



**Biosolids Management Program
Verification Audit Report**

**City of Los Angeles Bureau of Sanitation
Los Angeles, California**

Audit Dates: September 23 to 27, 2013

Audit Conducted By:

DEKRA Certification, Inc. (Chalfont, PA)

Auditors: Mr. Jon Shaver, Biosolids EMS Lead Auditor

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1. EXECUTIVE SUMMARY

DEKRA Certification Inc. (DEKRA) conducted an independent Verification Audit of the management system being used by City of Los Angeles Bureau of Sanitation (LA City) in managing its biosolids program. The audit was conducted September 23 to 27, 2013 at LA City's request as part of its participation in the NBP Biosolids Management Program (BMP). This was the third Verification Audit of LA City's biosolids program within the National Biosolids Partnership Biosolids Management Program certification program.

The purposes of this audit were to:

- Verify that the management system being used by LA City in managing its biosolids activities meets National Biosolids Partnership expectations and requirements.
- Confirm that LA City is managing its biosolids program effectively, with practices and procedures being performed as documented.
- Examine outcomes that LA City is achieving through the use of a systematic approach for continually improving its biosolids program.

The audit scope covered the LA City biosolids program, including activities within their biosolids value chain, consistent with NBP requirements. Audit criteria were the requirements of the 17 NBP BMP Elements and LA City's biosolids program requirements.

Audit Findings and Conclusions

Three minor nonconformances with respect to the audit criteria were found during this audit and LA City has prepared corrective action plans for these nonconformances that have been approved by DEKRA's Lead Auditor. Verification of effective corrective action will be included in the next third party audit, currently planned for September 2014.

Based on the results of this audit, DEKRA has determined that:

- LA City biosolids activities are consistent with NBP expectations and meet requirements of the NBP BMP Elements.
- Use of a management system approach is generating positive outcomes for LA City's biosolids program in the areas of regulatory compliance, environmental performance, quality practices and relations with interested parties.

DEKRA recommends "Platinum" Certification of LA City's biosolids program within the NBP Biosolids Management Program.

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2. AUDIT DETAILS

2A. Agency Details and Biosolids Program

Agency Detail

Agency Name, Location: City of Los Angeles Bureau of Sanitation, Los Angeles, California
(referred to as LA City in this report)

Biosolids Production Location(s): Hyperion Treatment Plant, Terminal Island Treatment Plant

Number of Employees: 375 (approximately)

Volume of Wastewater Treated (approximate): Hyperion Treatment Plant = 380 MGD
Terminal Island Treatment Plant = 30 MGD

Tons of Biosolids Produced (approximate): Hyperion Treatment Plant = 635 wet tons per day
(Class A)
Terminal Island Treatment Plant = 35 wet tons per day
(Class A & digested sludge)

Biosolids Use / Disposition Sites Audited

Griffith Park Composting Facility
Nursery Products Composting Facility

2B. Audit Team

LA City authorized DEKRA Certification Inc. to conduct this Third Party Audit of their biosolids program. DEKRA is an accredited Third Party Audit Company within the NBP Biosolids Management Program. Mr. Jon Shaver led the audit on behalf of DEKRA. Mr. Shaver is certified by the National Biosolids Partnership as a Biosolids EMS Lead Auditor and Biosolids Auditor. DEKRA asserts that our firm and auditor have an independent relationship with LA City that meets criteria established by NBP.

2C. Audit Criteria, Timing, Scope and Methodology

Audit Criteria

The audit criteria included requirements stipulated in the National Biosolids Partnership (NBP) BMP Elements (July 2011) and LA City's Biosolids Management Program.

Audit Timing

This Verification Audit was conducted September 23 to 27, 2013.

Audit Scope

The scope of the audit included parts of the LA City biosolids program, which encompasses pretreatment, solids generation, solids stabilization, handling and storage, biosolids transportation and biosolids use, with special attention to practices and management activities that directly support biosolids-related operations, processes and activities. The following topics were covered, consistent with NBP requirements and the Scope of Work agreed by LA City and DEKRA.

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1. Verification of effective corrective action for nonconformances from previous DEKRA audits.
2. Continual Biosolids Management System Dynamics Review, including:
 - Significant changes affecting biosolids program
 - BMP changes (incl documentation)
 - Biosolids Policy commitments
 - Effectiveness Reviews for Communications Program, Corrective & Preventive Action, Goals & Objectives, Management Reviews
3. Process Audits
 - Management Involvement
 - BMP Planning Processes
 - Competency, Awareness & Training
 - Critical Control Points & Operational Controls
 - Compliance (with legal & other requirements)
 - Communication Program (incl public participation)
 - Document Control & Recordkeeping
 - BMP Checking & Improvement Processes
 - Corrective and Preventive Action
 - Goals & Objectives
 - Management Review
 - Internal Audits
 - Biosolids Operations
 - Biosolids Preparation and Handling – Hyperion
 - Biosolids Preparation and Handling - Terminal Island
 - Biosolids Transportation
 - Emergency Preparedness
 - Maintenance
 - Pretreatment
 - Biosolids Use / Disposition
 - Biosolids Use – Griffith Park Composting
 - Biosolids Use - Nursery Products Composting
 - Control of Contractors
4. Examination of outcomes being achieved in the areas of regulatory compliance, interested party relations, environmental performance and quality practices.

Audit Methodology

The audit was conducted by qualified auditors following guidelines in the NBP Auditor Guidance (August 2011). Using a process auditing approach and sampling techniques, auditors observed practices in place, interviewed key persons and reviewed pertinent documents and records to assess the systematic performance of the process being audited and the consistency of biosolids management practices with written procedures. Interested parties were interviewed and transaction tests were performed to verify the effectiveness of the management system. This audit was conducted as a systems audit and is not a verification of compliance with any legal requirements applicable to practices performed by the agency or its contractors.

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2D. Reference Materials

The following documents were used as references during this audit:

- LA City EMS Manual (current version)
- National Biosolids Partnership "BMP Elements" (July 2011)
- National Biosolids Partnership Biosolids EMS Third Party Auditor Guidance (August 2011)
- National Biosolids Partnership Code of Good Practice
- National Biosolids Partnership Manual of Good Practice

2E. Definitions of Audit Findings and Required Corrective Action

Major Nonconformance – a serious omission from requirements and/or other departure that represents, or could cause a failure of the management system. Major nonconformances must be corrected within 90 days for DEKRA's verification to be issued.

Minor Nonconformance – an isolated departure from requirements that does not represent a management system failure. Minor nonconformances require timely and effective corrective action. A certified DEKRA auditor must verify the effectiveness of the corrective action taken in order to maintain DEKRA's Verification.

Opportunity (for improvement) – possible improvement in the EMS based on auditor observations. There is no obligation for action in response to these observations.

2F. Appeals

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 official verification decision or interim audit decision by the Audit Company. Information about the appeals process is available from the National Biosolids Partnership. Contact Mr. Ned Beecher: ned.beecher@nebiosolids.org).

2G. Further Information

Further information about this audit and/or the LA City Biosolids Management Program can be obtained from the City of Los Angeles Bureau of Sanitation. Contact Mr. Ernesto Libunao (telephone: 310- 648-5319, ernesto.libunao@lacity.org).

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3. SUMMARY OF AUDIT RESULTS

3A. Verification Conclusion

Based on results of this audit, DEKRA issues the following Verification Statement concerning the LA City's biosolids management system.

"DEKRA Certification, Inc. has independently verified that the biosolids management program being used by the City of Los Angeles Bureau of Sanitation supports continual improvement in environmental performance, meeting regulatory compliance obligations, utilizing good management practices and creating meaningful opportunities for public participation and is in conformance with requirements of the National Biosolids Partnership Biosolids Management Program."

3B. Strengths Observed

During this audit, DEKRA noted the following strengths in the LA City biosolids management system.

- The Environmental Learning Center at Hyperion is an excellent example of using a proactive outreach to communicate with the public.

3C. Outcomes

The LA City biosolids program is improving through the use of a systematic approach to managing their biosolids program. The following improvement outcomes within the past two years were confirmed.

Interested Party Relations

LA City's practice of openness and transparency with the public has led to active methods for engagement, including their website (127 million hits in the past year) and an Environmental Learning Center for public use.

Community meetings have moved to quarterly instead of monthly at the request of the local association in recognition of LA City's effective communication and addressing concerns in a timely manner.

Using crops from the Green Acres farm to feed animals in the LA zoo has received positive feedback from the public.

Environmental Performance

Average demand for energy has reduced to approximately 18 megawatts compared to 21 megawatts 10 years ago.

Recovery of digester off-gas for recycling and energy use has led to greenhouse gas reduction.

% solids of biosolids shipped to Green Acres has decreased from 750 tons to average 650 tons in 2008, leading to reduced fuel use and related emissions.

Quality Practices

A risk-based preventive maintenance system has been developed to assist in reducing downtime for critical equipment.

Redundancy for critical equipment has increased.

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Increased detention time in digesters and the use of egg-shaped digester has helped improve volatile solids reduction to 55% - 60% compared to 51% - 55% in most plants.

Regulatory Compliance

The Bureau of Sanitation has addressed all new regulatory and permit requirements in the past years without any noncompliances

Research is being conducted to determine if effects from pollutants of emerging concern to assist in understanding for possible regulations.

3D. Nonconformances Found This Audit

The following nonconformances were found during this audit:

Minor Nonconformance JS/E/13-01 NBP BMP Element #2 requires the organization to establish a biosolids management policy that commits to following the principles of the NBP Code of Good Practice and communicate that policy to employees. Seven of twelve employees who were asked were not aware of the basics or principles of the NBP Code of Good Practice.

Minor Nonconformance JS/E/13-02 NBP BMP Element #10 requires the biosolids organization to develop standard operating procedures, or other methods, to manage potential environmental impacts. The basis for determining the need for written SOPs has not been fully established.

Minor Nonconformance JS/E/13-03 NBP BMP Element #12 requires the biosolids organization to establish and maintain document control practices to ensure BMP documents are kept up to date. Hard copies of digester SOPs in the control room used by Operators do not include the most current versions of the procedures.

3E. Opportunities for Improvement

The following opportunities for improvement in the LA City biosolids management program were noted. LA City has no obligation to take any action in response.

- Since the EMS Manual is used to describe the Biosolids Management Program, it could begin with an introduction that includes purpose and scope and an introduction to how the system functions.
- A procedure for planning and implementing "significant" changes affecting the biosolids program could be developed to ensure consistency with BMP requirements and the addition of a new biosolids use location within the biosolids program (e.g. Nursery Products) could be considered to be a significant change.
- The link between Strategic Goals and the Biosolids Program Goals / Objectives of the Biosolids Program could be more evident.
- Consider periodic checking on the distribution and use of compost product derived from LA City biosolids to minimize potential liability for controversial practices.
- The effectiveness of key processes, such as operations, maintenance, training could be measured (e.g. key performance indicators) to identify improvement gains and opportunities.

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- A single Corrective and Preventive Action process and records could be used to determine if trends in system issues exist, such as repeating causes.
- The identification of critical control points could more clearly reference the quality, public acceptance and legal requirements that are being controlled and separate these from environmental impacts instead of combining them under "potential environmental impacts".

3F. Agreements

LA City and DEKRA will develop an Interim Audits Program to cover interim audits of the LA City biosolids program over the next four years. NBP requires that interim audits be conducted at least annually to verify that the certified organization's biosolids management program is functioning effectively and continues to conform to NBP expectations and requirements. The interim audits will be scheduled so that the complete LA City biosolids program is covered at least once during the current Certification cycle. Each interim audit will check on the effectiveness of key BMP processes and review any significant changes affecting LA City's biosolids program that have occurred since the previous audit. Interim Audit #3-1 will be conducted in September 2014 as a self assessment. DEKRA will conduct third party audits in 2015 and 2017. The next Verification Audit is due in 2018.

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4. DETAILED AUDIT RESULTS

The following outlines results of DEKRA's audit of processes used in managing the LA City biosolids program and the level of conformance with applicable requirements of the NBP BMP Elements.

4A Biosolids Management Dynamics Review

Significant Changes

The Hyperion Plant Manager is retiring and a new Plant Manager is in place. The new Plant Manager is familiar with the LA City BMP and its certification within the NBP program. The Hyperion Plant Manager remains responsible for the biosolids program. The addition of Nursery Products Composting Facility near Hinckley CA as a biosolids use site was done in a manner that is consistent with BMP requirements. The TIRE process at Terminal Island is not yet commissioned and remains outside the scope of the BMP.

BMP Changes

No changes to the LA City BMP have occurred in the past year. The EMS Manual was reviewed with minor changes that were consistent with requirements.

BMP Policy

The Biosolids Policy Statement remains as approved in 2004. The Policy commits to meet NBP requirements, which indirectly commits to following the Code of Good Practice.

Communications Program

The BMP communications and public outreach program continues as a top priority. An Environmental Learning Center has been introduced at the Hyperion plant for public participation. The Communications Program is functioning effectively.

Goals and Objectives

Of the 6 objectives established in 2012 for the biosolids program, 3 were successfully completed, 2 are ongoing and 1 was continued into 2013. The Goals and Objectives process is functioning effectively.

Internal Audits

An internal audit was conducted in March 2013 and findings are addressed. The Internal Audit process is functioning effectively.

Corrective & Preventive Action

The Corrective and Preventive Action process is being used effectively to address audit nonconformances. Incidents and accidents are also addressed using a separate corrective action process. The Corrective and Preventive Action process is functioning effectively.

Management Reviews

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The Biosolids Action Team meets quarterly to address biosolids program performance and to plan ongoing improvements. Two of these meetings use an agenda that follows NBP requirements for management reviews. The Management Review process is functioning effectively.

4B Closed Nonconformances from Prior Audits

Four minor nonconformances remained open from the previous DEKRA audit in June 2012. As a result, LA City took corrective action and DEKRA reviewed the effectiveness of that corrective action during this Reverification Audit. The results of that review are noted below

Minor Nonconformance JS/10-01/2 NBP EMS Element 2 requires the Biosolids Management Policy to be integrated into biosolids activities. Poor housekeeping was evident in Digester D battery, centrifuge area and truck loading (scaffolds, ladders left in place, hoses on ground, live electrical wires on floor, plastic bags in tunnels, equipment left on floors, cigarette butts on ground, control panels taped over). This is not consistent with commitment to Quality Practices included in commitment to Code of Good Practice.

CORRECTIVE ACTION: LA City determined that this nonconformance was caused by lack of attention to housekeeping due to limited resources. As a result they focused operator and maintenance activities to include improved housekeeping. Evidence of completion of this action was reviewed and the corrective action found to have effectively corrected the problem and addressed the cause. This nonconformance is now closed.

Minor Nonconformance JS/12-01/9 NBP BMP Element 9 requires the organization's communications program to communicate relevant information about its biosolids management policy to its employees and outside contractors. Some personnel at the Terminal Island plant were not fully aware of some principles of the Code of Good Practice that LA City has committed to follow as part of their biosolids program.

CORRECTIVE ACTION: LA City determined that this nonconformance was caused by lack of attention to the Code of Good Practices in EMS Awareness training. As a result they trained Terminal Island personnel in awareness of the Code of Good Practice. Evidence of completion of this action was reviewed and the corrective action found to have effectively corrected the problem and addressed the cause. This nonconformance is now closed.

Minor Nonconformance JS/12-02/10 NBP BMP Element 10 requires the organization to develop and implement appropriate methods to manage potential environmental impacts effectively. A Hazardous Waste accumulation site in the Mechanical Shop at Hyperion included unlabeled drums, no accumulation start date and drums containing other waste (dirty rags, universal waste, used oil).

CORRECTIVE ACTION: LA City determined that this nonconformance was caused by incorrect records and labeling. As a result they focused attention on correct labeling of hazardous waste. Evidence of completion of this action was reviewed and the corrective action found to have effectively corrected the problem and addressed the cause. This nonconformance is now closed.

Minor Nonconformance JS/12-03/14 NBP BMP Element 14 requires the organization to identify the cause and document and take action in response to nonconformances to prevent a recurrence.

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A change in corrective action plans to prevent nonconformance JS/10-01E from the August 2010 Third Party Audit from recurring was not documented.

CORRECTIVE ACTION: LA City determined that this nonconformance was caused by incomplete attention to verify effective corrective action. As a result they assigned responsibility to the EMS Coordinator to ensure audit nonconformances are effectively corrected. Evidence of completion of this action was reviewed and the corrective action found to have effectively corrected the problem and addressed the cause. This nonconformance is now closed.

4C Process Audits

As part of this audit DEKRA audited the following processes that LA City uses within its biosolids management program and determined the level of conformance of each process with NBP expectations and requirements of the audit criteria.

Process	Conformance with Applicable BMP Elements
Management Involvement (incl Policy, Direction, Roles / Responsibilities)	Conforms, except as noted below
<u>BMP Planning Processes</u>	
Communication Program	Conforms
Competency, Training & Awareness	Conforms
Compliance (with legal & other requirements)	Conforms
Critical Control Points & Operational Controls	Conforms
Document Control & Recordkeeping	Conforms, except as noted below
Public Participation in Planning	Conforms
<u>Checking & Improvement Processes</u>	
Corrective and Preventive Action	Conforms
Goals & Objectives	Conforms
Internal Audits	Conforms
Management Review	Conforms
<u>Biosolids Operations</u>	
Biosolids Preparation and Handling - Terminal Island	Conforms, except as noted below
Biosolids Preparation and Handling – Hyperion	Conforms, except as noted below
Emergency Preparedness & Response	Conforms
Maintenance	Conforms
Pretreatment	Conforms

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Process	Conformance with Applicable BMP Elements
<u>Biosolids Use / Disposition</u>	
Biosolids Use – Griffith Park Composting	Conforms
Biosolids Use - Nursery Products Composting	Conforms
Control of Contractors	Conforms

4D Audit Findings

Audit of the processes listed above determined that they are functioning effectively and meet requirements of the NBP EMS Elements, except as noted below.

Minor Nonconformance JS/E/13-01 NBP BMP Element #2 requires the organization to establish a biosolids management policy that commits to following the principles of the NBP Code of Good Practice and communicate that policy to employees. Seven of twelve employees who were asked were not aware of the basics or principles of the NBP Code of Good Practice.

Minor Nonconformance JS/E/13-02 NBP BMP Element #10 requires the biosolids organization to develop standard operating procedures, or other methods, to manage potential environmental impacts. The basis for determining the need for written SOPs has not been fully established.

Minor Nonconformance JS/E/13-03 NBP BMP Element #12 requires the biosolids organization to establish and maintain document control practices to ensure BMP documents are kept up to date. Hard copies of digester SOPs in the control room used by Operators do not include the most current versions of the procedures.

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APPENDICES

Appendix 1 List of Participants

The following persons participated in this audit. Other persons provided additional explanations, as necessary.

City of Los Angeles Personnel

Roshanak Aflaki	Plant Manager TIWRP
Emmanuel Alloh	Environmental Engineer HTP
Jeff Anderson	Transportation Manager SRPCD
Thomas Ardent	Wastewater Treatment Operator HTP
Eric Auclair	Wastewater Treatment Operator HTP
Lonnie Ayers	Environmental Engineer IWMD
Ronald Bell	Shift Superintendent I HTP
Susan Chang	Senior Chemist EMD
Tim Dafeta	Division Manager, IWMD + HTP Plant Manager (incoming)
Dan Denering	Superintendent, SRPCD
Maria Depaz	Environmental Compliance Inspector HTP
Mas Dojiri	Division Manager EMD
Steve Fan	Hyperion Treatment Plant Manager (outgoing)
Diane Gilbert Jones	Environmental Engineering Associate RAD
David Gumaer	Shift Superintendent Wastewater Treatment TIWRP
Karen Ingalla	Sanitation Wastewater Manager HTP
Ernest Jessop	Equipment Supervisor SRPCD
Cindy Kovacs	Environmental Engineer ICSD
Jensen Liang	Shift Superintendent 1 HTP
Ernesto Libunao	Environmental Engineering Associate HTP
Kristo Miloslavic	Wastewater Treatment Operator HTP
Omar Moghaddam	Division Manager RAD
Joe Pascu	Shift Superintendent Wastewater Treatment ISCD
Constantino Pano	Environmental Engineering Associate SRPCD
Hassan Rad	Assistant Division Manager RAD
Ricardo Rodriguez	Maintenance Laborer SRPCD
Rosalia Rojo	Environmental Engineer, SRPCD
Bahram Roshanian	Sanitation Wastewater Manager HTP
Michael Simpson	Assistant Manager, IWMD
John Salas	Environmental Compliance Inspector SRPCD
Mihran Sarkisian	Sanitation Wastewater Manager HTP
Seung Tag Oh	Environmental Engineer TIWRP
Ken Trong	Shift Superintendent TIWRP
Chuck Turhollow	Division Manager ISCD
Robert Urrea	Wastewater Treatment Operator HTP
Ollie Veasey	Sanitation Wastewater Manager HTP
Loudmilla Vertanessian	Environmental Engineer, IWMD
Bellele Yohannes	Chief Environmental Compliance Inspector, IWMD
Jonathon Zan	Environmental Engineer SRPCD

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Contractors

Joel Santos	Environmental Manager (Terra Renewal)
Chris Seney	Vice President, Nursery Products

Interested Parties

Lauren Fondahl	EPA Regional Biosolids Coordinator
Greg Kester	CASA
Ron Roque	Local Enforcement Agency – Environmental Specialist
Denny Schneider	IRP Stakeholder

Appendix 2 Documentation / Objective Evidence Reviewed

Balanced scorecard
Biosolids Overview training records (various)
Biosolids Performance Report 2012 (July 2013)
Biosolids Policy (12/12/04)
Biosolids Spill Response Plan
Bureau-wide evacuation exercise 1/16/13
Class Specification - Env'l Engr Associate 6/14/07
Composting regulations chap3.1
Critical control points and operational controls table
Emergency action & Fire Prevention Plans - Griffith Park Composting 3/17/13
Employee awareness tailgate 8/2/13
EMS objectives 2013/14, 2012/13
Griffith Park - daily logs
Griffith Park monthly report
HTP mercury data 2002-12
Hyperion heavy metal influent data
Hyperion Response Plan 9/18/13
Internal audit summary report 3/21/13, 3/26/13
IWM Treatment Plant Response Plan 9/2013
LA City Biosolids Policy Statement
LA City EMS Manual
Management reviews 8/29/13, 3/28/13
Metal concentration in biosolids - historical average
Monitoring & Measurement records (various)
MSDS (various)
Nonconformance Corrective Action Plans (various)
Nonconformance tracking log
Nursery Products - Biosolids Management Plan 9/1/13
Nursery Products Fire Prevention & Mitigation Plan 4/2010
Operator certifications (California) - various
Overview training manual 03-17-10
Position Description - Wastewater Treatment Operator
Program outcomes 2013
Solid Waste Handling Standard title 14, div7, chap3
SOP - truck loading
Top Gro literature
Training records (various)
Training responsibility table 5/30/12
Water integrated resource plan Jan-June 2013

END OF REPORT