

# **Biosolids Environmental Management System (EMS) Management Review Report**

## **Summary**

The City is required to perform a periodic management review of the biosolids EMS. The management review is conducted based upon the requirements and procedures established in the biosolids EMS manual under Element 17 “Periodic Management Review of Performance”.

Each division manager that supports biosolids activities has a role and responsibility in the management review of the biosolids EMS. The managers of each division are responsible for any changes or corrective actions that should be initiated concerning the EMS. The Management Review Team (MRT) is composed of the Bureau Director, each Assistant Director, and each Division Manager that supports biosolids activities and the EMS Coordinator. The following are divisions that support biosolids activities:

- Hyperion Treatment Plant (HTP)
- Terminal Island Treatment Plant (TITP)
- Regulatory Affairs Division (RAD)
- Solids Resources Engineering and Construction Division (SRECD)
- Industrial Waste Management Division (IWMD)
- Human Resources Development Division (HRDD)
- Environmental Monitoring Division (EMD)

EMD and SRECD division managers were not available to attend the meeting due to schedule conflicts. Mas Dojiri, Division Manager of EMD, had reviewed the internal audit report and submitted comments prior to the meeting. The following attended the meeting and represented their division:

- James Langley, Executive, Assistant Director
- Raymond Kearney, Executive, Assistant Director
- Joseph Mundine, Executive/HTP, Assistant Director
- Traci Minamide, RAD, Division Manager
- Dennis Vander Hook, HRDD, Division Manager
- Hiddo Netto, TITP, Plant Manager
- Diane Gilbert, RAD, EMS Technical Advisor
- Mark Starr, IWMD, Senior Engineer
- Patricia Cruz, HTP, EMS Coordinator

This report summarizes the final decisions based on the internal audit report as a guide and the EMS requirements focusing on the need for change(s) to:

- Policy Statement (Element 2)
- Goals & Objectives (Element 5)
- Operational Critical Control Points (CCPs) (Elements 3 & 10)

- Other EMS elements

The City, with the assistance from CH2M Hill conducted its first Biosolids EMS internal audit from January 28 to January 30, 2003. The internal audit report was forwarded to the MRT for review and use at the March 4, 2003 management review meeting. The findings from the internal audit were based upon site visits, staff interviews and document evaluation. Potential nonconformances were identified, and the audit team offered recommendations.

The audit team was extremely impressed with the progress made to date, as well as the overall design and effectiveness of the City’s EMS. For a complete internal audit report, refer to the EMS database Bureau of Sanitation Wastewater page) at:

[http://httpfs1.san.ci.la.ca.us/Biosolids Environmental Management System/](http://httpfs1.san.ci.la.ca.us/Biosolids_Environmental_Management_System/)

*(Go to Element 16, to Internal Audit Procedures-Results, to Internal Audit Results and then to Final Internal Audit Report)*

### Internal Audit Results and MRT’s Decision

The table below summarizes the potential nonconformances cited from 5 elements of the EMS, the recommendations made by the audit team and the decision made by the MRT.

EMS Element	Potential Nonconformance	Internal Audit Recommendations	MRT’s Decision
2 Policy	Policy does not commit specific requirements of the NBP Code of Good Practice	Update the policy within 6 months to formally include the Code; Check with NBP prior to third party verification if the current policy will suffice	Policy statement will not be changed at this time; MRT determined that the NBP Code of Good Practice is included in the approved EMS manual.
5 Goals & Objectives	No specific goals and objectives identified for the biosolids program. Current resources used do not allow future public participation and input.	Include REBOC goals and objectives in the scope of EMS; document how interested party input was considered in developing the current set of REBOC goals (via informal mechanisms)	Recommendations taken and approved.
3 CCPs	Critical Control Points not entirely consistent with NBP Manual of Good Practice, i.e. Primary & Secondary Processes	Consider adding Primary, Secondary and Thickening as CCPs to cover all sections of the biosolids value chain.	CCPs identified by the City were based upon the processes that control or influence the quality and management program, therefore the City’s CCPs are in conformance with the NBP EMS requirements; no change will be made at this time.

6 Public Participation	None of the current programs allow public input into setting goals and objectives.	Add other public meetings and county board meetings that City attends both near the plants and the land application site; send letters to Green Acres neighbors, i.e. dairy farmers, Texaco station, BV Lake State Park, etc. and inquire about being interested parties.	Recommendations taken and approved
10 Operational Control of CCPs	Need to update all SOPs for Green Acres, HTP and TITP digester and dewatering sections	The City should complete station orders and SOPs prior to third party audit.	Recommendations taken and approved

**Discussion:**

**Policy (Element 2) –** The policy statement is current for the existing program and changes will be made as the City moves forward to producing Class A biosolids at TITP. The MRT determined that the NBP Code of Good Practice is included as part of the overall EMS manual that was approved by the City Council and Mayor in February 2002. Therefore this item is in conformance with the EMS requirements as reflected in the revised Action Plan under Element 1 “EMS Documentation”.

**Goals & Objectives (Element 5) -** The findings stated that there were no specific set of goals established for biosolids management that consider input from interested parties. The recommendations from the MRT included identifying specific goals in the REBOC meeting. In addition, HTP should identify the information found in the biosolids program management monthly report as goals and objectives for the biosolids program. The summary for Element 5 will be modified to include procedures on how the interested parties are involved in setting goals. The interested parties will include those near the treatment plants and land application sites. These decisions are reflected in the revised Action Plan under Element 1 “EMS Documentation”.

**Critical Control Points (CCPs) (Element 3) -** Based upon internal audit comments, the CCPs identified by the City were not consistent with the NBP Manual of Good Practice. The criteria used to identify the CCPs were based upon processes that control or influence the biosolids quality and City’s biosolids management program. Based upon the legal requirements, potential environmental impacts and input from interested parties, the MRT decided that the identified CCPs were in conformance with the NBP EMS requirements. These decisions are reflected in the revised Action Plan under Element 1 “EMS Documentation”.

**Public Participation in Planning (Element 6) -** The City needs to specifically identify how public input was received and considered in planning for setting goals and objectives for the biosolids program. The MRT agreed with this finding and decided that the Summary under Element 6 would be changed to include how the stakeholders were selected for the IPWP and the criteria used to identify goals for the biosolids program. Also

information would be included to show how the stakeholders were involved in the EMS development. The MRT also concluded that the El Segundo Citizen's meetings should be documented and the process of how they are involved in setting goals for the biosolids program should be explained. These decisions are reflected in the revised Action Plan under Element 1 "EMS Documentation".

Operational Control of CCPs (Element 10) - The MRT agreed with the internal audit findings concerning documentation for operational controls of CCPs. Discussion was held concerning, which SOPs were outstanding, and how much time was needed by the divisions for completion. TITP and HTP representatives stated that three weeks were needed to complete. The MRT agreed with this time frame. Some outstanding Class A SOPs will be in draft form because of process optimization and process conversion to Class A at TITP.

Other Issues:

Discussion was held concerning biosolids EMS overview training and the need to provide refresher course prior to third-party audit. HRDD manager stated that his staff would be willing to develop a tailgate to address this issue.

The EMS coordinator provided a status report on the public participation and communication of the EMS. Inquiries are being tracked and logged. Responses are provided within 5 working days. Inquiries are received from different public agencies located nationwide and outside of the United States such as Canada and Australia. The City has sent about 90 letters to identified interested parties requesting participation in the EMS process. As part of the public relations program, the City has developed a biosolids EMS brochure and 3 videos that are available in English and Spanish. These items are available to the public upon request and through the tours at the treatment plants and the farm.

## Conclusion

During the meeting, the MRT discussed the entire EMS manual and specifically addressed the need for changes to policy, goals and objectives, CCPs, and other EMS elements based on internal audit results. Based on the MRT's decisions, there will be no changes made to the biosolids policy statement and identified CCPs prior to the third party verification. The rest of the recommendations were agreed upon and corrective actions will be implemented. The EMS coordinator was directed by the MRT to proceed with the application for the third party verification and a date of April 1, 2003 was given as a target date for the third party audit. All division heads were reminded of their roles and responsibilities specifically on completing nonconformances from the internal audit results. For nonconformance reports issued as a result of the internal audit, refer to the EMS database Bureau of Sanitation Wastewater page) at [http://httpfs1.san.ci.la.ca.us/Biosolids\\_Environmental\\_Management\\_System/](http://httpfs1.san.ci.la.ca.us/Biosolids_Environmental_Management_System/) (Go to Element 14, to Nonconformance from 01-03 internal audit then to 2003)