

SEWERAGE & WATER BOARD OF NEW ORLEANS

AUDIT COMMITTEE MEETING TUESDAY, NOVEMBER 12, 2019 10:00 AM

6 2 5 S T. J O S E P H S T R E E T
2 ^N D F L O O R B O A R D R O O M

Dr. Tamika Duplessis, Chair • Robin Barnes
Joseph Peychaud • Maurice Sholas • Alejandra Guzman

FINAL AGENDA

1. **ROLL CALL**

2. **PRESENTATION ITEMS**

Overview of a Risk Assessment

3. **ACTION ITEMS**

- a. R-172-2019: 2019 Independent Financial Auditing Contract Renewal
- b. R-173-2019: Audit Committee Charter Approval
- c. R-174-2019: Internal Audit Charter Approval
- d. R-167-2019: MWPP Audit for East Bank Sewer Treatment Plant
- e. R-177-2019: MWPP Audit for West Bank Sewer Treatment Plant

4. **EXECUTIVE SESSION**

5. **PUBLIC COMMENT**

6. **ADJOURNMENT**

2019 INDEPENDENT FINANCIAL AUDITING SERVICES CONTRACT RENEWAL

WHEREAS, the Sewerage and Water Board of New Orleans must produce and publish financial statements audited by an accounting firm with a favorable national reputation; and

WHEREAS, the Board's staff solicited public bids for independent financial auditing services for one year with four one year renewal options; and

WHEREAS, the independent auditors desire to exercise the execution of the second renewal option for independent financial auditing services for the calendar year 2019, at the terms and conditions set forth in the RFP response to the Board on November 29, 2017; and

WHEREAS, funds for this service are included in the 2019 Budget; and

WHEREAS, the fee shall be \$123,000 for calendar year 2019 financial auditing services, as previously quoted and submitted in a separate sealed envelope to the Board on November 2, 2017; and

WHEREAS, staff recommends the approval and concurs with the engagement letter submitted by Postlethwaite & Netterville for its 2nd renewal option of four (4) one (1) year renewal options with Bruno and Tervalon as DBE/Joint venture of 45% participation, for independent financial auditing services; and

NOW, THEREFORE, BE IT RESOLVED by the Sewerage and Water Board of New Orleans the approval of the 2nd renewal option for independent financial auditing services with Postlethwaite and Netterville and Bruno and Tervalon for the year 2019 for a total amount of \$123,000.

I, Ghassan Korban, Executive Director,
Sewerage and Water Board of New Orleans
do hereby certify that the above and foregoing is
a true and correct copy of a Resolution said
Board, duly called and held, according to the Law,
November 20, 2019

GHASSAN KORBAN
EXECUTIVE DIRECTOR
SEWERAGE & WATER BOARD OF NEW ORLEANS

**Sewerage and Water Board of New Orleans
BOARD OF DIRECTORS CONTRACTOR FACT SHEET**



ACTION REQUESTED

PROFESSIONAL SERVICES OPTION YEAR RENEWAL

Independent Financial Auditing

Approval to execute second option year for the 2019 independent financial audit service in the amount of \$123,000

CONTRACTOR/SUB/VENDOR INFORMATION

PRIME:	SUBS:	DBE PARTICIPATION:	
		Target	Actual
Postlethwaite & Netterville	Bruno & Tervalon	35%	45%

DESCRIPTION AND PURPOSE

Original Contract Value:	\$117,000
Previous Option Renewals/Changes:	383,000
No. of Option Years in Contract:	4
Option Year 2 Value:	123,000
Revised Contract Value:	\$643,000

Purpose of the Contract:

To perform annual audit of the finances of the Sewerage and Water Board by an independent accounting firm with a favorable national reputation.

Spending Previous Year:

Cumulative Contract Value (as of 9/30/2019):	\$520,000
Cumulative Contract Spending (as of 9/30/2019):	\$420,000

Contractor's Past Performance: Satisfactory

PROCUREMENT INFORMATION

Contract Type:	Request for Proposals	Award Based On:	Best Value
Commodity:	Professional Services	Contract Number:	
Contractor Market:	Open Market		

BUDGET INFORMATION

Funding:	Operating	Department:	Finance
System:	Combined	Department Head:	Rosita Thomas

ESTIMATED FUND SOURCE

User	Share%	Dollar Amount
Sewer System	40%	
Water System	40%	
Drainage System	20%	
Grant		
Other		
TOTAL ESTIMATED RENEWAL DOLLAR AMOUNT		\$123,000



Rosita Thomas

Finance Administrator

APPROVAL OF UPDATED AUDIT COMMITTEE CHARTER

WHEREAS, the Audit Committee of the Board of Directors operates pursuant to a charter, as is required by the International Standards for the Professional Practice of Internal Auditing; and

WHEREAS, the Audit Committee charter is established to define the roles and responsibilities of the Audit Committee; and

WHEREAS, all Audit Committee members have reviewed and approved proposed updates and revisions to the existing charter to better reflect the Committee's authority and responsibilities; and

NOW, THEREFORE, BE IT RESOLVED that the Audit Committee Charter for the Sewerage & Water Board of New Orleans is approved.

I, GHASSAN KORBAN, Executive Director,
Sewerage and Water Board of New Orleans, do hereby
certify that the above and foregoing is a true and
correct copy of a Resolution adopted at the Audit Committee Meeting of said Board,
duly called and held, according to
law, on November 20, 2019.

GHASSAN KORBAN, EXECUTIVE DIRECTOR
SEWERAGE AND WATER BOARD OF NEW ORLEANS

Sewerage & Water Board of New Orleans



Audit Committee Charter

Date Authorized: August 8, 2018

Supersedes all prior versions of this charter

Distribution: Audit Committee

The following document is established to define the role and responsibilities of the Audit Committee of the Board of Directors of the Sewerage & Water Board of New Orleans.

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Governing Authority

This charter is governed by the Sewerage & Water Board of New Orleans' Audit Committee and Board of Directors.

Introduction

The Audit Committee charter is required by the International Standards for the Professional Practice of Internal Auditing. The charter is a formal document that provides guidance to the Audit Committee members as to best practices in audit governance. It is not intended to supplant board actions or policies.

Purpose

The primary purpose of the Committee is to assist the Board of Directors in fulfilling its responsibility to ensure that management achieves organizational objectives while maintaining an effective system of internal control and risk management. The scope of this effort includes oversight of the audit process with a focus on: internal and external financial reporting; the effectiveness and efficiency of operations; compliance with applicable laws, regulations, policies and procedures; review of all contracts awarded by the Executive Director; the safeguarding of assets; and the Board's risk management processes.

Authority

The Audit Committee charter sets out the authority of the audit committee to carry out the responsibilities established for it by the Board as articulated within the Audit Committee charter.

In discharging its responsibilities, the audit committee will have unrestricted access to members of management, employees, and relevant information it considers necessary to discharge its duties. The committee will also have unrestricted access to records, data, and reports. If access to requested documents is denied, the Audit

Committee will follow a prescribed, Board approved mechanism for resolution of the matter.

The Committee is entitled to receive any explanatory information that it deem necessary to discharge its responsibilities. Sewerage and Water Board of New Orleans management and staff should cooperate with audit committee requests.

Composition of the Audit Committee

The Committee shall consist of five members of the Board, to be appointed by the President of the Board. Three members of any the audit committee shall constitute a quorum. All members must be independent of the organization.

Meetings

The Committee should meet at least once per calendar quarter. Meetings may be held more often at the discretion of the Committee Chairman. Following each meeting, the Committee Chairman shall report on the Committee's activities, discussions, and decisions to the Board of Directors.

The Chairman will establish agendas for audit committee meetings in consultation with audit committee members, legal counsel, senior management, and the Internal Audit Manager.

Primary Committee Responsibilities

The Committee should review and assess:

- Risk Management-The Board's business risk management process, including the adequacy of the company's overall control environment and controls in selected areas representing significant financial and business risk.
- Annual Reports and Other Major Regulatory Filings-All major financial reports in advance of filing or distribution.

- **Internal Controls and Regulatory Compliance-**Management's assessment of the system of internal controls for detecting accounting and reporting financial errors, fraud and defalcations, legal violations, and noncompliance with the code of conduct.
- **Internal Audit Responsibilities** – The annual audit plan and the process used to develop the plan; Status of activities, significant findings, recommendations, and management's response.
- **Regulatory Examinations** – The results of examinations by regulatory agencies in terms of important findings, recommendations, and management's response.
- **External Audit Responsibilities** – Auditor independence and the overall scope and focus of the annual/interim audit, including the scope and level of involvement with unaudited interim-period information.
- **Financial Reporting and Controls** -**Key** financial statement issues and risks, their impact or potential effect on reported financial information, the processes used by management to address such matters, related auditor views, and the basis for audit conclusions. Important conclusions on interim and/or year-end audit work in advance of the public release offinancials.
- **Auditor Recommendations** -Important internal and external auditor recommendations on financial reporting, controls, other matters, and management's response. The views of management and auditors on the overall quality of annual and interim financial reporting.

Relationship with Internal Auditors

- The Committee shall review and approve the Internal Audit department's annual audit plan and all major changes to the plan.
- The Committee shall review and discuss with the internal auditors the scope, progress and results of executing the internal audit plan.

- The Committee shall receive reports on the status of significant findings and recommendations, and management's responses.
- The Committee shall review the Charter, reporting relationship, activities, staffing, organizational structure and credentials of the Internal Audit department.
- The Committee shall review and concur on the appointment, replacement, reassignment or dismissal of the Internal Audit Director, who shall have direct access to the Committee.
- The Committee shall review the annual performance of the internal audit function.

Relationship with External Auditors

- Assess all relationships between the independent auditor and the Board to verify the auditors' independence.
- Consult at least once per year with the external auditor regarding the fair presentation of the financial statements, updates in developments affecting external financial reporting, the status of the internal control environment, the effectiveness of management's identification and management of risk, independence of the external auditor, and certain other matters required under generally accepted auditing standards.
- The Committee should be responsible for pre-approving all audit and non-audit services, including the scope of such work performed by the external auditors.
- Following completion of the external audit, review with management, the external auditor, and the Internal Audit Manager, any issues encountered during the course of the audit, including any restrictions on the scope of work or access to required information.

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- ¹¹ The Committee shall determine the appropriate funding needed by the Committee for payment of compensation to the independent auditor engaged for preparing or issuing audit reports, or performing other audit, review or attest services for Board.
- The Committee shall have the authority to retain outside counsel, accountants, experts and other advisors that it deems appropriate to assist the Committee in performing its functions.
 - Review any significant disagreement among management and the external auditor concerning the preparation of the financial statements.
 - Meet at least once per year with the external auditor without management present.

Risk Management and Controls

- The Committee shall discuss the Board's policies on risk assessment and risk management, including the risk of fraud.
- The Committee also shall discuss the Board's major financial risk exposures and the steps management has taken to monitor and control such exposures.
- The Committee shall review with senior management the Board's overall antifraud programs and controls.
- The Committee shall discuss with the internal auditors and the independent auditor the overall scope and plans for their respective audits, including the adequacy of staffing and budget or compensation.

Investigative Authority

The Committee shall be empowered to investigate any matter brought to its attention with full access to all Board, records and personnel, using special counsel or outside experts when necessary or appropriate.

Approval

Audit Committee Charter

Approved this ____ day of _____, _____

Special Counsel Executive

Director Chairman Audit

Committee

SWBNO Audit Committee Charter Amendment Summary of Changes

Purpose: To support the changes to previously adopted SWBNO Audit Committee Charter signed on September 21, 2016 according to R107-2016.

Audience/User: SWBNO Audit Committee

Best Practice

Recommendations: According to the Institute of Internal Auditors (IIA) that governs the internal audit function:

- The audit committee charter should be reviewed periodically (e.g., at least every two to three years) by the Audit Committee.
- The audit committee charter must be compatible with that of the internal audit charter.
- The audit committee charter should be formatted so that information within the charter is easily accessible and readable.

Below is a chart summarizing the changes made to the Audit Committee Charter with reasons to support the changes:

Proposed Amended Changes	Basis for Change
Re-formatted to include cover page, table of contents, added subtitles, and an approval section.	To provide a more efficient and readable document that would make it easier for audit committee members to locate information within the charter in a timely manner.
The following subtitles were added: Governing Authority, Introduction, Authority, and Composition.	<u>Governing Authority</u> - states that the Audit Committee governs the charter. <u>Introduction</u> - states the requirement of the charter, its guidance, and authority. <u>Authority</u> - explains in detail the authority of the audit committee. <u>Composition</u> -states how the Audit Committee shall be composed of, what constitutes a quorum, and the independence of members.
The following subtitles were omitted: Committee Operating Principles	The following information was omitted because part of it is added under the following subtitles: Meetings, Primary Committee Responsibilities, Risk Management and Controls, Relationships with the Internal Authorities, and Relationship with External Auditors.

<p>The following detail was added under the Purpose subtitle:</p> <p><i>"review of all contracts awarded by the Executive Director....."</i></p>	<p>As discussed in prior Audit Committee meeting, the committee is considering moving the oversight of Board contracts from the Finance Committee to the Audit Committee.</p>
<p>Authority Subtitle</p>	<p>The Vice Chair signature was removed and the Special Counsel signature was added as it applies to this committee.</p>

APPROVAL OF UPDATED INTERNAL AUDIT CHARTER

WHEREAS, an internal audit charter is required by the International Standards for the Professional Practice of Internal Auditing and is governed by the Audit Committee and Internal Audit Department; and

WHEREAS, the internal audit charter defines the Internal Audit Department's purpose, authority, and responsibility; establishes the internal audit position within the Sewerage and Water Board of New Orleans; authorizes access to records, personnel, and physical properties relevant to the performance of audit work; and defines the scope of internal audit activities; and

WHEREAS, all Audit Committee members have reviewed and approved proposed updates and revisions to the existing internal audit charter to better reflect the Internal Audit Department's authority and responsibilities; and

NOW, THEREFORE, BE IT RESOLVED that the Internal Audit Charter for the Sewerage & Water Board of New Orleans is approved.

I, GHASSAN KORBAN, Executive Director,
Sewerage and Water Board of New Orleans, do hereby
certify that the above and foregoing is a true and
correct copy of a Resolution adopted at the Audit Committee Meeting of said Board,
duly called and held,
according to law, on
November 20, 2019.

GHASSAN KORBAN, EXECUTIVE DIRECTOR
SEWERAGE AND WATER BOARD OF NEW ORLEANS

Sewerage & Water Board of New Orleans



Internal Audit Charter

Date Authorized: August 8, 2018

Supersedes all prior versions of this charter

Distribution: Audit Committee

The following document is established to define the internal audit activity's purpose, authority, responsibility and position within the Sewerage & Water Board of New Orleans.

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Governing Authority

This charter is governed by the Sewerage & Water Board of New Orleans' Audit Committee and Internal Audit department.

Introduction

The internal audit charter is required by the International Standards for the Professional Practice of Internal Auditing. The charter is a formal document that defines the Internal Audit department's purpose, authority and responsibility; establishes the internal audit position within the institution; authorizes access to records, personnel, and physical properties relevant to the performance of audit work; and defines the scope of internal audit activities.

Purpose

The purpose Internal Audit activity is to provide independent, objective assurance and consulting services designed to add value and improve the Board's operations. The Internal Audit department examines and evaluates the institutions' activities and their systems of controls to determine whether acceptable policies and procedures are followed, whether legislative requirements and established standards are met; whether resources are used efficiently and economically, whether planned missions are accomplished effectively, and whether the objectives of the organization are being achieved.

Mission

The mission of the Internal Audit activity is to enhance and protect organizational value by providing risk-based and objective assurance, advice, and insight. The Internal Audit department helps the Board accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

Authority

Sewerage & Water Board of New Orleans' Internal Audit personnel report to the Internal Audit Manager, who reports functionally to the Audit Committee/Board and administratively to the Executive Director. It functions independent of each Board department and function.

Internal Audit is authorized to:

- Have unrestricted access to all company or related functions, records, property, and personnel.
- Have full and free access to the Audit Committee, including in private meetings without management present.
- Allocate resources, set frequencies, select subjects, determine scopes of work, and apply the techniques required to accomplish audit objectives.
- Obtain the necessary cooperation and assistance of personnel in departments within the organization where they perform audits, as well as other specialized services from within or outside the organization.
- Consult to management on matters such as the design of business control systems, risk management activities, and governance processes.
- Have the authority to require a written response to audit observations and recommendations contained in audits.

Organization

The Internal Audit Manager will report functionally to the Audit Committee/Board and administratively to the Executive Director.

The Audit Committee will:

- Approve the internal audit charter.
- Approve the risk based internal audit plan.
- Approve the internal audit budget and resource plan.
- Receive communications from the Internal Audit Manager or on the internal audit activity's performance relative to its plan and other matters.
- Approve decisions regarding the appointment and removal of the Internal Audit Manager.
- Make appropriate inquiries of management and the Internal Audit Manager to determine whether there is inappropriate scope or resource limitations.

Independence & Objectivity

The internal audit activity will remain free from interference by any element in the organization, including matters of audit selection, scope, procedures, frequency, timing, or report content to permit maintenance of a necessary independent and objective mental attitude.

Internal auditors will have no direct operational responsibility or authority over any of the activities audited. Accordingly, they will not implement internal controls, develop procedures, install systems, prepare records, or engage in any other activity that may impair internal auditor's judgment.

Internal auditors will exhibit the highest level of professional objectivity in gathering, evaluating, and communicating information about the activity or process being examined. Internal auditors will make a balanced assessment of all the relevant circumstances and not be unduly influenced by their own interests or by others in forming judgments.

The Internal Audit Manager will confirm to the Audit Committee, at least annually, the organizational independence of the internal audit activity.

Responsibility

The scope of internal auditing encompasses, but is not limited to, the examination and evaluation of the adequacy and effectiveness of the organization's governance, risk management, and internal controls as well as the quality of performance in carrying out assigned responsibilities to achieve the organization's stated goals and objectives. This includes:

- Evaluating risk exposure relating to achievement of the organization's strategic objectives.
- Evaluating the reliability and integrity of information and the means used to identify measure, classify, and report such information.
- Evaluating the systems established to ensure compliance with those policies, plans, procedures, laws, and regulations which could have a significant impact on the organization.
- Evaluating the means of safeguarding assets and, as appropriate, verifying the existence of such assets.

- Evaluating the effectiveness and efficiency with which resources are employed.
- Evaluating operations or programs to ascertain whether results are consistent with established objectives and goals and whether the operations or programs are being carried out as planned.
- Monitoring and evaluating governance processes.
- Monitoring and evaluating the effectiveness of the organization's risk management processes.
- Performing consulting and advisory services related to governance, risk management and control as appropriate for the organization.
- Reporting periodically on the internal audit activity's purpose, authority, responsibility, and performance relative to its plan.
- Reporting significant risk exposures and control issues, including fraud risks, governance issues, and other matters needed or requested by the Board.
- Evaluating specific operations at the request of the Board or management, as appropriate.
- Ensure significant financial, managerial, and operating information is accurate, reliable, and provided timely.
- Evaluating employees' actions are in compliance with policies, rules, procedures and applicable laws and regulations;

Internal Audit Plan

At least annually, the Internal Audit Manager will submit to senior management and the Audit Committee an internal audit plan for review and approval. The internal audit plan will consist of a work schedule as well as budget and resource requirements for the next fiscal/calendar year. The Internal Audit Manager will communicate the impact of resource limitations and significant interim changes to senior management and the Board.

The internal audit plan will be developed based on a prioritization of the audit universe using a risk-based methodology, including input of senior management and the Audit Committee. The Internal Audit Manager will review and adjust the plan, as necessary, in response to changes in the organization's business, risks, operations, programs, systems, and controls. Any significant deviation from the approved internal audit plan must be reported to the Audit Committee.

Nature of Assurance Services Provided

Assurance services involve the internal auditor's objective assessment of evidence to provide an independent opinion or conclusion regarding an entity, operation, function, process, system, or other subject matter. The nature and scope of the assurance engagement are determined by the internal auditor. There are generally three parties involved in assurance services: (1) the person or group directly involved with the entity, operation, function, process, system, or other subject matter-the process owner, (2) the person or group making the assessment-the internal auditor, and (3) the person or group using the assessment –the user.

Nature of Consulting Services Provided

Consulting services are advisory in nature, and are generally performed at the specific request of management. The nature and scope of the consulting engagement are subject to agreement with management. Consulting services generally involve two parties: (1) the person or group offering the advice-the internal auditor, and (2) the person or group seeking and receiving the advice – management. When performing consulting services the internal auditor should maintain objectivity and not assume management responsibility

Reporting & Monitoring

A written report will be prepared and issued by the Internal Audit Manager or designee following the conclusion of each internal audit engagement and will be distributed as appropriate. Internal audit results will also be communicated to the Audit Committee. The internal audit report may include management's response and corrective action taken or to be taken in regard to the specific findings and recommendations. Management's response, included within the original audit report or provided thereafter (i.e. within thirty days) by management of the audited area should include a timetable for anticipated completion of action to be taken and an explanation for any corrective action that will not be implemented. The internal audit activity will be responsible for appropriate follow-up on engagement findings and recommendations. All significant findings will remain in an open issues file until cleared.

Professionalism

The internal audit activity will govern itself by adherence to The Institute of Internal Auditors' mandatory guidance including the Definition of Internal Auditing, the Code of Ethics, and the International Standards for the Professional Practice of Internal Auditing (Standards). This mandatory guidance constitutes principles of the fundamental requirements for the professional practice of internal auditing and for evaluating the effectiveness of the internal audit activity's performance. The Institute of Internal Auditors' Practice Advisories, Practice Guides, and Position Papers will also be adhered to as applicable to guide operations.

In addition, the internal audit activity will adhere to Sewerage & Water Board of New Orleans relevant policies and procedures and the internal audit activity's standard operating procedures manual.

Quality Assurance & Improvement Program

The internal audit activity will maintain a quality assurance and improvement program that covers all aspects of the internal audit activity. The program will include an evaluation of the internal audit activity's conformance with the Definition of Internal Auditing and the Standards and an evaluation of whether internal auditors apply the Code of Ethics. The program also assesses the efficiency and effectiveness of the internal audit activity and identifies opportunities for improvement.

The Internal Audit Manager will communicate to senior management and the Audit Committee on the internal audit activity's quality assurance and improvement program, including results of ongoing internal assessments and external assessments conducted at least every five years.

Approval

Internal Audit Activity Charter

Approved this _____ day of _____, _____

Special Counsel Internal

Audit Manager Chairman

Audit Committee

SWBNO Internal Audit Committee Charter Amendment Summary of Changes

Purpose: To support the changes to the previously adopted SWBNO Internal Audit Charter adopted on August 21, 2013 according to R166-2013. The current Internal Audit Charter is over five years old.

Audience/User: SWBNO Audit Committee and Internal Audit Department

Best Practice

Recommendations: According to the Institute of Internal Auditors (IIA) that governs the internal audit function:

- The internal audit charter should be reviewed periodically (e.g., at least annually) by the Internal Audit Manager and presented to the Board and Senior Management for approval.
- The internal audit committee charter must be compatible with that of the audit committee charter.
- The internal audit charter should be formatted so that information within the charter is easily accessible and readable.

Below is a chart summarizing the changes made to the Audit Committee Charter with reasons to support the changes:

Proposed Amended Changes	Basis for Change
Re-formatted to include cover page, table of contents, added subtitles, and an approval section.	To provide a more efficient and readable document that would make it easier for audit committee members to locate information within the charter in a timely manner.
The following subtitles were added: Governing Authority, Introduction, Purpose, Organization, Internal Audit Plan, Nature of Assurance Services Provided, Nature of Consulting Services Provided, Reporting & Monitoring, Quality Assurance & Improvement Program, and Approval.	<u>Governing Authority</u> - states that the Audit Committee and the Internal Audit department govern the charter. <u>Introduction</u> - states the requirement of the charter, its guidance, and authority. <u>Purpose</u> : states the purpose on the Internal Audit activity. <u>Organization</u> -based on the IIA standards, this subtitle states to whom the internal audit function reports to and the responsibility of the audit committee <u>Internal Audit Plan</u> -states the Internal Audit manager's responsibilities regarding the

	<p>internal audit plan.</p> <p><u>Nature of Consulting Services Provided & Nature of Assurance Services Provided</u>-state the types of audit services conducted and in what manner.</p> <p>Professionalism-describes the types of mandatory guidance internal auditors must adhere to.</p> <p><u>Quality Assurance & Improvement Program</u>-must be included to evaluate the performance of the internal audit activity.</p> <p>AQ Approval-signature page.</p>
The following subtitles were omitted: Policy, Objectives, Accountability, Independence, and Standards of the Practice	<p>The following information was omitted because part of it is added under the following subtitles:</p> <p>Governing Authority, Introduction, Purpose, Organization, Internal Audit Plan, Nature of Assurance Services Provided, Nature of Consulting Services Provided, Reporting & Monitoring, and Quality Assurance & Improvement Program.</p>
Authority Subtitle	<p>The Executive Director signature was removed; Executive Director would sign the Resolution approving the charter. The Special Counsel and Chairman of the Audit Committee signature were added as it applies to this committee.</p>

**EAST BANK WASTEWATER TREATMENT PLANT MUNICIPAL WATER POLLUTION PREVENTION
ENVIRONMENTAL AUDIT**

WHEREAS, on August 22, 2019 the Board's wastewater operator (Veolia Water North America) completed the Louisiana Municipal Water Pollution Prevention report for the East Bank Wastewater Treatment Plant for the period, June 1, 2018 to May 31, 2019; and

WHEREAS, the Board has reviewed the Municipal Water Pollution Prevention Environmental Audit Report, prepared for the Louisiana Department of Environmental Quality, which is attached to this resolution; and

WHEREAS, no corrective action is needed at this time, to maintain permit requirements contained in the Louisiana Water Discharge Permit System (LWPDPS) Number LA0038091. However, during this audit reporting period, to reduce sanitary sewer overflows due to collection system blockages, force main failures and sewer pumping station outages, the Board and/or its contactors performed the following collection system and sewer station preventive maintenance actions:

- Inspected 1,077,539.00 feet of the sewer system, 6,308 sewer manholes, completed 535 repairs, and cleaned 898,953.00 feet of the sewer system;
- Inspected a cumulative total of 34,646.00 feet of sewer line utilizing CCTV and a cumulative total of 1,046,740.00 feet of sewer line utilizing Smoke Testing;
- Inspected and maintained 68 known air release valves;
- Inspected and exercised 170 sewer force main isolation;
- Conducted 22 cathodic protection surveys;
- Inspected (100%) of the 102 miles of sewer force mains;
- Completed 4,942 sewage pumping station preventive maintenance tasks.

NOW, THEREFORE BE IT RESOLVED that the Board hereby acknowledges receipt and review of the report and assures performance of any actions necessary to maintain permit requirements.

I, Ghassan Korban, Executive Director, Sewerage and Water Board of New Orleans, do hereby certify that the above and foregoing is a true and correct copy of a Resolution adopted at the Regular Monthly Meeting of said Board, duly called and held, according to law on November 20, 2019.

Ghassan Korban,
EXECUTIVE DIRECTOR
SEWERAGE AND WATER BOARD OF NEW ORLEANS



SEWERAGE AND WATER BOARD

Inter-Office Memorandum

Date: October 7, 2019

From: Ann Wilson 
Chief of Environmental Affairs

Via: Bob Turner, P.E.
General Superintendent

To: Ghassan Korban, P.E.
Executive Director

Re: Municipal Water Pollution Audit for East Bank Sewer Treatment Plant

Enclosed please find a recommendation from the Chief of Environmental Affairs for the approval of resolution for the Municipal Water Pollution (MWPP) Audit for East Bank Sewer Treatment Plant (EBSTP). The Louisiana Pollutant Discharge Elimination System Permit No. LA0038091 requires SWBNO Board of Directors to review the MWPP Audit for the EBSTP and pass a resolution to document this review. This is an annual requirement of the permit. There is no financial requirement associated with the MWPP Audit review as no corrective action was identified during the audit process.

I would appreciate you forwarding this to the attention of the appropriate committees of the Board for consideration and approval.

APPROVED:

J1

Robert Turner, P.E.
General Superintendent

cc:

Y. Downs, CFO
Ron Spooner, Chief of Engineering
Yolanda Grinstead, Special Counsel
Eric Labat, Chief of Operations

LOUISIANA

MUNICIPAL WATER POLLUTION PREVENTION

MWPP



<i>Facility Name:</i>	New Orleans East Bank WWTP
<i>LPDES Permit Number:</i>	LA0038091
<i>Agency Interest (AI) Number:</i>	4859
<i>Address:</i>	6501 Florida Ave.
	New Orleans, LA 70117
<i>Parish:</i>	Orleans
<i>(Person Completing Form) Name:</i>	John Kennedy
<i>Title:</i>	Project Manager
<i>Date Completed:</i>	08/22/2019

Instructions to the Operator-in-Charge

1. Complete only the sections of the Environmental Audit which apply to your wastewater treatment system. Leave sections that do not apply blank and enter a "0" for the point value.
2. Parts 1 through 7 contain questions for which points may be generated. These points are intended to communicate to the department and the governing body or owner what actions will be necessary to prevent effluent violations. Place the point totals from parts 1 through 7 on the Point Calculation page.
3. Add up the point totals.
4. Submit the Environmental Audit to the governing body or owner for their review and approval.
5. The governing body must pass a resolution which contains the following items:
 - a. The resolution or letter must acknowledge the governing body or owner has reviewed the Environmental Audit.
 - b. The resolution must indicate specific actions, if any, will be taken to maintain compliance and prevent effluent violations. Proposed actions should address the parts where maximum or close to maximum points were generated in the Environmental Audit.
 - c. The resolution should provide any other information the governing body deems appropriate.

PART 1: INFLUENT FLOW/LOADINGS

Part 1: Influent Flow/Loadings (All plants)

- A. List the average monthly volumetric flows and BOD loadings received at your facility during the last reporting year.

Col.1 Average Monthly Flow (million gallons per day, MGD)		Col. 2 Average Monthly BODs Concentration (mg/l)		Col. 3 Average Monthly BODs Loading (pounds per day)
Jun-18	89.2	X	95	X 8.34 = 70,673
Jul-18	89.7	X	80	X 8.34 = 59,848
Aug-18	94.5	X	72	X 8.34 = 56,745
Sep-18	105.4	X	66	X 8.34 = 58,016
Oct-18	106.6	X	73	X 8.34 = 64,900
Nov-18	112.4	X	82	X 8.34 = 76,868
Dec-18	102.3	X	94	X 8.34 = 80,199
Jan-19	100.9	X	106	X 8.34 = 89,200
Feb-19	105.7	X	138	X 8.34 = 121,652
Mar-19	97.1	X	111	X 8.34 = 89,889
Apr-19	105.8	X	103	X 8.34 = 90,884
May-19	105.5	X	82	X 8.34 = 72,149

BOD loading= Average Monthly Flow (in MGD) x Average Monthly BOD concentration (in mg/l) x 8.34.

- B. List the design flow and design BOD loading for your facility in the blanks below. If you are not aware of these design quantities, refer to your Operation and Maintenance Manual (O & M) or contact your consulting engineer.

Design Flow, MGD

122

X 0.90=

110

Design BOD, lb/day

254,370

X 0.90 =

228,933

- C. How many months did the monthly flow (Col. 1) to the wastewater treatment plant (WWTP) exceed 90% of design flow?
Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	0	<u>2</u>	3	4	5	6	7	8	9	10	11	12	months
points	0	5	0	0	5	5	5	5	5	5	5	5	points

Write 0 or 5 in the C point total box 5 C Point Total

- D. How many months did the monthly flow (Col. 1) to the WWTP exceed the design flow?
Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<u>1</u>	2	3	4	5	6	7	8	9	10	11	12	months
points	5	5	10	10	15	15	15	15	15	15	15	15	points

Write 0, 5, 10, or 15 in the D point total box 5 D Point Total

- E. How many months did the monthly BOD loading (Col. 3) to the WWTP exceed 90% of the design loading?
Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<u>0</u>	1	2	3	4	5	6	7	8	9	10	11	12	months
points	0	0	5	5	5	0	10	10	10	10	10	10	10	points

Write 0, 5, or 10 in the E point total box 0 E Point Total

- F. How many times did the monthly BOD loading (Col. 3) to the WWTP exceed the design loading?
Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<u>0</u>	1	2	3	4	5	6	7	8	9	10	11	12	months
points	0	10	20	30	40	50	50	50	50	50	50	50	50	points

Write 0, 10, 20, 30, 40, or 50 in the F point total box 0 F Point Total

- G. Add together each point total for C through F and place this sum in the box below at the right.

TOTAL POINT VALUE FOR PART I || 0 || (max=80)

Also enter this value on the point calculation table on page 16.

PART 2: EFFLUENT QUALITY/PLANT PERFORMANCE

- A. List the monthly average effluent BOD and TSS concentrations produced by your facility during the last reporting year.

Month	Column 1 Avg. Monthly BOD (mg/l)	Column 2 Avg. Monthly TSS (mg/l)
Jun-2018	13	9
Jul-2018	11	6
Aug -2018	10	8
Sep -2018	8	9
Oct-2018	11	7
Nov-2018	8	8
Dec-2018	10	8
Jan-2019	22	19
Feb -2019	23	18
Mar-2019	21	16
Apr-2019	22	15
May-2019	19	12

- B. List the monthly average permit limits for your facility in the blanks below.

	Permit Limit		90% of Permit Limit
BOD, mg/l	30	X 0.90 =	27
TSS, mg/l	30	X 0.90 =	27

C. Continuous Discharge to Surface Water

1. How many months did the effluent BOD concentrations (Col. 1) exceed 90% of the permit limits? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	(o\1	2	3	4	5	6	7	8	9	10	11	12	months
points	0\0	10	20	30	40	40	40	40	40	40	40	40	points

Write 0, 10, 20, 30 or 40 in the i point total box i Point Total

11. How many months did the effluent BOD concentration (Col. 1) exceeds permit limits? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	(o\1	2	3	4	5	6	7	8	9	10	11	12	months
points	\V5	5	10	10	10	10	10	10	10	10	10	10	points

Write 0, 5, or 10 in the ii point total box ii Point Total

111. How many months did the effluent TSS concentration (Col. 2) exceed 90% of the permit limits? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	W	1	2	3	4	5	6	7	8	9	10	11	12	months
points	0	10	20	30	40	40	40	40	40	40	40	40	40	points

Write 0, 10, 20, 30, or 40 in the iii point total box iii Point Total

- IV. How many months did the effluent TSS concentration (Col. 2) exceed permit limits? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	(o\1	2	3	4	5	6	7	8	9	10	11	12	months
points	\V5	5	10	10	10	10	10	10	10	10	10	10	points

Write 0, 5, or 10 in the iv point total box iv Point Total

- v. Add together each point total for i through iv and place this sum in the box below at the right.

TOTALPOINTVALUEFORPART2 0
 Also enter this value on the point calculation table on page 16. **(max=100)**
 1b:==11

D. Other Monitoring and Limits

- i. At any time in the past year was there an exceedance of a permit limit for other pollutants such as: ammonia-nitrogen, phosphorus, pH, residual chlorine, or fecal coliform?

T Check one box ☐ Yes ☒ No If yes, please describe:

- n. At any time in the past year was there a "failure" of a Biomonitoring (Whole Effluent Toxicity) test of the effluent?

T Check one box ☐ Yes ☒ No If yes, please describe:

- iii. At any time in the past year was there an exceedance of a permit limit for a toxic substance?

T Check one box ☒ Yes ☐ No If yes, please describe:

In the past year the following toxic substances for effluent samples were exceeded:

Substance: Limit: Result: Date:

Zinc 20 ug/l 24.2 ug/l 04/3-4/2019

Phenols 10 ug/l 46.2 ug/l 04/3-4/2019

PART 3: AGE OF THE WASTEWATER TREATMENT FACILITIES

- A. What year was the wastewater treatment plant constructed or last major expansion/improvements completed? ~~1974~~ 2019

Current Year	(Answer to A)	Age in years
<u>2019</u>	<u>1974</u>	= <u>45</u> years

Enter Age in Part C below.

- B. Check the type of treatment facility that is employed:

		Factor
<u> </u> <u> </u> <u>X</u> <u> </u> <u> </u>	Mechanical Treatment Plant (Trickling filter, activated sludge, etc.) Specify Type Activated Sludge	2.5
<u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u>	Aerated Lagoon	2.0
<u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u>	Stabilization Pond	1.5
<u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u>	Other (Specify) _____	1.0

- C. Multiply the factor listed next to the type of facility your community employs by the age of your facility to determine the total point value of Part 3:

$$\text{TOTAL POINT VALUE FOR PART 3} = \frac{2.5}{\text{FACTOR}} \times \frac{45}{\text{AGE}} = \boxed{112.5} \quad (\text{max.} = 50)$$

Also enter this value or 50, which ever is less, on the point calculation table on page 16.

- D. Please attach a schematic of the treatment plant.

p.ART 4: OVERFLOWS AND BYPASSES

- A. (1) List the number of times in the last year there was an overflow, bypass, or unpermitted discharge of untreated or incompletely treated wastewater due to heavy rain: 7

(Circle One) 0 = 0 points = 5 points 2 = 10 points
3 = 15 points 4 = 30 points

- (2) List the number of bypasses, overflows, or unpermitted discharges shown in A (1) that were within the collection system and the number at the treatment plant.

Collection System 7 Treatment Plant 0

- B. (1) List the number of times in the last year there was a bypass or overflow of untreated or incompletely treated wastewater due to equipment failure, either at the treatment plant or due to pumping problems in the collection system: 5

(Circle One) 0 = 0 points = 5 points 2 = 10 points
3 = 15 points 4 = 30 points 5 or more = 50 points

- (2) List the number of bypasses or overflows shown in B (1) that were within the collection system and the number at the treatment plant.

Collection System 5 Treatment Plant 0

- C. Specify whether the bypasses came from the city or village sewer system or from contract or tributary communities/sanitary districts, etc.

All of the aforementioned bypasses came from the City's sanitary sewerage system.

- D. Add the point values circled for A and B and place the total in the box below

TOTAL POINT VALUE FOR PART 4 100 (max=100)

Also enter this value on the point calculation table on page 16.

- E. List the person responsible for reporting overflows, bypasses, or unpermitted discharges to State and Federal authorities:

Monthly bypass reports are signed by the Interim General Superintendent of the SWBNO. The reports are sent to the Environmental Protection Agency Region VI and to the Department of Environmental Quality.

Describe the procedure for gathering, compiling, and reporting:

RJN Cassworks Infrastructure Maintenance Management System is used to track overflows by retrieving pertinent information from work orders.

PART 5: SLUDGE STORAGE AND DISPOSAL SITES

A. Sludge Storage

How many months of sludge storage capacity does your wastewater treatment facility have available, either on-site or off-site?

Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<2	2	3	4 to 5	<u>>6</u>	months
points	50	30	20	10	<u>0</u>	points

Write 0, 10, 20, 30, or 50 in the A point total box  A Point Total

B. For how many months does your facility have access to (and approval for) sufficient land disposal sites to provide proper land disposal?

Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<2	6 to 11	12 to 23	24 to 35	<u>>36</u>	months
points	50	30	20	10	<u>0</u>	points

Write 0, 10, 20, 30, or 50 in the B point total box  B Point Total

C. Add together the A and B point values and place this sum in the box below at the right:

TOTAL POINT VALUE FOR PART **sl** 0 (max=100)

Also enter this value on the point calculation table on page 16.

PART 6: NEW DEVELOPMENT

- A. Please provide the following information for the total of all sewer line extensions which were installed during the last year. N/A

Design Population: _____

Design Flow: _____MGD

Design BOD₅: _____mg/l

- B. Has an industry (or other development) moved into the community or expanded production in the past year, such that either flow or pollutant loadings to the sewerage system were significantly increased (5% or greater)?

(Circle One) **Q** = 0 points Yes = 15 points

Describe: _____

List any new pollutants: _____

- C. Is there any development (industrial, commercial, or residential) anticipated in the next 2-3 years, such that either flow or pollutant loadings to the sewerage system *could* significantly increase?

(Circle One) No 0 points **g** IS points

Describe: The opening of a Brewery and an Alcohol Distillery: Dixie Beer Brewing Company and Sazerac Whiskey Distillery respectively.

List any new pollutants that you anticipate: Increased BOD and TSS into the POTW.

- D. Add together the point value circled in Band C and place the sum in the blank below.

TOTAL POINT VALUE FOR PART 6 || 15 || (max=30)

Also enter this value on the point calculation table on page 16.

PART 7: OPERATOR CERTIFICATION AND EDUCATION

- A. What was the name of the operator-in-charge for the reporting year? Steve Benjamin
- B. What is his/her certification number? #21-001; January 1998
- C. What level of certification is the operator-in-charge required to have to operate the wastewater treatment plant?
Class IV Wastewater Treatment
- D. What is the level of certification of the operator-in-charge? Class IV Wastewater Treatment **Level Certified**
- E. Was the operator-in-charge of the report year certified at least at the grade level required in order to operate this plant?

T Check one box ☒ yes= 0 points ☐ no= 50 points

Write 0 or 50 in the **E** point total box **E Point Total**

- F. Has the operator-in-charge maintained recertification requirements during the reporting year?

T Check one box ☒ yes ☐ no

- G. How many hours of continuing education have the operator-in-charge completed over the last two calendar years?

T Check one box ☒ 12 hours or more= 0 points ☐ Less than 12 hours= 50 points

Write 0 or 50 in the **G** point total box **G Point Total**

- H. Is there a written policy regarding continuing education and training for wastewater treatment plant employees?

T Check one box ☒ yes ☐ no

E-xplain:

All personnel maintained at least 16 hours of training every two years. Veolia implements an internal training and safety program that meets all State Operator Certification training requirements. Additionally, 16 hours of cross trainings are provided to each employee.

- I. What percentage of the continuing education expenses of the operator-in-charge were paid for:
- | | | |
|-------------------|------|----------------------|
| By the permittee? | 100% | Veolia North America |
| By the operator? | 0% | |

- J. Add together the E and G point values and place this sum in the box below at the right:

TOTAL POINT VALUE FOR PART 7 (max=100)

Also enter this value on the point calculation table on page 16.

! sSTATUSPART8 : FINANCIAL

- A. Are User-Charge Revenues sufficient to cover operation and maintenance expenses?

T Check one box

O Yes

☐

No

If no, how are O & M costs being financed?

_Explain:

In 2012, the New Orleans City Council approved eight consecutive annual 10 percent water rate increases beginning January 1, 2013.

Revenue from Plumbing Inspections, License Fees and Other Miscellaneous Revenue

- B. What financial resources do you have available to pay for your wastewater improvements and reconstruction needs?

Revenues in excess of expenses and proceeds from bond issues.

PART9: SUBJECTIVE EVALUATION

A. Collection System Maintenance

1. Describe what sewer system maintenance work has been done in the last year.

The Board and its contractors inspected 6,308 sewer manholes, completed 535 repairs, and cleaned 898,953.00.00 feet of the sewer system in 2018. Also, the Board and its contractors inspected a cumulative total of 34,640.00 feet of sewer line utilizing CCTV and a cumulative total of 1,046,740.00 feet of sewer line utilizing Smoke Testing in 2018. During the first and second halves of 2018, the Board inspected and maintained 68 known air release valves. In addition, 170 of 172 sewer force main isolation valves were inspected and exercised. 22 cathodic protection surveys were conducted and (100%) of the 102 miles of sewer force mains were visually inspected.

2. Describe what lift station work has been done in the last year.

The Board's Operations and Facility Maintenance personnel completed 4,942 sewage pumping station preventive maintenance tasks through December 31, 2018.

3. What collection system improvements does the community have under consideration for the next 5 years?

Collection system improvements are planned in accordance with the Third Modified Consent Decree.

B. If you have ponds, please answer the following questions: N/A

- | | |
|---|----------|
| 1. Do you have duckweed buildup in your ponds? | DYes DNo |
| 2. Do you mow your dikes regularly (at least monthly), to the waters edge? | DYes ONo |
| 3. Do you have bushes or trees growing on the dikes or in the ponds? | DYes ONo |
| 4. Do you have excess sludge buildup(>1 foot) on the bottom of any of your ponds? | DYes DNo |
| 5. Do you exercise all of your valves? | DYes ONo |
| 6. Are your control manholes in good structural shape? | DYes ONo |
| 7. Do you maintain at least three feet of freeboard in all your ponds? | DYes ONo |
| 8. Do you visit your pond system, at least weekly? | DYes ONo |

C. Treatment Plants

1. Have the influent and effluent flow meters been calibrated in the last year?

☒ Yes ☐ No

Influent flow meter calibration dates(s):

Effluent flow meter calibration date(s):

The most recent calibration for that period - 05/01/2019-The Flow Meters are calibrated monthly

The most recent calibration for that period - 05/01/2019-The Flow Meters are calibrated monthly

2. What problems, if any, have been experienced over the last year that has threatened treatment?

None

3. Is your community presently involved in formal planning for treatment facility upgrading?

☒ Yes ☐ No If yes, describe:

D. Preventive Maintenance

1. Does your plant have a written plan for preventive maintenance on major equipment items?

Yes **D** No If yes, describe:

Current system utilizes a computer generated maintenance work order system for both preventive and emergency repairs on all components in the plants.

Each piece of equipment's O&M manual is closely followed to ensure all factory preventive maintenance recommendations are performed.

2. Does this preventive maintenance program depict frequency of intervals, types of lubrication, and other

preventive maintenance tasks necessary for each piece of equipment? **[K]** Yes **O** No

3. Are these preventive maintenance tasks, as well as equipment problems, being recorded and filed so future maintenance problems can be assessed properly? **X** Yes **D** No

E. Sewer Use Ordinance

1. Does your community have a sewer use ordinance that limits or prohibits the discharge of excessive conventional pollutants (BOD, TSS, or pH) or toxic substances to the sewer from industries, commercial users, and residences?

O Yes **D** No If yes, describe:

E.P.A. approved Pretreatment Program and Section 16 of the Sewerage & Water Board of New Orleans Plumbing Code.

The implementation of a Fats, Oils, and Grease Program, Section 16.5 of the Sewerage & Water Board of New Orleans Plumbing Code, that involves the annual issuance of a Grease Trap Discharge Permit to all Food Service Establishments in Orleans Parish.

2. Has it been necessary to enforce? **O** Yes **D** No If yes, describe:

E.P.A. approved Pretreatment Program requires sampling/monitoring of Significant Industrial Users to demonstrate compliance with applicable Federal, State and Local discharge requirements.

- F. Any additional comments about your treatment plant or collection system? (Attach additional sheet if necessary.)

POINT CALCULATION TABLE

Fill in the values from parts 1 through 7 in the columns below. Add the numbers in the left column to determine the point total that the wastewater system has generated for the previous year.

	Actual Values	Actual Values	Maximum
Part 1:	Influent Flow/Loadings	<u>0</u>	80 Points
Part 2:	Effluent Quality/Plant Performance	<u>0</u>	100 Points
Part 3:	Age of WWTP	<u>50</u>	50 Points
Part 4:	Overflows and Bypasses	<u>100</u>	100 Points
Part 5:	Ultimate Disposition of Sludge	<u>0</u>	100 Points
Part 6:	New Development	<u>15</u>	30 Points
Part 7:	Operator Certification Training	<u>0</u>	100 Points
TOTAL POINTS			<u>165</u>

ATTACHMENT 3

SAMPLE MWPP RESOLUTION

Resolved that the city/town _____ informs Louisiana Department of
of _____
Environmental Quality that the following actions were taken by
the _____
_____ (governing
_____ body).

1. Reviewed the Municipal Water Pollution Prevention Environmental Audit Report which is attached to this resolution.
2. Set forth the following actions necessary to maintain permit requirements contained in the Louisiana Water Discharge Permit System (LWDPS) number _____

(Please be specific in listing the actions that will be taken to address the problems identified in the audit report.)

a.

b.

c.

d.

etc.

Passed by a majority/unanimous (circle one) vote of
the _____

_____ on _____ (date).

CLERK

**WEST BANK WASTEWATER TREATMENT PLANT MUNICIPAL WATER POLLUTION
PREVENTION ENVIRONMENTAL AUDIT**

WHEREAS, on September 10, 2019 the Board's wastewater operator (Veolia Water North America) completed the Louisiana Municipal Water Pollution Prevention report for the West Bank Wastewater Treatment Plant for the period, September 1, 2018 to August 31, 2019; and

WHEREAS, the Board has reviewed the Municipal Water Pollution Prevention Environmental Audit Report, prepared for the Louisiana Department of Environmental Quality, which is attached to this resolution; and

WHEREAS, no corrective action is needed at this time, to maintain permit requirements contained in the Louisiana Water Discharge Permit System (LWPDPS) Number LA0038105. However, during this audit reporting period, to reduce sanitary sewer overflows due to collection system blockages, force main failures and sewer pumping station outages, the Board and/or its contactors performed the following collection system and sewer station preventive maintenance actions:

- Inspected 73,000 feet of the sewer system;
- Inspected 583 sewer manholes;
- Completed 14 repairs;
- Cleaned 125,000 feet of the sewer system;
- Completed 1,202 sewage pumping station preventive maintenance tasks and 164 corrective maintenance actions.

NOW, THEREFORE BE IT RESOLVED that the Board hereby acknowledges receipt and review of the report and assures performance of any actions necessary to maintain permit requirements.

I, Ghassan Korban,
Sewerage and Water Board of New Orleans, do hereby
certify that the above and foregoing is a true and
correct copy of a Resolution adopted at the Regular
Monthly Meeting of said Board, duly called and held,
according to law on November 20, 2019.

Ghassan Korban,
EXECUTIVE DIRECTOR
SEWERAGE AND WATER BOARD OF NEW ORLEANS



SEWERAGE AND WATER BOARD

Inter-Office Memorandum

Date: October 7, 2019

From: Ann Wilson
Chief of Environmental Affairs ()»I

Via: Bob Turner, P.E.
General Superintendent

To: Ghassan Korban, P.E.
Executive Director

Re: Municipal Water Pollution Audit for West Bank Sewer Treatment Plant

Enclosed please find a recommendation from the Chief of Environmental Affairs for the approval of resolution for the Municipal Water Pollution (MWPP) Audit for West Bank Sewer Treatment Plant (WBSTP). The Louisiana Pollutant Discharge Elimination System Permit No. LA0038105 requires SWBNO Board of Directors to review the MWPP Audit for the WBSTP and pass a resolution to document this review. This is an annual requirement of the permit. There is no financial requirement associated with the MWPP Audit review as no corrective action was identified during the audit process.

I would appreciate you forwarding this to the attention of the appropriate committees of the Board for consideration and approval.

APPROVED:

Robert Turner, P.E.
General Superintendent

cc:

Y. Downs, CFO
Ron Spooner, Chief of Engineering
Yolanda Grinstead, Special Counsel
Eric Labat, Chief of Operations

LOUISIANA

MUNICIPAL WATER POLLUTION PREVENTION

MWPP



<i>Facility Name:</i>	New Orleans West Bank WWTP
<i>LPDES Permit Number:</i>	LA0038105
<i>Agency Interest (AI) Number:</i>	4688
<i>Address:</i>	3501 Canal Street
	New Orleans, LA 70131
<i>Parish:</i>	Orleans
<i>(Person Completing Form) Name:</i>	John Kennedy
<i>Title:</i>	Project Manager
<i>Date Completed:</i>	09/10/2019

Instructions to the Operator-in-Charge

1. Complete only the sections of the Environmental Audit which apply to your wastewater treatment system. Leave sections that do not apply blank and enter a "0" for the point value.
2. Parts 1 through 7 contain questions for which points may be generated. These points are intended to communicate to the department and the governing body or owner what actions will be necessary to prevent effluent violations. Place the point totals from parts 1 through 7 on the Point Calculation page.
3. Add up the point totals.
4. Submit the Environmental Audit to the governing body or owner for their review and approval.
5. The governing body must pass a resolution which contains the following items:
 - a. The resolution or letter must acknowledge the governing body or owner has reviewed the Environmental Audit.
 - b. The resolution must indicate specific actions, if any, will be taken to maintain compliance and prevent effluent violations. Proposed actions should address the parts where maximum or close to maximum points were generated in the Environmental Audit.
 - c. The resolution should provide any other information the governing body deems appropriate.

PART 1: INFLUENT FLOW/LOADINGS

Part 1: Influent Flow/Loadings (All plants)

A. List the average monthly volumetric flows and BOD loadings received at your facility during the last reporting year.

	Col.1 Average Monthly Flow (million gallons per day, MGD)		Col. 2 Average Monthly <i>BODs</i> Concentration (mg/l)		Col. 3 Average Monthly <i>BODs</i> Loading (pounds per day)
Sep-18	12.5	X	129	X 8.34 =	13,448
Oct-18	12.6	X	84	X 8.34 =	8,827
Nov-18	13.9	X	66	X 8.34 =	7,651
Dec-18	13.6	X	66	X 8.34 =	7,486
Jan-19	11.8	X	86	X 8.34 =	8,463
Feb-19	13.1	X	102	X 8.34 =	11,144
Mar-19	10.3	X	95	X 8.34 =	8,161
Apr-19	11.9	X	106	X 8.34 =	10,520
May-19	12.8	X	87	X 8.34 =	9,287
Jun-19	9.0	X	108	X 8.34 =	8,106
Jul-18	13.8	X	93	X 8.34 =	10,704
Aug-19	15.4	X	76	X 8.34 =	9,761

BOD loading= Average Monthly Flow (in MGD) x Average Monthly BOD concentration (in mg/l) x 8.34.

B. List the design flow and design BOD loading for your facility in the blanks below. If you are not aware of these design quantities, refer to your Operation and Maintenance Manual (O & M) or contact your consulting engineer.

Design Flow, MGD

20

X 0.90=

18

Design BOD, lb/day

14,972

X 0.90=

13,475

- C. How many months did the monthly flow (Col. 1) to the wastewater treatment plant (WWTP) exceed 90% of design flow?

Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months (2) 1 2 3 4 5 6 7 8 9 10 11 12 months
 points 0 0 0 0 5 5 5 5 5 5 5 5 points

Write 0 or 5 in the C point total box **CD** C Point Total

- D. How many months did the monthly flow (Col. 1) to the WWTP exceed the design flow?

Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months (2) 1 2 3 4 5 6 7 8 9 10 11 12 months
 points **y** 5 5 10 10 15 15 15 15 15 15 15 15 points

Write 0, 5, 10, or 15 in the D point total box **CD** D Point Total

- E. How many months did the monthly BOD loading (Col. 3) to the WWTP exceed 90% of the design loading?

Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months 0 1 2 3 4 5 6 7 8 9 10 11 12 months
 points 0 0 5 5 5 0 10 10 10 10 10 10 10 points

Write 0, 5, or 10 in the E point total box **CD** E Point Total

- F. How many times did the monthly BOD loading (Col. 3) to the WWTP exceed the design loading?

Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months (10) 1 2 3 4 5 6 7 8 9 10 11 12 months
 points 10 20 30 40 50 50 50 50 50 50 50 50 points

Write 0, 10, 20, 30, 40, or 50 in the F point total box **CD** F Point Total

- G. Add together each point total for C through F and place this sum in the box below at the right.

TOTAL POINT VALUE FOR PART 1 || 0 || (**max=80**)

Also enter this value on the point calculation table on page 16.

PART 2: EFFLUENT QUALITY/PLANT PERFORMANCE

A. List the monthly average effluent BOD and TSS concentrations produced by your facility during the last reporting year.

Month	Column 1 Avg. Monthly BOD (mg/l)	Column2 Avg. Monthly TSS (mg/l)
Sep-18	5	9
Oct-18	5	11
Nov 18	6	12
Dec-18	8	14
Jan-19	10	17
Feb-19	14	20
Mar-19	17	17
Apr-19	14	17
May-19	8	16
Jun-19	6	11
Jul-19	7	12
Aug-19	8	12

B. List the monthly average permit limits for your facility in the blanks below.

	Permit Limit		90% of Permit Limit
BOD, mWIl	30	X 0.90 =	27
TSS, mg/l	30	X 0.90=	27

C. Continuous Discharge to Surface Water

- i. How many months did the effluent BOD concentration (Col. 1) exceeds 90% of permit limits?
Circle the number of months and corresponding point total. Write the point total in the box below at the right.

:: :SS 0 0 :0 :0 :0 :0 :0 :0 ::: :0:

Write 0, 10, 20, 30 or 40 in the i point total box i Point Total

- ii. How many months did the effluent BOD concentration (Col. 1) exceeds permit limits?
Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months (0) 1 2 3 4 5 6 7 8 9 10 11 12 months

points (0) 5 5 10 10 10 10 10 10 10 10 10 10 points

Write 0, 5, or 10 in the ii point total box ii Point Total

- iii. How many months did the effluent TSS concentration (Col. 2) exceed 90% of permit limits?
Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months (0) 1 2 3 4 5 6 7 8 9 10 11 12 months

points (0) 0 10 20 30 40 40 40 40 40 40 40 40 points

Write 0, 10, 20, 30, or 40 in the iii point total box iii Point Total

- iv. How many months did the effluent TSS concentration (Col.2) exceed permit limits?
Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months (0) 1 2 3 4 5 6 7 8 9 10 11 12 months

points (0) 5 5 10 10 10 10 10 10 10 10 10 10 points

Write 0, 5, or 10 in the iv point total box iv Point Total

- v. Add together each point total for i through iv and place this sum in the box below at the right.

TOTAL POINT VALUE FOR PART 211 0
 Also enter this value on the point calculation table on page 15. (max=100)

D. Other Monitoring and Limits

- i. At any time in the past year was there an exceedance of a permit limit for other pollutants such as: ammonia-nitrogen, phosphorus, pH, residual chlorine, or fecal coliform?

T Check one box

D Yes O No

If yes, please describe:

- n. At any time in the past year was there a "failure" of a Biomonitoring (Whole Effluent Toxicity) test of the effluent?

T Check one box

D Yes O No

If yes, please describe:

- iii. At any time in the past year was there an exceedance of a permit limit for a toxic substance?

T Check one box

☒ **X** Yes ☐ No

If yes, please describe:

In the past year the following toxic substances for effluent samples were exceeded:

Substance:	Limit:	Result:	Date
Aluminum	2.5 ug/l	230 ug/l	04/02-03/2019
Arsenic	5 ug /l	10 ug/l	04/02-03/2019
Chromium IV	10 ug/l	23 ug/l	04/02-03/2019
Copper	2 ug/l	5.3 ug/l	04/02-03/2019
Mercury	0.0005 ug/l	0.00477 ug/l	04/02-03/2019
Zinc	20 ug/l	24.9 ug/l	04/02-03/2019

PART 4: OVERFLOWS AND BYPASSES

- A. (1) List the number of times in the last year there was an overflow, bypass, or unpermitted discharge of untreated or incompletely treated wastewater due to heavy rain: 0

(Circle One) 1 = 5 points 2 = 10 points
 3 = 15 points 4 = 30 points 5 or more = 50 points

- (2) List the number of bypasses, overflows, or unpermitted discharges shown in A (1) that were within the collection system and the number at the treatment plant.

Collection System 0 Treatment Plant 0

- B. (1) List the number of times in the last year there was a bypass or overflow of untreated or incompletely treated wastewater due to equipment failure, either at the treatment plant or due to pumping problems in the collection system: 10

(Circle One) 0 = 0 points = 5 points 2 = 10 points
 3 = 15 points 4 = 30 points 5 or more = 50 points

- (2) List the number of bypasses or overflows shown in B (1) that were within the collection system and the number at the treatment plant.

Collection System 1 Treatment Plant 0

- C. Specify whether the bypasses came from the city or village sewer system or from contract or tributary communities/sanitary districts, etc.

The collection system bypasses came from the city's sewer system.

- D. Add the point values circled for A and B and place the total in the box below.

50

TOTAL POINT VALUE FOR PART 4 (max=100)

Also enter this value on the point calculation table on page 15.

- E. List the person responsible for reporting overflows, bypasses, or unpermitted discharges to State and Federal authorities:

Bypass report is signed by the Executive Director of the SWBNO. The report is submitted to the Department of Environmental Quality

Describe the procedure for gathering, compiling, and reporting:

RJN Cassworks Infrastructure Maintenance Management System is used to track overflows by retrieving pertinent information from work orders.

PART 5: SLUDGE STORAGE AND DISPOSAL SITES

A. Sludge Storage

How many months of sludge storage capacity does your wastewater treatment facility have available, either on-site or off-site?

Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<2	2	3	4 to 5	(<u>>6</u>) months
points	50	30	20	10	(\./}_) points

Write 0, 10, 20, 30, or 50 in the A point total box **O** A Point Total

B. For how many months does your facility have access to (and approval for) sufficient land disposal sites to provide proper land disposal?

Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<2	6 to 11	12 to 23	24 to 35	A 36 months
points	50	30	20	10	0 points

Write 0, 10, 20, 30, or 50 in the B point total box **O** B Point Total

C. Add together the A and B point values and place this sum in the box below at the right:

TOTALPOINTVALUEFORPARTS || 0 || (max=100)

Also enter this value on the point calculation table on page 15.

PART 6: NEW DEVELOPMENT

- A. Please provide the following information for the total of all sewer line extensions which were installed during the last year. NA

Design Population: _____

Design Flow: _____ MGD

Design BODs: _____ mg/1

- B. Has an industry (or other development) moved into the community or expanded production in the past year, such that either flow or pollutant loadings sewerage system were significantly increased (5% or greater)?
(Circle One) **U** = 0 points Yes = 15 points

Describe: _____

List any new pollutants: _____

- C. Is there any development (industrial, commercial, or residential) anticipated in the next 2-3 years, such that either flow or pollutant loadings to the ~~sew~~ system could significantly increase?

(Circle One) = 0 points Yes = 15 points

Describe: _____

List any new pollutants that you anticipate: _____

- D. Add together the point value circled in Band C and place the sum in the blank below.

TOTAL POINT VALUE FOR PART 6 11 0 || (max=30)

Also enter this value on the point calculation table on page 15.

PART 7: OPERATOR CERTIFICATION AND EDUCATION

- A. What was the name of the operator-in-charge for the reporting year? Cantrelle Larkins
- B. What is his/her certification number? #15-250 October, 1992
- C. What level of certification is the operator-in-charge required to have to operate the wastewater treatment plant?
Class IV Wastewater Treatment
- D. What is the level of certification of the operator-in-charge? Class IV Wastewater Treatment Level Certified
- E. Was the operator-in-charge of the report year certified at least at the grade level required in order to operate this plant?

T Check one box ☒ yes= 0 points ☐ no= 50 points

Write 0 or 50 in the E point total box E Point Total

- F. Has the operator-in-charge maintained recertification requirements during the reporting year?

T Check one box ☒ yes ☐ no

- G. How many hours of continuing education have the operator-in-charge completed over the last two calendar years?
T Check one box ☒ 12 hours or more= 0 points ☐ Less than 12 hours= 50 points

Write 0 or 50 in the G point total box G Point Total

- H. Is there a written policy regarding continuing education and training for wastewater treatment plant employees?
T Check one box ☒ yes ☐ no

Explain:

All personnel maintained at least 16 hours of training every two years for Wastewater Treatment certifications. Veolia implements an internal training and safety program that meets all State Operator Certification training requirements. Additionally, 16 hours of cross training are provided

- I. What percentage of the continuing education expenses of the operator-in-charge were paid for:

By the permittee? 100% Veolia
By the operator? _____

- J. Add together the E and G point values and place this sum in the box below at the right:

TOTAL POINT VALUE FOR PART 7 11 0 (max=100)

Also enter this value on the point calculation table on page 15.

PART8 : FINANCIALSTATUS

A. Are User-Charge Revenues sufficient to cover operation and maintenance expenses?

Check one box

☒ Yes

☐

No

If no, how are O & M costs being financed?

Explain:

In 2012, the New Orleans City Council approved eight consecutive annual 10 percent water rate increases beginning January 1, 2013.

Revenue from Plumbing Inspections, License Fees and Other Miscellaneous Revenue

B. What financial resources do you have available to pay for your wastewater improvements and reconstruction needs?

Revenues in excess of expenses and proceeds from bond issues.

PART 9: SUBJECTIVE EVALUATION

A. Collection System Maintenance

- Describe what sewer system maintenance work has been done in the last year.

Sewer Line Inspections: 73,000 feet (using smoke)
 Sewer Line Cleanings: 125,000 feet
 Sewer Repairs: 24
 Sewer Man Hole Inspections 583

- Describe what lift station work has been done in the last year.

1,202 Preventative Maintenance Actions
 164 Corrective Maintenance Actions

- What collection system improvements does the community have under consideration for the next 5 years?

Even though the West Bank is not mandated to improve the collection system in accordance with the Third Modified Consent Decree, repairs and improvements are made when identified through sewer main inspections, sewer main cleaning and manhole inspections.

B. If you have ponds, please answer the following questions: N/A

- | | |
|---|----------|
| 1. Do you have duckweed buildup in your ponds? | DYes DNo |
| 2. Do you mow your dikes regularly (at least monthly), to the waters edge? | DYes ONo |
| 3. Do you have bushes or trees growing on the dikes or in the ponds? | DYes ONo |
| 4. Do you have excess sludge buildup(>1 foot) on the bottom of any of your ponds? | DYes DNo |
| 5. Do you exercise all of your valves? | DYes DNo |
| 6. Are your control manholes in good structural shape? | DYes ONo |
| 7. Do you maintain at least three feet of freeboard in all your ponds? | DYes DNo |
| 8. Do you visit your pond system, at least weekly? | DYes DNo |

C. Treatment Plants

1. Have the influent and effluent flow meters been calibrated in the last year? ☒ Yes ☐ No

Influent flow meter calibration date(s):	Effluent flow meter calibration date(s):
The most recent calibration of that period – 8/13/2019-The Flow Meters are calibrated monthly	The most recent calibration of that period – 08113/2019-The Flow Meters are calibrated monthly

2. What problems, if any, have been experienced over the last year that has threatened treatment?

None

3. Is your community presently involved in formal planning for treatment facility upgrading?

Yes **0** No If yes, describe:

D. Preventive Maintenance

1. Does your plant have a written plan for preventive maintenance on major equipment items?

☐ Yes ☒ No If yes, describe:

Current system utilizes a computer generated maintenance work order system for both preventive and emergency repairs on all components in the plants.

Each piece of equipment's O&M manual is closely followed to ensure all factory preventive maintenance recommendations are performed.

2. Does this preventive maintenance program depict frequency of intervals, types of lubrication, and other preventive maintenance tasks necessary for each piece of equipment? ☒ Yes ☐ No

3. Are these preventive maintenance tasks, as well as equipment problems, being recorded and filed so future maintenance problems can be assessed properly? ☒ Yes ☐ No

E. Sewer Use Ordinance

1. Does your community have a sewer use ordinance that limits or prohibits the discharge of excessive conventional pollutants (BOD, TSS, or pH) or toxic substances to the sewer from industries, commercial users, and residences?

☐ Yes ☒ No If yes, describe:

E.P.A. approved Pretreatment Program and Section 16 of the Sewerage & Water Board of New Orleans Plumbing Code.

The implementation of a Fats, Oils, and Grease Program, Section 16.5 of the Sewerage & Water Board of New Orleans Plumbing Code, that involves the annual issuance of a Grease Trap Discharge Permit to all Food Service Establishments in Orleans Parish.

2. Has it been necessary to enforce? ☐ Yes ☒ No If yes, describe:

E.P.A. approved Pretreatment Program requires sampling/monitoring of Significant Industrial Users to demonstrate compliance with applicable Federal, State and Local discharge requirements.

F. Any additional comments about your treatment plant or collection system? (Attach additional sheet if necessary.)

POINT CALCULATION TABLE

Fill in the values from parts 1 through 7 in the columns below. Add the numbers in the left column to determine the point total that the wastewater system has generated for the previous year.

	Actual Values	Actual Values	Maximum
Part 1:	Influent Flow/Loadings	<u>0</u>	80 Points
Part 2:	Effluent Quality/Plant Performance	<u>0</u>	100 Points
Part 3:	Age of WWTP	<u>50</u>	50 Points
Part 4:	Overflows and Bypasses	<u>50</u>	100 Points
Part 5:	Ultimate Disposition of Sludge	<u>0</u>	100 Points
Part 6:	New Development	<u>0</u>	30 Points
Part 7:	Operator Certification Training	<u>0</u>	100 Points
TOTAL POINTS			<u>100</u>

ATTACHMENT 3

SAMPLE MWPP RESOLUTION

Resolved that the city/town _____ informs Louisiana Department of
of _____
Environmental Quality that the following actions were taken by
the _____ (governing
----- **body**).

1. Reviewed the Municipal Water Pollution Prevention Environmental Audit Report which is attached to this resolution.
2. Set forth the following actions necessary to maintain permit requirements contained in the Louisiana Water Discharge Permit System (LWDPS) number _____

(Please be specific in listing the actions that will be taken to address the problems identified in the audit report.)

a.

b.

c.

d.

etc.

Passed by a majority/unanimous (circle one) vote of the

(date).

CLERK