



City of St. Cloud Minnesota Wastewater Treatment Facility
BIOSOLIDS MANAGEMENT PROGRAM
Environmental Management System

**INTERNAL AUDIT 2015
REPORT SUMMARY**

To: William R. Hancuff, NSF – International Strategic Registrations
Patrick Shea, Public Services Director
Tracy Hodel, Assistant Public Utilities Director

From: Emma Larson, Environmental Compliance Specialist (EMS Coordinator)

C: Erin McMahon, Laboratory Technician
Brian Schoenecker, Maintenance Mechanic

Audit Date: 3.9.15

Audit Report Date: 3.18.15

Summary Report Date: 3.23.15

Auditors: Erin McMahon, Laboratory Technician: Lead Auditor
Brian Schoenecker, Maintenance Mechanic: Lead Auditor
Patrick Shea, Public Services Director
Tracy Hodel, Assistant Public Utilities Director
Shane Lund, Utilities Water Quality Coordinator
Chris Plautz, Wastewater Services Supervisor
Wayne Ethen, Heavy Equipment Operator II
Donald Lumley, Treatment Plant Operator

Schedule of Year 2 Platinum Interim Audit was provided by Bill Hancuff and was used as a template for Year 2 Internal Audit. With prior approval from Mr. Hancuff, this Internal Audit shall meet the requirement for Year 2 Interim Audit.

Strengths, Minor Non-Conformances, Major Non-Conformances and Opportunities for Improvement are summarized below.

Corrective actions, where planning has started, is detailed. All corrective actions are listed in the Corrective Action Plan, which is available upon request.

Strengths of the Current Program:

- Element 1: The manual is very thorough and includes all necessary policies, programs, plans, procedures and management practices in the EMS and to maintain compliance.

- Element 1: All staff that has responsibilities in the EMS program received an online survey. One question asked was “What do you feel is the purpose of the EMS program?” 100% of the respondents wrote a positive purpose for the program.
- Element 8: A summary of the land application requirements (example; setback requirements) are laminated and in all tractors.
- Element 8: Goals have been posted throughout the facility and updated several times a year.
- Element 8: Emergency response and public relations procedures and contact information is laminated and in all tractors and semi-trailers in order to be able to respond in a more timely manner.
- Element 8: The online survey asked the question “What are your roles and responsibilities of your position regarding the EMS?” Over 88% of the total respondents (17) had a clear understanding of their roles and responsibilities. In addition, 75% of the respondents thought they receive enough training in their roles and responsibilities.
- Element 15: Biosolids Management Report is very well formatted; great colors and layout.
- Element 15: Auditors liked how the goals portion of Element 5, item #2 is termed “2014 and Beyond”.
- Element 15: Continue to highlight voluntary work and improvement in program.
- Element 17: The management review process was easy to follow.
- Element 17: Documentation is easily traceable. Audit members used Wastewater Update notes, Corrective Action Plan, Management Review Agenda, and the Management Review Report to locate information.
- Element 17: Management is clearly reviewing the EMS program annually and adhering to the review procedures in Element 17.

Major Non-Conformance:

- None Listed.

Minor Non-Conformances:

- None Listed.

Opportunities for Improvement:

Element 1:

- A procedure for determining the most “up to date” manual should be included.
- Update all city logos on attachments in manual.
- Reference contractor contract in Element 7 “Contractor Roles and Responsibilities”.
- Add updated EMS Platinum status audit plan to table 16.2.
- In Attachment 7.2, for contractors, take X off of “Monitoring and Measurement” and move to “Documentation, Document Control & Record Keeping”.
- Update MSDS to an SDS.
- A table of contents or tabs with element titles would be helpful.

Element 8:

- Attachment 8.2 should be evaluated and updated to include training required to fulfil roles and responsibilities for changes made to the EMS program. For example, internal audit procedures were changed and additional training was required.
- Consider developing a training log for formal and informal training that can be updated and accessed by the EMS team.
- Send an individual copy of Attachment 8.2 and Table 13.1 to all employees who impact the EMS

Element 15:

- The 2014 report did not contain a summary of total cost savings as stated in procedure H in Element 15.

- Recommend putting “NA” for molybdenum.
- Two copies of a “Final Annual Report” are saved on the f drive. Not sure which one is actually the final copy.
- The City website naming and structure for the EMS program needs improvement to make the report better accessible to interested parties. List file path under “attachments” to make finding the report very simple.
- Internal audits are not available online to interested parties.
- A method to track how many people look at the report would be nice (measure clicks?)
- Change the name of the report to avoid internal confusion and make it more interesting to interested parties.
- More review and comments by EMS team will enhance the report.
- Development of a newsletter template with less graphs, simple numbers, and an 8th grade reading level will help the report be more readable by interested parties.
- Add details about sustainability goals even if not an EMS specific goal.
- “No Corrective Actions/Preventive Action forms have been filled out since the external audit in July of 2014.”

Previous Non-Conformances (Previous Audit: External Third Party Certification 2013)

All non-conformances from the 2014 external audit were completed in accordance with the procedure outlined in Element 14.

Progress towards Goals and Objectives

It was determined that both 2014 goals and their associated objectives have either been met, or are on schedule to be completed on time.

Performance of EMS as it Relates to 4 Key Outcomes

Better Relations with Interested Parties—the development of the EMS program has significantly improved relationships with interested parties. St. Cloud WWTF provides opportunities to provide input through tours and various public events. It was discussed to include a survey or short questionnaire before and/or after tours to increase public participation.

Environmental Performance/Quality Management Practices—the implementation of the EMS program has led St. Cloud’s biosolids program to maintain a high quality product. Future Biosolids Management Program alternatives will enhance environmental performance and sustainability of the system.

Regulatory Compliance—St. Cloud biosolids program continues to exceed regulatory compliance enforced by the Minnesota Pollution Control Agency.

Evaluation of Management Review Process

Completion dates of the records that relate to the management review have been updated so that the scope of the review can be accomplished.

Troublesome Areas of the System

None Listed.

Notes from Lead Auditors:

“The result of the 2015 interim audit show St. Cloud Wastewater Treatment Facility has a continually improving and evolving EMS program. Dedication to continual improvement is evident in the participation of the EMS team and supportive staff.”

Note: A Corrective Action plan is required for all major non-conformances with a completion date of 60 days from this report: No major non-conformances were identified in this audit.

