



<p>Standard Operating Instruction – WWEMS-0100.009A Name: Compliance Audit/Evaluation Inspection for Wastewater Treatment</p>	<p>Corresponding Requirements: EMS Manual: 7-2 ISO Standard: 4.5.2 NBP Element: 13</p>
<p>Prepared By: Steve Oakley, Laboratory Supervisor Nancy Matherly, Industrial Chemist</p>	<p>Revision # 1 Revision Date: 7/12/05</p>
<p>Revised By: David Shellenbarger, Asst. Div. Manager - Compliance</p> <p>Approved By: David Shellenbarger, Assistant Division Manager - Compliance Signature:</p>	<p>Effective Date: 4/20/01</p> <p style="text-align: right;">Page 1 of 4</p>

Compliance Audit Standard Operating Instruction

1.0 Purpose

1.1 The following procedure provides guidance for conducting inspections of the Wastewater Treatment Facilities to help ensure proper operation and compliance with relevant environmental laws and regulations. Each wastewater treatment plant, the laboratory, pretreatment section, resource recovery farm and collection system will be inspected separately at least annually.

2.0 Associated Equipment

2.1 None

3.0 Associated Reference Material

- 3.1 City of Gastonia Environmental Policy
- 3.2 City of Gastonia Environmental Management System Manual
- 3.3 National Biosolids Partnership Manual of Good Practice
- 3.4 National Biosolids Partnership EMS Elements
- 3.5 ISO 14001 Standard
- 3.6 Treatment Plant Internal Compliance Audit Checklist - WWEMS-0101.009A
- 3.7 Pretreatment Internal Compliance Audit Checklist – WWEMS-0101.009E
- 3.8 Biosolids Internal Compliance Audit Checklist – WWEMS-0101.009F
- 3.9 Laboratory Internal Compliance Audit Checklist – WWEMS-0101.009G
- 3.10 Internal Check Sheets for individual laboratory analyses – WWEMS-0101.009_ as listed on document control matrix EMS-0101.000.
- 3.11 Applicable State and Federal regulations

4.0 Procedure

4.1 Inspectors for each area will be selected by the Assistant Division Manager - Compliance. Inspectors will be selected for having experience or knowledge of the area they are auditing but not working directly or being responsible for it. Inspectors will be trained on this procedure and judged sufficiently trained by the Assistant Division Manager of Compliance prior to performing audits.

4.2 Inspections consist of reviewing relevant laws and regulations, and the audited area's site, operations, and records to ensure compliance with them. The applicable Internal Compliance Audit Checklist(s) can serve as a guide to performing the inspection and should be filled out as a record of the inspection.

4.3 Treatment Plant Inspection involves reviewing the following aspects of proper plant operation:

- 4.3.1 NPDES Permit Review
- 4.3.2 Records/Reports Review
- 4.3.3 Facility Site Review
- 4.3.4 Flow Measurement Review
- 4.3.5 Effluent/Receiving Waters Inspection
- 4.3.6 Compliance Schedules
- 4.3.7 Self Monitoring Program Review
- 4.3.8 Operations Review
- 4.3.9 Sludge Disposal Review

4.4 Laboratory Inspection including review of:

- 4.4.1 Latest Certification Audit
- 4.4.2 Laboratory Certification
- 4.4.3 Laboratory Procedures
- 4.4.4 Chain of Custody Records
- 4.4.5 Laboratory Bench Sheets
- 4.4.6 Logbooks and other documentation
- 4.4.7 Quality Assurance Program
- 4.4.8 Data Review
- 4.4.9 Chemicals

4.5 Pretreatment Inspection including review of:

- 4.5.1 Sewer Use Ordinance
- 4.5.2 Industrial Waste Survey Procedures
- 4.5.3 Long Term Monitoring Plan
- 4.5.4 Headworks Analysis
- 4.5.5 Industrial Permits
- 4.5.6 Inspections of Industries
- 4.5.7 Compliance Judgments and Enforcement
- 4.5.8 Annual Report

4.6 Biosolids Inspection including review of:

- 4.6.1 Permit
- 4.6.2 Sampling and analyses (being conducted according to requirements with acceptable results)

- 4.6.3 Bimonthly and annual reporting
- 4.6.4 Oversight of contractor
- 4.6.5 Handling of spills
- 4.6.6 Application sites (done according to requirements)
- 4.6.7 Operation at Resource Recovery Farm
- 4.7 Collection System Permit Inspection including review of:
 - 4.7.1 Collection system maintenance and record keeping requirements
 - 4.7.2 Pump station maintenance, operations and record keeping requirements
 - 4.7.3 Mapping requirements
 - 4.7.4 Engineering requirements
 - 4.7.5 Fats, oil and grease program requirements
- 4.8 A copy of the compliance audit checklist will be given to the respective area supervisor, as well as the Assistant Division Managers, Division Manager and EMS Coordinator.
- 4.9 The compliance audit reports will also be reviewed during quarterly management review board meetings.
- 4.10 All areas where non-compliance with regulations is identified shall be brought to the area supervisor's attention and be addressed through the corrective and preventative action program.

5.0 Environmental Impacts

- 5.1 The environmental aspects of the effluent parameters, biosolids quality and all plant processes may be affected by this procedure. This procedure helps ensure that the wastewater treatment facilities operate efficiently and in accordance with permitted controls such as the NPDES permit, Land Application Permit, Pretreatment Regulations and Laboratory Certifications. This procedure helps to eliminate or minimize negative impacts to the receiving waters or land application sites and to ensure compliance with relevant laws and regulations.
- 5.2 Not following this procedure could allow improper decisions to be made about plant control with the results including poorer quality effluent discharged, or poorer quality biosolids or potentially allowing for non-compliance with relevant laws and regulations.

6.0 Revision History:

Revision		C/PAR #	Reason for Revision	Description of Revision
Date	#			
5/20/02	1*	EMS-0084	C/PAR	Added a modification history section
		EMS-0074	External Auditor	Removal of Deviations statement from Level II procedures * procedure #EMS-0100.009A
1/21/03	0	WPR-0030	C/PAR	Expanded inspections to include pretreatment, laboratory and biosolids inspections.
		N/A	N/A	Changed number of procedure from EMS-0100.009A to WWEMS-0100.009A since it references activities in wastewater division instead of department-wide.
7/12/05	1	596	C/PAR	Added section for compliance audit of collection system permit requirements. Reduced minimum audit frequency to annually and removed reference to audit schedule.
		EMS-0116	The WWTD committed to the National Partnership and the NBP requirements need to be added to applicable EMS documents	Compared to Manual of Good Practice and added NBP references.