



**National Biosolids Partnership
Biosolids EMS Corrective Action Audit Report**

**New England Organics, Hawk Ridge Composting Facility
Portland & Unity, Maine**

Audit Dates: June 29, 2011

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

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

Report Written By: Mr. Jon Shaver, DEKRA Certification Inc.

Report Date: July 11, 2011

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1. SUMMARY – AUDIT PURPOSES AND RESULTS

DEKRA Certification, Inc. (DEKRA) conducted a Biosolids EMS Interim Audit at New England Organics (Portland, Maine) March 30 to April 1, 2011. During that audit it was determined that one nonconformance from the 2010 interim audit had not been fully corrected and a follow-up audit was planned to occur before June 30, 2011. DEKRA conducted that review on June 29, 2011.

Audit Purposes

The audit was conducted to review the effectiveness of actions taken to resolve open nonconformances from previous third party audits of the New England Organics Biosolids Management System.

Audit Criteria

Criteria for this audit were requirements of the National Biosolids Partnership EMS Elements and requirements of the New England Organics biosolids management system.

DEKRA Auditors

The audit was conducted by Mr. Jon Shaver on behalf of DEKRA Certification, Inc. Mr. Shaver is certified by NBP as a Biosolids EMS Lead Auditor and Biosolids Auditor.

Audit Conclusions

The audit determined that:

- New England Organics has effectively corrected the open nonconformance from the 2010 Biosolids EMS Interim Audit.
- Nonconformances from the Interim Audit that DEKRA conducted in March 2011 remain open. DEKRA has approved corrective action plans for those nonconformances.

Based on results of this audit, DEKRA continues our Verification that the New England Organics Biosolids Management System meets the expectations and requirements of the NBP EMS Elements and we recommend continuing certification within NBP's Biosolids Management (EMS) Program.

Addendum to Report

This report can be considered to be an addendum to DEKRA's report of the Interim Audit conducted at New England Organics March 29 to April 1, 2011.

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2. AUDIT RESULTS

2A. Closed Nonconformances (from Previous Third Party Audits)

Corrective actions taken in response to specific nonconformance findings related to requirements of the NBP EMS Elements found during the Interim Audit conducted March 29 to April 1, 2011 were assessed for effectiveness. Based on those assessments, the nonconformances have been closed, as described below.

Minor Nonconformance JS 10-01/3 NEO's definition of critical control points and operational controls states that they address legal, quality and public acceptance requirements. NEOs' identification of critical control points and operational controls does not clearly reference legal, quality or public acceptance requirements.

Corrective Action

New England Organics determined that the cause of the above nonconformance was caused by "Training, Inadequate Procedure". In response New England Organics modified their identification of critical control points and operational controls to separately reference environmental, quality, legal and public acceptance requirements. This nonconformance is now closed.

2B. Nonconformances Remaining Open (from Previous Third Party Audits)

Four minor nonconformances from previous third party audits remain open. These nonconformances were found during the Interim Audit conducted March 29 to April 1, 2011 and are listed below.

Minor Nonconformance JS / 11-01/3 NBP EMS Element 3 requires the organization to identify potential or actual environmental impacts at each critical control point. The revised Critical Control Point table notes that "environmental performance" needs to be controlled, however in some cases does not specify the performance or impact(s) that require control.

Minor Nonconformance JS / 11-02/9 NBP EMS Element 9 requires the organization to communicate information about its biosolids policy, biosolids management activities and EMS to employees. Some aspects of the EMS are not fully understood by Transportation personnel. Awareness of EMS has not been fully communicated to those employees.

Minor Nonconformance JS / 11-03/14 NBP EMS Element 14 requires corrective actions be taken to address identified nonconformances. Corrective action determined necessary for an incident that was recorded in May 2010 was not completed over 8 months past the June 2010 deadline. The action, therefore, is considered to have not been effectively implemented.

Minor Nonconformance JS / 11-04/17 NBP EMS Element 17 requires that management review performance of the biosolids program relative to established performance measures. The Q4 2010 "Biosolids Program Management Review" does not include description (or discussion) of performance measures.

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2C. Plans for Closure of Nonconformances

DEKRA has approved Corrective Action Plans that New England Organics prepared for each open nonconformance remaining noted above. DEKRA will review the effectiveness of the completed corrective action during the next Third Party Interim Audit, which is currently planned to occur during the week of March 26, 2012.

2D. Agreements

New England Organics will continue the work that had begun in correcting nonconformances found during DEKRA's audit in March 2011.

DEKRA will conduct the third interim audit of the New England Organics Biosolids Management System during the week of March 26, 2012. Details for that audit will be arranged by New England Organics and DEKRA.

END OF REPORT