NATIONAL BIOSOLIDS PARTNERSHIP
THIRD INTERIM AUDIT REPORT

Alexandria Sanitation Authority
Alexandria, Virginia

Audit conducted by

NSF-International Strategic Registrations

William R. Hancuff, Lead Auditor

References:
National Biosolids Partnership (NBP) ***EMS Elements***
NBP ***Third Party Verification Auditor Guidance – November 2001***
(Latest Revision August 2007)
NBP ***Code of Good Practice***
Alexandria Sanitation Authority EMS Manual
(Core Documents – Various dates)

Final Report – May 2, 2011

INTRODUCTION

The purpose of the Biosolids Environmental Management System (EMS) interim audits is to verify through regular reviews the system's health and effectiveness between verification audits. The third party on-site interim audits provide independent reviews and supports credibility between re-verification audits. The goal of the third party interim audit is to collect and evaluate objective evidence related to a portion of the EMS such that over the course of the four interim audits conducted between verification audits all 17 elements are covered. The audits determine whether the Alexandria Sanitation Authority (ASA) Wastewater Treatment Facility Biosolids EMS is functioning as intended, that practices and procedures are conducted as documented, and that the EMS as implemented conforms to the NBP's Code of Good Practice and EMS program objectives.

RECOMMENDATION

The results of the ASA biosolids EMS interim audit and review of corrective action notices are positive, and it is the recommendation of the audit team that the ASA biosolids EMS maintain its "Verification" status.

AUDIT SCOPE

The NSF- International Strategic Registrations, Ltd. (NSF-ISR) conducted a third party interim audit of the ASA's EMS for Biosolids from April 18, 2011 through April 20, 2011. The on-site interim audit team consisted of Dr. William R. Hancuff, Lead Auditor.

The scope of the first interim audit included a review of areas generally related to the organization's progress toward goals and objectives; EMS outcome requirements for environmental performance, regulatory compliance, relations with interested parties, and quality biosolids management practices; actions taken to correct minor nonconformances; the management review process; and corrective and preventive action requests and responses. This review generally included requirements found in elements 1, 2, 5, 6, 9, 14, 15, 16 and 17. The specific elements that were audited in their entirety were 3, 10 and 13.

The following individuals were interviewed as part of the audit process:

Karen Pallansch	General Manager
James Sizemore	Quality Manager
Joel Gregory	Process Manager
Lisa Racey	Engineering Coordinator
Heather Thomas	Communications Manager
EMS Team	

INTERIM AUDIT FINDINGS

The interim audit included review of the latest versions of relevant ASA EMS element procedures and employed the most recent version of the NBP Third Party Verification Auditor Guidance dated August 2007. The interim audit found 4 positive observations, no major non-conformances, 5 minor non-conformances and 9 opportunities for improvement.

The NBP Third Party Verification Auditor Guidance indicates that when the auditor has identified minor nonconformances during the on-site audit, the organization must resolve the nonconformances and provide documentation to the auditor within 30 days of the audit. NBP acknowledges that biosolids organizations may not be able to fully correct some minor nonconformances within 30 days, in which case NBP requires that the audited organization develop an action plan with time frames. This plan and schedule for correcting minor nonconformances must be approved by the lead auditor. Corrective action plans were prepared and submitted to the lead auditor and the approach and time frame for implementation were approved. Field verification of the closure of all minor findings will be finalized during the next scheduled interim audit.

The following is a review of the positive observations made during the interim audit. The minor non-conformances and opportunities for improvement follow and are listed by item number, which correspond to the element minimum conformance requirements found in the NBP Third Party Verification Auditor Guidance. These findings are presented in the sequence of the NBP standard elements.

Positive Observations

The ASA management and all plant personnel involved in the biosolids environmental management system development should be recognized for their outstanding achievements, and the exceptional features of their Biosolids EMS. The following is a summary of those positive observations made during the third interim audit.

Commendations:

- ASA is to be commended for merging its ISO 14001 based EMS with its Biosolids EMS to form a single streamlined management system. This is no easy task, but appears to have been effectively accomplished.

- The facilities maintain an exemplary visitors center that presents a comprehensive exhibit of processes used to produce high quality water and exceptional quality class A biosolids. This is an excellent tool for making the general public aware of the complexities of processing wastewater into useable end products. The display not only provides facts and data to technical and professional individuals, but also provides an introduction for enlightening school age children to the industry.

- ASA is to be recognized for creating a full time position to emphasize the importance of communication with the general public in telling the ASA story. It is one of only a handful of wastewater agencies that have moved forward to proactively embrace the need for public awareness.

- ASA has established an excellent system for tracking all changes to its EMS element procedures and standard operating procedures. This detailed tracking system is included as an historic record of specific EMS advances and enhancements along with the improvement dates.

And finally, the hard work and dedication of the EMS Team must be acknowledged. Maintaining the EMS verification goal is obviously a team effort, but the guidance and direction provided by the Quality Manager, James Sizemore and the assistance of the Engineering Coordinator, Lisa Racey to ensure continuous improvement must be recognized. Additionally, the support, encouragement and active participation of General Manager, Karen L. Pallansch, in the EMS process has guaranteed the continued success of the program.

Minor Nonconformances

- Requirement 9.1 – The Communications and Public Outreach Procedure (EMSP-4.4.3-1) does not adequately describe the details of communication with regulatory agencies with respect to routine reporting responsibilities and other formal or informal communications.

- Requirement 12.3 – The Control of Records Matrix (EMSD-4.5.4-2) does not accurately reflect the retention time requirement for each record.

- Requirement 15.1 – The annual biosolids program and performance report does not adequately describe the details of each goal and objective and the progress made to meet the outcome requirements for environmental performance, regulatory compliance, relations with interested parties, and quality biosolids management practices.

- Requirement 16.1 – The implementation of the internal audit procedure does not adequately include all of the organization's biosolids management activities associated with its land application contractor.

- Requirement 17.2 – The management review meetings do not include the status of follow-up on action items identified in the previous management review meeting.

Opportunities for Improvement

- Requirement 2 – Consider dating the Policy Statement and including it as a reference in Document EMSP-4.2-1 – Environmental Policy Procedure.

- Requirement 3.1 – It does not appear that "truck storage" included in List of Critical Control Points (EMSD - 4.3.1-2) is a stand alone critical control point.

- Requirement 5 – Consider formulating goals and objectives according to the outcome categories of: environmental performance, regulatory compliance, relations with interested parties, and quality biosolids management practices;

- Requirement 5 – Consider using the strategic planning initiative as a source of new biosolids EMS objectives.

- Requirement 5.2 – Consider using the Communications Strategy as a basis for developing the goals, objectives and programs for the biosolids EMS "relations with interested parties" outcome area.

- Requirement 5.2 – Consider referencing in the Goals, Objectives and Programs Procedure (EMSP - 4.3.3-1) the summary list/table of the current Goals, Objectives and Programs presented as Monitoring and Measurement of Goals, Objectives & Programs (EMSD - 4.5.1-2).

- Requirement 8.1 – Consider including in the Competence, Training and Awareness Procedure (EMSP - 4.4.2-1) a description of the methodology used to ensure that all personnel requiring training have received that training.

- Requirement 16.3 – Consider expanding the number of qualified or certified internal EMS auditors through supporting attendance at formal auditor training program(s).

- Requirement 17.1 – Consider including in the Management Review Procedure (EMSP - 4.6-1) a reference to the "Agenda Template" and the "Minutes Template."

For the minor non-conformances, ASA personnel prepared Corrective Action Notices (CANs) and Corrective Action Work Plans, and will implement corrective actions according to their EMS procedures to provide continual improvements to their biosolids program. All proposed corrective action work plans were reviewed by the auditor and found to be acceptable and final closure will be verified during the next external third party interim audit. As a further measure to demonstrate continuous improvement the opportunities for improvement will be addressed to the maximum extent possible.

There have been considerable improvements in the ASA's EMS since the last external interim audit and this continuous improvement is expected in the future.

ALEXANDRIA SANITATION AUTHORITY COMMENTS

ASA values the importance of periodic third-party audits and understands the benefit of using the audit's findings to improve our Environmental Management System. Based on the conducted interim audit, ASA agrees with the result of the audit and is committed to addressing all non-conformances as well as the opportunities for improvement. We have prepared action plans and dedicated resources to address each of the minor non-conformances.

OUTCOMES MATTER

The ASA Biosolids Environmental Management System established one biosolids EMS goal and 4 objectives within that goal. The goal and objectives were developed by the Biosolids EMS coordinator and the EMS Team considering public interest. The ASA Biosolids goal for its EMS was established cognizant of each of the four outcome focal points of the NBP program as identified below:

1. Environmental Performance,
2. Regulatory Compliance,
3. Relations with Interested Parties, and
4. Quality Biosolids Management Practices.

While it is not a requirement to fully attain all objectives established, it is a critical component of the system to make progress towards accomplishing the overall goal. The ASA initially established goals in 2006, and attained, or completed to the ASA desired level, those goals. Subsequently, a single new major goal was established in 2008. The goal and the objectives that were a subpart to that goal were established using Specific, Measurable, Achievable, Relevant, and Time Bound (SMART) criteria.

The goal of ASA's biosolids EMS is to develop the capacity to reuse 100% of ASA's biosolids in an option other than agricultural land application. There were four objectives initially identified under this goal: develop partnerships with ASA's customers that will determine the capacity for local reuse by the end of 2008; initiate a pilot project and develop a marketable biosolids product; incorporate new reuse options into ASA's biosolids EMS and address regulatory requirements for new reuse options; and beneficially reuse 1% of ASA's biosolids in an alternative other than land application by 2009. As part of its dedication to continual improvement as it accomplished these objectives it developed two new of follow-on objectives. These new objectives included initiating a pilot program for the evaluation of the effectiveness of employing a biosolids/soil blend in landscaping and supporting an investigation of the feasibility of a biosolids-to-energy (B2E) project.

The facility's performance relative to each of the above listed outcome groups is addressed below.

In the Environmental Performance outcome area, ASA completed its initial objective of initiating a pilot project and developing a marketable biosolids product. The primary purpose of this objective was to produce an aesthetically pleasing biosolids end product for use as a soil amendment for urban usage as opposed to farmland agricultural land application. This requires establishing improved environmental performance standards associated with reduction in the odor profile of biosolids; production of a uniform quality product through controlling the texture and moisture content, and ensuring attainment of a maximum carbon to nitrogen ratio. Tasks accomplished to meet this end include: entering into a contract to evaluate a blended product of biosolids and mulch fines (or other mixes) to determine the optimum ratios of blends for texture, odor, composition and overall value; selection of the final blend ratios and product manufacturing process; and development and implementation of a comprehensive long term product analysis and quality control program. The combination of these tasks were completed by the end of 2009, and the follow-on objective of employing and evaluating the biosolids/soil blend on an experimental landscaping site was initiated. The initial baseline measurements of trees and shrubs has been completed.

ASA has also developed an additional action plan in which the authority is partnering with regional utilities to investigate the feasibility of a biosolids-to-energy (B2E) project.

In the Regulatory Compliance outcome area, ASA established an objective to incorporate new reuse options into ASA's biosolids EMS and address regulatory requirements for these alternatives. Tasks within this objective include addressing all regulatory permitting issues, such as a marketing and distribution permit and modification of the Sludge Management Plan (SMP) for regulatory approval. ASA has determined that there are two options available for use of biosolids as a soil amendment. The first is distribution of the product at no charge and the second is the sale of the final product. Each alternative has separate regulatory requirements. If the product material is distributed free the requirements can be met through alteration of the existing Virginia Pollutant Discharge Elimination System (VPDES) permit to include modification of the ASA's SMP. On the other hand, the option of selling the product requires meeting the regulatory requirements for distribution and marketing and a permit must be issued for that purpose through the Virginia Pollution Abatement Program operated by the Virginia Department of Environmental Quality. The ASA land application contractor obtained the final permit in June 2010 and ASA is in the process of establishing a new objective to address the regulatory compliance outcome area.

In the Relations with Interested Parties outcome area, ASA established an objective to develop partnerships with ASA's customers that will determine the capacity for local reuse by the end of 2008. Tasks within this objective include: initiating contacts with target customers to gauge interest and obtain specific feedback on product uses and product concerns; calculating approximately the expected quantity that potential customers could logically reuse; developing marketing tools for the product, such as name, packaging, and marketing brochures; and discussing reuse agreements with local government bodies. After completing the initial tasks associated with this objective it was determined to develop a new approach. This objective as removed in 2010, and a

modification to the land application contractors contract was made whereby the contractor would provide up to 100 tons of blended material to ASA to be used for whatever applications the authority determined would be most beneficial. This objective has not yet been formalized through an action plan. Additionally, there is a new overall public relations and communications action plan being developed to include biosolids activities.

In the Quality Biosolids Management Practices outcomes area, ASA originally established two objectives, parts of which address this area. The first is to implement the reuse of a portion of ASA's biosolids in an option other than land application. The tasks involved in this objective include: finalizing reuse agreements including costs with local government agencies; developing a transportation and distribution system; distribution of initial production of bagged biosolids product; document distribution and marketing as critical control point in the biosolids EMS; develop appropriate operational controls for distribution and marketing, and finalize product delivery schedule with local customers. This objective was completed in 2009 with the use of 1% of the total biosolids in research activities. This objective progressively evolved into the new activity described above, i.e. having the land application contractor provide up to 100 tons of blended material to ASA for the authority's beneficial use.

The second objective related to quality biosolids management practices is one previously discussed associated with the environmental performance outcome, namely initiating a pilot project and developing a marketable biosolids product. Quality biosolids management practices that are the focus of this and the previous objective include development of a QA/QC program for blending the final product; development and implementation of appropriate operational controls for this new critical control point; preparation of a comprehensive sampling plan that goes beyond regulatory requirements by analyzing the product for toxicity characteristic leaching procedure (TCLP); pathogens, including enteric viruses and viable helmuth; polychlorinated biphenyls (PCBs), organics; and all Section 503 tests applied to the final product. This objective was completed in 2009 with the incorporation of these quality control analyses into the standard operating procedures SOPs.

The most recent objective in this area is with maintaining a quality blend of biosolids and soil such that a measurable improvement can be made in landscaping activities. This objective is currently in the beginning stages and the baseline measurements have been completed.

CONCLUSIONS AND RECOMMENDATIONS

The results of the third party interim audit show the ASA has a fundamentally strong Environmental Management System. The NSF lead auditor reviewed the implantation of the corrective action plan for the major nonconformance and associated minor nonconformances on May 28, 2009. Additionally the corrective action plans for the new minor nonconformances were reviewed and approve at the same time. Therefore, it is the

recommendation of the audit team that ASA's Biosolids Environmental Management System (EMS), Alexandria, Virginia retain its "verification" status.

As was mentioned previously, an EMS is a continuously improving process, and retention of verification status is not the end. The results of this and future audits will provide value added to the system and should be viewed as an overall opportunity to improve. Every audit is a snapshot in time, and does not, or cannot, identify each and every area for improvement. And yet, while no single audit identifies all of the areas for improvement the results of each audit provide an additional incremental step in the overall system's improvement.

Based on discussions between the facility's Biosolids EMS Coordinator and the third party auditor the following interim audit schedule is proposed for the next three years.

The scope of each interim audit will include a review of the organization's progress toward goals and objectives; EMS outcomes (environmental performance, regulatory compliance, interested party relations, and quality practices); actions taken to correct minor nonconformances; the management review process; and corrective and preventive action requests and responses. This review generally includes requirements found in elements 1, 2, 5, 6, 9, 14, 15, 16 and 17.

In order to address each element of the NBP standard over the four years of interim audits the following elements are tentatively scheduled over the period between verification audits:

Year 1 (third party) – Elements 2, 5, 6, and 9 (completed)

Year 2 (internal) – Elements 1, 4, and 8 (completed)

Year 3 (third party) – Elements 3, 10, and 13 (completed)

Year 4 (third party) – Elements 7, 11, and 12.

Attachment 1

Documents and Other Objective Evidence Reviewed During the Third External Interim Audit

Element 1. Documentation of EMS for Biosolids

- Interview with James Sizemore, Quality Manager.
- Interview with Lisa Racey, Engineering Coordinator.
- EMSP-4.4.4-1 EMS Manual and Documentation Procedure, dated 2/24/11.
- EMSD-4.4.5-2 Master Document Matrix, dated 4/30/07.
- EMSD-4.4.4-4 EMS Reference Matrix, dated 10/14/09.
- Biosolids EMS Element (Core) documents contained throughout 20 EMS Sections with various version numbers and effective dates (Constituting ASA's "EMS Manual").

Element 2. Biosolids Management Policy

- Interview with Karen Pallansch, General Manager.
- Interview with James Sizemore, Quality Manager.
- Interview with Lisa Racey, Engineering Coordinator.
- EMSP-4.2-1 – Environmental Policy Procedure, dated 6/23/10.
- Alexandria Sanitation Authority Environmental Policy Statement, undated; containing commitment to follow the NBP Code of Good Practice.
- Alexsan.com website (http://www.alexsan.com/).

Element 3. Critical Control Points

- Interview with James Sizemore, Quality Manager.
- Interview with Lisa Racey, Engineering Coordinator.
- Interview with Joel Gregory, Process Manager.
- EMSP-4.3.1.1-1 – Critical Control Points, dated 10/21/10.
- EMSD-4.3.1.1-2 – List of Critical Control Points, dated 10/13/09.
- Field observation of various select critical control points, primarily in the biosolids processing portion of the value chain.

Element 4. Legal and Other Requirements

- Interview with James Sizemore, Quality Manager.
- Interview with Lisa Racey, Engineering Coordinator
- Interview with Joel Gregory, Process Manager
- EMSP-4.3.2-1 – Legal & Other Requirements Procedure, dated 10/20/10

Element 5. Goals and Objectives for Continual Improvement

- Interview with James Sizemore, Quality Manager.

- Interview with Lisa Racey, Engineering Coordinator.
- EMSP-4.3.3-1 – Goals, Objectives and Programs Procedure, dated 2/25/11.
- Soil Blending Action Plan – critical control point determination, 10/14/10 (Objective).
- Soil Blending Action Plan – landscaping, dated 2/15/11 (Objective).
- Biosolids to Energy Action Plan, dated 4/15/11 (Objective)
- EMSD-4.5.1-2 Monitoring and Measurement of Goals, Objectives, & Programs, dated 1/29/07 (Summary of Reporting Period: January 2001 – March 2011).

Element 6. Public Participation in Planning

- Interview with Heather Thomas, Communications Manager
- Interview with James Sizemore, Quality Manager.
- Interview with Lisa Racey, Engineering Coordinator.
- EMSP-4.4.3-1 – Communication and Public Outreach, dated 3/1/11.
- Communications Strategy for Alexandria Grow Green – Spring/Summer, 2009.
- ASA Biosolids Management Program Performance Report for the period January 1, 2008 to December 31, 2008.
- ASA Biosolids Management Program Performance Report for the period January 1, 2009 to December 31, 2009.
- CMOM Strategic Communications Action Plan, dated 12/17/10.
- Redefining the Future of Wastewater, ASA 2010 Annual Report.
- Alexsan.com website (http://www.alexsan.com/).

Element 7. Roles and Responsibilities

- Interview with James Sizemore, Quality Manager.
- Interview with Lisa Racey, Engineering Coordinator.
- ASA Organization Chart dated January 28, 2011.
- EMSD-4.4.1-1 – Resources, Roles, Responsibilities & Authority Procedure, dated 11/1/10.

Element 8. Training

- Interview with James Sizemore, Quality Manager.
- Interview with Lisa Racey, Engineering Coordinator.
- EMSP-4.4.2-1 Competence, Training & Awareness Procedure, dated 6/23/10.
- Action Plan Template for Training, undated.

Element 9. Communications

- Interview with James Sizemore, Quality Manager.
- Interview with Lisa Racey, Engineering Coordinator.
- Interview with Heather Thomas, Communications Manager.
- EMSP-4.4.3-1 – Communication and Public Outreach, dated 3/1/11.
- Communications Strategy for Alexandria Grow Green – Spring/Summer, 2009.

- EMSF-4.4.5.7 – Meeting Agenda Template, for EMS team meeting held 4/20/11.
- Attendance at monthly EMS team meeting held 4/20/11.
- ASA Biosolids Management Program Performance Report for the period January 1, 2008 to December 31, 2008.
- ASA Biosolids Management Program Performance Report for the period January 1, 2009 to December 31, 2009.
- CMOM Strategic Communications Action Plan, dated 12/17/10.
- Redefining the Future of Wastewater, ASA 2010 Annual Report.
- Alexsan.com website (http://www.alexsan.com/).

Element 10. Operational Control of Critical Control Points

- Interview with Joel Gregory, Process Manager.
- Interview with James Sizemore, Quality Manager.
- Interview with Lisa Racey, Engineering Coordinator.
- EMSP-4.4.6-1 – Operational Control Procedure, dated 9/7/10.
- Operational Guidelines for Sludge Pre-Pasteurization, dated 7/23/10.
- Operational Guidelines for Anaerobic Digestion, dated 7/18/10.
- Operational Guidelines for Dewatering Centrifuges, dated 8/31/10.
- Operational Guidelines for Haul Routes, dated Sept. 1, 2006.
- Operational Guidelines for Off Site Storage, dated Sept. 1, 2006.
- Operational Guidelines for Site Preparation, dated Sept. 1, 2006.
- Operational Guidelines for Application of Material (Stored and Direct), dated Sept. 1, 2006.\
- Operational Guidelines for Post Application Management, dated Sept. 1, 2006.

Element 12. EMS Documentation and Document Control

- Interview with James Sizemore, Quality Manager.
- Interview with Lisa Racey, Engineering Coordinator.
- EMSP-4.4.5-1 – Control of Documents Procedure, dated 10/20/10.
- EMSD-4.4.5-2 Master Document Matrix, dated 4/30/07.
- EMSD-4.5.4-2 Control of Records Matrix, dated 6/23/10.

Element 13. Monitoring and Measurement

- Interview with James Sizemore, Quality Manager.
- Interview with Lisa Racey, Engineering Coordinator.
- Interview with Joel Gregory, Process Manager.
- EMSP-4.5.1-1 Monitoring and Measurement Procedure, dated 3/4/11.
- EMSD-4.5.1-2 Monitoring and Measurement of Goals, Objectives, & Programs, dated 1/29/07 (Summary of Reporting Period: January 2001 – March 2011).
- EMSD-4.5.1-3 – Monitoring and Measurement Calibration Log, dated 1/3/2008.
- EMSD-4.5.1-4 – Performance Indicators (for biosolids processes), dated 11/06/09.

Element 14. Nonconformances: Preventive and Corrective Action

- Interview with James Sizemore, Quality Manager.
- Interview with Lisa Racey, Engineering Coordinator.
- EMSP-4.5.3-1 – Nonconformity, Corrective Action and Preventive Action, dated 6/23/10.
- Review corrective action notices and corrective action work plans for findings from 2009 external interim audit.
- Review corrective action notices and corrective action work plans for findings from 2010 internal interim audit.
- Various Work Plans for Corrective Actions.

Element 15. Periodic Biosolids Program and EMS Performance Report

- Interview with James Sizemore, Quality Manager.
- Interview with Lisa Racey, Engineering Coordinator.
- Interview with Heather Thomas, Communications Manager.
- EMSP-4.6.1-1 – Biosolids Management Program Report Procedure, dated 2/16/11.
- ASA Biosolids Management Program Performance Report for the period January 1, 2008 to December 31, 2008.
- ASA Biosolids Management Program Performance Report for the period January 1, 2009 to December 31, 2009.

Element 16. Internal EMS Audit

- Interview with James Sizemore, Quality Manager.
- Interview with Lisa Racey, Engineering Coordinator.
- EMSP-4.5.5-1 – Internal Auditing Procedure, dated 11/2/10.
- ASA Internal Audit Report – April 2010.

Element 17. Periodic Management Review of Performance

- Interview with Karen Pallansch, General Manager.
- Interview with James Sizemore, Quality Manager.
- Interview with Lisa Racey, Engineering Coordinator.
- EMSP-4.6-1 – Management Review Procedure, dated 3/3/11.
- EMSF-4.4.5.7 – Meeting Agenda Template, for Management Review meeting held on May 17, 2010.
- Power Point slides used in management review meeting of May 17, 2010.
- ASA Biosolids Management Program Performance Report for the period January 1, 2008 to December 31, 2008.
- ASA Biosolids Management Program Performance Report for the period January 1, 2009 to December 31, 2009.

Attachment 2
Appeals Process National Biosolids Partnership

Biosolids organizations that participate in the National Biosolids Partnership (NBP) Environmental Management System (EMS) Program are required to undergo an EMS verification audit by an independent, third party auditor assigned by the NBP and yearly interim audits. The purpose of the EMS audit is to determine whether or not the organization's EMS conforms with -- that is, meets the requirements of -- the NBP program, as defined in the EMS Elements1. The spirit of these requirements includes a well-documented program and meaningful opportunities for interested party involvement.

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 audit company's official verification decision or interim audit decision.

To submit an appeal before the Appeals Board, the petitioner must set forth the specific EMS element(s) and requirements that is believed to have not been evaluated and/or implemented consistent with NBP requirements as reflected in the EMS Elements, along with the objective evidence to support that claim. For example, a petitioner may believe that a major nonconformance exists but was not found by the auditor. In this case, the petitioner would need to identify in the petition the specific EMS element believed to be out of conformance and why.

To submit an appeal, petitioners must fill out and submit the standardized appeals petition form that is available on the NBP website at http://www.biosolids.org. A formal appeal must be submitted within 30 days of the verification decision or interim audit decision by the audit company.

The Board's Administrative Officer receives all appeals petitions on behalf of the Board and conducts a basic completeness check. Upon completion of this check, the petition is either forwarded to Appeals Board members or back to the petitioner with incomplete areas documented Petitions should be sent via certified, return receipt requested mail to:

The NBP EMS Appeals Board, Attention: Board Administrative Officer, c/o Water Environment Federation, 601 Wythe Street, Alexandria, VA 22314

The Appeals Board will examine the facts, interview parties involved, deliberate the case, and then make a determination as to whether a major nonconformance does or does not exist. Appeals cases vary in complexity. As a result, the time required for the Board to evaluate a case and make a decision might vary. However, the overall Board target for processing an appeal is approximately four months.

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[1] The *EMS Elements* and other program materials are available on the NBP website at http://www.biosolids.org.