



NBP 501 WORKSHOP FOR CERTIFIED AGENCIES

Summary Report

February 6, 2007
Alexandria, VA

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Overview

The NBP certified agencies were invited to this workshop to recognize their achievements, review and understand ongoing auditing requirements, discuss issues of concern, and to obtain input about their needs and issues.

This report is intended to recap the key topics discussed during the workshop and to serve as a high-level summary for those who were not able to attend, or who may be interested in reviewing the themes and outcomes of the discussion at the workshop.

If issues arose that could not be addressed within the timeframe of the workshop, they were written down and posted in a “Parking Lot” for further evaluation and follow-up. These items are noted near the end of the summary report.

The slide presentations for the workshop are located by clicking on this link:
http://www.biosolids.org/docs/NBP_EMS%20501%20Workshop_PPSlides_020607.ppt.

Participants

The following attended the workshop:

Lisa Vogel - King County, WA	Lori Stone - NBP
Dave Taylor - Madison, WI	Eugene DeMichele - NBP
Chris Peot - DC WASA	Sam Hadeed - NBP
Julie Frazer - Butler County, OH	Tim Williams - WEF
Kim York - Butler County, OH	Nick Bardis - WEF
Marti Gibson - City of Raleigh, NC	Jim Horne - EPA
Mike Taylor - Columbus, GA	Bill Hancuff - NSF
Jeremy Cummings - Columbus, GA	
Michelle Hetherington - Orange County, CA	
Jeannette Klamm - Lawrence, KS	
Debbie Biggs - Encina, CA	
Donna Hull - Metro-Denver, CO	
Angel Foster - Metro Denver, CO	
James Newton - Kent County, DE	
Jennifer Lee - EBMUD, CA	
Dan Collins - Chicago MWRD, IL	

Opening Remarks

The session kicked off with introductions of the participants and an overview of the agenda with some revisions (see Appendix A). **Jim Horne, U.S. EPA, provided opening remarks.**

Mr. Horne commended all of the certified agencies for their commitment to the NBP and their achievements with environmental management systems. He explained that U.S. EPA is working on various initiatives including the identification of outcomes for effective utilities, as well as a resource toolbox to help utilities measure performance. Infrastructure needs and succession planning are driving performance measures.

The U.S. EPA has signed a Letter of Intent to promote utility management with several organizations: NACWA, WEF, AMWA, NAWC, APWA, and AWWA.

“You are building the groundwork...this program has a bright future because of your efforts,” emphasized Mr. Horne.

Eugene DeMichele, NBP Program Director, offered additional commendations and introductory remarks. He welcomed all the participants and encouraged their commitment to continual improvement. Mr. DeMichele explained that “even though he is a great athlete, Peyton Manning said that he would come back better next year.” This is the same commitment that the certified agencies exhibit.

WEF is offering a special discount for certified agencies to attend the upcoming 2007 WEF/ AWWA Joint Residuals and Biosolids Management Conference to be held in Denver, CO. The registration form and instructions will be distributed after the workshop.

Session 1 – Ongoing Auditing

Lori Stone, NBP EMS Project Manager, gave an overview of the workshop agenda. She explained that Peter Machno, NBP EMS Senior Manager, and Lori Ahouse, Ross and Associates, were unable to attend the workshop due to illness.

This objective of this session was to review the basics of interim and internal audits (scope, timing/cycle, forms, etc.).

Presentation

The presentation by Lori Stone/Lori Ahouse (Ross and Associates) covered five interim audit topics including: timing and frequency, length and scope, substitutions of internal audits, open minor nonconformances, and significant changes. Key discussion points from the session are presented in this section. The slide presentation is available from the NBP website www.biosolids.org.

Interim Audits

Key Presentation Points

- Interim audit timing and cycle: third party interim audits happen annually between verification audits. Two of the third party interim audits may be substituted with internal audits.
- Interim audit purpose: check on “system health”, ensure EMS maintains conformance with EMS Elements and corrective actions completed / nonconformances addressed.
- Interim audit scope: includes all 17 EMS elements covered in the cycle of interim audits (e.g., split between the four interim audits), progress towards goals & objectives, four EMS outcomes, corrective & preventive actions and management review process.

Internal Audits

Key Presentation Points

- Internal audit timing: internal audits suggested annually, but not required (Element 16 says “periodically”). It is important to coordinate the internal audit timing with the management review and the periodic Biosolids Management Program Report, as the results of the internal EMS audit inform those processes.
- Internal audit purpose: is to determine whether the EMS is “effectively meeting its biosolids management policy, program requirements and biosolids program goals and objectives”.
- Internal audit scope: policy commitments, goals & objectives, outcomes, and program requirements.
- When substituting internal audits for third party interim audits, agencies must report on system conformance with the *EMS Elements* by providing the NBP with a copy of the internal audit report.

Nonconformances

Key Presentation Points

- Only an NBP third party auditor can close out a minor nonconformance cited by an NBP third party auditor.
- Auditors are encouraged to close out via paperwork review or wait until the next planned on-site audit.
- Needing to close out minor nonconformances does not prevent an agency from substituting an internal audit for the third party interim audit.

Notification of Changes

Key Presentation Points

- When changes occur to the EMS and biosolids operations, agencies should inform the NBP and third party auditors.
- The auditor determines if the change warrants additional auditing. NBP encourages auditors to examine changes via paperwork review or at the next planned on site audit.
- Changes do not prevent an agency from substituting an internal audit for the third party interim audit.

Reporting & Appeals

Key Presentation Points

- Agencies must make available to the public: an Annual Biosolids Management Program and EMS Performance Report every year after initial verification audit (report content described in Element 15); and the third party EMS audit results
- NBP has an Appeals Board to resolve disputes regarding major nonconformances. Additional forms and information on NBP web site
- Third party audit companies also have internal appeals processes (required as ISO “registrars”) that agencies can place appeal for major or minor nonconformances. The appeal is handled by registrar management (not the auditors who conducted the audit)

Session 2 – Learning from NBP Platinum Agencies

Jeanette Klamm, City of Lawrence, Kansas

Background

Lawrence, Kansas is a college town, a progressive community, and a high growth area. The city owns and operates a 12.5 MGD wastewater treatment plant and is looking to build a second plant. The wastewater utility division currently has 30 employees plus lab services (which operates independently). The wastewater utility division includes the plant, biosolids and lift stations. Biosolids are land applied.

The City got involved in the EMS program for various reasons:

- In 2000, management heard about EMS systems from EPA; joined NBP as a charter agency and was certified in October 2005.
- The City wanted to bring public confidence in what they were doing and believed certification increased credibility with their public.

- The City saw benefits to expanding the EMS to the entire utility and to receive ISO 14001 and OHSAS 18001 certification.
- The City wanted to increase efficiency and productivity; significant time savings have been realized due to more efficient meetings and training.

Benefits and Challenges of EMS

The City has experienced better document control, better communications, and public participation. They had a strong program anyway, but did see additional benefits.

The City received two EPA awards in addition to NBP, ISO, and OSHAS certifications, which added to public confidence and they have gotten good mileage out of it. They are currently looking to site a new WWTP, so any little bit of credibility that they have can only help them with public relations as they go through the process (and less money they have to spend on public relations.)

There have been some staff members that were reluctant to participate in the program. Their excuses of "I'm too busy" were met with the explanation that it might take some time to set things up initially, but you will save time and frustration in the long-run.

Work continues to develop a preventive and corrective action database; a consultant is working with City staff at this time. Management review meetings were a little "stiff" initially, but they are becoming more focused and efficient (i.e., less than one hour to conduct). Future efforts will focus on translating what an improved management system means to the public.

Audit Experience

In September/October 2006, the City was audited for ISO and OSHAS. The result was one major nonconformance and five minor nonconformances (one was specifically related to biosolids). The overall experience was good, although confusing at times. In December 2006, the major was corrected and verified by a desk audit. The City received its certification. The City is exploring Performance Track, and anticipates submitting its application this spring.

The process has been very good for them. The audit was very valuable learning experience.

For more information related to Lawrence's program, please contact Jeanette Klamm, jklaamm@ci.lawrence.ks.us.

Brainstorming Session – Establishing an NBP Mentoring Program

Participants offered the following observations about the establishment of an NBP Mentoring Program.

- The Northwest Biosolids Management Association (NBMA) has successfully established a peer group that helps agencies improve their biosolids programs. Aspects of the peer program include:
 - Evaluation materials
 - Training
 - Matching resources to needs
 - Phone support/conference calls

- A shared e-mail list would be helpful to encourage the sharing of information (*NBP note: a secure Yahoo discussion group is available for only EMS coordinators. Registration instructions and use of this group has been advertised in the monthly newsletter. However, there may be other, more user-friendly options available to facilitate secure information sharing among NBP participants. NBP will evaluate this further*).
- Currently have a good informal network
- Agencies are willing to share lessons learned and provide internal audit assistance – “we are just a phone call away”.
- Columbus developed a “shortlist” of contacts based on a review of the audits found on the web; this was helpful to narrow his information search.
- Contact list with phone numbers would be helpful (*NBP note: E-mail addresses for each EMS coordinator at every participating agency are listed on the NBP website*).

Session 3 – How to Create Goals & Objectives that Meet SMART Criteria

Key presentation points from the presentation are summarized below. Break-out groups were given a set of example goals and objectives. Some of the examples met the SMART criteria, but none met all of the criteria. The small groups were asked to come up with similar examples that met the SMART criteria. One person from each small group was asked to report back their results to the rest of the participants.

Goals and Objectives – SMART Criteria

Key Presentation Points

- NBP requirements in Element 5 include establishing and periodically reviewing measurable biosolids program goals and objectives that reflect identified priorities for improving the environmental performance of its biosolids management activities.
- Goals and objectives must also consider input from interested parties, be integrated with other elements of the EMS and biosolids management activities, be developed and documented using SMART criteria and be updated on a regular basis.
- NBP definitions for Goals and Objectives:
 - Biosolids Program Goals– environmental performance improvement goals that are consistent with an organization’s biosolids management policy to assure biosolids activities comply with applicable laws and regulations, meet quality and public acceptance requirements, and prevent other unregulated adverse environmental and public health impacts by effectively managing all critical control points.

- Biosolids Program Objective – a detailed environmental performance improvement requirement, quantified wherever possible, based on a biosolids program goal. One or more objectives must usually be met in order for the underlying goal to be achieved.
- SMART Criteria are: Specific, Measurable, Achievable, Relevant, and Time-bounded.
- Using SMART criteria will help you know if you have accomplished what you’ve set out to do, completed it on time, and achieved level of improvement desired.

Discussion Points

- There were two different approaches to the application of SMART criteria to goals and objectives. Some groups applied SMART criteria to the collective group of “goals and objectives.” Other groups applied SMART criteria to both goals and objectives so they could “stand alone.”

Session 4 – How NBP EMS is Helping Agencies with Public Acceptance

Chris Peot, DC Water and Sewer Authority (DCWASA)

Background

DC WASA was the fifth agency to receive NBP certification, completing the EMS verification in the fall of 2004. DCWASA is a Tier 4, Platinum agency.

Benefits of EMS

The fact that they are certified has translated into a lot of respect and credibility for the agency. Chris believes that DCWASA was doing a lot of things right with biosolids management, but the EMS provided a good structure to bring everything together. “We probably would have implemented CCPs, and other aspects, but not the public acceptance program if it weren’t for the EMS.” The Virginia Department of Health (VDH) sees them in a different light, as an agency that does things right. Moreover, citizen stakeholders have open communication with DCWASA staff. This is attributed to prioritizing the need for improved communication and providing stakeholders with regular reports about DCWASA’s biosolids program.

DCWASA is working with a lot of citizen’s groups because they recognized that they needed to reach out to a lot of people. Some people may not care about the certification (there is inherent mistrust of the government these days), but they do care about the fact that the agency is out there telling them about their process and their certification.

Unique aspects of DCWASA’s program include:

- Recycling program involving agricultural land application, silviculture in VA, poplar tree reclamation, and other reclamation activities (Stafford airport and West Virginia)

- The use of GIS mapping to show tonnages applied by county/state, nutrient value of biosolids applied
- Nutrient rebate from contractors (\$ per ton) totaling approximately \$250,000 per year is used for continued biosolids research
- Carbon sequestration is documented in biosolids reports; greenhouse gas reductions from biosolids land application are tracked and documented
- Contractor land application activities are overseen by Maryland Environmental Services, including olfactory odor measuring onsite by field inspectors

For copies of Chris Peot's presentation, visit:

http://www.biosolids.org/docs/NBP_EMS%20501%20Workshop_PP_Chris%20Peot_020607.ppt and more information about DCWASA's biosolids program, contact Chris (chris_peot@dcwasa.com).

Session 5 – Advisory Committee Briefing

Dave Taylor, NBP Advisory Committee Co-chair, provided a brief update of committee activities to date. Highlights from his update included:

- Description of the role of the Advisory Committee
- Presentation about the list of issues that the Advisory Committee has been asked to provide recommendations to the Steering Committee, including:
 - Regulatory participation in EMS programs
 - Continual improvement vs. nonconformance
 - Approaches to simplifying the EMS program
- Request for comments from the certified agencies on the above issues by February 16th (note that request for comment was distributed in a separate e-mail after the workshop by Mr. Taylor)
- Advisory Committee recommendations on the above issues will be submitted to the Steering Committee in advance of its May 9th meeting
- Dave also queried the certified agencies for input on whether the Advisory Committee could benefit by adding an auditor. There was overall support for the addition of an auditor.

Parking Lot Issues and Action Items

The following issues were listed in the “parking lot” for further clarification/action.

1. **Issue:** How are the four outcome areas audited? How are they linked to the EMS Elements?

Further information: Information on how the auditors are advised to examine outcomes and link them to the EMS Elements is provided in the Auditor Guidance, sections 4.53 through 4.5.6. This same information is also presented in the EMS Guidance Manual, chapter 11, pages 11-29 to 11-42.

2. **Issue:** If an agency did not meet a goal, would it be considered as a nonconformance?

Further information: No. An agency not meeting a goal or an objective is not considered a nonconformance. Rather, an auditor would look at how an agency's EMS responded to an unmet goal or objective and whether it made adjustments. For example, if an objective was not met, was the root cause investigated and were corrective actions made? An agency could fail to meet a goal or objective without having any related incidents of nonconformance.

3. **Issue:** During interim audits, is the auditor auditing against 17 EMS Elements or Auditor Guidance? NBP should provide a clarification statement to address this.

Further information: Auditors cite the 17 EMS Elements for specific findings of nonconformance, as the EMS Elements are the EMS program requirements. Auditors also use the Auditor Guidance for further guidance on auditing techniques, NBP audit process requirements (e.g., desk audits, scope of on-site audits), and interpreting the spirit and intent of the language in the EMS Elements where that may be unclear. The Auditor Guidance also contains the text of the 17 EMS Elements.

Follow up action: To help ensure consistency, NBP staff will communicate in writing with the third party auditors that they should be citing the 17 EMS Elements for findings of nonconformance.

4. **Issue:** Participants expressed concern about EMS terminology, and that various terms may connote different meanings to different organizations. For example, could an agency use the term "functional review" in lieu of the term "internal audit"? Is there flexibility to redefine terms so they are more meaningful to the respective agency?

Further information: An agency can use different terminology as long as definitions are included in EMS documentation and definitions meet the intent of the NBP requirement. For example, some agencies pursuing joint ISO certification use the terms "objectives and targets" instead of "goals and objectives". These agencies include definitions in their EMS documentation explaining the terms (e.g., target = NBP objective). Similarly, an agency could use the term "functional review" instead of "internal audit", provided that the functional review definition was documented and met the NBP requirements for internal audits.

5. **Issue:** Do SMART criteria apply to the collective "Goals and Objectives," or must they apply to "Goals" and "Objectives" separately? NBP needs to issue a clarification statement about this.

Further information: SMART criteria apply to objectives, as the definition of "objectives" in the EMS Elements specifically mentions that they should be quantified; however, "quantified" is not included in the definition of goals, inferring that it is unnecessary. Since objectives are steps towards achieving goals, the specificity, measurability, etc. of goals is identified within the related objective(s). Therefore, either approach is acceptable.

Follow up action: When the NBP EMS Guidance documents are next updated, interpretive text will be added to Element 5 to clarify the NBP intent.

6. **Action item.** Dave Taylor will distribute the Advisory Committee issues memo to the workshop participants for comment. (Completed).
7. **Issue:** What is the definition of a “contractor” according to NBP?

Further information: Broadly defined, “contractors” included anyone who is contracted to provide biosolids management activities and is not a direct employee of the agency. More important than the definition is how contractors are addressed by an agency’s EMS. Under the NBP program, it is the responsibility of the biosolids agency to ensure that contractors are meeting the requirements of the EMS, as applicable to the contractors’ biosolids management roles and responsibilities.

Follow up action: This issue was also raised by the Advisory Committee and presented to the NBP Steering Committee. Based on the Steering Committee’s direction, interpretive language will be added to EMS Elements 7 - 13 to provide greater flexibility in how agencies can demonstrate that they are ensuring contractors are meeting the EMS requirements, as applicable.

Appendix A – Final Agenda

National Biosolids Partnership
Certified Agencies 501 Workshop
February 6, 2007
Alexandria, VA

Agenda

Topic	Time
Breakfast	7:00 – 8:00 am
Welcome and Introductions <ul style="list-style-type: none">• Welcome from the NBP partners• Participant introductions	8:00 – 8:40 am
Workshop Overview	8:40 – 8:45 am
SESSION 1 – LIFE AFTER VERIFICATION: ONGOING AUDITING <ul style="list-style-type: none">• Review basics of interim and internal audits (scope, timing/cycle, forms, etc.)• Q&A	8:45 – 10:15 am
Break	10:15 – 10:30 am
SESSION 2 – LEARNINGS FROM THE NBP PLATINUM AGENCIES <ul style="list-style-type: none">• Presentation by Jeannette Klamm, Lawrence, KS: Key expectations, challenges and successes• Q&A• Brainstorming session: Establishing an NBP mentoring program	10:30 - 11:30 am
Lunch	11:30 am – 12:15 pm
SESSION 4 – How NBP EMS IS HELPING AGENCIES WITH PUBLIC ACCEPTANCE CHALLENGES <ul style="list-style-type: none">• Presentation by Chris Peot, DC WASA• Q&A	12:15 – 1:30 pm
Break	1:30 – 1:45 pm

Topic	Time
SESSION 3 - HOW TO CREATE RELEVANT GOALS & OBJECTIVES THAT MEET THE SMART CRITERIA <ul style="list-style-type: none"> • Review NBP requirements, SMART criteria • Small group, hands on exercise 	1:45 – 2:45 pm
SESSION 5 – ADVISORY COMMITTEE BRIEFING <ul style="list-style-type: none"> • Update by Dave Taylor, Co-chair, NBP Advisory Committee • Q&A 	2:45 – 3:10 pm
SESSION 6 – WRAP UP <ul style="list-style-type: none"> • Feedback • Next Steps • Wrap Up 	3:10 – 3:45 pm
Adjourn	3:45 pm

Appendix B – Survey Results

At the end of the workshop the participants were asked to complete a survey. The survey and its results are included here.



National Biosolids Partnership
EMS 501 Workshop
February 6, 2007

Workshop Evaluation/Survey Form

Your comments are very helpful to us in planning future workshops. Please take a moment to fill out this evaluation and turn it in to the workshop host. Thank you!

1. How would you rate the workshop?

(Circle one)

- a) excellent *Comments:*
- b) very good
- c) good
- d) fair
- e) poor

2. How would you rate the presentations?

- a) excellent *Comments:*
- b) very good
- c) good
- d) fair
- e) poor

3. How would you rate the level of interaction and discussion?

- a) excellent *Comments:*
- b) very good
- c) good
- d) fair
- e) poor

4. Describe the workshop content. The level of detail was:

- a) excellent *Comments:*
- b) very good
- c) good
- d) fair
- e) poor

5. Describe the level of information presented:

- a) too simple *Comments:*
- b) too complicated
- c) about right

6. Describe the length of the presentations:

- a) too long *Comments:*
- b) too short
- c) about right

7. Describe the group discussions:

- a) enough time for group discussions
- b) not enough time for group discussions
- c) about right

Comments:

8. How would you rate the meeting room and hotel accommodations?

- a) excellent *Comments:*
- b) very good
- c) good
- d) fair
- e) poor

9. How would you rate the meals and breaks provided during the workshop?

- a) excellent *Comments:*
- b) very good
- c) good
- d) fair
- e) poor

10. Please indicate the greatest benefit you gained by attending this workshop.

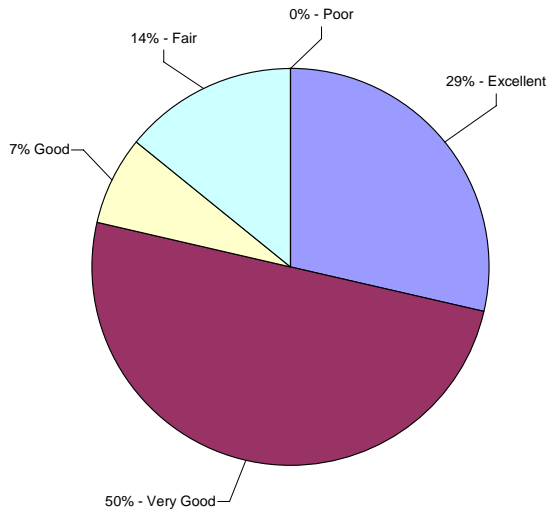
11. Please indicate any topics that you feel were not covered adequately.

12. Please provide any general comments on how the workshop could be improved.

Survey Results

14 surveys were filled out and turned in.

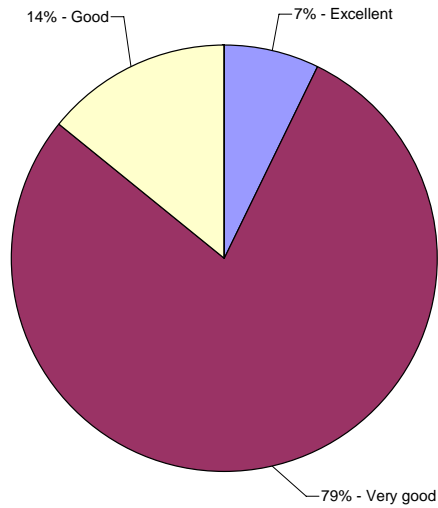
1. How would you rate the workshop?



Comments:

- Good job
- More time needed

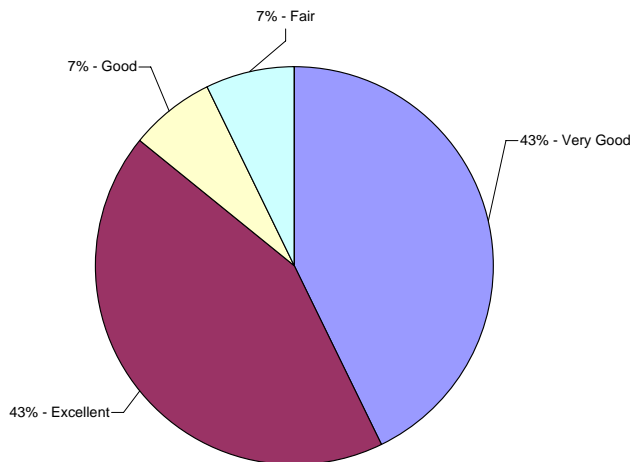
2. How would you rate the presentations?



Comments:

- Good job stepping in on short notice

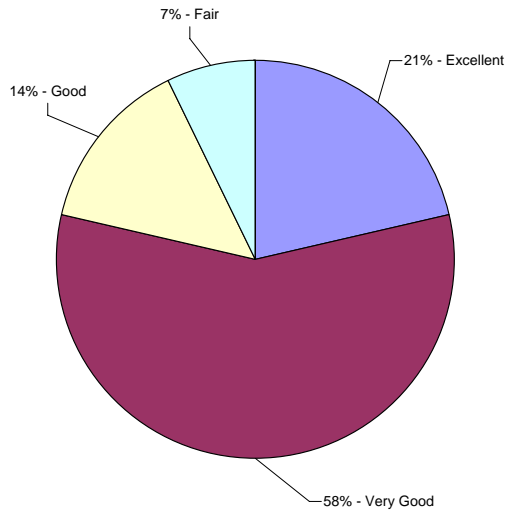
3. How would you rate the level of interaction and discussion?



Comments:

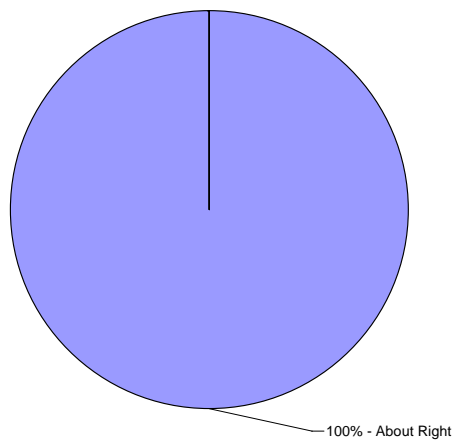
- See comments regarding auditor perspectives (question 12 below)

4. Describe the workshop content. The level of detail was:



Comments:

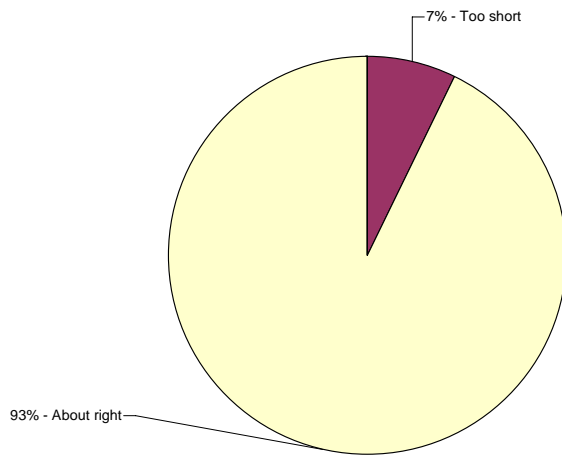
5. Describe the level of information presented:



Comments:

- Little on the simple side
- Still some unanswered questions

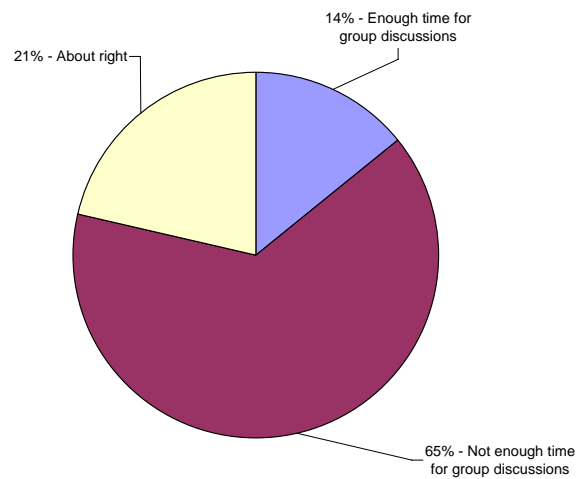
6. Describe the length of the presentations:



Comments:

- Need 2 days

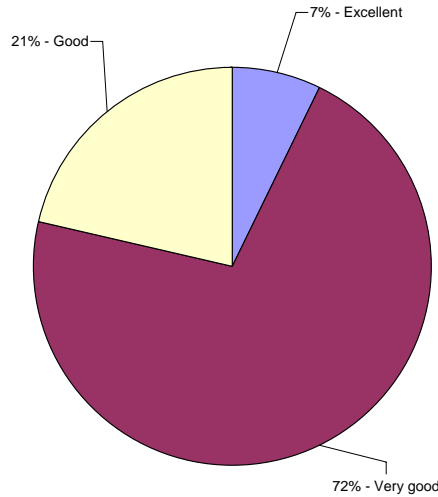
7. Describe the group discussions:



Comments:

- Morning discussion was fine, but the afternoon always seems pressed for time when there is more information to discuss
- Need at least 4 more hours

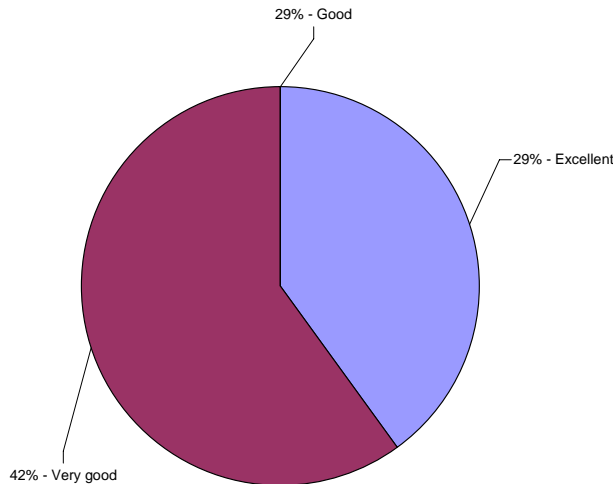
8. How would you rate the meeting room and hotel accommodations?



Comments:

- Location could be better

9. How would you rate the meals and breaks provided during the workshop?



Comments:

10. Please indicate the greatest benefit you gained by attending this workshop.

- Lessons learned from other agencies
- Good opportunity to voice opinions
- To hear other agencies are struggling in the same areas that we are – Goals and Objectives
- Networking opportunities and establishing relationship with other agencies
- Going over Goals and Objectives, SMART criteria
- Learning from other agencies
- Hearing other agency examples
- Better perspective on land application and audits
- Ideas from other agencies on their EMS

- Agency interaction
- Real-world experiences from Lawrence and DC WASA
- DC WASA's greenhouse gases study - great information swap!
- Good discussions with other agencies; nice to be able to compare notes with other agencies on EMS experiences
- Great outreach ideas from DCWASA (monthly reports and greenhouse gases)
- Another great opportunity to share info and problems with other certified agencies and NBP

11. Please indicate any topics that you feel were not covered adequately.

- Would have liked to know how agencies narrow down lists of goals and objectives
- Goals and objectives - very subjective; needs continued consideration by NBP
- Need clarification of goals and objectives and meeting SMART criteria
- What areas are agencies struggling with - more discussion needed
- Non-conformance issues from auditors; non-conformances not descriptive enough
- Goals and objectives have still not been addressed adequately; a lot of argument, but not a lot of consensus
- Did not learn about goals and objectives
- None evident

12. Please provide any general comments on how the workshop could be improved.

- None evident
- Need more time
- Have auditor participation
- The overall process may be improved by providing an entire session on goals and objectives - how to set, SMART criteria, how many, etc. Even a refresher course for certified agencies would be beneficial. More clarification needed.
- Survey for hot topics before workshops and spend more focus on them
- As more agencies get certified, consider holding workshop with another conference, like WEFTEC
- Don't want any auditors present; makes me uncomfortable; restricted discussion
- Is it possible to meet in a different month than February? The weather in DC is not very hospitable at this time. Also, with snow and ice in other parts of the county there is constant worry about flight delays or cancellations in connecting airports. Spring is a nicer time of year.
- February is the worst time to hold this meeting as it coincides with annual reports. I would also like it to be held in a more central location. The Biosolids Specialty Conference would be a good time.