National Biosolids Partnership
Audit Report

Biosolids EMS Reverification Audit

Encina Wastewater Authority

Encina Wastewater Treatment Facility, Carlsbad, California

Audit Dates: September 13 to 17, 2010

Audit Conducted By:

KEMA-Registered Quality, Inc. (Chalfont, PA)

Auditors: Mr. Jon Shaver, Biosolids EMS Lead Auditor

Report Written By: Jon Shaver, Biosolids EMS Lead Auditor

Report Date: October 30, 2010

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1. EXECUTIVE SUMMARY

KEMA-Registered Quality Inc. (KEMA) conducted an independent Verification Audit of the management system being used by Encina Wastewater Authority (EWA) in managing its biosolids program. The audit was performed at the request of the National Biosolids Partnership (NBP) as part of EWA's participation in the NBP EMS Program and included a review of EWA EMS documentation (reported 9/7/2010) and an onsite audit at EWA facilities and biosolids use sites September 13 to 17, 2010.

The purposes of this Verification Audit were to:

- Verify that the management system being used by EWA in managing its biosolids activities meets requirements of the National Biosolids Partnership's EMS Program, particularly the 17 EMS Elements (audit criteria).
- Confirm that the EWA is managing their biosolids program effectively and in a manner that meets NBP expectations, with practices and procedures being performed as documented.
- Examine outcomes that EWA is achieving through the use of a systematic approach to managing their biosolids program.

The scope of this audit included EWA's biosolids program, as defined in their audit application and covered all activities within EWA's biosolids value chain. During the audit KEMA reviewed processes and activities used by EWA in managing its biosolids program and assessed the conformance of these processes with NBP expectations and requirements of the NBP EMS Elements.

The audit determined that:

- Encina Wastewater Authority's biosolids management system meets NBP expectations and requirements of NBP's EMS Elements.
- Use of a management system approach is generating positive outcomes for the EWA biosolids program in the areas of regulatory compliance, environmental performance, quality practices and relations with interested parties.

Based on the audit results, KEMA verifies that the Encina Wastewater Authority biosolids management system meets NBP expectations and requirements of the NBP EMS Elements and recommends re-certification of EWA's biosolids program within NBP's Biosolids Management Program.

2. AUDIT DETAILS

2A. Local Agency Details

Agency Name: Encina Wastewater Authority, Carlsbad, California (referred to as EWA in this report)

Number of Employees = 64

Biosolids Production Sites Audited: Encina Wastewater Plant, Carlsbad CA

Volume of Wastewater Treated = 43 MGD (capacity)

Biosolids Produced = currently 6,000 dry tons per day Class A

Biosolids Use / Disposition Sites Audited

Solid Solutions land application site, Yuma AZ
Cemex plant, Apple Valley CA

Contractors Participating in Audit

Solid Solutions / Terra Renewal
Cemex Inc.

2B. Audit Team

KEMA-Registered Quality Inc. was asked o perform this audit on behalf of the National Biosolids Partnership. The audit was performed by Mr. Jon Shaver. Mr. Shaver is qualified as a certified Biosolids EMS Lead Auditor and Biosolids Auditor by the National Biosolids Partnership. KEMA asserts that our firm and auditors have an independent relationship with EWA that meets criteria established by NBP for Third Party Audit Companies and Auditors.

2C. Audit Criteria

Requirements stipulated in the National Biosolids Partnership EMS Elements (May 2002) and the NBP Biosolids EMS Program were used as criteria for this audit.

2D. Audit Scope and Methodology

The scope of this audit included all parts of the EWA biosolids program, which encompasses pretreatment, wastewater treatment and solids generation, biosolids stabilization, storage and transportation and end use / disposition, with special attention to practices and management activities that directly support biosolids-related operations, processes and activities.

The audit included the following topics, consistent with NBP requirements and the Scope of Work agreed by NBP and KEMA dated July 5, 2010.

1. Review of EWA's EMS Manual describing the biosolids management system and its use.
2. Examination of outcomes being achieved in the areas of regulatory compliance, interested party relations, environmental performance and quality practices.

3. Process Audits (covering requirements of applicable EMS Elements and review of process effectiveness):
   - Biosolids Preparation (including Wastewater Treatment / Solids Collection, Solids Stabilization, Conditioning & Handling, Storage)
   - Biosolids Solids Transportation
   - Biosolids Use – Alternative Energy (Cemex site, Apple Valley CA)
   - Biosolids Use - Land Application (Yuma Arizona)
   - Communication Program
   - Competency, Awareness & Training
   - Compliance (with legal & other requirements)
   - Contractor Control
   - Corrective and Preventive Action
   - Critical Control Points and Operational Control (Identification)
   - Document Control & Recordkeeping
   - Emergency Preparedness
   - EMS Planning (including public participation)
   - Goals & Objectives for Improvement
   - Internal EMS Audits
   - Maintenance
   - Management Involvement (including Biosolids Policy, Roles & Responsibilities, Management Review)
   - Pretreatment & Collection

The audit was conducted by qualified auditors following guidelines stated in the NBP Auditor Guidance (August 2007) and KEMA's Biosolids EMS Audit Planning Guide. Using 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 biosolids practices performed by the agency or its contractors.

2E. Reference Materials

The following documents were used as references during this audit:

EWA EMS Manual (current version)
National Biosolids Partnership "EMS for Biosolids" standard (May 2002)
National Biosolids Partnership Biosolids EMS Third Party Auditor Guidance (August 2007)
National Biosolids Partnership Code of Good Practice
National Biosolids Partnership Manual of Good Practice

2F. Definitions of Audit Findings & Required Corrective Action

Major Nonconformance – a serious omission from requirements and/or other departure that represents, or could cause, a systemic failure. Major nonconformances must be corrected within 90 days for verification to proceed.

Minor Nonconformance – an isolated departure from requirements that does not represent a systemic failure. Minor nonconformances require timely and effective correction and verification by a Third Party Auditor.

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

2G. 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. Anyone who may need help in understanding the appeals process should contact the National Biosolids Partnership staff, Mr. Jim Cox at 703-684-2438, or by e-mail: jcoxl@wef.org.

An appeal process is available to persons concerned about the methods and/or scope of this audit. Further information about this appeal process can be obtained from KEMA (contact Pierre Salle, pierre.salle@kema.com or Jon Shaver jon.shaver@kema.com) or from NBP (contact Jim Cox, jcox@wef.org).

3. SUMMARY OF AUDIT RESULTS

3A. Strengths Observed

During this audit KEMA noted the following strengths in the EWA biosolids management system.

- An effective "lessons learned" process is in place for evaluating significant changes (e.g. centrifuge addition) for use in planning future changes.
- An effective practice is in place for responding to complaints and inquiries from the public near the wastewater treatment plant.
- Completion of 95% of PMs within 40 days of required timing demonstrates an effective preventive maintenance system.

3B. Outcomes

The EWA 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.

<u>Quality Practices</u>

- The disciplined, structured approach in the EMS, particularly Corrective Action methods, helped develop lessons learned from the Heat Dryer Project
- Development and certification of EWA's EMS is helping the marketability of their products, particularly with private companies.

<u>Regulatory Compliance</u>

- 95% of EWA solids are now used as biofuel (cement manufacture). This provides a use that is not controversial, while reducing greenhouse gas emissions and lowering chance of spills.

<u>Environmental Performance</u>

- Research & Development has begun on the use of biosolids as a soil amendment. Success would represent a $240K / year savings over current uses and $2+ million over previous uses and result in lower greenhouse gas emissions and energy use.

<u>Relations with Interested Parties</u>

- The Phase V expansion was completed in 2009, a major step towards the 2025 strategic plan. The project also continued to increase public credibility in EWA performance.
- Internal EMS audits are conducted as process based audits and performed by EWA employees. Employees report gaining appreciation for all aspects of EWA's biosolids program.

3C. Audit Findings - Nonconformances

The following minor nonconformances were identified during the onsite audit. EWA has prepared corrective action plans for each nonconformance and those plans have been approved by the Lead Auditor.

Minor Nonconformance JS/10-01/1 NBP EMS Element 1 prescribes requirements for EMS Documentation (EMS Manual, or equivalent). The EWA EMS Manual does not meet requirements as follows:

- There is no reference to identifying, controlling "other requirements"
- There is no reference (e.g. Table 3.1) for need to control quality and public acceptance (per definition of critical control points)
- The procedure for developing programs, goals and objectives does not fully reflect actual practices
- Some records that require control are not identified

Minor Nonconformance JS/10-02/7 Several NBP EMS Elements prescribe requirements for contractor activities within the biosolids management system. Some arrangements with Cemex required by NBP have not been completed (e.g. operational controls, document control and recordkeeping).

Minor Nonconformance JS/10-03/11 NBP EMS Element 11 requires effective response to accidents associated with biosolids management activities. A spill of polymer in the centrifuge recirculation area that occurred in July, 2010 was controlled with adsorbent, but had not been cleaned up.

Minor Nonconformance JS/10-04/17 NBP EMS Element 17 requires that management review biosolids program performance against established performance measures. The management review conducted 6/21/2010 did not describe biosolids program performance against established measures.

3D. Audit Findings – Opportunities for Improvement

The following opportunities for improvement in the EWA biosolids program were noted during the audit.

- Responsibilities for managing site security could be defined
- Term "critical control points" could be replaced with "process control points" to make concept more meaningful to operators
- A more structured, repeatable risk assessment method for quality, regulatory compliance, public acceptance, safety and environmental impacts could be used to determine the need for operational controls (Risk Analysis – Operational Controls – Control Points).
- Maintenance work orders could include PPE requirements, additional controls (e.g. lockout / tagout, safe work permits)

- When equipment is tagged out of service the tag could identify responsible person and effective date for better understanding
- Task-based performance assessment for Operators could encourage development of operating experts
- The Corrective and Preventive Action Process could be expanded to include incident investigations, complaints, findings from contractor inspections and, perhaps, broader issues such as safety, customer satisfaction.

3E. Verification Conclusion

Based on results of this audit, KEMA is able to issue the following Verification Statement concerning the EWA's biosolids program:

"The Encina Wastewater Authority has been independently verified by KEMA-Registered Quality Inc. as having an effective biosolids environmental management system that 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 EMS Program."

3F. Agreements

To verify continuing conformance of EWA's biosolids management system with NBP expectations and requirements, Interim Audit #1 will be conducted prior to September 17, 2011. An Audit Program will be developed with agreement by the EWA and KEMA to cover the 4 interim years between verification and re-verification. A full Reverification Audit is due in 2015.

4. AUDIT OBSERVATIONS + RESULTS

The following describes the results of KEMA's audit of each management system process and the level of conformance of the process with all applicable requirements of the NBP EMS Elements.

4A Review of Open Nonconformances

Correction of the following nonconformances from KEMA's audit at EWA in September 2008 (Biosolids EMS Interim Audit 3) were reviewed/

Minor Nonconformance JS/08-01 / Element 14 NBP EMS Element 14 requires that corrective actions be developed for nonconformances identified during routine monitoring and measurement. A corrective action required by a contractor in response to EWA inspections took over 10 months and financial penalty to complete, indicating the EWA corrective and preventive action process is not functioning in a timely and effective manner.

> Corrective Action - EWA determined that the cause of this nonconformance was a failure by the contractor. In response they continued to ask the contractor for their corrective action plans, however such plans were not forthcoming. EWA then changed contractors and the new contractor has demonstrated willingness to cooperate with requests for corrective action. This nonconformance is now closed.

Minor Nonconformance JS/08-02 / Element 17 NBP EMS Element 17 requires that management reviews be conducted to ensure the continuing suitability, adequacy, and effectiveness of the management system. The Management Review conducted in August 2008 does not make any conclusion(s) about the suitability, adequacy and effectiveness of the biosolids management system.

> Corrective Action - EWA determined that the cause of this nonconformance was a failure to fully document their management review. In response EWA added a section to management review agendas (and record) that makes conclusions about the suitability, adequacy and effectiveness of their EMS. This nonconformance is now closed.

4B Significant Changes

Heat dryer installed, Phase V completed. New regulations, SOPs, maintenance requirements, training implemented per management system requirements. 96% of bioslids produced in past year were pellets sent to Cemex (new contractor). Considerable lessons learned and reported.

<u>Audit Results</u>
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements.

4C EMS Documentation

EWA's Environmental Management System (EMS) Manual and supporting documents describe the management system being used in managing their biosolids activities. The manual is organized to correspond to the NBP EMS Elements. It is available on the EWA website. Detailed results of

KEMA's initial documentation review were sent to the EWA in advance of the onsite audit and some corrections were made prior to completing the onsite audit.

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements, except as noted below:

Minor Nonconformance JS/10-01/1 NBP EMS Element 1 prescribes requirements for EMS Documentation (EMS Manual, or equivalent). The EWA EMS Manual does not meet requirements as follows:

- There is no reference to identifying, controlling "other requirements"
- There is no reference (e.g. Table 3.1) for need to control quality and public acceptance (per definition of critical control points)
- The procedure for developing programs, goals and objectives does not fully reflect actual practices
- Some records that require control are not identified

4D Biosolids Preparation

(including Wastewater Treatment / Solids Collection, Solids Stabilization, Conditioning & Handling, Storage)

Wastewater is treated in primary and secondary clarifiers and through tertiary treatment prior to reuse. Solids from the clarifiers are digested, thickened via centrifuge, dried (heat dryer) and transported to end use sites. The majority of solids meet Class A requirements. Critical control points are identified and SOPs and other operational controls are in place. Operator competency is reviewed at least annually, including need for additional training. The Phase V expansion, including heat drying, was installed with some problems in centrifuging. Operators were able to control these problems and improve centrifuge operation.

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements:

4E Biosolids Solids Transportation

Biosolids are transported by a contractor (Solid Solutions) from EWA plant to end use sites. EWA inspect trucks at the plant prior to loading and releasing the shipment. Solid Solutions has a robust program in place to ensure driver competency, including handling bioslids spills.

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements:

4F Biosolids Use – Alternative Energy (+ related contractor control

The majority of EWA biosolids are sent to the Cemex cement plant near Victorville CA for use as an energy source. Both EWA and Cemex are happy with arrangements and a contract is in place. EWA periodically visit the Cemex site to ensure biosolids are handled as required.

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements, except as noted below

> Minor Nonconformance JS/10-02/7 Several NBP EMS Elements prescribe requirements for contractor activities within the biosolids management system. Some arrangements with Cemex required by NBP have not been completed (e.g. operational controls, document control and recordkeeping).

4G Biosolids Use - Land Application (+ related contractor control

Approximately 5 % of EWA biosolids are land applied by a contractor (Solid Solutions / Terra renewal)on permitted sites in Arizona. Inspection of a land application site during this audit demonstarted proper handling and control of biosolids. A contract is in place defining contractor responsibilities and periodic inspections are done to verigy conformance.

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements:

4H Communication Program

Biosolids Program requirements and performance are communicated internally through training and staff meetings and externally through an annual Biosolids Program Report. Basics of the program are available on the EWA website.

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements:

4I Competency, Awareness & Training

Plant personnel are made aware of biosolids program and EMS requirements through “all hands” meetings and Supervisors’ meetings. Personnel competency is reviewed at least annually and “performance improvement plans” are implemented if needed. Some voluntary training is done to continually improve personnel competence. New Operators and Maintenance personnel are mentored until competency is verified. Considerable safety training is performed with all personnel.

In addition, the following opportunities were noted:

- Task-based performance assessment for Operators could encourage development of operating experts

4J Compliance (with legal & other requirements)

Information about legal requireents is kept up to date through communications with regulators and industry associations (e.g. CASA). Action is in place to comply with new California regulation AB32 (greenhouse gas reporting). Operational controls (SOPs, training) address regulatory requirements. Compliance with legal requirements is monitored through laboratory testing and management review of operating data. Regulatory reports are submitted as required. Contractor compliance is monitored through inspections by EWA personnel.

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements:

4K Corrective and Preventive Action

The Corrective and Preventive Action process is used to adress permit viosliations, odor complaints and incidents (e.g. spills) involving biosolids. It is also used to correct EMS nonconformances. The process includes cause analysis, action, responsibilities, timing and closed loop verification.

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements:

In addition, the following opportunities were noted:
- The Corrective and Preventive Action Process could be expanded to include incident investigations, complaints other than odor, findings from contractor inspections and, perhaps, broader issues such as safety, customer satisfaction.

4L Critical Control Points and Operational Control (Identification)

Critical control ponts and operational controls are identified in the EMS Manual. Personnel are familiar with the critical control point concept, however some use the term “process control points”. CCP are consistent with NBP requirements.

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements:

In addition, the following opportunities were noted:
- Term “critical control points” could be replaced with “process control points” to make concept more meaningful to operators
- A more structured, repeatable risk assessment method for quality, regulatory compliance, public acceptance, safety and environmental impacts could be used to determine the need for operational controls (Risk Analysis – Operational Controls – Control Points).

4M Document Control & Recordkeeping

Documents and records requiring control are noted in the EWA EMS Manual. Documents and records reviewed during this audit were found to be effectively controlled.

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements:

4N Emergency Preparedness

Emergency Contingency Plans are in place, including fire prevention and earthquake procedures. An onsite emergency response trailer contains dedicated response equipment. An annual "spill drill" is conducted. Mutual aid plans are in place with member agencies. Contractors have emergency plans and vehicles transporting biosolids have spill response procedures and equipment.

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements, except as noted below:

> Minor Nonconformance JS/10-03/11 NBP EMS Element 11 requires effective response to accidents associated with biosolids management activities. A spill of polymer in the centrifuge recirculation area that occurred early in 2010 was controlled with adsorbent, but had not been cleaned up.

In addition, the following opportunities were noted:
- Responsibilities for managing site security could be defined

4O EMS Planning (including public participation)

The EWA biosolids program is managed by the Executive Team, headed by the General Manager. Their EMS is coordinated by the Director of Environmental Compliance. Strategic Focus Areas are developed based on 5 year plans, including biosolids management plans, with Business Plan goals, objectives and success indicators used to continually improve performance. Biosolids plans and activities are discussed at open meetings with public participation.

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements:

4P Goals & Objectives for Improvement

Goals are set periodically within Strategic Focus Areas. Objectives are prepared annually, with measurable targets and action plans, for all wastewater activities, including biosolids. 46 of 51 objectives were successfully completed in 2009.

Audit Results

Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements:

4Q Internal EMS Audits

Internal audits of biosolids activities are conducted by the EMS Coordinator at least annually. A process auditing approach is used. Results are reported to the Executive Team, including any corrective actionsneeded. Inspections of contractor operations using EWA biosolids are done at least semi-annually and corrective actions are implemented if needed,.

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements:

4R Maintenance

Plant maintenance is performed on both an as needed and preventive basis. An effective KPI is in place to measure performance via ratio of reactive to preventive maintenance. Reportedly 95% of PMs are being completed within 40 days of due date. Maintenance personnel are qualified through skill demonstration and experience. Maintenance also controls a library of documents (e.g. O&M Manuals) related to equipment in use.

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements:

In addition, the following opportunities were noted:

- Maintenance work orders could include PPE requirements, additional controls (e.g. lockout / tagout, safe work permits)
- When equipment is tagged out of service the tag could identify responsible person and effective date for better understanding

4S Management Involvement

(including Biosolids Policy, Roles & Responsibilities, Management Review)

The Executive Team meets bi-weekly to discuss ongoing issues, address problem prevention and recommendations for improvement. Goals for sustainability, including targets in all 4 outcomes areas are set and reviewed. The Biosolids Manageent Policy is reviewed periodically, including performance in meeting commitments. A Biosolids Management Plan has been prepared and is updated every 5 years. The Team ensures actions are consistent with that Plan.

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements, except as noted below.

> Minor Nonconformance JS/10-04/17 NBP EMS Element 17 requires that management review biosolids program performance against established performance measures. The

management review conducted 6/21/2010 did not describe biosolids program performance against established measures.

4T Pretreatment & Collection

Significant industrial users are permitted and inspected at least annually and sampled quarterly to ensure compliance. Those regulated under Best Management Practice permits require less oversight and are inspected less frequently. If permit violations are found, a NOV is issued and the user is required to investigate the cause and implement corrective action. EWA evaluates the corrective action plans and inspectors review action taken during the next inspection. Programs are being developed for minimizing discharge of dental amalgams and other emerging concerns are being studied (e.g. pharmaceuticals, medical waste).

Audit Results
Audit of the process described above found it meets NBP expectations and conforms to applicable requirements of the EMS Elements:

APPENDICES

Appendix 1 List of Participants

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

Name	Position
EWA Personnel	
Debbie Biggs	Director of Environmental Compliance / EMS Coordinator
Chuck Bollinger	Operations Supervisor
Bruce Dale	Asst Operations Supt
John Fetu	Maintenance Manager
Kevin Hardy	General Manager
John Jardin	Director of Operations
Jimmy Kearns	Safety & Training Manager
Don Little	Source Control Manager
Gary Parker	Systems Manager
Duane Larson	Director of General Services
Mike Steinlicht	Asst General Manager
Contractors	
Darlene Bray	Environmental Manager - Cemex
Austin Fulfer	Procurement Manager - Cemex
Angelica Wong	Process Engineer – Cemex
Cesar Garcia	Area Manager – Solid Solutions
Bud Black	Operator Solid Solutions, Yuma AZ
Interested Parties	
Allan Julinssen	Chairman EWA Board of Directors

Appendix 2 Documentation / Objective Evidence Reviewed

AQMD permit Cemex June 2010
B&V project report April 2008
Biosolids Management Plan July 2010
Biosolids Program Performance Report 2009
Bisolids Spill Response SOP
Business Plan Quarterly Update Status Report (7/22/09)
Cemex SOPs (various)
Centrifuge SOP 66 7/9/09
Contract – EWA / Cemex
Corrective Action Requests (various)
Dryer bldg event incident report 9/17/09
Emergency Contingency plans
Employee performance evaluations (various)
EWA Biosolids Management System Letter of Understanding – Solid Solutions (12/7/08)
EWA Biosolids EMS brochure
EWA Effluent Exceedance Order 12/3/09
EWA EMS Manual
EWA SOPs (various)
Executive Leadership Team Agenda 7/10/10, 11/10/09
Heat dryer safety checklist
Hot work permits (various)
Job descriptions (various)
Maintenance work orders (various)
Management Review findings 6/21/10
Management review meeting 6/21/10
Master Materials Agreement – Cemex 6/25/09
MSDS (various)
NOV 22115 8/12/09
Objectives status – quarterly report June 2010
SCADA screens (various)
Solid Solutions Biosolids Management Plan 4/14/09
Solid Solutions monthly report – biosolids land application Arizona June 2009
Supervisor's Incident Report 6/16/10
Training certificates - EWA, Solid Solutions, Cemex (various)

END OF REPORT