



National Biosolids Partnership

Biosolids Management Program Reverification Audit Report

**City of Chattanooga Moccasin Bend Wastewater Treatment Plant
Chattanooga, TN**

Audit Dates: March 31 to April 3, 2014

Audit Conducted By: DEKRA Certification, Inc. (Chalfont, PA)

Audit Team: Mr. Jon Shaver, Biosolids EMS Lead Auditor / Biosolids Auditor

Report Written By: Mr. Jon Shaver, Biosolids EMS Lead Auditor

Report Date: Final April 18, 2014

Reviewed By: Ms Alice Cannella, Director – Waste Resources Division

Approved By: Michelle Hunn, Vice President - DCI

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1. EXECUTIVE SUMMARY

DEKRA Certification Inc. (DEKRA) conducted an independent Verification Audit of the management system being used by City of Chattanooga Moccasin Bend Wastewater Treatment Plant (Chattanooga) in managing its biosolids program. The audit was conducted March 31 to April 3, 2014 at Chattanooga's request as part of its participation in the NBP Biosolids Management Program (BMP). This was the second Verification Audit of Chattanooga's biosolids program within the National Biosolids Partnership Biosolids Management Program certification program. DEKRA first verified Chattanooga's Biosolids Management System in 2009.

The purposes of this audit were to:

- Verify that the management system being used by Chattanooga in managing its biosolids activities meets National Biosolids Partnership expectations and requirements.
- Confirm that Chattanooga is managing its biosolids program effectively, with practices and procedures being performed as documented.
- Examine outcomes that Chattanooga is achieving through the use of a systematic approach for continually improving its biosolids program.
- Verify that open nonconformances from previous DEKRA audits have been effectively corrected.

The audit scope covered the Chattanooga biosolids program, including activities within Chattanooga's biosolids value chain, consistent with NBP requirements. Audit criteria were the requirements of the 17 NBP BMP Elements and Chattanooga's Biosolids Management System.

Audit Results and Conclusions

Three minor nonconformances with respect to the audit criteria were found during this audit. Chattanooga has prepared corrective action plans for these nonconformances that have been approved by DEKRA's Lead Auditor. Verification of effective corrective action will be included in the next third party audit.

Based on the results of this audit, DEKRA has determined that:

- Chattanooga biosolids activities are consistent with NBP expectations and meet requirements of the NBP BMP Elements.
- Use of a management system approach is generating positive outcomes for Chattanooga's biosolids program in the areas of regulatory compliance, environmental performance, quality practices and relations with interested parties.

DEKRA recommends "Platinum" Certification of Chattanooga's Biosolids Management System within the NBP Biosolids Management Program.

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2. AUDIT DETAILS

2A. Agency Details and Biosolids Program

Agency Name: City of Chattanooga (referred to as Chattanooga in this report)

Facility: Moccasin Bend Wastewater Treatment Plant, Chattanooga, Tennessee

Number of Employees (approximate): 147 FTE

Volume of Wastewater Treated (approximate): = capacity to 140 MGD, with additional 80MGD for wet weather treatment

Tons of Biosolids Produced (approximate): 70,000 wet tons per year (Class B and Class A)

Biosolids Use / Disposition Sites Audited

Sheldon Farm, Bledsoe County TN

2B. Audit Team

Chattanooga authorized DEKRA Certification Inc. to conduct this Third Party Audit of their biosolids program. DEKRA is an accredited Third Party Audit Company within the NBP Biosolids Management Program. Mr. Jon Shaver led the audit on behalf of DEKRA. Mr. Shaver is certified by the National Biosolids Partnership as a Biosolids EMS Lead Auditor and Biosolids Auditor. DEKRA asserts that our firm and auditor have an independent relationship with Chattanooga that meets criteria established by NBP.

2C. Audit Criteria, Timing, Scope and Methodology

Audit Criteria

Requirements stipulated in the National Biosolids Partnership (NBP) EMS Elements (July, 2011) and the City of Chattanooga "Biosolids Management System" were used as criteria for this audit.

Audit Timing

The review of Chattanooga's BMS Documentation was conducted offsite and reported 3/20/14. The onsite Verification Audit was conducted March 31 to April 3, 2014.

Audit Scope

The scope of the audit included parts of the Chattanooga biosolids program, which encompasses pretreatment, solids generation, solids stabilization, handling and storage, biosolids transportation and biosolids use, with special attention to practices and management activities that directly support biosolids-related operations, processes and activities. The following topics were covered, consistent with NBP requirements and the Scope of Work agreed by Chattanooga and DEKRA.

1. Verification of effective corrective action for nonconformances from previous DEKRA audits.
2. Continual Biosolids Management System Dynamics Review, including:
 - Significant Changes (incl planning & MOC)
 - Effectiveness Reviews:

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Corrective & Preventive Action Status

Goals & Objectives Status

Management Review

- Review Policy commitments
- Communication (internal & external + public participation)
- Review of Internal Audits (& related corrective action)

3. Process Audits

- Management Involvement
- BMP Planning Processes
 - Competency, Awareness & Training
 - Critical Control Points & Operational Controls
 - Compliance (with legal & other requirements)
 - Communication Program (incl public participation)
 - Document Control & Recordkeeping
- BMP Checking & Improvement Processes
 - Corrective and Preventive Action
 - Goals & Objectives
 - Management Review
 - Internal Audits
- Biosolids Operations
 - Biosolids Preparation and Handling
 - Biosolids Storage & Transportation
 - Emergency Preparedness
 - Maintenance
 - Pretreatment
- Biosolids Use / Disposition
 - Biosolids Use – Land Application
 - Control of Contractors

4. Examination of outcomes being achieved in the areas of regulatory compliance, interested party relations, environmental performance and quality practices.

Audit Methodology

The audit was conducted by qualified auditors following guidelines in the NBP Auditor Guidance (August 2011). Using a process auditing approach and 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 practices performed by the agency or its contractors.

2D. Reference Materials

The following documents were used as references during the audit:

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Chattanooga BMS Manual (current version)
National Biosolids Partnership "BMP Elements" (July 2011)
National Biosolids Partnership Biosolids EMS Third Party Auditor Guidance (August 2011)
National Biosolids Partnership Code of Good Practice
National Biosolids Partnership Manual of Good Practice

2E. Definitions of Audit Findings and Required Corrective Action

Major Nonconformance – a serious omission from requirements and/or other departure that represents, or could cause a failure of the management system. Major nonconformances must be corrected within 90 days for DEKRA's verification to be issued.

Minor Nonconformance – an isolated departure from requirements that does not represent a management system failure. Minor nonconformances require timely and effective corrective action. A certified DEKRA auditor must verify the effectiveness of the corrective action taken in order to maintain DEKRA's Verification.

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

2F. 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 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 date of this audit report. Information about the appeals process is available from the National Biosolids Partnership. Contact Ms. Lisa McFadden at lmcfadden@wef.org.

2G. Further Information

Further information about this audit or the Chattanooga Biosolids Management Program can be obtained from the City of Chattanooga. Contact Ms. Sandy Barbee (e-mail: barbee_s@chattanooga.gov).

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3. SUMMARY OF AUDIT RESULTS

3A. Verification Conclusion

Based on results of this audit, DEKRA issues the following Verification Statement concerning the Chattanooga's biosolids management system.

“DEKRA Certification, Inc. has independently verified that the biosolids management program being used by the City of Chattanooga Moccasin Bend Wastewater Treatment Plant 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 Management Program.”

3B. Strengths Observed

During this audit, DEKRA noted the following strengths in the Chattanooga biosolids management system.

- The focus on improved energy performance (approx 12% reduction) is resulting in significant environmental improvement and lower costs.
- The table identifying critical control points and operational controls is being used to determine the need for standard operating procedures and operator training.

3C. Outcomes

The Chattanooga 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.

Environmental Performance

A focus on energy reduction has resulted in 1.5% reduction from low cost opportunities and an additional 10% reduction from installing VFDs (total approximately \$80K/year).

Participation in an energy curtailment program offered by the local electric utility is saving approximately \$70K/year in energy cost.

Reuse of digester gas as boiler fuel is resulting in savings of \$25K/month in natural gas use.

Recycled process water is now used in place of potable water for defoaming in the chlorine contact tank.

Biosolids Quality

Class A quality capability was achieved in the filter press process.

Biosolids Management System information stations have been established throughout the plant to help communicate the system and requirements internally.

Regulatory Compliance

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Procedures have been reviewed and modified to ensure control of vector attraction and pH to ensure Class A EQ quality requirements are met.

Interested Party Relations

NBP Certification has led TDEC to allow City of Chattanooga to self permit for biosolids land application sites by issuing a notice of intent.

3D. Nonconformances Found This Audit

The following nonconformances were found during this audit:

Minor Nonconformance JS 14-01/8 The NBP BMP element 8 requires the organization to establish training program(s) to ensure employees are competent in performing their assigned biosolids management tasks and duties. There is evidence that employees are considered to be fully trained and qualified with some training noted as “incomplete”.

Minor Nonconformance JS 14-02/8 The NBP BMP element 8 requires the organization to establish training program(s) to provide general awareness of the BMP and how each employee’s assigned roles and responsibilities relate to the entire biosolids value chain, including new or reassigned employees. Employees hired or re-assigned since November 2013 have not received the necessary training.

Minor Nonconformance JS 14-03/11 NBP BMP element 11 requires the organization to review and evaluate the effectiveness of its emergency preparedness and response procedures. The Moccasin Bend Plant has not conducted an emergency exercise or drill in over 2 years. It is uncertain how effective the emergency preparedness and response plan currently is.

3E. Opportunities for Improvement

The following opportunities for improvement in the Chattanooga biosolids management program were noted. Chattanooga has no obligation to take any action in response.

- Focus Management Reviews on Improving Performance instead of extending the review of performance.
- The statement describing “Objectives” for improvement could include a measurable target, rather than relying on the action plan.
- Add function-specific objectives to the BMS list of objectives (e.g. increase ratio of preventive to corrective maintenance work).
- Consider assessing and prioritizing the significance of environmental, quality, regulatory compliance and interested party relations when developing critical control points and operational controls.
- Consider including a description of potential environmental and quality impacts in SOPs.
- Add “supplier / contractor” issue as a possible cause in the Corrective / Preventive Action process.
- Two instances of inappropriate Lockout / Tagout and two instances of inadequate hot work preparation were observed. Consider assessing the effectiveness of safety training programs.

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- Install sign for Hazardous Waste Accumulation in the laboratory
- Consider requiring laboratories contracted to assist in providing sample analysis to require NELAC (or equivalent) certification.
- The list of documents and records requiring control (BMS Manual Appendix F) could include documents and records that the biosolids transportation and land application contractor is required to maintain.

3F. Agreements

NBP requires that interim audits be conducted at least annually to verify that the certified organization's biosolids management program is functioning effectively and continues to conform to NBP expectations and requirements. Chattanooga and DEKRA have developed an Interim Audits Program to cover Verification Audits of the Chattanooga biosolids program for the period 2015 through 2018. . Each interim audit will check on the effectiveness of key BMP processes and review any significant changes affecting Chattanooga's biosolids program that have occurred since the previous audit. The interim audits will be scheduled so that the complete biosolids program is covered at least once during the Interim Audits period. Interim Audit #2-1 will be conducted during the week of April 6, 2015 as a Third Party Audit. Chattanooga will substitute self assessments as interim audits in 2016 and 2018.

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4. DETAILED AUDIT RESULTS

The following outlines results of DEKRA's audit of processes used in managing the Chattanooga biosolids program and the level of conformance with applicable requirements of the NBP BMP Elements.

4A BMP Documentation Review

NBP requirements include a review of the agency's BMP Documentation as part of each Reverification / Certification Audit. Chattanooga's BMS Manual (current version dated 2/14/14) is used to describe the Biosolids Management System and its requirements. DEKRA reviewed this manual and determined that it meets NBP requirements. Some suggestions for improvement were noted and reported to Chattanooga.

4B Biosolids Management Dynamics Review

Significant Changes

The Moccasin Bend Director of Waste Resources has retired and a new Director is in place with responsibility for the biosolids program. The new Director is familiar with the Chattanooga BMS and its certification within the NBP program. Additional odor control equipment has been installed, including a Trickling Filter and H₂S scrubber.

BMP Changes

No changes to the Chattanooga BMP have occurred in the past year. The BMS Manual was reviewed and changes were suggested for consistency with NBP requirements.

BMP Policy

The Biosolids Policy Statement remains as approved in 2008. The Policy commits to following the Code of Good Practice. Sampling confirmed that practices in place are consistent with Code of Good Practice principles.

Communications Program

The BMP communications and public outreach program continues as a top priority and are functioning effectively. A Biosolids Performance Report was issued for 2012 publicly in March 2013.

Goals and Objectives

Of the 5 objectives established in 2013 for the biosolids program, 4 were completed successfully and 1 was continued into 2014.

Corrective & Preventive Action

The Corrective and Preventive Action process is being used effectively to address audit nonconformances. Incidents and accidents are also addressed using a separate corrective action process. The Corrective and Preventive Action process is functioning effectively.

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Management Reviews

The Biosolids Management Team meets quarterly to address biosolids program performance and to plan ongoing improvements. Two of these meetings use an agenda that follows NBP requirements for management reviews.

Internal Audits

Internal audits were conducted in January 2014 and March 2013. Findings were addressed via the Corrective and Preventive Action process. The internal audit in 2013 was submitted as an Interim Audit required by Chattanooga's participation in the NBP Biosolids Management Program.

Summary – BMP Dynamics

Process	Process Effectiveness
BMP Changes	Process functioning effectively
Biosolids Policy commitments	Process functioning effectively
External Communications	Process functioning effectively
Goals and Objectives	Process functioning effectively
Corrective and Preventive Action	Process functioning effectively
Management Review	Process functioning effectively
Internal Audits	Process functioning effectively

4C Process Audits

As part of this audit DEKRA audited the following processes that Chattanooga uses within its biosolids management program and determined the level of conformance of each process with NBP expectations and requirements of the audit criteria.

Process	Conformance with Applicable BMP Elements
Management Involvement (incl Policy, Planning, Direction, Roles / Responsibilities)	Conforms
<u>BMP Planning Processes</u>	
Communication Program	Conforms
Competency, Training & Awareness	Conforms, except as noted in nonconformances 14-01 & 14-02
Compliance (with legal & other requirements)	Conforms
Critical Control Points & Operational Controls	Conforms

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Process	Conformance with Applicable BMP Elements
Document Control & Recordkeeping	Conforms
Public Participation in Planning	Conforms
<u>Checking & Improvement Processes</u>	
Corrective and Preventive Action	Conforms
Goals & Objectives	Conforms
Internal Audits	Conforms
Management Review	Conforms
<u>Biosolids Operations</u>	
Biosolids Preparation and Handling	Conforms
Emergency Preparedness & Response	Conforms, except as noted in nonconformance 14-03
Maintenance	Conforms
Pretreatment and Collection	Conforms
<u>Biosolids Use / Disposition</u>	
Biosolids Use – Land Application	Conforms
Control of Contractors	Conforms

4D Closed Nonconformances from Prior Audits

Six minor nonconformances remained open from the previous DEKRA audit in February 2012. As a result, Chattanooga took corrective action and DEKRA reviewed the effectiveness of that corrective action during this Reverification Audit. The results of that review are noted below

Major Nonconformance JS 12-01 / 3 The Chattanooga BMS (section 3.3) requires that critical control points address significant environmental impacts, compliance with legal & other requirements, biosolids quality and interested party relations. The list of "Critical Control Points and Operational Controls" does not note what conditions need control for interested party relations or quality and incorrectly includes legal requirements as environmental impacts.

CORRECTIVE ACTION: Chattanooga determined that this nonconformance was caused by incomplete documentation. As a result it modified the list identifying critical control points to include locations that can affect interested party relations and quality and separated legal and other requirements. Evidence of completion of this action was reviewed and the corrective action found to have effectively corrected the problem and addressed the cause. This nonconformance is now closed.

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Minor Nonconformance JS 12-02 / 5 NBP EMS Element #5 requires that objectives for improvement be measurable. Three of seven biosolids objectives (increase outreach attempts, continue newsletter, reduce carbon footprint) are not presented in a measurable way.

CORRECTIVE ACTION: Chattanooga determined that this nonconformance was caused by lack of measurability. As a result they added measurable targets for objectives in related action plans. Evidence of completion of this action was reviewed and the corrective action found to have effectively corrected the problem and addressed the cause. This nonconformance is now closed.

Minor Nonconformance JS 12-03 / 5 NBP EMS Element #5 requires the biosolids organization to establish goals for improvement. Biosolids program goals in the BMS Manual are not the same as those shown on the Goals, Objectives and Action Plan dated 1/19/2012.

CORRECTIVE ACTION: Chattanooga determined that this nonconformance was caused by inconsistent objectives. As a result they modified the goals in the current goals and objectives to be consistent with those stated in the BMS Manual. Evidence of completion of this action was reviewed and the corrective action found to have effectively corrected the problem and addressed the cause. This nonconformance is now closed.

Minor Nonconformance JS 12-04 / 8 NBP EMS Element #8 requires that the BMP General Awareness training address new or reassigned employees. Five employees hired at the Wastewater Treatment Plant in 2011 have not received BMS Awareness training.

CORRECTIVE ACTION: Chattanooga determined that this nonconformance was caused by incomplete training requirements. As a result they developed a BMS Training Scheme whereby all employees, including new or reassigned employees and contractors are required to be trained in BMS awareness. Evidence of completion of this action was reviewed and the corrective action found to have effectively corrected the problem and addressed the cause. This nonconformance is now closed.

Minor Nonconformance JS 12-05 / 12 NBP EMS Element #12 requires that controlled documents be up to date and readily available. CB1 Shutdown Procedure (SOP 1002) has been "under review" since 2008 and is not up to date or available. In addition, an obsolete version of the "EMS Manual for Biosolids Management" is in use in CB1.

CORRECTIVE ACTION: Chattanooga determined that this nonconformance was caused by lack of attention to control of SOPs. As a result they reviewed SOPs and removed draft or under review versions. Evidence of completion of this action was reviewed and the corrective action found to have effectively corrected the problem and addressed the cause. This nonconformance is now closed.

Minor Nonconformance JS 12-06 / 17 The Chattanooga Biosolids Policy commits to continually improve the biosolids program and Management Review is a key process for identifying and directing improvement. Four of five management reviews conducted since January 2011 did not identify improvement opportunities.

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CORRECTIVE ACTION: Chattanooga determined that this nonconformance was caused by an omission in management review records. As a result they added “recommendations for improvement” to the agenda for management reviews. Evidence of completion of this action was reviewed and the corrective action found to have effectively corrected the problem and addressed the cause. This nonconformance is now closed.

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APPENDICES

Appendix 1 List of Participants

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

City of Chattanooga Personnel

Sandy Barbee	BMS Coordinator
Alice Cannella	Director – Waste Resources Division
Marty Knight	Interim Plant Operations Supervisor
Brian Lessman	Plant Manager
Bill Newell	Pump Station Operations Supervisor
Mike Patrick	Deputy Director
Paul Patterson	Mgr Lab Services
Matthew Snyder	Sewer Project Coordinator
Jimmy Spence	Maintenance Manager
Rick Tate	Pretreatment Supervisor
Randy Taylor	Plant Engineer
Karen Styers	Administrative Specialist
Charles Thomas	Plant Operations Supervisor – Liquids
Ed Wellman	Project Engineer / Internal Auditor
Gary Williams	Occupational Safety Specialist

Other

Aaron Lloyd	Technical Service - Synagro
Doris Magourik	Project Manager - Synagro
Chad Raines	Field Manager - Synagro

Interested Parties

Steve Ahearn	Farmer (biosolids user)
Shelly Andrews	Friends of Moccasin Bend
Micah Gravitt	Environmental Specialist TN Dept Environment & Conservation
Angela Young	Environmental Specialist TN Dept Environment & Conservation

Appendix 2 Documents & Records Reviewed

“Tell us how we are doing” feedback	BMS Training Program for Employees
Biosolids audit report – TDEC	BMS Training Scheme
Biosolids fact sheet 2013	Calibration records (various)
Biosolids Performance Report 3/1/13	CAPA records (various)
BM Policy statement 10/7/08	City of Chattanooga website (various pages)
BMS Information Sheet	Emergency Preparedness Plan 2/14/14
BMS Manual	Emergency Preparedness Training Program & records

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Filtration cycle 8/18/09 (Siemens document)	Maintenance work orders (various)
Goals, Objectives & Action Plans Year End Summary 2013	Management Review records (4/17/13, 7/18/13)
Incident investigation 1/13/14	MSDS (various)
Internal audit 2014	New Employee Training records
Internal audit report 1/17/14, 4/23/13	O&M Manuals (various)
Internal audit scope & schedule	Policy resolution 4/24/07
Job Description (various)	Public relations for biosolids land application (Synagro document)
Land application site compliance report	Records – Material Manager
Liquid operations report	SOPs (various)
List of critical control points & operational controls 2/12/14	Sustainability committee mtg minutes (9/2013)
List of emergency response equipment	Visitors outreach webpage
List of legal & other requirements 2/12/14	Water reuse plan 8/7/13

END OF REPORT