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Surveillance / Interim Audit
City of Lawrence Department of Utilities, Lawrence KS
Closing Meeting – October 14, 2011

1. Audit Purpose, Scope & Criteria

Audit Purposes:

- Surveillance / Interim Audit for conformance with ISO-14001:2004, OHSAS 18001:2007, ISO-9001:2008, Biosolids EMS Elements
- Help improve management system effectiveness

Audit Scope:

The treatment and distribution of safe drinking water to the public, the collection and treatment of wastewater, and the control and return of treated water and biosolids to the environment.

Audit covered activities at WWTP, Kaw & Clinton plants

Audit Criteria

Requirements of ISO-14001:2004, OHSAS 18001:2007, ISO-9001:2008, Biosolids EMS Elements & City of Lawrence Department of Utilities Management System.

2. Audit Activities

Continual Management Dynamics

Process Audits

- Biosolids Transportation & Use
- Contractor control
- Compliance (with legal & other requirements)
- Corrective & preventive action
- Customer processes (orders / quotes, communication)
- Emergency preparedness & response
- Engineering (incl process design & development)
- Field operations (incl sewer collection, water distribution)
- Goals / objectives / targets / programs (+ management of change)
- Internal audits
- Nonconforming material control
- Receiving / inspection
- Supplier management (vendors, purchasing)
- Water intake, storage (Kaw & Clinton)
- Water treatment - Clinton

Outcomes Examination

Interested Party interviews (biosolids EMS)

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All audits integrated to cover quality management, environmental management, health & safety management, biosolids management, as applicable.

3. Strengths Observed

Teamwork & cooperation between Divisions has improved significantly over the past two years.

Operating personnel are thinking about the purpose of their operations beyond regulatory compliance.

The Performance Scorecard used in the biosolids program is an effective way of assessing contractor performance.

4. Audit Results – Summary & Conclusion

All previous nonconformances are closed

- 0 Major Nonconformances
- 4 Minor Nonconformances
- 10 Opportunities for Improvement

Conclusion

The management system is functioning effectively & conforms with ISO-14001:2004, ISO-9001:2008, OHSAS-18001:2007 & NBP EMS Elements. Continuing certification will be recommended.

5. Next Steps / Events

- DEKRA reports will be issued within 30 days. Note – Biosolids EMS audit report will first be sent as draft for comment.
- Send Corrective Action Plan for each nonconformance (including results of cause analysis) to DEKRA by November 14, 2011.
- Follow-up (Corrective Action Audit) within 6 months (before April 14, 2012) to verify effective correction of nonconformances. (+1/2 day offsite)
- Recertification Audits for ISO-14001, OHSAS-18001 due before October 2012 (suggest week of October 8, 2012)
- Recertification Audit for ISO-9001 due before July 2012 (suggest coinciding with ISO-14001 & OHSAS-18001 Recertification)

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- Biosolids EMS – Interim Audit # 2-3 (suggest coinciding with ISO audits)

Arrange for next audits through DEKRA office.

6. Audit Results - Nonconformances

Minor Nonconformance JS/S/11-01/4.3.3 ISO-14001 & OHSAS-18001 require the organization to establish, implement and maintain programs for achieving its objectives and targets. Action plans / programs are not fully defined for achieving EHS & quality objectives in the Divisions.

Minor Nonconformance JS/S/11-02/4.3.3 ISO-14001 & OHSAS-18001 require the organization to establish and document measurable objectives and targets at relevant functions and levels and that these objectives be consistent with the Environmental and OHS Policy, including commitments to continual improvement. "Strategic focus areas" are defined as a starting point for EHS and quality improvements, however there is not a clear link between direction for these areas and objectives used in operating areas.

Minor Nonconformance JS/S/11-03/4.5.5 ISO-14001 & OHSAS-18001 require internal audits of the management system to be objective and impartial. The internal audit conducted 9/21/11 to compare actions with LUMS Manual was conducted by the author of the Manual and therefore was not impartial.

Minor Nonconformance JS/S/11-04/4.6 ISO-14001 & OHSAS-18001 require that management reviews include follow-up actions from previous management reviews and recommendations for improvement. Management reviews conducted 7/11/11 & 10/4/11 did not include follow-up from previous reviews or recommendations for improvement.

7. Audit Results - Opportunities (for Improvement)

- Op1. Management of Change could be used to address changes in responsibilities such as merging of water collection and sewer maintenance responsibilities.
- Op2. A simple description of product characteristics needed to meet customer requirements could help in defining those requirements and communicating with customers about them.
- Op3. Changing sodium bisulfite handling from bulk to totes could be analyzed for safety and environmental risks.

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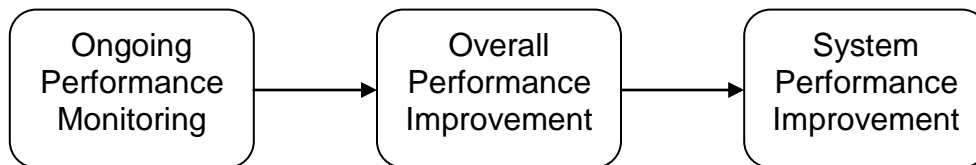
- Op4. The definition of what is (and what is not) a nonconforming materials could be clarified to help in establishing practices for controlling these products, both as received and as produced.
- Op5. The “Scorecard” method used to evaluate biosolids contractors & suppliers could be extended to other operations & used in selection of suppliers.
- Op6. Procedures for receiving hazardous materials (e.g. chemicals) could be modified so they are the same at the wastewater and water treatment plants.
- Op7. A procedure could be established for communicating with contractors and visitors about OH&S workplace risks
- Op8. Inspection reports for biosolids land application projects could be consolidated and could include requirements of the NBP EMS Elements, such as participation in external communications, training, use of site management plans (or other operational controls) and emergency preparedness.
- Op9. Internal audits used to assess performance against Policy commitments (e.g. Code of Good Practice) could discuss actual performance, not only how a commitment is met
- Op10. Analysis of safety-related MSOs determined “inattentiveness” was a predominant cause. This could be further assessed to determine and address causes of inattentiveness.

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Management Review



Objectives for Improvement

