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Kent County Department of Public Works.

Regional Wastewater Treatment Facility

Milford, DE

Corrective Action Report

ISO 14001:2004, OHSAS-18001:2007

DEKRA Certification, Inc.

Chalfont, Pennsylvania

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CONFIDENTIAL REPORT

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Approved by: NPR

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1 SUMMARY

A total of five (5) minor nonconformances remained open from the ISO-14001:2004, OHSAS-18001:2007 and Biosolids Management Program Surveillance Audit that DEKRA conducted at Kent County Department of Public Works November 7 to 9, 2012. As a result, Kent County Department of Public Works took appropriate corrective action. The details are included in the body of this report.

DEKRA auditor Jon Shaver was onsite for 1 eight hour day, for a total of 1 auditor-day.

Upon review, corrective actions for 4 of the 5 nonconformances are approved and closed. Adequate progress has been made on the remaining nonconformance (see body of report). Surveillance Audits may proceed on schedule.

The following "opportunity" for improvement was noted:

- Identification of significant EHS aspects could include other considerations, such as strategic direction and interested party input in addition to the EHS risk analysis.

2 REQUESTS

The next ISO-14001, OHSAS-18001 and Biosolids Management Program audits will be Surveillance / Interim Audits. These will continue to be conducted as integrated audits.

The next audit was tentatively scheduled for the week of November 25, 2013. Arrangements will be made through DEKRA's office.

The nonconformance remaining open (see Section 3.2 of this report) will be reviewed during the next DEKRA audit.

3 CORRECTIVE ACTION

3.1 Closed Nonconformances From Previous DEKRA Audits

Corrective actions taken in response to specific nonconformance findings related to requirements of ISO-14001:2004, OHSAS-18001 and the National Biosolids Partnership BMP elements found during the Surveillance Audit conducted November 7 to 9, 2012 were assessed for effectiveness. Based on those assessments, the following nonconformances have been closed, as described below.

Minor Nonconformance JS/12-01/4.3.1 ISO-14001, OHSAS-18001 and NBP BMP Element 3 require the organization to identify environmental aspects and occupational health and safety risks of activities within the management system scope that it can control and those that it can influence.

- Activities and products for handling septage are not included in identification of EHS risks and critical control points and determining necessary operational controls.
- Biological exposure is considered a significant risk in operating areas, however this is not included in the analysis of risks
- Maintenance activities are not directly included in EHS risk analysis or necessary operational controls

CORRECTIVE ACTION: Kent County determined that this nonconformance was caused by incomplete risk analysis and not following procedures. As a result, Kent County expanded their environmental, health and safety risk analysis to include the items mentioned in the nonconformance. Evidence of completion of this action was reviewed and the corrective action found to have effectively corrected the problem and the cause. *This nonconformance is now closed.*

Minor Nonconformance JS/12-02/4.4.2 ISO-14001, OHSAS-18001 and NBP BMP Element 8 require the organization to identify training needs and competency for tasks that can affect environmental impacts, workplace safety & health and performance of the biosolids program. On the job training and competency requirements for plant maintenance personnel have not been defined except for plant-wide procedures.

CORRECTIVE ACTION: Kent County determined that this nonconformance was caused by not following training and competency procedures when a new position was created. As a result, Kent County added training requirements for Maintenance personnel to their list of training needs. Evidence of completion of this action was reviewed and the corrective action found to have effectively corrected the problem and the cause. *This nonconformance is now closed.*

Minor Nonconformance JS/12-03/4.4.6

ISO-14001, OHSAS-18001 and NBP BMP Elements require the organization to identify and plan operations associated with the identified significant environmental aspects (ISO-14001, 4.4.6) and hazards (OHSAS-18001 4.4.6). The table used to identify critical control points and operational controls does not clearly link to the identification of significant risks.

CORRECTIVE ACTION: Kent County determined that this nonconformance was caused by an incomplete table that is used to link environmental, health and safety risks to operational controls. As a result, Kent County modified their identification of environmental, health and safety risk analysis to include related operational controls. Evidence of completion of this action was reviewed and the corrective action found to have effectively corrected the problem and the cause. *This nonconformance is now closed.*

Minor Nonconformance JS/12-04/4.5.3

ISO-14001, OHSAS-18001 and NBP EMS Element 14 require the organization to establish corrective and preventive action procedures, including cause analysis and reviewing effectiveness, to deal with nonconformities. OHSAS-18001 also requires corrective and preventive action to address results of incident and accident investigation. The SMS Corrective and Preventive Action procedure was not used to address a permit exceedance on 11/2/12 nor an accident that occurred in June 2012.

CORRECTIVE ACTION: Kent County determined that this nonconformance was caused by inadequate links to their Corrective and Preventive Action process. As a result, Kent County developed links to the SMS Corrective and Preventive Action process from their procedures for incident investigation and noncompliance corrections. Evidence of completion of this action was reviewed and the corrective action found to have effectively corrected the problem and the cause. *This nonconformance is now closed.*

3.2 Corrective Actions from prior DEKRA Audits remaining open**Minor Nonconformance JS/12-05/4.5.5**

ISO-14001, OHSAS-18001 and NBP BMP Elements require the organization to ensure that internal audits are conducted at planned intervals to determine whether the management system has been properly implemented and maintained. The scope of internal audits and schedule for these audits have not included Pretreatment operations.

CORRECTIVE ACTION: Kent County determined that this nonconformance was caused by an incomplete internal audit program. As a result, Kent County modified their internal audits program to include Pretreatment operations and to ensure the manager responsible for Pretreatment does not conduct the audit. As

of the time of this CA audit, the planned internal audit of Pretreatment had not occurred so *the nonconformance remains open and will be reviewed during the next DEKRA audit.*

3.3 Reviewed Documents

Analysis of environmental, health & safety risks / aspects

Internal audit planning

List of critical control points and operational controls

SMS Manual

Training records