

Audit Report

12 Month Surveillance Audit for

Ontario Clean Water Agency for the City of Kawartha Lakes

1634181-02

Audited Address: 322 Kent Street, Lindsay, Ontario, CAN, K9V 5R8

Start Date: Apr 21, 2022 End Date: Apr 22, 2022

Type of audit - Surveillance System Audit

Issue Date: Apr 22, 2022

Revision Level: *Final*

BACKGROUND INFORMATION

SAI Global conducted an audit of Ontario Clean Water Agency for the City of Kawartha Lakes beginning on Apr 21, 2022 and ending on Apr 22, 2022 to DRINKING WATER QUALITY MANAGEMENT STANDARD VERSION 2 - 2017.

The purpose of this audit report is to summarise the degree of compliance with relevant criteria, as defined on the cover page of this report, based on the evidence obtained during the audit of your organization. This audit report considers your organization's policies, objectives, and continual improvement processes. Comments may include how suitable the objectives selected by your organization appear to be in regard to maintaining customer satisfaction levels and providing other benefits with respect to policy and other external and internal needs. We may also comment regarding the measurable progress you have made in reaching these targets for improvement.

SAI Global audits are carried out within the requirements of SAI Global procedures that also reflect the requirements and guidance provided in the international standards relating to audit practice such as ISO/IEC 17021-1, ISO 19011 and other normative criteria. SAI Global Auditors are assigned to audits according to industry, standard or technical competencies appropriate to the organization being audited. Details of such experience and competency are maintained in our records.

In addition to the information contained in this audit report, SAI Global maintains files for each client. These files contain details of organization size and personnel as well as evidence collected during preliminary and subsequent audit activities (Documentation Review and Scope) relevant to the application for initial and continuing certification of your organization.

Please take care to advise us of any change that may affect the application/certification or may assist us to keep your contact information up to date, as required by SAI Global Terms and Conditions.

This report has been prepared by SAI Global Limited (SAI Global) in respect of a Client's application for assessment by SAI Global. The purpose of the report is to comment upon evidence of the Client's compliance with the standards or other criteria specified. The content of this report applies only to matters, which were evident to SAI Global at the time of the audit, based on sampling of evidence provided and within the audit scope. SAI Global does not warrant or otherwise comment upon the suitability of the contents of the report or the certificate for any particular purpose or use. SAI Global accepts no liability whatsoever for consequences to, or actions taken by, third parties as a result of or in reliance upon information contained in this report or certificate.

Please note that this report is subject to independent review and approval. Should changes to the outcomes of this report be necessary as a result of the review, a revised report will be issued and will supersede this report.

Standard: DRINKING WATER QUALITY MANAGEMENT STANDARD VERSION 2 - 2017

Scope of Certification: Full Scope – Entire DWQMS

Drinking Water System Owner: City of Kawartha Lakes

Operating Authority: Ontario Clean Water Agency

Owner: City of Kawartha Lakes

Population Served: 11665

Activities: Treatment

Drinking Water Systems

- Birchpoint Estates Drinking Water System (license # 141-109)
- Bobcaygeon Drinking Water System (license # 141-105)
- Canadiana Shores Drinking Water System (license # 141-112)
- Fenelon Falls Drinking Water System (license # 141-104)
- Janetville Drinking Water System (license # 141-111)
- Kings Bay Drinking Water System (license # 141-119)
- Kinmount Drinking Water System (license # 141-121)
- Manorview Drinking Water System (license # 141-118)
- Mariposa Estates Drinking Water System (license # 141-117)
- Norland Drinking Water System (license # 141-103)
- Omeme Drinking Water System (license # 141-108)
- Pinewood Drinking Water System (license # 141-110)
- Pleasant Point Drinking Water System (license # 141-113)
- Southview Drinking Water System (license # 141-101)
- Victoria Place Drinking Water System (license # 141-114)
- Western Trent/Palmina Drinking Water System (license # 141-102)
- Woodfield Drinking Water System (license # 141-116)
- Woodville Drinking Water System (license # 141-115)

Total audit duration: Person(s): 1 Day(s): 1.88

Audit Team Member(s): Team Leader Paul Cartlidge

Audit Report

Definitions and action required with respect to audit findings

Major Non-conformance:

Based on objective evidence, the absence of, or a significant failure to implement and/or maintain conformance to requirements of the applicable standard. Such issues may raise significant doubt as to the capability of the management system to achieve its intended outputs (i.e. the absence of or failure to implement a complete Management System clause of the standard); or

A situation which would on the basis of available objective evidence, raise significant doubt as to the capability of the Management System to achieve the stated policy and objectives of the customer.

NOTE: The "applicable Standard" is the Standard which SAI Global are issuing certification against, and may be a Product Standard, a management system Standard, a food safety Standard or another set of documented criteria.

Action required: This category of findings requires SAI Global to issue a formal NCR; to receive and approve client's proposed correction and corrective action plans; and formally verify the effective implementation of planned activities. Correction and corrective action plan should be submitted to SAI Global prior to commencement of follow-up activities as required. Follow-up action by SAI Global must 'close out' the NCR or reduce it to a lesser category within 90 days for initial certification and within 60 days for surveillance or re-certification audits, from the last day of the audit.

If significant risk issues (e.g. safety, environmental, food safety, product legality/quality, etc.) are detected during an audit these shall be reported immediately to the Client and more immediate or instant correction shall be requested. If this is not agreed and cannot be resolved to the satisfaction of SAI Global, immediate suspension shall be recommended.

In the case of initial certification, failure to close out NCR within the time limits means that the Certification Audit may be repeated.

If significant risk issues (e.g. safety, environmental, food safety, product legality/quality, etc.) are detected during an audit these shall be reported immediately to the Client and more immediate or instant correction shall be requested. If this is not agreed and cannot be resolved to the satisfaction of SAI Global, immediate suspension shall be recommended.

In the case of an already certified client, failure to close out NCR within the time limits means that suspension proceedings may be instituted by SAI Global.

Follow-up activities incur additional charges.

Minor Non-conformance:

Represents either a management system weakness or minor issue that could lead to a major nonconformance if not addressed. Each minor NC should be considered for potential improvement and to further investigate any system weaknesses for possible inclusion in the corrective action program

Action required: This category of findings requires SAI Global to issue a formal NCR; to receive and approve client's proposed correction and corrective action plans; and formally verify the effective implementation of planned activities at the next scheduled audit.

Opportunity for Improvement:

A documented statement, which may identify areas for improvement however shall not make specific recommendation(s).

Action required: Client may develop and implement solutions in order to add value to operations and management systems. SAI Global is not required to follow-up on this category of audit finding.

Audit Type and Purpose

Surveillance Audit:

A systems desktop audit in accordance with the systems audit procedure as it applies to Full Scope accreditation. The audit also included consideration of the results of the most recent audit undertaken in accordance with this Accreditation Protocol and any of the following that have occurred subsequent to that audit including but limited to;

- (a) the results of any audits undertaken in accordance with element 19 of the DWQMS V2;
- (b) historical responses taken to address corrective action requests made by an Accreditation Body;
- (c) the results of any management reviews undertaken in accordance with element 20 of the DWQMS V2; and,
- (d) any changes to the documentation and implementation of the QMS.

Audit Objectives

The objective of the audit was to determine whether the drinking water Quality Management System (QMS) of the subject system conforms to the requirements of the Ontario Ministry of the Environment & Climate Change (MOECC) Drinking Water Quality Management Standard (DWQMS V2).

The audit was also intended to gather the information necessary for SAI Global to assess whether accreditation can continue or be offered or to the operating authority.

Audit Scope

The facilities and processes associated with the operating authority's QMS were objectively evaluated to obtain audit evidence and to determine a) whether the quality management activities and related results conform with DWQMS V2 requirements, and b) if they have been effectively implemented and/or maintained.

Audit Criteria:

- The Drinking Water Quality Management Standard Version 2
- Current QMS manuals, procedures and records implemented by the Operating Authority
- SAI Global Accreditation Program Handbook

Confidentiality and Documentation Requirements

The SAI Global stores their records and reports to ensure their preservation and confidentiality. Unless required by law, the SAI Global will not disclose audit records to a third party without prior written consent of the applicant. The only exception will be that the SAI Global will provide audit and corrective action reports to the Ontario Ministry of the Environment. For more information, please refer to the SAI Global Accreditation Program Handbook.

As part of the SAI Global Terms, it is necessary for you to notify SAI Global of any changes to your Quality Management System that you believe are significant enough to risk non-conformity with DWQMS V2: For more information, please refer to the SAI Global Accreditation Program Handbook.

Review of any changes

Changes to the Operating Authority since last audit include: none identified

EXECUTIVE OVERVIEW

Based on the results of this surveillance system audit the management system remains effectively implemented and meets the requirements of the standard relative to the scope of certification; therefore, a recommendation for continued certification will be submitted.

Recommendation

Based on the results of this audit it has been determined that the management system is effectively implemented and maintained and meets the requirements of the standard relative to the scope of certification identified in this report; therefore, a recommendation for continued certification will be submitted to SAI Global review team.

Opportunities for Improvement:

The following opportunities for improvement have been identified.

- Element 8 - Consider updating Risk Assessment Outcomes as soon as possible to include Cybersecurity risks as described in the updated "Potential Hazardous Events for Municipal Residential Drinking Water Systems" released on April 13, 2022.

It is suggested that the opportunities for improvement be considered by management to further enhance the Operating Authority's Quality Management System and performance.

Management System Documentation

The management systems operational plan was reviewed and found to be in conformance with the requirements of the standard.

Management Review

Records of the most recent management review meetings were verified and found to meet the requirements of the standard. All inputs were reflected in the records, and appear suitably managed as reflected by resulting actions and decisions.

Internal Audits

Internal audits are being conducted at planned intervals to ensure conformance to planned arrangements, the requirements of the standard and the established management system.

Corrective, Preventive Action & Continual Improvement Processes

The Operating Authority is implementing an effective process for the continual improvement of the management system through the use of the quality policy, quality objectives, audit results, data analysis, the appropriate management of corrective and preventive actions and management review.

Summary of Findings

1. Quality Management System	Conforms
2. Quality Management System Policy	Conforms
3. Commitment and Endorsement	Conforms
4. Quality Management System Representative	Conforms
5. Document and Records Control	Conforms
6. Drinking-Water System	Conforms
7. Risk Assessment	Conforms
8. Risk Assessment Outcomes	OFI
9. Organizational Structure, Roles, Responsibilities and Authorities	Conforms
10. Competencies	Conforms
11. Personnel Coverage	Conforms
12. Communications	Conforms
13. Essential Supplies and Services	Conforms
14. Review and Provision of Infrastructure	Conforms
15. Infrastructure Maintenance, Rehabilitation & Renewal	Conforms
16. Sampling, Testing and Monitoring	Conforms
17. Measurement & Recording Equipment Calibration and Maintenance	Conforms
18. Emergency Management	Conforms
19. Internal Audits	Conforms
20. Management Review	Conforms
21. Continual Improvement	Conforms
Major NCR #	Major non-conformity. The auditor has determined one of the following: (a) a required element of the DWQMS has not been incorporated into a QMS; (b) a systemic problem with a QMS is evidenced by two or more minor non-conformities; or (c) a minor non-conformity identified with a corrective action request has not been remedied.
Minor NCR #	Minor non-conformity. In the opinion of the auditor, part of a required element of the DWQMS has not been incorporated satisfactorily into a QMS.
OFI	Opportunity for improvement. Conforms to requirement, but there is an opportunity for improvement.
Conforms	Conforms to requirement.
NANC	Not applicable/Not Covered during this audit.
****	Additional comment added by auditor in the body of the report.

PART D. Audit Observations, Findings and Comments

DWQMS Reference:	1 Quality Management System
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-01 Quality & Environmental Management System, rev. 2, 23-Apr-21
Details: Documented Quality Management System described in the City of Kawartha Lakes Multi Facility Operational Plan. Reviewed and accepted.	

DWQMS Reference:	2 Quality Management System Policy
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-02 Quality & Environmental Management System Policy, rev. 0, 31-Aug-18
Details: Policy Statement describes the Quality Management System – reviewed and accepted. Policy statement was approved by OCWA Board of Directors on April 6, 2016. Reviewed and accepted.	

DWQMS Reference:	3 Commitment and Endorsement
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-03 Commitment and Endorsement, rev. 0, 31-Aug-18
Details: Appendix OP-03A contains written endorsement of the Operational Plan signed by OCWA Managers and City of Kawartha Lakes Manager, Water and Wastewater and Director of Public Works in November 2021. Reviewed and accepted.	

DWQMS Reference:	4 Quality Management System Representative
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-04 Quality & Environmental Management System (QEMS) Representative, rev. 0, 31-Aug-18
Details: The role of QEMS Representative for the CKL DWS is shared between the Kawartha Hub Process and Compliance Technicians (PCT). The Safety, Process and Compliance Manager will act as an alternate QEMS Representative when required. Reviewed and accepted.	

DWQMS Reference:	5 Document and Record Control
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-05 Document and Records Control, rev. 14, 31-Mar-22
Details: Procedure OP-05 reviewed and accepted.	

DWQMS Reference:	6 Drinking Water System
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-06 Drinking Water System, rev. 1, 07-Apr-21 and associated system descriptions
Details: Contents of Drinking Water System Descriptions reviewed and accepted for all systems including: <ul style="list-style-type: none">• OP-06A Birchpoint Estates Drinking Water System Description, revision 7, 08-Apr-21• OP-06B Bobcaygeon Drinking Water System Description, revision 12, 16-Apr-21• OP-06C Canadiana Shores Drinking Water System Description, revision 9, 17-Aug-21• OP-06D Fenelon Falls Drinking Water System Description, revision 12, 15-Apr-21• OP-06E Janetville Drinking Water System Description, revision 7, 08-Apr-21	

- OP-06F Kings Bay Drinking Water System Description, revision 8, 08-Apr-21
- OP-06G Kinmount Drinking Water System Description, revision 9, 15-Apr-21
- OP-06H Manorview Drinking Water System Description, revision 10, 08-Apr-21
- OP-06I Mariposa Estates Drinking Water System Description, revision 8, 08-Apr-21
- OP-06J Norland Drinking Water System Description, revision 9, 15-Apr-21
- OP-06K Omemee Drinking Water System Description, revision 8, 08-Apr-21
- OP-06L Pinewood Drinking Water System Description, revision 9, 08-Apr-21
- OP-06M Pleasant Point Drinking Water System Description, revision 10, 08-Apr-21
- OP-06N Southview Estates Drinking Water System Description, revision 9, 16-Apr-21
- OP-06O Victoria Place Drinking Water System Description, revision 8, 16-Apr-21
- OP-06P Western Trent/Palmina Drinking Water System, revision 9, 16-Apr-21
- OP-06Q Woodfield Drinking Water System Description, revision 7, 08-Apr-21
- OP-06R Woodville Drinking Water System Description, revision 9, 16-Apr-21

DWQMS Reference	7 Risk Assessment
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-07 Risk Assessment, rev. 10, 18-Nov-20
Details: Procedure OP-07 Risk Assessment reviewed and accepted.	

DWQMS Reference:	8 Risk Assessment Outcomes
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-07 Risk Assessment, rev. 10, 18-Nov-20 City of Kawartha Lakes Multi Facility Operational Plan OP-08 Risk Assessment Outcomes, rev. 1, 08-Apr-21
<p>Details: Risk Assessment Outcomes adequately describes all risk, hazards, hazardous events and critical control limits for the Drinking Water System and covers all required risks as described in the MOECC document "Potential Hazardous Events for Municipal Residential Drinking Water Systems". Risk assessment outcomes are current as of March 2021 when new 36-month assessments were performed, along with subsequent minor updates. Reviewed and accepted.</p> <ul style="list-style-type: none"> • OP-08A Birchpoint Estates Summary of Risk Assessment Outcomes, revision 7, 16-Apr-21 • OP-08B Bobcaygeon Summary of Risk Assessment Outcomes, revision 16, 16-Apr-21 • OP-08C Canadiana Shores Summary of Risk Assessment Outcomes, revision 12, 16-Apr-21 • OP-08D Fenelon Falls Summary of Risk Assessment Outcomes, revision 12, 09-Apr-21 • OP-08E Janetville Summary of Risk Assessment Outcomes, revision 9, 16-Apr-21 • OP-08F Kings Bay Summary of Risk Assessment Outcomes, revision 11, 16-Apr-21 • OP-08G Kinmount Summary of Risk Assessment Outcomes, revision 12, 09-Apr-21 • OP-08H Manorview Summary of Risk Assessment Outcomes, revision 11, 16-Apr-21 • OP-08I Mariposa Estates Summary of Risk Assessment Outcomes, revision 11, 16-Apr-21 • OP-08J Norland Summary of Risk Assessment Outcomes, revision 11, 09-Apr-21 • OP-08K Omemee Summary of Risk Assessment Outcomes, revision 10, 16-Apr-21 • OP-08L Pinewood Summary of Risk Assessment Outcomes, revision 10, 16-Apr-21 • OP-08M Pleasant Point Summary of Risk Assessment Outcomes, revision 11, 16-Apr-21 • OP-08N Southview Estates Summary of Risk Assessment Outcomes, revision 13, 16-Apr-21 • OP-08O Victoria Place Summary of Risk Assessment Outcomes, revision 13, 16-Apr-21 • OP-08P Western Trent/Palmina Summary of Risk Assessment Outcomes, revision 7, 09-Apr-21 • OP-08Q Woodfield Summary of Risk Assessment Outcomes, revision 8, 16-Apr-21 • OP-08R Woodville Summary of Risk Assessment Outcomes, revision 15, 07-Dec-21 	

Full Risk Assessments performed for all systems in 2021. Risk Assessment information is also reviewed for currency every calendar year during Management Review. Reviewed and accepted.

Opportunity for Improvement – Consider updating Risk Assessment Outcomes as soon as possible to include Cybersecurity risks as described in the updated “Potential Hazardous Events for Municipal Residential Drinking Water Systems” released on April 13, 2022.

DWQMS Reference:	9 Organizational Structure, Roles, Responsibility and Authorities
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-09 Organizational Structure, Roles, Responsibility and Authorities, rev. 2, 22-Jul-19
Details: Organizational Structure, Roles, Responsibility and Authorities reviewed are adequately described in the Operational Plan. Reviewed and accepted.	

DWQMS Reference:	10 Competencies
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-10 Competencies, rev. 2, 19-Nov-20
Details: Procedure OP-10 reviewed and accepted.	

DWQMS Reference:	11 Personnel Coverage
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-11 Personnel Coverage, rev. 12, 19-Nov-20
Details: Procedure OP-11 reviewed and accepted.	

DWQMS Reference:	12 Communications
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-12 Communications, rev. 5, 31-Aug-18
Details: Procedure OP-12 reviewed and accepted.	

DWQMS Reference:	13 Essential Supplies and Services
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-13 Essential Supplies and Services, rev. 7, 31-Aug-18
Details: Procedure OP-13 Essential Supplies and Services describes the requirements for contractors, water testing services, calibration services, chemical supplies and process components and the controls placed on these companies. Essential Supplies and Services List, rev. 22, 30-Mar-2022 contains a list of all companies. Reviewed and accepted.	

DWQMS Reference:	14 Review and Provision of Infrastructure
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-14 Review and Provision of Infrastructure, rev. 4, 31-Aug-18
Details: Procedure OP-14 reviewed and accepted.	

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DWQMS Reference:	15 Infrastructure Maintenance, Rehabilitation and Renewal
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-15 Infrastructure Maintenance, Rehabilitation and Renewal, rev. 0, 31-Aug-18
Details: Procedure OP-15 reviewed and accepted.	

DWQMS Reference:	16 Sampling, Testing and Monitoring
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-16 Sampling, Testing and Monitoring, rev. 7, 15-Apr-20
Details: Procedure OP-16 reviewed and accepted. Sampling Calendars describe the specific parameters to be monitored (reviewed for all systems for 2022).	

DWQMS Reference:	17 Measurement and Recording Equipment Calibration and Maintenance
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-16 Measurement and Recording Equipment Calibration and Maintenance, rev. 3, 31-Aug-18
Details: Procedure OP-17 reviewed and accepted.	

DWQMS Reference:	18 Emergency Management
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-18 Emergency Management, rev. 7, 19-Nov-20
<p>Details: General requirements are described in procedure OP-18 and the OCWA Emergency Response Plan. Reviewed and accepted.</p> <p>The following specific contingency plans have been established for each cluster within the CKL area:</p> <ul style="list-style-type: none">• CP-01 Spill Response, rev. 3, 31-Jan-20• CP-02 Critical Injury, rev. 3, 31-Jan-20• CP-03 Critical Shortage of Staff, rev. 3, 31-Jan-20• CP-04 Loss of Service, rev. 1, 31-Jan-20• CP-05 Unsafe Water, rev. 4, 14-Apr-22• CP-06 Security Breach, rev. 1, 31-Jan-20	

DWQMS Reference:	19 Internal Audits
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-19 Internal QEMS Audits, rev. 6, 29-May-20
<p>Details: Procedure OP-19 reviewed and accepted. Each year's internal audit includes a sample of 4 DWS to be reviewed in detail. Internal audit schedule exists for CKL, includes a 5-year plan to cover all systems. Most recent internal audit was performed in September 2021 including Manorview, Norland, Omemee and Woodville DWS. Internal Audit performed by the OCWA PCT and Safety, Process and Compliance Manager for the CKL clusters. No non-conformances and 5 Opportunities for Improvement were identified. Follow-up on the OFI performed through as per element 21.</p>	

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DWQMS Reference:	20 Management Review
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-20 Management Review, rev. 5, 31-Aug-18
Details: Procedure OP-20 captures all PLAN requirements from section 20 of the DWQMS. Management Reviews are conducted a minimum of once every calendar year. Reviewed and accepted. Many standing items from monthly meetings with CKL and included as inputs to the Management Review. Most recent Management Review was performed on December 8, 2021. Minutes included all required Management Review agenda items. Action items are noted in the minutes and assigned to a staff member with a due date for completion (e.g. new well construction in Omemee DWS). Management Review Implementation Action Plan is created to monitor all action items as needed or as action items are completed.	

DWQMS Reference:	21 Continual Improvement
Client Reference:	City of Kawartha Lakes Multi Facility Operational Plan OP-21 Continual Improvement, rev. 1, 29-May-20
Details: Procedure OP-21 reviewed and accepted. Corrective Actions, Preventive Actions and Best Management Practices are recorded on the Summary Table of Action Items. Examples reviewed included: <ul style="list-style-type: none">• Corrective Action 2022-01 – Woodville DWS additional sampling requirements being performed by 2 different laboratories caused one series of tests not to be performed. Root cause identified Uncommon site sampling requirements with separate and different lab requirements combined with recent staff changes. Corrective Action implemented, BV Chain of Custody is now on the S drive, Updated Sample Calendar to reflect that two separate lab submissions are needed to satisfy Semi-Annual Sample results in the description. Added separate check boxes for SGS and BV samples. Verification of effectiveness still to be performed.• Best Management Practice 2021-07 (from Manorview DWS Ministry inspection) for additional written details on log books when adjusting analysers – reviewed with Operators at South Cluster Staff meeting• Preventive Action 2021-06 (from 2021 Re-Accreditation Audit) - Consider adjusting SOP wording around making adjustments to turbidity analysers based on hand-held device readings. SOP was revised July 26, 2021 to Online Regulatory Analyzer Calibration/Verification and Adjustment SOP Rev 1. Verification of effectiveness was performed through subsequent MECP inspections.	

Details regarding the personnel interviewed and objective evidence reviewed are maintained on file at SAI Global.

This report was prepared by:

Paul Cartlidge
SAI Global Management Systems Auditor

The audit report is distributed as follows:

- SAI Global
- Operating Authority
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