Annual Activities – Management Review

The following activities are described in the EMS Manual as required activities on a periodic or annual basis. In italics are quotations from the EMS Manual and below the quote is the Management Response.

*The District Manager will bring the revisions to the Board of Trustees for consideration. Recommended revisions to the policy may also be included in the annual EMS Management Review.*

The annual report and management review for 2019 will be presented to the Board on February 13, 2020. The Internal Audit was reviewed at the October 2019 Board meeting. The results of the Twelfth Interim Reverification Audit conducted by NSF International were presented to the Board at the meeting in November 2019. There were no major and minor non-conformances identified in the external audit. The District has increased hauling to the landfill in 2019 due to contract negotiations with the Wasatch Regional landfill, the contract requires a minimum tonnage to be met every month.

*Central Davis Sewer District Manager will review information in Table 3.1 on an annual basis, when there are regulatory changes or whenever major operational changes occur. The annual review will be conducted by February 28th each year.*

Table 3.1 on critical control points were reviewed as of December 21, 2019.

*Check with state biosolids coordinator at least annually on an informal basis*

Numerous formal and informal contacts with Dan Griffin, the Utah State Biosolids Coordinator were made in 2019.

*Central Davis Sewer District will set or revise goals and objectives for its biosolids program on an as-needed basis. Any new goals and strategies will be finalized no later than February 28th of each year.*

The goals and objectives for 2019 were completed and the final goals report was presented to the Board at the October 2019 District Board Meeting. Goals specific to
each of the four outcome areas were identified and completed. A list of potential goals for 2020 will be presented to the Board for consideration at the February 2019 meeting. The selected goals for 2020 will be incorporated in the EMS manual.

Goals and objectives will be posted in the District office on the main bulletin board.

Goals are included in the manual that is posted on the District’s web site at CDSewer.org. The EMS Manual and the associated goals and objectives are also on the desktop of all District Computers. In addition, a paper copy of the goals and objectives are posted on the Main bulletin board. All employees are issued an electronic manual for individual use.

Roles and responsibilities for various individuals that are specific to the EMS are assigned by the District Manager. They are reviewed and updated as necessary on an annual basis (by February 28th of each year).

The roles and responsibilities outlined in Element 7 have been modified. However, changes are ongoing, and the roles and responsibilities will be reevaluated on an annual basis along with the EMS review.

The District maintains several lists of individuals interested in Central Davis Sewer District biosolids program and/or EMS related activities. These lists include the Odor Complaint Log, attendance lists in the minutes of Board meetings, and a Telephone Log for specific concerns expressed by the public (not including queries about compost availability or pricing) and is maintained by the District Manager and the Accountant.

The accountant/clerk maintains the complaint log and the telephone query log. There were multiple queries about availability and pricing of compost that were not logged. There were six odor comments or complaints in 2019. The District Manager contacted all individuals that contacted the District with comment or concerns. The District believes all comments and concerns have been addressed.

Operational controls will be reviewed by the District Manager on an annual basis (by February 28th) or whenever significant changes in plant processes and/or operations occur. Revisions (if any) to Table 3.1 and associated SOP’s and monitoring/measurements will be made by the District Manager following these reviews.

All operational controls appear to be adequate. The dewatering process now includes the addition of the Screw Presses and inDENSE process. The SOP for the Screw Presses was created in January 2019, however the inDENSE process will need to be included in the coming year.

Significant changes will be documented in writing and will be noted in the annual biosolids program report and updated to the NBP and the 3rd party auditor.
The were no major changes in 2019. Several minor changes were made in conjunction with the audits, but these were insignificant in relation to the entire program.

*Central Davis Sewer District Wastewater Treatment Plant has an Emergency Response Program which is reviewed yearly and updated as needed. Interim revisions to specific sections of the Emergency Response Program are made on an “as needed” basis. A specific biosolids section is included in the manual and covers impacts from significant load changes, slug loads, extreme weather conditions, and equipment failures.*

The emergency response plan was updated in 2012 and implemented in 2013 and is current with present practices. The District switched to an inherently safer technology for disinfection in place of gaseous chlorine. The District now uses liquid sodium hypochlorite for disinfection. In 2019 there were no incidents requiring emergency response. Training on the emergency response program and complete program review were conducted with staff during December 2019 and January 2020. An Emergency Action for Biosolids Transportation Release procedure was implemented in December of 2017 and converted to an SOP in 2019.

*Important emergency contact information is kept by each phone and in the manual.*

Emergency notice information is posted at each phone as of December 27, 2016. Periodic checks are made by the safety officer throughout the year to ensure the phone information is current and not destroyed or removed.

*Monitoring and measurement activities will be reviewed by the District Manager on an annual basis (by February 28th) or whenever significant changes in plant processes and/or operations occur. Revisions (if any) to Tables 3.1 and associated SOPs and monitoring/measurement documents will be made by the District Manager.*

All current SOP’s and associated documentation are adequate and current with EMS needs. The Manager reviewed all documentation associated with the annual report during safety days in January 2020. All activities comply with regulatory and permitted requirements.

*The District Manager will prepare and submit a written report to the Board of Trustees by February 28th of each year, summarizing the internal audit results and corrective actions (if necessary) that have already been taken or will be taken to address any non-conformances.*

This report will be submitted and reviewed with the Board in February 2020. Corrective actions taken throughout the year have been discussed with the Board as needed.

*The District Manager will prepare a written report on an annual basis that summarizes the performance of the biosolids management program. The performance report will be completed by February 28th of each year and will address performance during the*
previous calendar year. At a minimum, the report will contain the following information:

a. Summaries of monitoring data and other measurements that demonstrate the performance of Central Davis Sewer District biosolids program relative to established goals, objectives and legal requirements.

b. Summary of relevant contractor activities (if any).

c. Summaries of actions that have been taken on a voluntary basis.

d. Progress towards achieving biosolids program goals and objectives.

e. A summary of internal audits.

f. A summary of independent third-party audits (if applicable).

The District’s Annual Biosolids Report will be submitted to the Board for review in February 2020. This report summarizes all needed regulatory compliance issues. The report contains information from the 2019 calendar year activities. The 2019 goals were discussed and approved by the Board during the October 2019 Board meeting. 2020 Goals will be presented to the Board during the second Board Meeting in 2020.

The scope of the management review will include:

a. Review monitoring data and other measurements that demonstrate the performance of Central Davis Sewer District biosolids program relative to established goals, objectives and legal requirements.

b. Review progress towards achieving biosolids goals and objectives.

c. Review internal audit results.

d. Review 3rd party audit results.

e. Review the need for changes in existing policy or the adoption of new policy to support the EMS and biosolids related activities.

No significant changes to the current EMS Manual are needed.