

**NATIONAL BIOSOLIDS PARTNERSHIP
INTERIM AUDIT REPORT**

**St. Cloud Public Utilities
Wastewater Treatment Facility
St. Cloud, Minnesota**

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 2011)
NBP Code of Good Practice
City of St. Cloud, Minnesota
Wastewater Treatment Facility
Biosolids Management Program
Environmental Management System
Manual 18 June 2021

Final Report – July 26, 2021

INTRODUCTION

The purpose of the Biosolids Management Program (BMP) interim audits are 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 support credibility between re-verification audits. The goal of the audit is to collect and evaluate objective evidence related to a portion of the BMP such that over the course of the four interim audits conducted between verification audits all 17 elements are addressed.

The goal of the audit is to determine whether the St. Cloud Public Utilities Wastewater Treatment Facility's Biosolids Management Program (BMP) is functioning as intended, that practices and procedures are conducted as documented, and that the BMP as implemented conforms to the NBP's Code of Good Practice and the BMP requirements of the National Biosolids Partnership (NBP) program objectives.

RECOMMENDATION

The results of the St. Cloud interim audit and review of the corrective action plans are positive, and it is the recommendation of the audit team that the St. Cloud Wastewater Treatment Facility BMP maintain its the platinum level recognition certification status. Maintaining certification is not the end, but rather part of a continuum of a continuously improving biosolids management program.

AUDIT SCOPE

The (NSF-ISR) conducted a third party interim audit of the St. Cloud Wastewater Treatment Facility BMP from July 13 through July 14, 2021. The on-site audit team consisted of Dr. William R. Hancuff, Lead Auditor.

The primary objective of the annual interim audit is to ensure the biosolids management program's health by reviewing:

- Progress toward goals and objectives,
- Corrective and preventive action requests and responses.
- Actions taken to correct minor non-conformances,
- Management review process, and
- BMP outcomes (environmental performance, regulatory compliance, interested party relations, and quality practices)

The first four items identified above involved reviewing procedures, activities, processes and products that have general requirements found in the NBP standard

elements 5, 14, 15, 16 and 17. The fifth item, BMP outcomes, had the potential of involving other NBP standard elements, namely: 1, 2, 4, 6, 9, 10 and 13. In addition the scope specifically included review and verification of individual EMS Elements 5, 6, 9, 14 and 16. Work involved document review, interviews, and field visits.

In general terms, the scope of the third party interim audit encompasses the entire biosolids value chain (pretreatment, collection and treatment, solids processing through final end use or disposal) with special attention on those practices and management activities that directly support solids and biosolids-related operations, processes, and activities within the wastewater treatment plant's functions.

The physical biosolids facilities included in the audit and visited during the interim audit were the St. Cloud wastewater treatment facilities, including the gravity belt thickening operations, blower operations, solids storage tanks, tanker trucks, tractor and one land application farm site: Kent Westbur's fields H & I 28 in Sterns County near St. Augusta (180 acres corn and soybeans).

The following individuals were interviewed or otherwise participated in meetings as part of the audit process:

- Tracy Hodel – Public Services Director
- Lisa Vollbrecht – Public Utilities Director
- Emma Larson – Assistant Public Utility Director
- Chris Plautz – Chief Wastewater Services Supervisor
- Jacob Ethen – Wastewater Services Manager & Internal Auditor
- Elijah Stuben - Environmental Compliance Specialist, EMS Coordinator
- Shanna Czeck – Water Quality Coordinator
- David Wallen – Wastewater Supervisor
- Mark Weyer – Utility Maintenance Mechanic
- Rocio Durkot – Laboratory Technician
- Kent Westbur – Farmer and biosolids land application user
- Cole Huggins – Hydrologist Municipal Waste Section, of Resource Management and Assistance Division, Minnesota Pollution Control Agency

INTERIM AUDIT FINDINGS

The interim audit included review of the latest version of the St. Cloud Biosolids Environmental Management System Manual updated 18 June 2021 containing the current element procedures, and utilized the most recent version of the NBP Third Party Verification Auditor Guidance dated August 2011. The interim audit found no major non-conformances, 1 minor non-conformances and 6 opportunity for improvement, as well as 2 commendations or positive observations.

The following is a review of the positive observations made during the audit process. The minor non-conformance and opportunities for improvement follow and are presented

in the sequence of the NBP standard elements listed by requirement number. These numbers correspond to the Element minimum conformance requirements.

Positive Observations

St. Cloud has made a significant improvement in its historic tracking of communication with interested parties, recording all such communication in the Public Input Summary.

St. Cloud made excellent use of the after action report for identification and evaluation of what went right and what went wrong in responding to an emergency spill or release.

Minor Non-conformance

Requirement 5.1 and 5.5 – The standard requires that measurable biosolids program goals and objectives are established and periodically reviewed. Also, it requires that each program goal uses the SMART criteria (Specific, Measurable, Achievable, Relevant and Time-bound.) Not all of the goals include specifically measurable quantities related to biosolids management that can be used to evaluate progress and accomplishment of goals.

Opportunities for Improvement

Requirement 5.1 and 5.6 – The standard requires that measurable biosolids program goals and objectives be established and periodically reviewed. Also, the standard requires that goals and objectives be updated on a regular basis. Consider including more details in the “ongoing status update” column of the Goals and Objectives table.

Requirement 5.7 – The standard requires that action plans contain schedules, resources, and responsibilities for achieving biosolids goals and objectives. Not all of the action plans include the resources required or the individuals responsible for tracking and reporting on the progress of the goals and objectives.

Element 5 and 9 – Consider quantifying the financial benefits (cost savings and/or revenue generated) of each of the goals and objective and communicating those values to interested parties and the public.

Requirement 6.4 – The standard requires that interested parties be provided meaningful opportunities to express views and perspectives relative to biosolids management activities.... In Table 6.1 consider including within the Description column, associated with the formal participation mechanisms, how biosolids relates to or can be related to each of the mechanisms identified.

Requirement 9.2 – The standard requires identifying the process of assuring timely response to inquiries by interested parties. For communication received from interested

parties consider including the data and **time** of the receipt of and response to communication in the Public Input Summary sheet.

Requirement 16.3(b) – Consider having internal auditor(s) attend a more affordable shortened version of introduction to the ISO 14001 standard for internal auditors (not for certification) with emphasis on the standard and not auditing techniques.

Summary

The hard work and dedication of the BMP Team must be recognized. While maintaining BMP certification obviously a team effort, the hard work and dedication of Emma Larson, Elijah Stuben, Shanna Czeck, Chris Plautz, David Wallen, and Jacob Ethen must be acknowledged. Also, the encouragement, support and active participation of Tracey Hodel, Public Services Director and Lisa Vollbrecht, Public Utilities Director ensure the continued success of this program.

For the non-conformance, the St. Cloud BMP Team prepared the Corrective Action/Improvement Forms and implement corrective actions according to their BMP procedures to provide continual improvements to their biosolids program. The corrective action/Improvement Forms was presented to the lead auditor within 30 days.

The corrective action for minor nonconformance must be corrected within 30 days of the audit, or within the extensions beyond 30 days found to be acceptable and approved by the lead auditor.

As a further measure to demonstrate continual improvement the opportunities for improvement will be addressed to the maximum extent possible.

The final report and recommendation for continued recognition at the platinum level of certification was submitted to NBP within two weeks following approval of the proposed corrective action for the minor nonconformance.

CITY OF ST. CLOUD WASTEWATER TREATMENT FACILITY COMMENTS

The City of St. Cloud Biosolids Management Program staff acknowledge the findings of the audit are an accurate representation of the EMS program. The EMS team will work to resolve the minor nonconformance identified during the audit ensuring that the corrective actions are comprehensive and timely. The opportunities for improvement will be investigated and considered. The EMS team, staff in the Public Utilities Department and City Administration have demonstrated continued dedication to advancing the EMS program.

OUTCOMES MATTER

Since establishing a new approach to formulating its goals in 2013 with longer-term time-bound targets the City of St. Cloud's Wastewater Treatment Facility Biosolids Management Program established ten goals with corresponding related objectives. Some of the objectives did not clearly establish measurable criteria upon which to evaluate progress or accomplishment. However the program has continually improved and accomplished many of the goals and objectives, such that there are currently four active goals.

The EMS Coordinator and the EMS Team in consideration of potential public concerns developed goals and objectives. The current goals and supporting objectives were, for the most part, developed using Specific, Measurable, Achievable, Relevant, and Time-bound (SMART) criteria and established cognizant of each of the four NBP required outcome areas listed below:

- Environmental Performance,
- Regulatory Compliance,
- Relations with Interested Parties, and
- Quality Biosolids Management Practices

While it is not a requirement to accomplish all objectives established, it is a critical component of the system to make progress towards achieving the majority of the goals. The facility's performance relative to each of the above outcome groups is addressed beneath each of the goals and objectives identified below.

As was mentioned above several goals have been attained and have been retired, while some evolved to become new goals and objectives. The following presents a review of the status of the goals and objectives as of this 2021 interim audit. Goal numbers that are not discussed have either been accomplished or retired or both.

Goal 7 – Reduce Purchased Electricity by 100% of 2013 baseline by 2022. (The measurability of this goal is to reduce the number of days when purchasing electricity is required from 365 days to zero.)

Objective 7.1 – Optimize high strength waste (HSW) utilization by 2021. The action required to accomplish this objective is to upgrade facilities to enable increased HSW volume to maximize generation efficiency and energy production. The measurable target for this objective will be to increase gas production at a rate of 1 gallon of HSW = 0.63 kWh. Status – currently St. Cloud maintains seven sources of HSW and is conducting an investigation (through Hazen) to determine if further improvements are possible.)

Objective 7.2 – Increase biofuel generator capacity by adding a second generator by the end of 2020. (Completed).

Objective 7.3 – Increase digester gas production through increased primary digester capacity sufficient to utilize the increase in HSW by the end of 2022. The action required to accomplish this objective is to convert digester 4 to a primary digester to have redundancy and increase gas production from 350,000 cubic feet per day to 500,000 cubic feet per day. The construction and modifications needed for objective is estimated to be complete by the end of 2022.

Outcome Areas Impacted: Environmental Performance, Relations with Interested Parties and Quality Biosolids Management Practices.

Goal 8 – Reduce Phosphorus Concentration in St. Cloud’s Biosolids Liquid Product by 2021. The measurability of this goal will be tracked by following the phosphorus concentration in the biosolids as well as the volume of biosolids fertilizer produced. This will ensure regulatory compliance and increase farmer interest in the product.

Objective 8.1 – Reduce the phosphorus concentration in biosolids product from baseline in 2015 of 7.25 mg/L to 3.0 mg/L by optimizing NR2 processed (WASSTRIP, Ostara) and improving dewatering process to reduce liquid product. The progress towards this goal and objective has showed a value of 3.36 mg/l in crop year 2017 and 4.07 mg/l in crop year 2021.

Outcome Areas Impacted: Environmental Performance, Regulatory Compliance, Relations with Interested Parties and Quality Biosolids Management Practices.

Goal 9 – Reduce polymer consumption in Lystek process by 1 gallon per hour by the end of 2021. The baseline used for comparison was established at 5.3 gallons per hour.

Objective 9.1 – Provide a stable polymer feed to the Lystek process to reduce consumption through stabilizing feed water temperature and lower seasonal fluctuations. The current status involves weekly monitoring of polymer correlated with feed rate and bowl speed.

Outcome Areas Impacted: Environmental Performance and Quality Biosolids Management Practices.

Goal 10 – Improve financial performance of biosolids recycling program to ensure long term program sustainability. Reducing cost of biosolids application operations, and potentially increasing revenues will accomplish this. This goal needs to be quantified in terms of dollars.

Objective 10.1 – Reduce expenditures associated with hauling costs including labor hours, distance hauled, fuel consumption and equipment depreciation.

Outcome Areas Impacted: Environmental Performance, Relations with Interested Parties and Quality Biosolids Management Practices.

CONCLUSIONS AND RECOMMENDATIONS

The results of the interim audit showed the St. Cloud Wastewater Treatment Facility has an excellent Biosolids Environmental Management Program. The NSF lead auditor reviewed and approved the corrective action plan for the minor non-conformance identified during the audit. Therefore it is recommended that the Wastewater Treatment Facilities Biosolids Management Program (BMP), St. Cloud, Minnesota maintain its platinum level recognition certification by the NBP. The full implementation of the corrective actions for the minor non-conformances will be accomplished according to the schedule proposed in the corrective action worksheets. It is expected that the opportunities for improvement will each be addressed although they do not require formal closure.

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.

Each internal or interim audit will include a review of: the organization's progress toward goals and objectives; BMP outcomes (environmental performance; regulatory compliance; interested party relations; quality practices); actions taken to correct minor non-conformances; the management review process; corrective action requests and responses; and preventive actions. In addition to the above, all of the elements will be audited individually over the four-year interim period between certification audits, such that all elements are addressed.

Based on discussions between the Biosolids Coordinator (EMS Coordinator) and the third party auditor the following tentative interim audit schedule was established to maintain platinum recognition status over the intervening years between certification audits:

Year 6 (completed) –Elements 3, 10, 12, 13

Year 7 (completed) – Elements 1, 8, 15, 17

Year 8 (completed) – Elements 5, 6, 9, 14, 16

Year 9 (internal audit substitution) – Elements 2, 4, 7, 11

Year 10 (third party) – Re-verification audit

Attachment 1

Documents and Other Objective Evidence Reviewed During the Interim Audit

- Tracy Hodel – Public Services Director
- Lisa Vollbrecht – Public Utilities Director
- Emma Larson – Assistant Public Utility Director
- Chris Plautz – Chief Wastewater Services Supervisor
- Jacob Ethen – Wastewater Services Manager & Internal Auditor
- Elijah Stuben - Environmental Compliance Specialist, EMS Coordinator
- Shanna Czeck – Public Utilities Water Quality Coordinator
- David Wallen – Wastewater Supervisor
- Mark Weyer – Utility Maintenance Mechanic
- Rocio Durkot – Laboratory Technician
- Kent Westbur – Farmer and biosolids land application user
- Cole Huggins – Hydrologist Municipal Waste Section, of Resource Management and Assistance Division, Minnesota Pollution Control Agency

Element 1. BMP Manual

- EMS Manual – Version 8 – June 2021
- Biosolids Master Calendar for 2021
- Review and Revise Documentation
- Interview with Elijah Stuben - Environmental Compliance, EMS Coordinator
- Interview with Shanna Czeck – Public Utilities Water Quality Coordinator
- Interview with Emma Larson – Assistant Public Utility Director

Element 2. Biosolids Management Policy

- Element 2: Biosolids Management Policy, Version 3, June 2021
- Attachment 2.1: NBP Code of Good Practice
- Attachment 2.2: St. Cloud Biosolids Mission Statement Poster
- Interview Tracy Hodel – Public Services Director
- Interview with Lisa Vollbrecht – Public Utilities Director
- Interview with Emma Larson – Assistant Public Utility Director
- Interview with Elijah Stuben – Environmental Compliance, EMS Coordinator
- Interview with Shanna Czeck – Public Utilities Water Quality Coordinator

Element 3. Critical Control Points

- Element 3: Process Control Points, Version 9, June 2021
- Table 3.1: Process Control Points, Operational Controls, SOPs, Monitoring/Measurements and Potential Significant Impacts.
- St. Cloud Wastewater Treatment Facilities, Process Flow and Biosolids Diagram.
- Interview with Chris Plautz – Chief Wastewater Services Supervisor
- Interview with Emma Larson – Assistant Public Utility Director
- Interview with Jacob Ethen – Wastewater Services Manager & Internal Auditor
- Interview with David Wallen – Wastewater Supervisor
- Interview with Mark Weyer – Utility Maintenance Mechanic
- Interview with Elijah Stuben - Environmental Compliance Specialist, EMS Coordinator
- Interview with Shanna Czeck – Public Utilities Water Quality Coordinator
- Field review of various critical control points operations
- Field review of farmland application site: Kent Westbur’s fields H & I 28 in Sterns County near St. Augusta (180 acres corn and soybeans).

Element 4. Legal and Other Requirements

- Element 4: Legal and Other Requirements, Version 7, June 2021
- Table 4.1: Legal Requirements and Guidance Specific to City of St. Cloud Biosolids Land Application Program.
- Table 4.2: NPDES Permit Reporting Requirements and Related Reports Submitted.
- Reviewed Pretreatment Program (Significant Industrial Users)
- Reviewed Pretreatment Annual Report – 24 February 2021
- Interview with Elijah Stuben - Environmental Compliance Specialist, EMS Coordinator
- Interview with Shanna Czeck – Public Utilities Water Quality Coordinator
- Interview with Chris Plautz – Chief Wastewater Services Supervisor
- Interview with Emma Larson – Assistant Public Utility Director
- Interview with Cole Huggins – Hydrologist Municipal Waste Section, of Resource Management and Assistance Division, Minnesota Pollution Control Agency

Element 5. Goals and Objectives

- Element 5: Goals and Objectives for Continual Improvement, Version 5, June 2021
- Table 5.1 - Goals and Objectives Template
- Table 5.2 – Goals and Objectives Summary Sheet Template
- Interview with Lisa Vollbrecht – Public Utilities Director
- Interview with Emma Larson – Assistant Public Utility Director
- Interview with Chris Plautz – Chief Wastewater Services Supervisor
- Interview with Jacob Ethen – Wastewater Services Manager & Internal Auditor

- Interview with Elijah Stuben - Environmental Compliance Specialist, EMS Coordinator
- Interview with Shanna Czeck – Public Utilities Water Quality Coordinator
- Interview with David Wallen – Wastewater Supervisor
- Reviewed Summary sheet for 2019, 2020 and 2021 Biosolids Management System Goals and Objectives.
- Reviewed Action Plans contained in Goals and Objectives for 2020 and 2021.
- Current Annual Review of Open EMS Goals.

Element 6. Public Participation in Planning

- Element 6: Public Participation in Planning, Version 6, June 2021
- Attachment 6.1 - Table 6.1 City of St. Cloud Biosolids Management Program Public Participation Mechanisms
- Attachment 6.2 Letter to interested parties – open invitation to observe third party audit (example).
- Invitation to Biosolids Management Program Audit – June 4, 2021.
- Element 9: Communication, Version 9, June 2021
- Interview with Lisa Vollbrecht – Public Utilities Director
- Interview with Emma Larson – Assistant Public Utility Director
- Interview with Chris Plautz – Chief Wastewater Services Supervisor
- Interview with Elijah Stuben - Environmental Compliance Specialist, EMS Coordinator
- Interview with Shanna Czeck – Public Utilities Water Quality Coordinator
- Interview with Cole Huggins – Hydrologist Municipal Waste Section, of Resource Management and Assistance Division, Minnesota Pollution Control Agency
- St. Cloud Public Utilities Website (<http://www.ci.stcloud.mn.us/index.aspx>)
- Biosolids Digester Newsletter 2020 (Part of Annual Performance Report).
- Public invitation to attend Biosolids Management Program Audit on July 13 through July 14, 2021 dated June 4, 2021.
(<http://www.ci.stcloud.mn.us/332/Biosolids-Management-Program.>)

Element 7. Roles and Responsibilities

- Limited Review

Element 8. Training

- Limited Review

Element 9. Communications

- Element 9: Communication, Version 9, June 2021
- Review Interested Parties Summary Spreadsheet

- Review improvement in historic tracking of communication with interested parties, and recording communication in the Public Input Summary
- Element 6: Public Participation in Planning, Version 6, June 2021
- Attachment 6.1 - Table 6.1 City of St. Cloud Biosolids Management Program Public Participation Mechanisms
- Attachment 6.2 Letter to interested parties – open invitation to observe third party audit (example).
- Invitation to Biosolids Management Program Audit – June 4, 2021.
- Interview with Lisa Vollbrecht – Public Utilities Director
- Interview with Emma Larson – Assistant Public Utility Director
- Interview with Chris Plautz – Chief Wastewater Services Supervisor
- Interview with Elijah Stuben - Environmental Compliance Specialist, EMS Coordinator
- Interview with Shanna Czeck – Public Utilities Water Quality Coordinator
- Interview with Cole Huggins – Hydrologist Municipal Waste Section, of Resource Management and Assistance Division, Minnesota Pollution Control Agency
- St. Cloud Public Utilities Website (<http://www.ci.stcloud.mn.us/index.aspx>)
- Biosolids Digester Newsletter 2020 (Part of Annual Performance Report).
- Public invitation to attend Biosolids Management Program Audit on July 13 through July 14, 2021 dated June 4, 2021.
(<http://www.ci.stcloud.mn.us/332/Biosolids-Management-Program.>)

Element 10. Operational Control of Critical Control Points

- St. Cloud Wastewater Treatment Facilities, Process Flow and Biosolids Diagram.
- Element 10: Operational Controls, Version 7, June 2021
- Reviewed Attachment 10.1 – Standard Letter of Expectations for Biosolids Management Contractors.
- Reviewed (Partial) Attachment 10.3 - Master Calendar for 2021 various actions.
- Element 3: Process Control Points, Version 9, June 2021
- Table 3.1: Process Control Points, Operational Controls, SOPs, Monitoring/Measurements and Potential Significant Impacts.
- Interview with Chris Plautz – Chief Wastewater Services Supervisor
- Interview with Emma Larson – Assistant Public Utility Director
- Interview with Jacob Ethen – Wastewater Services Manager & Internal Auditor
- Interview with David Wallen – Wastewater Supervisor
- Interview with Mark Weyer – Utility Maintenance Mechanic
- Interview with Elijah Stuben - Environmental Compliance Specialist, EMS Coordinator
- Interview with Shanna Czeck – Public Utilities Water Quality Coordinator
- Field review of various critical control points operations
- Field review of farmland application site: Kent Westbur’s fields H & I 28 in Sterns County near St. Augusta (180 acres corn and soybeans).
- Reviewed Gravity Belt Thickener Operations
- Reviewed land application equipment.

Element 11. Emergency Preparedness and Response

- Element 11: Emergency Response Plan, Version 9, June 2021
- Attachment 11.1 – Biosolids Management Program – Emergency Response Plan
- Attachment 11.2 – Emergency Numbers Card for Vehicles
- Attachment 11.3 – On the Spot Accident Report
- Attachment 11.4 – After Action Review Form
- Attachment 11.5 – Corrective Action Form (CAPA)
- Attachment 11.6 – Safety Data Sheet
- Attachment 11.7 – Emergency Response Equipment: Inventory
- Attachment 11.8 – Emergency Spill Response Vendor Contact Information
- Attachment 11.9 – Public Relations and Communications
- Completed After Action Review Form for Emergency Training on 5 Sept 2019.
- Interview with Chris Plautz – Chief Wastewater Services Supervisor
- Interview with Emma Larson – Assistant Public Utility Director
- Interview with Jacob Ethen – Wastewater Services Manager & Internal Auditor
- Interview with David Wallen – Wastewater Supervisor
- Interview with Shanna Czeck – Public Utilities Water Quality Coordinator
- Interview with Elijah Stuben - Environmental Compliance Specialist, EMS Coordinator
- Discussed emergency response training, tabletop exercises and actual spill.

Element 12. BMP Documentation and Document Control

- Element 12: Documentation, Document Control and Record Keeping, Version 5, June 2021
- EMS Manual – Version 8 – June 2021
- Biosolids Master Calendar for 2021
- Element 2: Biosolids Management Policy, Version 3, June 2021
- Attachment 2.1: NBP Code of Good Practice
- Attachment 2.2: St. Cloud Biosolids Mission Statement Poster
- Evaluation of various Review and Revise Documentation for Elements.
- Biosolids Digester Newsletter 2021 (Part of Annual Performance Report).
- Interview with Chris Plautz – Chief Wastewater Services Supervisor
- Interview with Emma Larson – Assistant Public Utility Director
- Interview with Shanna Czeck – Public Utilities Water Quality Coordinator
- Interview with Elijah Stuben - Environmental Compliance Specialist, EMS Coordinator

Element 13. Monitoring and Measurement

- Element 13 – Monitoring and Measurement, Version 4, June 2021
- Element 10: Operational Controls, Version 7, June 2021
- Element 3: Process Control Points, Version 9, June 2021

- Table 3.1: Process Control Points, Operational Controls, SOPs, Monitoring/Measurements and Potential Significant Impacts.
- St. Cloud Wastewater Treatment Facilities, Process Flow and Biosolids Diagram.
- Interview with Chris Plautz – Chief Wastewater Services Supervisor
- Interview with Emma Larson – Assistant Public Utility Director
- Interview with Jacob Ethen – Wastewater Services Manager & Internal Auditor
- Interview with David Wallen – Wastewater Supervisor
- Interview with Mark Weyer – Utility Maintenance Mechanic
- Interview with Elijah Stuben - Environmental Compliance Specialist, EMS Coordinator
- Interview with Shanna Czeck – Public Utilities Water Quality Coordinator
- Interview with Kent Westbur - land application farmer.
- Interview with Cole Huggins – Hydrologist Municipal Waste Section, of Resource Management and Assistance Division, Minnesota Pollution Control Agency
- Field review of farmland application site: Kent Westbur’s fields H & I 28 in Sterns County near St. Augusta (180 acres corn and soybeans).
- Reviewed Gravity Belt Thickener Operations
- Annual Review of Open EMS Goals – 2021.

Element 14. Nonconformances: Preventive and Corrective Action

- Element 14:Nonconformance: Preventive Action and Corrective Action, Version 6, June 2021
- Attachment 14.2 – Corrective Action Summary Document
- Reviewed Environmental Management System Corrective/Preventive Action Documentation.
- Interview with Jacob Ethen – Wastewater Services Manager & Internal Auditor
- Interview with Chris Plautz – Chief Wastewater Services Supervisor
- Interview with Emma Larson – Assistant Public Utility Director
- Interview with Mark Weyer – Utility Maintenance Mechanic
- Interview with Elijah Stuben - Environmental Compliance Specialist, EMS Coordinator
- Interview with Shanna Czeck – Public Utilities Water Quality Coordinator
- Interview with David Wallen – Wastewater Supervisor
- Reviewed internal audit report for 2020 – conducted 25 February 2020.
- Reviewed internal audit report for 2021 – conducted 22 February 2021.
- Reviewed corrective action plan status form for audit conducted 2/25/20.

Element 15. Biosolids Management Program Report

- Element 15 – Biosolids Management Report, Version 4, June 2021
- Interview with Tracy Hodel – Public Services Director
- Interview with Lisa Vollbrecht – Public Utilities Director
- Interview with Emma Larson – Assistant Public Utility Director

- Interview with Chris Plautz – Chief Wastewater Services Supervisor
- Interview with Elijah Stuben - Environmental Compliance Specialist, EMS Coordinator
- Interview with Shanna Czeck – Public Utilities Water Quality Coordinator
- Biosolids Digester Newsletter 2021 (Part of Annual Performance Report).
- Management Review Report for 2020 – dated 30 March 2021

Element 16. Internal BMP Audit

- Element 16: Internal Biosolids Management Program Audit, Version 8, June 2021
- Attachment 16.1 – Internal Audit Team Details, Lead Auditors Qualifications, Training and Responsibilities.
- Attachment 16.2 – Corrective Action Table for Internal and External Audit use.
- Attachment 16.3 – Internal EMS Audit Schedule (2019 – 2023)
- Interview with Jacob Ethen – Wastewater Services Manager & Internal Auditor
- Interview with Chris Plautz – Chief Wastewater Services Supervisor
- Interview with Emma Larson – Assistant Public Utility Director
- Interview with Elijah Stuben - Environmental Compliance Specialist, EMS Coordinator
- Interview with Shanna Czeck – Public Utilities Water Quality Coordinator
- Interview with David Wallen – Wastewater Supervisor
- Discussed auditor training and qualification requirements
- Reviewed internal audit report for 2020 – conducted 25 February 2020.
- Reviewed internal audit report for 2021 – conducted 22 February 2021.
- Reviewed corrective action plan status form for audit conducted 2/25/20.

Element 17. Management Review

- Element 17: Management Review, Version 6, June 2021.
- Attachment 17.1 – Management Review Agenda template
- Attachment 17.2 – Management Review Report template
- Attachment 17.3 – Weekly Report template
- Attachment 17.4 – Wastewater Update Meeting Summary Agenda Template
- Attachment 17.5 – Master Calendar 2021.
- Annual Review of Open EMS Goals – 2021.
- Interview with Tracy Hodel – Public Services Director
- Interview with Lisa Vollbrecht – Public Utilities Director
- Interview with Emma Larson – Assistant Public Utility Director
- Interview with Chris Plautz – Chief Wastewater Services Supervisor
- Reviewed Management Review Report for 2020 – dated 30 March 2021.