

City of Los Angeles 2011 Biosolids EMS Interim Audit Summary



The City of Los Angeles' wastewater system serves more than four million people in Los Angeles and 27 cities that contract for this public works service. The system is comprised of more than 6,700 miles of sewer pipelines and four wastewater treatment and water reclamation plants that process more than 364 million gallons of flow each day citywide. The City processes, recycles and renews 147 billion gallons of this wastewater annually into 24 billion gallons of recycled water for beneficial water conservation purposes and 230 thousand tons of biosolids, a treated commodity. Biosolids are nutrient-rich organic material resulting from the treatment of domestic sewage at wastewater treatment facilities and are recycled as a soil amendment and fertilizer.

The City's biosolids management program is nationally recognized and has received the highest achievement (Platinum level) for biosolids management and environmental stewardship from the National Biosolids Partnership (NBP) that includes the National Association of Clean Water Agencies (NACWA), Water Environment Federation (WEF), and U.S. Environmental Protection Agency (EPA). For more than 15 years, the City of Los Angeles has maintained an environmentally sound biosolids land application program that meets and exceeds all enforceable local, state and federal regulations. For more than 20 years, the city has beneficially reused 100% of all biosolids produced.

The City completed its EMS interim audit from April-June, 2011. The City requested through the NBP to conduct its own audit as a substitution for an external third party auditor. A team of trained City staff conducted the Interim Audit and used their independent judgment to analyze the City's current biosolids practices. The audit results were reported to the Bureau of Sanitation management, the NBP, independent audit firm KEMA, and interested parties.

WHY: The goal of the audit is to ensure the City of Los Angeles' Biosolids EMS conforms to the requirements of the NBP EMS Program and City's EMS procedures.

WHAT: The "Year 3" interim audit of the City of Los Angeles' Biosolids Environmental Management System (EMS) and biosolids program. The City requested to substitute an internal audit for the interim audit, and the National Biosolids Partnership (NBP) approved the request. The scope of the interim audit is consistent with NBP requirements for the biosolids EMS interim audit and the overall audit program agreed to by independent auditor, KEMA, and the City.

WHERE: Audit was conducted of the Griffith Park Compost Facility, and Green Acres Farm.

WHEN: April-June 2011

WHO: Trained City of Los Angeles employees performed the audit.

RESULTS: Continued certification under NBP National Biosolids EMS program through September 2012. One (1) minor non-conformance requires corrective action, and the City of Los Angeles will consider the suggested opportunities for improvement.

SCOPE: Reviews are performed to assess the overall program effectiveness of the EMS processes. Audits are conducted to verify conformance with City of Los Angeles and NBP EMS requirements. The techniques used to conduct the audit are interviewing, observing, reviewing documents and records, and transaction testing. The scope included the following:



Auditor Observing Biosolids Being Off-Loaded at Green Acres Farm

1. Verification of open nonconformances from previous audits conducted in 2010.
2. Examination of EMS outcomes (regulatory compliance, interested party relations, environmental performance, quality practices).
3. Review of Significant EMS changes, EMS manual changes, and Management Involvement
4. Audit of Biosolids Transportation – Griffith Park and Green Acres Farm, Biosolids Use & Disposition – Composting – Griffith Park, Biosolids Use & Disposition-Agricultural (CA), Corrective and Preventive Action, Competency, Awareness & Training (incl. internal communications), Document Control & Record keeping-Contractor/Griffith Park, Communication Program (incl. public participation), Goals & Objectives, EMS Documentation, and Maintenance.

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AUDIT FINDINGS:

EMS Strengths

- The Bureau of Sanitation's communication process for alerting and informing the public about changes and updates to the program are effective.
- The communications between contractor, farmer, and City staff at Green Acres farm continues to be open and transparent.
- The Bureau's public outreach and communications program is effective and has resulted in positive feedback and recognition from several sources, including other City Departments and outside governmental agencies and organizations.
- The Bureau of Sanitation's process for maintaining contractor control has resulted in improved operations, continued regulatory compliance, and allowed continued use of biosolids at Green Acres Farm.



**Auditor Interviewing Biosolids
Transportation Driver**

EMS Nonconformances and Continual Improvements

The 2011 interim audit found no major nonconformance, one (1) minor nonconformance (listed below), and five (5) opportunities for improvement.

- 11-02 I- An inaccurate aerial photo of the Griffith Park site shows a conveyor belt crossing the fence of the facility, however this photo conflicts with the description of the facility given in the plan and what currently exists at the site.

EMS Outcomes

Regulatory Compliance

- Monthly reporting of monitoring and measurement results has helped improve relationships with regulatory agencies and other interested parties.
- Regulatory compliance continues at Green Acres Farm.

Environmental Performance

- The City continues to produce a Class A product that is beneficially used at Green Acres as a soil amendment and fertilizer to grow healthy crops that are sold to local dairies and others in Kern County.
- The Griffith Park Compost Facility continues to provide a quality compost product that is accepted and used by City, landscapers, and donated for public events.

Interested Party Relations

- The Bureau of Sanitation's public outreach program continues to expand and allows interested parties to make informed decisions about the program's future.
- The City's website continues to be the most used outreach medium, and frequent updates allow interested parties to access current information about the program.

Quality Practices

- The City's review and control of SOP's has helped achieve biosolids program goals and maintain a nationally certified biosolids management program.
- The City's incorporation of on-line new and existing training modules and material, including auditor training for biosolids has helped the City reduce overtime costs and resources such as paper and staff.
- The process used by the City to track contractor progress and activities has allowed continued use of Green Acres Farm.
- Griffith Park Compost facility continues to follow industry standards and best management practices for compost production and use.

If you would like to review the audit report, assist in addressing the findings, or have any questions please contact us at 310-648-5877 or visit www.lacitysan.org/biosolidsems/

