of completing corrective actions and periodically updating the status is not effectively implemented as a control.

Attachment 3 Appeals Process National Biosolids Partnership

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 Elements¹. 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

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.

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