

## EMS CASE STUDY #1

### **KENT COUNTY DEPARTMENT OF PUBLIC WORKS**

#### ***Wastewater Treatment Facility***

##### **Organizational Profile/Background**

Kent County is in the middle of Delaware's three counties. It is the smallest of the three having a population of approximately 134,000. The major city in the county, Dover (which is the second largest city in Delaware), also serves as the state capital. Kent County is bounded to the north by New Castle County, to the south by Sussex County, to the west by Maryland, and to the east by the Delaware River and Delaware Bay. The county is a mix of industry, regional commercial banking and retail, farming, and numerous bedroom communities for nearby Wilmington, DE and Philadelphia, PA. Major activity areas within the county include a state park, Dover Air Force Base, Dover Downs, the Delaware State Fairgrounds complex, and several significant industries who discharge into the county wastewater system.

Kent County is a commissioner-based, county manager operated government. It consists of three major departments and several smaller departments. The major departments are Public Safety, Planning, Parks and Recreation and Public Works. The County has over 250 employees within these three and several smaller departments. Included within the Public Works Department is a 16 MGD wastewater treatment plant that treats most of the wastewater in the county, over fifty pump stations and nearly 50 miles of gravity sewer and force main, and management of County owned buildings. The wastewater that enters the Kent County regional system comes from five municipal contract users and ten significant industrial users. The City of Harrington operates a separate advanced wastewater treatment facility.

An on-site private contractor, K-F Environmental Technologies, Inc., treats and facilitates land application of a Class A biosolids. Kent County and K-F currently treat the biosolids from the Harrington facility and will shortly be contracted to land apply the biosolids on County-owned property.

##### **NATIONAL PILOT PROJECT PARTICIPATION**

The Kent County Department of Public Works decided to implement their EMS through the 3<sup>rd</sup> *EMS Initiative for Public Entities*, a U.S. EPA supported national pilot project facilitated by the Global Environment & Technology Foundation ([www.getf.org](http://www.getf.org)). During the initial stages of participation and EMS implementation, Kent County also decided to join the National Biosolids Partnership program which allowed the organization to follow the implementation plan of the EMS Initiative and include their biosolids partner operations.

Since August 1997, 32 public entities have benefited from environmental management system (EMS) implementation thanks to their participation in three "EMS Initiatives for Local Government Entities" initiatives. The initiatives were made possible through a cooperative agreement between the U.S. Environmental Protection Agency (EPA) and

the Global Environment & Technology Foundation (GETF). The initiatives tested the applicability and benefit of an EMS on environmental performance, pollution prevention, and stakeholder involvement in government operations. Participant organization's have included ports, universities, utilities, wastewater treatment, and others further promoting EPA's overall policy to actively promote adoption of EMSs in key sectors. For more information on these initiatives please visit [www.getf.org/projects/muni.cfm](http://www.getf.org/projects/muni.cfm).

The goal of the National Biosolids Partnership (NBP) EMS Demonstration Program, a not-for-profit alliance formed in 1997 between the Association of Metropolitan Sewerage Agencies (AMSA) and Water Environment Federation (WEF), with advisory from the U.S. Environmental Protection Agency (EPA), is to advance environmentally sound and accepted biosolids management practices. A central component of this effort is a national EMS pilot program involving over 100 participants throughout the nation. For more information see [www.biosolids.org](http://www.biosolids.org).

### EMS FENCELINE SELECTED

Kent County selected the wastewater treatment facility and collection system as their initial EMS fenceline. The Department of Public Works maintains and operates the regional wastewater collection and treatment system, building maintenance and engineering functions to support both. The regional system serves 70% of the Kent County population through a 16 MGD wastewater treatment plant, collection system consisting of fifty-nine pump and lift stations, and over forty-five miles of force main and main sewer lines.

This select area of operations currently employs thirty-nine staff with an additional fourteen engineering staff that have some responsibilities related to wastewater operations. This selection offers a unique opportunity to promote a public/private partnership, since the biosolids portion of the wastewater facility is owned and operated by K-F Environmental Technologies, Inc. After biosolids treatment, the material referred to as Kentorganite is turned back to the County for application on local farmland as a fertilizer and soil amendment.



## KEY REASONS FOR IMPLEMENTING AN EMS

Kent County sought to implement an EMS because the county not only wanted to be a better environmental steward, but also wanted to reduce its emissions, improve operational safety, and optimize both its resources and the quality of the system's byproducts. The following were initial goals defined by the organization:

### KENT COUNTY EMS ORGANIZATIONAL GOALS

1. Maintain compliance with all permits (NPDES, CAA, Biosolids, etc.).
2. Reduce emissions into air, water, etc.
3. Optimize nutrient loading from Kentorganite on local farms.
4. Improve plant safety.
5. Optimize the use of operational resources (funds, personnel, etc.).
6. Be in a better fiscal shape to lower bond and insurance costs.
7. Build a better working relationship with K-F Environmental Technologies (biosolids contractor).
8. Be an EMS leader within the State of Delaware and Kent County, particularly with respect to other governmental agencies and local industries.
9. Be a better environmental steward.
10. Improve relationships with general community and other interested stakeholders.
11. Be better able to handle job succession issues such as the transfer of "Tribal" Knowledge".
12. Receive third party certification under ISO 14001 and 18001, and the NBP program.

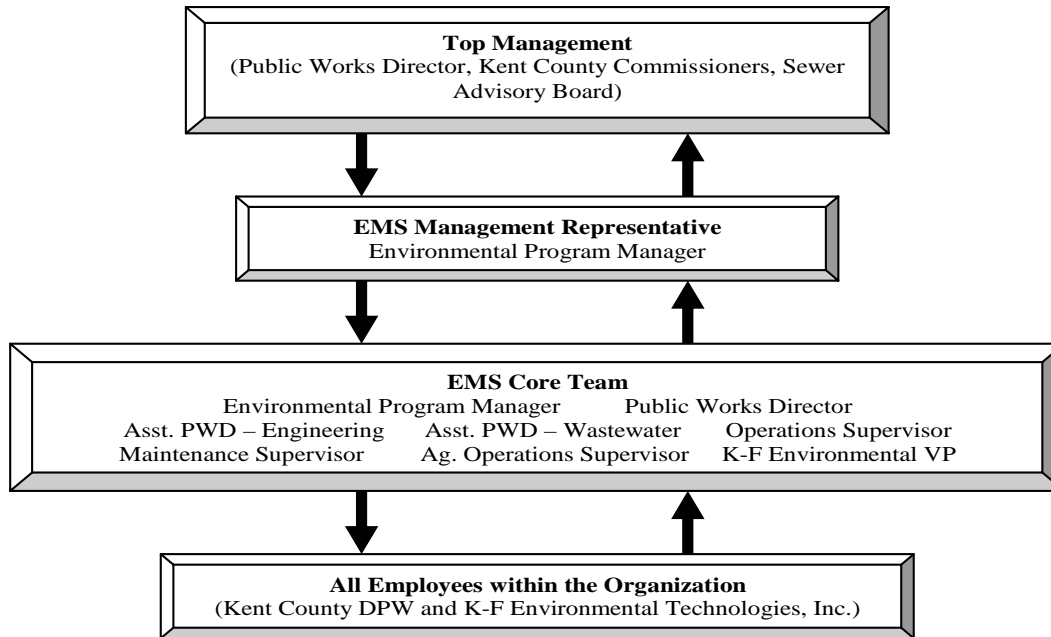
## EMS CORE TEAM STRUCTURE

Kent County initially recruited personnel for their EMS Core Team by placing "teaser" posters about EMS in order to promote curiosity and interest. This also served as a valuable awareness building tool within the organization. Based upon responses, management gauged the level of interest and defined the initial Core Team. The EMS core team is made up of eight members, including area managers from each distinct operational area, with the Environmental Program Manager designated as the EMS Project Manager or "Environmental Management Representative (EMR)". Top management is actively involved in all core team activities, including regular participation by the Public Works Director and Assistant Public Works Director.



Kent County selected Jim Newton, Environmental Program Manager, to lead the EMS implementation. Mr. Newton holds a bachelor's degree in engineering science and master's degrees in both engineering science and civil engineering. Mr. Newton joined Kent County in 2002 and became the internal champion for EMS implementation from past experience within a chemical engineering company. Prior to EMS implementation, Mr. Newton's responsibilities included tracking new and revised regulations, revising the County Standards and Code, pretreatment coordination, and managing the County's Fats, Oils, and Grease (FOG) Program. Mr. Newton has over 27 years of professional experience and is a licensed environmental engineer in 14 states.

The following EMS chart details the basic team structure:




**ENVIRONMENTAL POLICY**

Kent County developed their initial Environmental Policy after a year of EMS implementation, opting to defer until after the environmental aspects and impacts were identified. This is an approach that many organizations have selected, which allows an organization to develop a more specific Environmental Policy, one that truly captures the mission and unique characteristics of a particular organization.

In this case, Kent County developed a combined policy that included a clear commitment to include their biosolids operations and comply with the NBP Code of Good Practice. As part of the first round EMS Management Review, the County decided to expand their EMS to include Safety and Health as well. When this decision was confirmed, they rightly decided to review their policy and add in the expanded commitment to safety and health and ensure that the new policy was officially signed by the Levy Court (see p. 28 for a copy of the Policy).

**Environmental/Biosolids Policy**



- Comply with regulations and NBP Code of Good Practice
- Have an environmental/biosolids vision
- Improve continuously
- Readily share information
- Practice pollution prevention

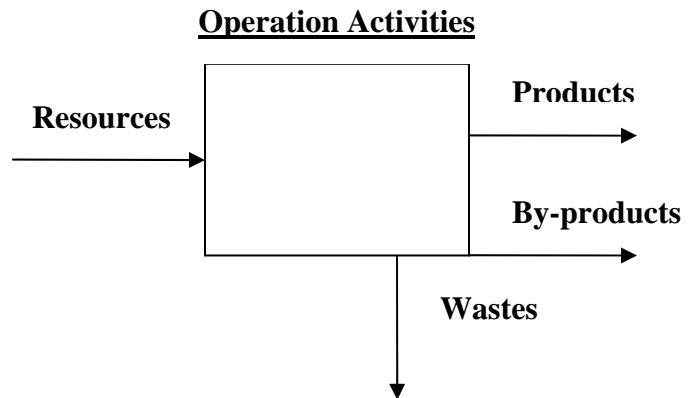
Adopted by Levy Court on December 9, 2003

**SIGNIFICANT ASPECTS & IMPACTS**

The Environmental Aspect and Impact element of EMS implementation is the step where organization’s asses the operations, services, and activities within their EMS fenceline and identify how each positively and negatively affects the environment. The

result is most commonly a list of environmental aspects (how you interact with the environment) and impacts (actual impact on the environment) that helps an organization visualize their “environmental footprint” and focus in on the most significant impacts. Kent County utilized a systematic approach to identifying their significant aspects and impacts, which included shared responsibility among each member of the Core Team. The County took the following steps in the aspect identification process:

1. Each area manager was tasked to identify all activities that occurred under his/her direction. In doing so, each manager was asked to fill out an Input/Output diagram for each central activity. This approach allows for easy identification of impacts, waste, and byproducts. Area managers used operations personnel to assist in preparation of the I/O charts as they are the people that conduct activities and know them “in and out”.



2. The EMS Core Team, as a group, conducted a review of submitted I/O diagrams and developed a list of aspects relevant to each activity. The lists of activities and associated aspects were put together into a single table, which resulted in a list of 95 total environmental aspects.

3. Environmental impacts were identified and ranked for each individual aspect based upon the following list:

- Changes in air quality
- Changes in water quality
- Direct exposure to agent
- Changes in habitat
- Nuisance (including odor)
- Conserves/depletes resources
- Frequency/probability
- Regulated
- Critical control point (NBP designation)
- Recently added Energy, and Health and Safety as additional factors to be included in rankings.



4. The Core Team determined the significance of each environmental aspect by using the best professional judgment with respect to the impacts associated with each aspect, assigning a value from 0-5 for each aspect (with 0 being no impact and 5 being major impact). Where there was disagreement between the Core Team, they used an average score. A regulated activity received a ranking of 5 within that impact area and an unregulated received a 0. Because of Kent County’s simultaneous involvement in the National Biosolids Program, Critical

Control Points (CCP), as defined by the program guidelines, received an additional rating of 3 and non-CCP received a rating of 0.

The initial ranking of aspects was conducted by the Environmental Management Representative for efficient use of the Core Team member's time. The Core Team then met to evaluate and "truth test" the rankings of all environmental aspects and determine which should be designated "significant".

Based upon the Core Team discussions, Kent County designated the following as their initial significant aspects:

<b>Environmental Aspects</b>
Spreading of Kentorganite
Running dryer scrubber
Running dryer boiler
Kentorganite spills
Sanitary sewer overflows – force mains
Running the dryer
Sanitary sewer overflows – pump stations
Changing chlorine cylinders

### EMS OBJECTIVES, TARGETS, AND PROGRAMS

Based upon the identification of significant environmental aspects, Kent County developed the following Objectives, Targets, and Programs to promote and measure environmental performance.

#### **Objective: Reduce air pollution**

<b>Target</b>	<b>Program(s)</b>
Reduce sulfur, particulate and CO emissions by 50% from CY 2002 levels	<ul style="list-style-type: none"> <li>▪ Develop Operational Controls for Biosolids Operations focused upon consistency in process among all shifts.</li> <li>▪ Replace 75% of Diesel Usage with Biodiesel in Operating Equipment.</li> <li>▪ Replace Emergency Generator Diesel Fuel with Biodiesel.</li> <li>▪ Obtain approval from state regulatory agency (DNREC) to allow generator load sharing.</li> <li>▪ Replace Dryer Diesel Fuel with Bio-Fuel Made from Grease</li> </ul>

Target	Program(s)
	Trap Waste or Biodiesel.

**Objective: Reduce energy consumption**

Target	Program
Reduce electricity usage by 20% from CY 2002 levels	<ul style="list-style-type: none"> <li>▪ Enroll in EPA Green Lights Program.</li> <li>▪ Obtain approval from state regulatory agency (DNREC) to allow generator load sharing.</li> <li>▪ Upgrade to more Energy Efficient Pumps, Lights, etc.</li> <li>▪ Seek Renewable Energy Alternatives such as Wind.</li> </ul>

**Objective: Reduce or eliminate effects of chlorine and sulfur dioxide**

Target	Program
Improve safety of existing processes or switch to an alternative disinfection method	<ul style="list-style-type: none"> <li>▪ Develop Operational Controls for Current System.</li> <li>▪ Evaluate Chlorine Hazard Potential</li> <li>▪ Hire Consultant to look at Cost Effective Alternatives</li> <li>▪ Develop Plans for Alternatives or Ways to Improve Safety of Current Systems</li> <li>▪ Budget Finances</li> <li>▪ Secure Financing</li> <li>▪ Operate</li> </ul>

**Objective: Reducing sanitary sewer overflows**

Target	Program
Reduce SSOs by 40% from CY 2002 levels	<ul style="list-style-type: none"> <li>▪ Develop System to Document Sources of SSOs.</li> <li>▪ Implement Fats, Oils, Grease (FOG) Program.</li> <li>▪ Develop Action Plans to Reduce or Eliminates SSOs.</li> <li>▪ Develop CMOM Program.</li> </ul>

**BENEFITS OF ADOPTING AN EMS**

**Energy Savings**

Kent County's annual electric bill exceeds \$600,000 and they want the EMS to reduce their electric load. Under serious consideration is installing a renewable energy system using wind to replace electricity generated by local power plants. The County is currently in the process of collecting a year's worth of wind data to fully assess the project's potential. The County is also pursuing the construction of an on-site bio-gas facility with a local cooperative partner and generator load sharing.

**Expected Benefits:**

- Reduce the plant's electric costs by \$200,000 - \$300,000 per year.
- Reduce air pollution by 5 million pounds of CO<sub>2</sub> per year, the equivalent of taking 500 cars off the road, as measured at the power plants generating the electricity that has been deferred.

**Employee Succession**

Like many wastewater agencies throughout the U.S., Kent County has several operators that have been on staff for over 30 years. The County estimates that one-third of the workforce, with decades of practical experience, will retire in the next five years. The EMS ensures regular training, transfer of "tribal" knowledge from long time staff to new employees, and consistency in best management practices among all shifts. Kent County has successfully recorded critical processes or activities via flow charts, work instructions, diagrams, and even photographs! In addition, this presented a great learning opportunity for the EMR and Core Team members to learn the in's and out's of the organization's activities. A part-time EMS intern shadowed employees conducting covered activities, asked questions about procedures, drafted operational controls and standard operating procedures, and truth tested them with employees.

**Reduction in Air Pollution**

Kent County has switched from Fuel Oil No. 2 to B20 biodiesel as a fuel source for its emergency generators and is considering a switch to B20 for all of its diesel fleet and potentially as the primary fuel for its biosolids heating system. Collectively, the County uses approximately 300,000 gallons of fuel per year.

**Expected Benefits:**

- 20% reduction in hydrocarbon emissions.
- 12% reduction in carbon monoxide emissions.
- 12% reduction in particulate emissions.

**Improvements in the Chlorine Delivery System and Management**

The EMS has established controls for the operation of the chlorination/dechlorination system operating at the plant, ensuring that chlorine and sulfur dioxide cylinders are changed out using the same process for all three shifts providing the most employee and public health protection possible. The EMS has begun to evaluate alternatives to the current system as a part of its continuous improvement program. The controls utilize "Tribal" knowledge gained by operators who currently have 25-30 years experience to ensure that the operation meets all standards.



### Sanitary Sewer Overflow Reductions

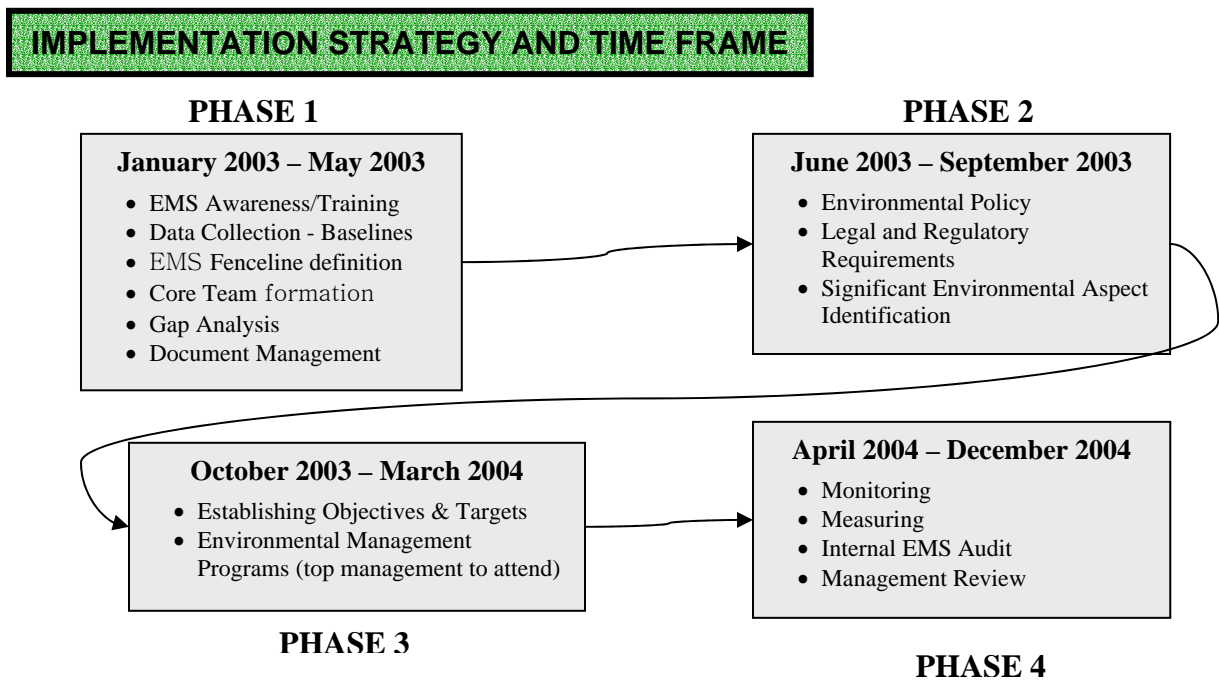
Sanitary sewer overflows (SSOs) are a serious problem operating any sewage collection system. The EMS has helped to emphasize the importance of reducing these events. A fats, oils and grease (FOG) reduction program has been established within County Sanitary Code requiring food service providers to acquire a permit for grease traps and interceptors. For 2004, an 85% reduction in SSOs from 2002 levels has occurred.

### Improved Public Image

Another benefit of the EMS program has been improved public visibility of the treatment plant. The plant was awarded a National Association of Counties (NACo) 2004 Achievement Award, placed second in the 2004 Clean Water Act Recognition Awards for its Pretreatment Program, and was named one of five Facilities of the Year by Environmental Protection magazine for its FOG program. A website that provides information on the EMS has had approximately 1,000 visitors. Representatives of the department have given numerous presentations at regional and national conferences about the EMS. A local citizens committee has been established to oversee the EMS and provide input into the EMS targets and objectives.

### Be an EMS leader within Delaware and Region

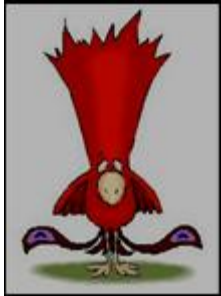
As a result of participation in the EMS, the County has made numerous presentations on the program. The presentations have included several Water Environment Federation (WEF) conferences including the Biosolids Specialty Conference and WEFTEC. Representatives of the County serve on the WEF EMS Committee, have served on the Steering Committee for a major EPA publication regarding EMS development and implementation at wastewater facilities, and assisted with an EMS training session sponsored by the Delaware Dept. of Natural Resources and Control (DNREC) promoting EMSs at other public agencies. The County has established a web page devoted to the EMS that includes Adobe Acrobat versions of the major EMS procedures.



As a participant in two national pilot projects, the 3<sup>rd</sup> EMS Initiative for Public Entities and the National Biosolids Partnership, Kent County followed a structured approach to EMS implementation. The basic approach was broken down into 4 distinct faces, with each phase requiring completion of detailed tasks and documentation, over a 24 month period. The County started implementation in January 2003 and complete their initial internal audit and management review in late December 2004.

## OUTREACH

Kent County has made external communication a central component of their EMS implementation, utilizing the following main strategies:

- 1) **EMS Graphic Identity:** To promote consistent recognition and give the EMS efforts an identity, the County developed a cartoon figure called CHIRP. The word is an acronym that forms the basis of their Environmental Policy. This mascot has since been used on all EMS related internal and external outreach, including on coffee mugs, mouse pads, magnets, brochures, the website, etc...
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- 2) **Sewer Advisory Board:** The Board is made up of citizen representatives with the responsibility of advising the Commissioner on sewer-related issues. Kent County leveraged the existence of this group and designated them as the County's Public Awareness Committee for their EMS under the National Biosolids Program. The county provides monthly updates to the Board during scheduled meetings and has conducted EMS awareness training to promote thorough understanding and communication.
  - 3) **EMS Website:** The County developed, during the relatively early stages of EMS implementation, a website devoted to their EMS related efforts. On this website, the interested parties can find updated information including the Environmental Policy, EMS procedures, presentations, lists of significant aspects, objectives and targets, and benefits. The site provides a central clearinghouse of information for both internal and external purposes, [http://www.kentcountypw.com/kent\\_county\\_environmental\\_manage.htm](http://www.kentcountypw.com/kent_county_environmental_manage.htm).

## RESOURCES REQUIRED TO IMPLEMENT/MAINTAIN THE EMS

**Internal Labor** -- One complete cycle of EMS implementation, over a 24-month period, required Kent County to commit 2,985 total direct labor hours at a cost of approximately \$101,681. This number represents the direct labor hours employees performed in addition to their regular duties

**ISO Registrations and Audits** -- Kent County plans to pursue ISO 14001 (Environmental Management System) and 18001 (Occupational Safety and Health) Registration by Fall 2005, as well as certification to the National Biosolids Program Guidelines. Based on the costs incurred by other local governments and initial estimates from the selected auditor, Kent County estimates the registration process will

cost approximately \$30,000 for a 3-year combined (ISO 14001, 18001, and NBP) audit cycle (\$15,000 for the ISO 14001/18001 and \$15,000 for the NBP).

**Other Material Costs** -- Kent County spent approximately \$3,237 on other materials during implementation including EMS software, promotional materials (i.e., magnets and mugs), and graphics. Participation in the national EMS pilot project also required travel and related costs for workshop participation.

### 3<sup>RD</sup> PARTY VERIFICATION

The County will seek third party certification for its EMS not only through ISO 14001 registration, but as a member of the National Biosolids Partnership in November 2005. The county is also working to integrate occupational safety and health measures to meet the ISO 18001 Standard, which would offer an additional registration and recognition opportunity. This decision was reflective of a direct recommendation from Levy County Court to expand the original scope of the EMS to include health and safety. The County is currently setting their sites on a combined, single external audit that will cover all three elements of their management system. Kent County has selected a firm with the unique capability of providing auditing services that meet the ISO 14001, ISO 18001, and National Biosolids Program guidelines.

*"The benefit of having third party certification for our EHS-MS program is to add legitimacy to it in the eyes of our employees, constituents and the general public. It makes no sense to expend the resources to develop and implement the EHS-MS program and not add a way to show it is more than just a program of the month. The cost of the audits are outweighed by the goodwill and credibility gained through them."*

Jim Newton  
Environmental Program Manager

### KEYS TO SUCCESS/BARRIERS/LESSONS LEARNED

Kent County's EMS implementation was characterized by a high level of commitment up, down, and throughout the organization, which was maintained from beginning to end. Like many organizations, Kent County found that achieving and maintaining momentum behind the EMS was the key to success. During the interview for this case study, Jim Newton, Environmental Management Representative, commented that "establishing momentum towards accomplishing the tasks was critical. It's like rolling a boulder down the hill. It takes quite a bit of effort to begin to make it roll, but it quickly gathers momentum as it rolls." Kent County also found that communication is essential to all involved in EMS implementation, including outside contractors. Realizing this early on and because their unique approach to EMS included a private, on-site partner, Kent County included outside contractors on their Core Team.

*"The EMS has helped us improve internal communication, problem detection and solution, teamwork, expedited decision making and job/task completion. It is time consuming, but also has its numerous rewards."*

Reinhold Betschel  
Assistant Public Works Director –  
Wastewater Facilities



### **Top 3 Keys to Success**

1. Active senior management support. Kent County's Assistant Public Works Director participated in nearly every Core Team meeting and was instrumental in decision-making. In addition, the Public Works Director was also actively involved attending several Core Team meetings, training sessions, and conducting community outreach. Whenever the EMR called on them their support was there.
2. Committed Core Team that understood the program and desired to see it completed.
3. Participating in the U.S. EPA supported national initiative and NBP Program allowing Kent County to learn from prior participants and utilize the knowledge and guidance provided by GETF technical assistants.



### **Top 3 Barriers**

1. It is important not to take too long to "roll out" the program and implement the EMS. The first cycle should take 1.5-2 years. Early momentum is key. Kent County utilized an early poster campaign to spark interest among staff and followed this up with active engagement of the Core Team. The EMRs enthusiasm for the program also resonated throughout the organization.
2. It proved more difficult than originally expected to facilitate the private-public partnership and to keep all team members on the same page and committed. Kent County's private partner, K-F Environmental, Inc., remained supportive throughout the implementation, attending workshops and meetings, but faced difficulty due to high intensity, limited staff required operations.
3. Many organizational layers have to agree to participate in the program, internal and external. The Directors awareness and active involvement were important, especially in promoting the program to the County Board and advisory committee. Additionally, the organization made a good decision to include area manager's on the Core Team which created direct communication links throughout the organization.



### **Top 3 Lessons Learned**

1. It's important to undertake the project using the assistance of practitioners and experienced technical assistance providers and take advantage of Federal and/or state supported programs. Kent County participated in the 3<sup>rd</sup> EMS Initiative for Public Entities and the National Biosolids Partnership program, both

national EMS pilot projects supported by the U.S. Environmental Protection Agency.

2. Active senior management involvement throughout the project, even before implementation actually begins, such as participation on the Core Team.
3. The EMR or a representative (such as our EMS Intern) must interact with team members on an almost daily basis, especially during the first stages of EMS implementation. Kent County relied heavily, especially during the second year of implementation, on the assistance of an intern that happened to be studying towards her masters in the use of EMS as a management tool. With a flexible schedule, the intern was able to spend quality time with individual team members, identifying and detailing critical steps in controlling environmental impacts. In addition, the close working relationships resulted in EMS dialogue and awareness building throughout the staff.

#### **NEXT STEPS**

Kent County will continue developing its EMS and advance its environmental targets. The County will seek third party certification for its EMS not only through ISO 14001 registration, but as a member of the National Biosolids Partnership in November 2005. The county is also working to integrate safety and health measures to meet the ISO 18000 standards, which would offer an additional registration and recognition opportunity. In addition, the County continues to look for opportunities to promote EMS and showcase their achievements throughout the region.

Kent County is also in the development stage of a program referred to as the Pretreatment Environmental Excellence Program (PEEP), which will potentially offer regulated industries an opportunity for reduced sampling, fines, and application fees, as well as recognition awards for installing an EMS to cover pretreatment operations.

In addition, Kent County has formed a Pretreatment Advisory Workgroup (PAW) in order to continue outreach for the EMS to interested stakeholders.

#### **ADDITIONAL INFORMATION**

For additional information on Kent County's EMS experience and progress, please contact:

Jim Newton  
139 Milford Neck Road  
Milford, Delaware 19963  
302-335-6000  
[james.newton@co.kent.de.us](mailto:james.newton@co.kent.de.us)

In addition, Kent County maintains an up-to-date website devoted solely to their EMS implementation:

[http://www.kentcountypw.com/kent\\_county\\_environmental\\_manage.htm](http://www.kentcountypw.com/kent_county_environmental_manage.htm).

Kent



County

Commission Members  
David R. Burris, President  
Ronald D. Smith, Vice-President  
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Donald A. Blakey, Ph.D.  
Richard E. Ennis  
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## Levy Court

414 Federal Street  
Dover, Delaware 19901-3615  
(Handicapped Accessible)  
(302) 744-2305  
FAX (302) 736-2279

### **Environmental/Health and Safety/Biosolids Policy.**

- A. The Kent County Levy Court commits to reduce the impact of its operations on the environment, by adopting the International Organization for Standardizations (ISO) 14001 Environmental Management Systems standards, the International Organization for Standardizations (ISO) OSHAS 18001 Occupational Health and Safety Management Systems standards, and the National Biosolids Partnership (NBP) Code of Good Practice for the wastewater collection and treatment facility operations directed by the Department of Public Works. In addition, the Levy Court requires all public works contractors employed at the covered facilities to abide by this Policy to the maximum extent practicable.
- B. The Levy Court commits to:
- (1) Comply with all applicable environmental laws and regulatory requirements, to the NBP Code of Good Practice, appropriate occupational health and safety practices, and any other requirements to which the organization subscribes;
  - (2) Have an environmental, health and safety and biosolids vision and mission, then develop/achieve the objectives and targets to implement this mission;
  - (3) Improve continuously, through the EHS-MS, the management of the environment, employee health and safety, wastewater effluent and biosolids product;
  - (4) Readily share its wastewater operations, health and safety, and biosolids information with interested stakeholders; and
  - (5) Promote pollution prevention activities, including energy conservation, and appropriate health and safety practices.

David R. Burris  
President, Kent County Levy Court

Mar 31, 05  
Date

“Serving Kent County With Pride”