

Element 1

EMS DOCUMENTATION

EMS Plan

ELEMENTS OF CITY'S EMS PLAN	Element 1 EMS Documentation	Element 2 Biosolids Management Policy	Element 3 Critical Control Points
OBJECTIVE	Develop a program manual or procedures that describe the EMS process for the City's biosolids program	Establish a policy that is documented, maintained, and communicated that is in full compliance with all regulations and address continual improvement. Use environmentally appropriate practices when developing the policy.	Identify and document all locations, unit processes, activities and events from the wastewater pretreatment, collection, solids treatment and handling, and final disposition that control or influence the management of the city's biosolids program
SUPPORT DOCUMENTATION	<ul style="list-style-type: none"> -EMS plan -EMS organization and procedures -EMS element summaries -Internal EMS element audit forms -BEDRTS -EMS element documentation and responsibility tables -BEDRTS master document list 	<ul style="list-style-type: none"> -City Biosolids Policy Statement -Bureau of Sanitation Mission Statement -Division Mission Statements -City Biosolids Resolution -NBP Code of Good Practice 	<ul style="list-style-type: none"> -Pretreatment -Digestion -Sludge Dewatering -Truck loading -Hauling/Transportation -Land application
RESPONSIBLE DIVISION/SECTION	-HTP Engineering	<ul style="list-style-type: none"> -Executive Division -Division Managers <ul style="list-style-type: none"> ▪ Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Regulatory Affairs ▪ Solids Resources & Citywide Recycling ▪ Solids Resources Engineering & Construction ▪ Industrial Waste Management ▪ Human Resources Development ▪ Environmental Monitoring 	<ul style="list-style-type: none"> -Division Managers <ul style="list-style-type: none"> ▪ Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Solids Resources & Citywide Recycling ▪ Solids Resources Engineering & Construction
NONCONFORMANCE	None	None	None
ACTION PLAN	None	None	None

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ELEMENTS OF CITY'S EMS PLAN	Element 4 Legal and other Requirements	Element 5 Goals and Objectives for Continual Improvement	Element 6 Public Participation in Planning
OBECTIVE	Identify and document all legal and other requirements that impact the management of biosolids activities. Establish, document, and maintain procedures to ensure compliance with existing and new legal requirements.	Establish and maintain environmental goals and objectives that are consistent with the biosolids policy statement. Develop an action plan to achieve the goals and objectives. Communicate the goals and objectives and action plan to appropriate employees.	Select and implement a proactive public program that includes public participation in the biosolids program management and EMS process. Include Code of Good Practice principles and third party verification of EMS elements.
SUPPORT DOCUMENTATION	<ul style="list-style-type: none"> -EPA Part 503 regulations -NPDES permit -Compost facility permit -LA Municipal Code -State General Order permit -Local Ordinance permit -State Site specific permit -CWEA Manual of Good Practice for Land Application of Biosolids -Biosolids Contracts -Program EIRs 	<ul style="list-style-type: none"> - Goals for biosolids program - Goals and objectives for each division/section -Study areas for each division/section -Action plan and work plans established to address goals and objectives 	<ul style="list-style-type: none"> -City Council action for policy statement -City Council action for biosolids resolution -CEQA process for environmental impacts -Public notification of Request for Proposals - El Segundo Citizens meeting -Stakeholders of IPWP process -Internet/intranet feedback -EMS information to interested parties -Review of draft EMS procedures to interested parties
RESPONSIBLE DIVISION/SECTION	<ul style="list-style-type: none"> -Division Managers <ul style="list-style-type: none"> ▪ Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Regulatory Affairs ▪ Solids Resources Engineering & Construction ▪ Industrial Waste Management -Contractor 	<ul style="list-style-type: none"> -Executive Division -Division Managers <ul style="list-style-type: none"> ▪ Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Regulatory Affairs ▪ Solids Resources & Citywide Recycling ▪ Solids Resources Engineering & Construction ▪ Industrial Waste Management ▪ Human Resources Development ▪ Environmental Monitoring -Contractor 	<ul style="list-style-type: none"> -Executive Division -Division Managers <ul style="list-style-type: none"> ▪ Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Regulatory Affairs ▪ Solids Resources & Citywide Recycling ▪ Solids Resources Engineering & Construction ▪ Industrial Waste Management ▪ Human Resources Development ▪ Environmental Monitoring -Contractor
NONCONFORMANCE	None	None	None
ACTION PLAN	Train EMS coordinator on documents and procedures developed to track legal requirements.	When EMS is implemented provide program goals and objectives to all Bureau employees, Distribute EMS brochure to all Bureau employees	<ul style="list-style-type: none"> ▪ Bring EMS website on-line ▪ Complete the biosolids videos ▪ Construct farm conference center

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ELEMENTS OF CITY'S EMS PLAN	Element 7 Roles and Responsibilities	Element 8 Training	Element 9 Communications
OBJECTIVE	Establish and maintain records of the assigned roles and responsibilities for the City's biosolids management program. This should include a person responsible for ensuring the biosolids management program and EMS are implemented and maintained.	Establish, document, and maintain, a training program that ensures all employees are aware of the biosolids policy, EMS requirements, legal, and other requirements and have special needs to manage biosolids activities. The contractor shall be included in this program.	Establish and maintain a communication program that provides information on the City's biosolids program and EMS to city employees, public, and outside parties. Include the contractor in the program.
SUPPORT DOCUMENTATION	<ul style="list-style-type: none"> -Bureau organizational structure -Division organizational structure <ul style="list-style-type: none"> ▪ Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Regulatory Affairs ▪ Solids Resources & Citywide Recycling ▪ Solids Resources Engineering & Construction ▪ Industrial Waste Management ▪ Human Resources Development ▪ Environmental Monitoring -Contractors 	<ul style="list-style-type: none"> -Training requirements for digester, dewatering and truck loading -Compost facility training -Contractor tailgate meetings -Pretreatment training program -CWEA, WEF conferences -CWEA Manual of Good Practice training -Specialty seminars and conference -EMS overview training -Contractor EMS training 	<ul style="list-style-type: none"> -City of Los Angeles web site -Sani-Times -Hyperion Pipeline -Wastewater Web page -Contractor meetings -REBOC meetings -EMS brochures/pamphlets -Budget study area retreat -Division Fact Sheets/Brochures -Facility tours -Workshops, seminars, conference -Program Videos -Internal EMS communication BEDRTS -Board of Public works week -Ad Hoc special interest meetings
RESPONSIBLE DIVISION/SECTION	<ul style="list-style-type: none"> -Executive Division -Division Managers <ul style="list-style-type: none"> ▪ Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Regulatory Affairs ▪ Solids Resources & Citywide Recycling ▪ Solids Resources Engineering & Construction ▪ Industrial Waste Management ▪ Human Resources Development ▪ Environmental Monitoring -Contractor 	<ul style="list-style-type: none"> -Human Resources Development Treatment Plant <ul style="list-style-type: none"> ▪ HTP ▪ TI -Contractor 	<ul style="list-style-type: none"> -Executive Division -City of Los Angeles Public Affairs Office -Division Managers <ul style="list-style-type: none"> ▪ Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Regulatory Affairs ▪ Solids Resources & Citywide Recycling ▪ Solids Resources Engineering & Construction ▪ Industrial Waste Management ▪ Human Resources Development ▪ Environmental Monitoring
NONCONFORMANCE	Need to establish roles and responsibilities for Contractor concerning EMS program and update existing contracts to reflex this change	Training tracking system needs to be established for IWMD and SRECD concerning the pretreatment program and compost facility	
ACTION PLAN	Establish contract requirements for biosolids contractors.	HRDD will work with IWMD and SRECD to establish a training tracking system	Train HTP on BEDRTS and complete the communication program

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ELEMENTS OF CITY'S EMS PLAN	Element 10 Operational Control of Critical Control Points	Element 11 Emergency Preparedness and Response	Element 12 Documentation, Document Control, and Record keeping
OBJECTIVE	Develop, document, and maintain standard operating procedures and preventative maintenance procedures for the critical control points identified in element 3 to comply with legal and other requirements and the goals and objectives for biosolids management. Include the contractor requirements.	Establish, maintain, and document procedures to respond to emergency conditions, and prevent compliance violations for biosolids management. Include the contractor procedures.	Establish, document, and maintain documents and records supporting the EMS process and the biosolids management program. Include the contractor requirements. The documents should be current, located in orderly manner, and available for review.
SUPPORT DOCUMENTATION	<ul style="list-style-type: none"> -Pretreatment -Digestion -Sludge Dewatering -Truck loading -Hauling/Transportation -Land Application <ul style="list-style-type: none"> ▪ SOPs ▪ Tailgate Meetings ▪ Daily Shift Instructions ▪ Daily process meetings ▪ SPAs ▪ SOPERs ▪ Written policies and procedures ▪ Beneficial use contracts 	<ul style="list-style-type: none"> -Treatment Plant Emergency response procedures -Treatment plant safety manuals -Treatment plant business plan -IWMD response guide -IWMD policies and procedures -Compost facility policy -Contractor emergency response procedures 	<ul style="list-style-type: none"> ▪ <i>Annual Reports</i> <ul style="list-style-type: none"> ▪ Treatment Plants ▪ Pretreatment ▪ Contractor ▪ <i>Monthly reports</i> <ul style="list-style-type: none"> ▪ Treatment plants ▪ Biosolids assessment ▪ Contractor land application report ▪ Weekly update from contractor ▪ Field change reports ▪ Contractor requirement reports ▪ Permit application information for land application sites ▪ Regulations and Legislation report (Quarterly and Annually) ▪ BEDRTS
RESPONSIBLE DIVISION/SECTION	<ul style="list-style-type: none"> - Division Managers <ul style="list-style-type: none"> ▪ Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Solids Resources & Citywide Recycling ▪ Solids Resources Engineering & Construction ▪ Industrial Waste Management -Contractor 	<ul style="list-style-type: none"> - Division Managers <ul style="list-style-type: none"> ▪ Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Solids Resources & Citywide Recycling ▪ Solids Resources Engineering & Construction ▪ Industrial Waste Management ▪ Human Resources Development -Contractor 	<ul style="list-style-type: none"> - Division Managers <ul style="list-style-type: none"> ▪ Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Solids Resources & Citywide Recycling ▪ Solids Resources Engineering & Construction ▪ Industrial Waste Management ▪ Regulatory Affairs ▪ Human Resources Development ▪ Environmental Monitoring -Contractor
NONCONFORMANCE	Need to update all SOPs per the EMS document revision system	Several documents are still outstanding from some of the divisions.	Several documents are still outstanding from some of the divisions.
ACTION PLAN	Work with plant operations personnel to update SOPs	Link all documents to BEDRTS	Link all documents to BEDRTS

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ELEMENTS OF CITY'S EMS PLAN	Element 13 Monitoring and Measurement	Element 14 Nonconformance: Preventative and Corrective Action	Element 15 Biosolids Management Program Performance Report
OBJECTIVE	Establish and maintain regular monitoring and measurement procedures to ensure compliance with legal and other requirements and the goals and objectives for the biosolids program. Include the contractor requirements. Maintain records and documents in Element 12	Establish, document, and maintain procedures for investigating noncompliance with legal and other requirements, EMS internal audit and third party verification audits. Procedures should address how to handle changes or corrections to any of the above listed requirements.	Prepare a written report that summarizes the performance of the biosolids management program. The report should include monitoring and measurement results, performance based on goals and objectives, and legal and other requirements. Include contractor performance. Include information on the third party verification and internal audit results.
SUPPORT DOCUMENTATION	-Part 503 <ul style="list-style-type: none"> ▪ Pathogens <ul style="list-style-type: none"> ▪ Fecal Coliform ▪ Salmonella ▪ Vector attraction reduction ▪ Pollutants ▪ Setback requirements ▪ Management practices -NPDES permit <ul style="list-style-type: none"> ▪ Pollutants for industrial users ▪ Organic pollutants in biosolids -Local Ordinances <ul style="list-style-type: none"> ▪ Pollutants ▪ Pathogens ▪ Vector attraction reduction ▪ Soil analysis ▪ Dioxins/PCBs ▪ Setback requirements ▪ Management practices -Contractor requirements <ul style="list-style-type: none"> ▪ Cumulative pollutant loading ▪ Soil analysis ▪ Agronomic rates ▪ Management Practices -Compost facility <ul style="list-style-type: none"> ▪ Fecal Coliform 	-Proposed EMS nonconformance procedures -Proposed EMS nonconformance form -HTP biosolids nonconformance procedures and form -Treatment plant incident report -Tailgate meeting -IWMD response guide -IWMD policies and procedures	-HTP EPA biosolids annual report -IWMD annual report -Contract requirement annual report -EMS internal audit annual report -EMS management review report -EMS Biosolids program performance report - Third party verification audit results
RESPONSIBLE DIVISION/SECTION	- Division Managers <ul style="list-style-type: none"> ▪ Solids Resources Engineering & Construction ▪ Industrial Waste Management Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Environmental Monitoring -Contractor	-Division Managers <ul style="list-style-type: none"> ▪ Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Regulatory Affairs ▪ Solids Resources & Citywide Recycling ▪ Solids Resources Engineering & Construction ▪ Industrial Waste Management ▪ Human Resources Development ▪ Environmental Monitoring 	-Division Managers <ul style="list-style-type: none"> ▪ Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Solids Resources Engineering & Construction ▪ Industrial Waste Management -Contractor
NONCONFORMANCE	All documents and monitoring reports are not linked to BEDRTS	Need to establish who will complete nonconformance forms in each division	No report currently produced that contains all the items listed in element objective
ACTION PLAN	Complete the task of linking all reports and documents to BEDRTS	Work with each division to set a nonconformance completion procedure	Develop a report from existing EPA annual report to address element objectives

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ELEMENTS OF CITY'S EMS PLAN	Element 16 Internal EMS Audit	Element 17 Periodic Management Review of Performance
OBJECTIVE	Establish, document, and maintain an internal audit program that analyzes the EMS, and the biosolids program goals and objectives. Program should define scope, frequency, and responsible auditor. Prepare written report of audit results for management.	Review the EMS and the performance of the process relative to legal and other requirements, biosolids policy, and program goals and objectives. Address need for change to policy, goals, and objectives, and the EMS based on nonconformance, internal audits, and third party verification audits. Document actions and findings.
SUPPORT DOCUMENTATION	<ul style="list-style-type: none"> -EMS internal audit program -Procedures for internal EMS audit -IWMD internal audit -HRDD internal audit -EMS Nonconformance Audit 	<ul style="list-style-type: none"> -Wastewater Managers meetings -Division head meetings -REBOC meetings -EMS management review team -Procedures for management review -EMS management review meeting -Third party audit requirements
RESPONSIBLE DIVISION/SECTION	<ul style="list-style-type: none"> -Division Managers <ul style="list-style-type: none"> ▪ Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Regulatory Affairs ▪ Solids Resources & Citywide Recycling ▪ Solids Resources Engineering & Construction ▪ Industrial Waste Management ▪ Human Resources Development ▪ Environmental Monitoring 	<ul style="list-style-type: none"> -Executive Division -Division Managers <ul style="list-style-type: none"> ▪ Treatment Plants <ul style="list-style-type: none"> ▪ HTP ▪ TI ▪ Regulatory Affairs ▪ Solids Resources & Citywide Recycling ▪ Solids Resources Engineering & Construction ▪ Industrial Waste Management ▪ Human Resources Development ▪ Environmental Monitoring
NONCONFORMANCE	None	None
ACTION PLAN	Train HTP staff in preparation for internal audit	Conduct internal audit and schedule a management review meeting