

Michigan Department of Natural Resources

2009 Forest Certification Internal Audit

Gwinn Forest Management Unit

Internal Audit Dates: June 23, 2009 to June 25, 2009

Internal Audit Summary Date: June 25, 2009

Lead Auditor: Les Homan

Internal Auditors: Bob Burnham, Tom Haxby, Gary Roloff

Comments:

The internal audit of the Gwinn FMU was held the week of June 23-25, 2009. The scope of the audit was State Forest Land (SFL) within the Gwinn FMU. The audit criteria were the May 6, 2008 version of the Work Instructions (WIs) and all supporting DNR policy, procedures, rules, management guides, guidance documents, plans, and handbooks that were relevant to the management of SFL. On Tuesday, June 23, a detailed list of audit sites was selected and two audit routes established based on a search of records and interviews with staff. A brief opening meeting was held with the participants Wednesday morning, June 24, at the Gwinn Field Office. Subsequently, the audit team split into two groups and moved to areas of MDNR field management activities that were generally located in Marquette County. One route proceeded northwesterly from Gwinn and the other proceeded southerly. Multiple sites were visited by each group. A debriefing was held for FMU management staff at the end of the day Wednesday for the northwesterly tour. Thursday morning was spent reviewing the audit findings, conducting follow-up interviews, and further reviewing documents as needed. The evidence gathered to determine work instruction conformance through interviews, document review and field observations was developed into an audit report. This report was presented at a closing meeting was held on Thursday June 25, at 2:00 pm.

The internal audit team appreciated the cooperation, involvement, and openness of the Gwinn Unit staff. The audit team was impressed with handling of Special Conservation Areas on the unit, implementation of the Mesic Conifer Initiative, on the ground timber sale preparation and contract administration. It is clear that staff is passionate about their work and knowledgeable about the conduct of forest operations. It was obvious from our observations that multiple resource values are being considered and appropriately addressed during timber sale preparation and administration. It was equally obvious that staff from all divisions collaborate regularly to resolve differences in opinions on treatments.

The Auditors found no major non-conformances, seven minor non-conformances, and suggest several opportunities for improvement.

Definitions:

Major Non-conformances: One or more of the Michigan Department of Natural Resource (MDNR) Sustainable Forest Certification Work Instruction requirements has not been addressed or has not been implemented to the extent that a systematic failure of the MDNR to meet a Sustainable Forest Certification (Sustainable Forestry Initiative or Forest Stewardship Council) principle, objective, performance measure or indicator occurs. (Adapted from the Sustainable Forestry Initiative Standard 2005-2009 Edition definitions.)

Minor Non-conformances: An isolated lapse in MDNR Sustainable Forest Certification Work Instruction implementation which does not indicate a systematic failure to consistently meet a Sustainable Forest Certification (SFI or FSC) principle, objective, performance measure or indicator. (Adapted from the Sustainable Forestry Initiative Standard 2005-2009 Edition definitions.)

Opportunities for improvement: Opportunities for improvement are findings that do not indicate a current deficiency, but serve to alert the FMU to areas that could be strengthened or which could merit future attention.

Report and Review Procedure following the Internal Audit:

1. Nonconformance Reports (NCRs) that describe observed nonconformity with forest certification work instructions will be prepared by lead and staff auditors during internal audits.
2. Lead Auditor will prepare a Draft Internal Audit Report (DIAR) consisting of Audit team Nonconformance Reports and a brief audit summary (cover memo). Complete at closing meeting.
3. Lead Auditor will send the DIAR to FMU Manager and send a copy to Forest Certification Specialist and District FMFM Supervisor within 1 week.
4. The FMU Manager will respond to the NCRs and assemble the root cause analysis and corrective actions for all NCRs in consultation with staff, or, dispute findings with an explanation. FMU Manager will send to the FMFM District Supervisor with copy to FC Specialist and Lead Auditor.
5. The FMFM District Supervisor will review, support, and date the NCRs. The FMFM District Supervisor will send the Internal Audit Report with approved NCRs to the Forest Certification Specialist within 4 weeks of the closing meeting. A copy of this report will also be sent to the Lead Auditor.
6. The Forest Certification Specialist will consult with Lead Auditor to confirm corrective actions satisfactorily address NCRs. The FC Specialist will review and sign the NCR corrective actions to acknowledge completion. Complete within 6 weeks of closing meeting date.
7. Forest Certification Specialist will forward Final Internal Audit Report to FCIT, FMFM Management Team, FMFM District Supervisors, all FMU Managers, and representatives from other Divisions, as identified by the FCIT Division representatives.
8. Corrective Actions will be cleared via notification by the responsible manager that corrective actions are complete and via verification by the responsible manager's supervisor and the Forest Certification Specialist.

OPPORTUNITIES FOR IMPROVEMENT:

Exceeds Expectations:

- Within-stand retention occurring internal to the Unit boundaries was well planned and implemented. The Gwinn Unit's use of comments in the Pre-Timber Sale Checklist to detail the retention objectives is commendable. On-the-ground contractors were clear on retention guidelines and the resulting implementation reflects these well-planned and communicated activities.
- Record-keeping by the Gwinn Unit Secretary is exemplary.

Opportunities for Improvement:

- Work Instruction 1.4, Biodiversity Management on State Forest Lands – In some timber harvest units, retention occurred as patches along the unit edges. Comments in OI did not reflect the location of these retention patches. The Retention Guidelines (Page 10, C3) indicate that a “detailed description of retention and its location” should occur in the inventory notes of the harvest prescription. The audit team did not see evidence that retention patches occurring along unit boundaries had location descriptions, which may compromise their retention through a complete stand rotation.
- Work Instruction 5.1, Coordinated Natural Resource Management Research – The annual research summary report was available to Unit staff but few were aware of the document.
- Staff has not been made aware of the recently approved document (Sustainable Soil and Water Quality Practices on Forest Land) or where to access the document.
- There is good work in relation to monitoring of Mesic Conifer plantings. However, those monitoring results are not getting to FMFM and OI is not getting updated.
- There was an illegal bridge found on The Dennis Camp Sale but the Unit Manager was unaware of the bridge. Under WI 7.2 illegal activities should be reported to the Unit Manager.

Non-Conformance Reports (NCRs):

Copies of all NCRs (form R 4502) are attached at the end of this audit summary.



**INTERNAL AUDIT
NON CONFORMANCE REPORT**

Unit Name Gwinn		Site location Office Interviews and Record Reviews		Non Conformance Report Number (Unit Code - yyyy - #): 32-2009-1							
Lead Auditor Les Homan		Team Member(s) Gary Roloff, Bob Burnham, Tom Haxby									
Date (mm/dd/yyyy) 06/24/2009		Work Instruction or Standard and Clause Number 1.2 3(d) Management Review Process for Continual Improvement in the Management of Forest Resources									
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor		Other Documents (if applicable) Jan 27, 2009 Management Review Report		Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): FMFM and WLD Division Chiefs							
Requirement of Audited Standard/ Work Instruction											
<p>“Division Chiefs will ensure changes and improvements approved by the statewide Council are implemented via written communication to employees.” (from Work Instructions).</p> <p>“It is recommended that a joint memo be sent from FMFM and WLD Division Chiefs to DNR staff to clarify which specific lands are in scope by June 1.” (from Management Review Report, clarify the scope of certification FSC CAR 2008:3).</p>											
Observed Nonconformity											
<p>1) 2009 Management Review report has not been distributed to staff.</p> <p>2) Joint memo clarifying lands in scope has not been sent to MDNR staff.</p> <p>These combined activities may compromise implementation of 2009 corrective actions and Work Instruction understanding.</p>											
<p>Root Cause Analysis (Describe the cause of the problem.)</p> <p>Prepared by: Dennis Nezich, 9-17-09</p> <p>At the time of this audit, the memo and supporting documentation had not been finalized for review, approval and distribution by the Division Chiefs. As a result staff did not have this information for reference.</p>											
<p>Corrective Action - Proposed corrective action - To be completed by the Unit and relevant Divisions.</p> <p>Prepared by: Dennis Nezich, 9-17-09</p> <p>A joint memo dated July 1, 2009 was sent from FMFM Division Chief Lynne Boyd and WLD Division Chief Russ Mason to DNR staff in FMFM and WLD. The memo defined which lands are included as part of the certified state forest system. In terms of forest operations, it includes lands which are currently inventoried under either the OI or IFMAP system, are identified in a forest compartment, and go through the compartment review process. The memo was forwarded to FSC and SFI auditors on July 1, 2009 in order to address a FSC Corrective Action Request.</p> <p>The memo was distributed to Gwinn land management staff for review and is on file at the Gwinn Field Office.</p>											
<p>Proposed Completion Date: July 1, 2009</p> <table style="width: 100%; border: none;"> <tr> <td style="text-align: center; width: 33%;">Cara Boucher</td> <td style="text-align: center; width: 33%;">Email approval</td> <td style="text-align: center; width: 33%;">8-26-09</td> </tr> <tr> <td style="text-align: center;">Responsible Manager</td> <td style="text-align: center;">Signature</td> <td style="text-align: center;">Date</td> </tr> </table>						Cara Boucher	Email approval	8-26-09	Responsible Manager	Signature	Date
Cara Boucher	Email approval	8-26-09									
Responsible Manager	Signature	Date									
<u>Bill Brondyke</u> FMFM Unit Manager		electronic Signature		<u>9-18 -09</u> Date							
<u>Debbie Begalle</u> FMFM Dist Supervisor		electronic Signature		<u>10-2-09</u> Date							
<p>CORRECTIVE ACTION PLAN ACCEPTED</p> <p>Forest Cert Specialist: Dennis Nezich</p> <p>Date: 10-05-09</p>											

Actual Completion Date (July 1, 2009)

Responsible Manager:

Date

Verified by:

Verified by:

Responsible Mgr Supervisor

Signature

Date

FMFM FC Specialist

Signature

Date

Follow Up Comments



**INTERNAL AUDIT
NON CONFORMANCE REPORT**

Unit Name Gwinn		Site location Office Interviews, OI Review, Vicinity of Jack Pine Planting Areas (FTP 694, 671, 723)		Non Conformance Report Number (Unit Code - yyyy - #): 32-2009-2	
Lead Auditor Les Homan		Team Member(s) Gary Roloff, Bob Burnham, Tom Haxby			
Date (mm/dd/yyyy) 06/25/2009		Work Instruction or Standard and Clause Number 1.4(II, and III(4)) Biodiversity Management on State Forest Lands			
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor		Other Documents (if applicable)		Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): WLD Habitat Biologist	
Requirement of Audited Standard/ Work Instruction					
<p>II. "It is the responsibility of the DNR land management staff to understand the intent of the SCA identification as well as the implications for management activities. The database...Certification Specialist. Through the course of conducting Forest Inventory (Operations Inventory or IFMAP), stand examiners evaluate the database for completeness."</p> <p>III(4). "Record information in Operations Inventory locked comments.</p>					
Observed Nonconformity					
Kirtland's warblers have been documented in the jack pine plains of the Gwinn Unit for multiple years. The audit team did not observe comments in OI that would alert forest management of warbler areas.					
Root Cause Analysis (Describe the cause of the problem.) Prepared by: Terry McFadden 9/11/09 Unlike the northern lower peninsula whereby KW management areas are designated and identified in management plans, areas are not similarly designated in the UP. Kirtland Warblers move unpredictably within young jack pine stands and are there one day and gone another. SCAs for KW management have not been designated in the UP and timber management plans have not been modified to accommodate KW. It is unlikely that timber management would be modified in those jack pine stands where KW are found because of the young age of the stands occupied and the high stocking level of the stands. MNFI does track KW sightings and this information is available through this source. There is no value in tagging every jack pine stand in the UP as potential KW habitat, however, individual stands where sighting have occurred could be tagged and dated.					
Corrective Action - Proposed corrective action - To be completed by the Unit and relevant Divisions. Prepared by: Terry McFadden 9/11/09 When Kirtland Warblers are sighted, a comment will be placed into locked OI comments to inform staff of the sighting. It is recommended that the WLD Habitat Biologist be granted approval to enter this type of information into OI directly at the Marquette office.					
Proposed Completion Date (mm/dd/yyyy)		Ongoing			
Terry McFadden		On file		9-15-09	
Responsible Manager		Signature		Date	
Bill Brondyke	electronic	9- 18 -09	Debbie Begalle	electronic	10-2-09
FMFM Unit Manager	Signature	Date	FMFM Dist Supervisor	Signature	Date
CORRECTIVE ACTION PLAN ACCEPTED					
Forest Cert Specialist: Dennis Nezych					
Date: 10-05-09					

Actual Completion Date (mm/dd/yyyy)					
Responsible Manager:					
Date					
Verified by:			Verified by:		
_____		_____	_____		_____
Responsible Mgr Supervisor		Signature	Date		
_____		_____	_____		_____
Responsible Mgr Supervisor		Signature	Date		Date
Follow Up Comments					



Michigan Department of Natural Resources - Forest, Mineral and Fire Management

**INTERNAL AUDIT
NON CONFORMANCE REPORT**

Unit Name Gwinn		Site location Office Interviews and Record Reviews		Non Conformance Report Number (Unit Code - yyyy - #): 32-2009-4	
Lead Auditor Les Homan		Team Member(s) Gary Roloff, Bob Burnham, Tom Haxby			
Date (mm/dd/yyyy) 06/25/2009		Work Instruction or Standard and Clause Number 3.1 Forest Operations			
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor		Other Documents (if applicable)		Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): FMFM Unit Manager	
Requirement of Audited Standard/ Work Instruction					
<p>“For forest operations that are not reviewed by the Natural Heritage Unit or MNFI, the operating division will have the lead responsibility including coordination with the DNR endangered species coordinator for the protection of rare, threatened, and endangered species and special ecological sites, and will document the potential impacts as part of the operations approval process”.</p> <p>“For forest operations that are not reviewed by the State Historic Preservation Office of the Department of History, Arts, and Libraries, the operating division will take t he lead in ensuring protection of these as part of the operations approval process”</p>					
Observed Nonconformity					
<p>For intrusive operations that did not go through compartment review, the audit team did not observe evidence that the MNFI and HAL databases were queried.</p> <ol style="list-style-type: none"> 1) FMFM 032200904 (Holli Road Permit) 2) FMFM 0322007015 (Treaman/NMU) 3) FMFM 03200107 (Kennecott Minerals) 4) TSP-301-09 (Black River Falls Fire) 					
Root Cause Analysis (Describe the cause of the problem.)					
<p>Prepared by: Bill Brondyke, August 31, 2009.</p> <p>Local staff were not aware that MNFI/ HAL needs to be checked for these types of permits.</p>					
Corrective Action - Proposed corrective action - To be completed by the Unit and relevant Divisions.					
<p>Prepared by: Bill Brondyke, 9-16-09, 2009.</p> <p>IC 4123, the DNR Resource Assessment Procedure Checklist, was reviewed by the FMFM Unit Manager on 9-16-09 and will be followed in the future. A new form has been developed locally which lists needed information for intrusive activity assessments. This form includes check off boxes for MNFI and HAL information to ensure checks are complete for intrusive activities not reviewed during the compartment review process.</p>					
Proposed Completion Date (mm/dd/yyyy) Ongoing					
Bill Brondyke		9-16-09			
Responsible Manager		Signature		Date	
Bill Bondyke	electronic	9- 18 -09	Debbie Begalle	electronic	10-2-09
_____	Signature	Date	_____	Signature	Date
FMFM Unit Manager		FMFM Dist Supervisor			
CORRECTIVE ACTION PLAN ACCEPTED					
Forest Cert Specialist: Dennis Nezich					
Date: 10-05-09					

Actual Completion Date (mm/dd/yyyy)					
Responsible Manager:					
Date					
Verified by:			Verified by:		
_____		_____	_____		_____
Responsible Mgr Supervisor		Signature	Date		Date
Follow Up Comments					



**INTERNAL AUDIT
NON CONFORMANCE REPORT**

Unit Name Gwinn		Site location Office Interviews and Record Reviews of W32-697 and W41-698		Non Conformance Report Number (Unit Code - yyyy - #): 32-2009-5	
Lead Auditor Les Homan		Team Member(s) Gary Roloff, Bob Burnham, Tom Haxby			
Date (mm/dd/yyyy) 06/25/2009		Work Instruction or Standard and Clause Number 3.1 Forest Operations			
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor		Other Documents (if applicable) OI Manual Chapter 7 Post Review		Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): WLD Habitat Biologist	
Requirement of Audited Standard/ Work Instruction					
<p>“FMFM, Fisheries, and Wildlife Division will review and approve all intrusive operations performed or permitted by any DNR Division on State Forest lands at appropriate level(s), and these approvals will be documented.”</p> <p>“Documentation of completed FTP’s will be kept in the compartment file, and forest inventory records will be updated annually.”</p> <p>“For any delayed decisions , or when any significant changes in prescriptions are contemplated after compartment review, they should receive the consensus of effected DNR/DEQ Divisions (OI Manual)</p>					
Observed Nonconformity					
<p>FTP’s W32-697 and W41-698</p> <p>The audit team could not find evidence that the TMS had approved the FTP’s or that the MNFI and HAL databases were queried for stands not scheduled at the compartment review.</p> <p>Completion reports were done however, OI database was not updated.</p> <p>W32-698 was not scheduled as part of the 2008 YOE and no evidence of a Chapter 7 revision could be found.</p>					
Root Cause Analysis (Describe the cause of the problem.)					
<p>Prepared by: Terry McFadden, 9/11/09</p> <p>WLD staff were not aware that the TMS needed to sign off on WLD practices.</p> <p>Updating OI to reflect treatment completions is irregular partially due to the fact that the WLD Habitat Biologist must travel to remote offices to enter data and cannot do so from his/her office.</p> <p>Treatment of hunter walking trails were approved at Compartment Review, however, each and every stand that the trail goes through was not coded - this was a technical oversight.</p>					
Corrective Action - Proposed corrective action - To be completed by the Unit and relevant Divisions.					
<p>Prepared by: Terry McFadden 9/11/09</p> <p>Approval procedures as outlined in the “Intrusive Activity Approval Procedure” will be followed and sign-off by the TMS will be obtained, if required, on future FTPs.</p> <p>Updates to stand information will be completed in OI at least on an annual basis. However, it is requested that the WLD Habitat Biologist be granted approval to enter inventory updates into the OI data base directly from the Marquette office. This would greatly improve ability to keep forest inventory data up-to-date.</p> <p>If hunter walking trails can be designated as a stand it would be greatly simplify inventory coding. Whether this can be done or not, updating forest inventory stand data to reflect treatment completions will be done regularly and at least annually.</p>					
Proposed Completion Date (mm/dd/yyyy)		To begin immediately			
Terry McFadden		On file		9-15-09	
Responsible Manager		Signature		Date	

Bill Brondyke	electronic	9- 18 -09	Debbie Begalle	electronic	10-2-09
_____ FMFM Unit Manager	_____ Signature	_____ Date	_____ FMFM Dist Supervisor	_____ Signature	_____ Date
CORRECTIVE ACTION PLAN ACCEPTED					
Forest Cert Specialist: Dennis Nezych					
Date: 10-05-09					
Actual Completion Date (mm/dd/yyyy)					
Responsible Manager:					
Date					
Verified by:			Verified by:		
_____ Responsible Mgr Supervisor	_____ Signature	_____ Date	_____ FMFM FC Specialist	_____ Signature	_____ Date
Follow Up Comments					



**INTERNAL AUDIT
NON CONFORMANCE REPORT**

Unit Name Gwinn		Site location Office field interviews		Non Conformance Report Number (Unit Code - yyyy - #): 32-2009-6	
Lead Auditor Les Homan		Team Member(s) Bob Burnham, Tom Haxby, Gary Roloff			
Date (mm/dd/yyyy) 6/25/09		Work Instruction or Standard and Clause Number 3.2 Best Management Practices Non-Conformance Recording Instruction			
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor		Other Documents (if applicable)		Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): FMFM Unit Manager	
Requirement of Audited Standard/ Work Instruction					
<p>The Unit Manager is responsible for recording and tracking all BMP problems reported.</p> <p>Ensure that reporting occurs and maintenance of Tracking database.</p>					
Observed Nonconformity					
<p>There are RDR's in the system that the Unit was un-aware of. Database can't be accessed by the Unit Manager. Database is not being updated.</p> <p>There is a lack of new RDR's entered into the system (no new RDRs since July 07), observed breached berms.</p>					
Root Cause Analysis (Describe the cause of the problem.)					
<p>Prepared by and date Bill Brondyke 9-16-09</p> <p>The RDR web site was taken down by Lansing sometime ago and was not available to us for review.</p>					
Corrective Action - Proposed corrective action - To be completed by the Unit and relevant Divisions.					
<p>Prepared by: Bill Brondyke 9-16-09</p> <p>Currently the RDR web site is being updated by Lansing personnel and is expected to be available for field review and use in September, 2009. Training will occur for the FMFM Unit Manager at the Statewide Managers meeting on 9-17-09. Gwinn FMU staff will be trained in use of the RDR reporting and tracking system by February 1, 2010. FMU staff will report RDR sites when found to the Unit Manager.</p>					
<p>Proposed Completion Date (mm/dd/yyyy) February 1, 2010</p>					
Bill Brondyke Responsible Manager		Signature		9-16-09 Date	
Bill Brondyke _____ FMFM Unit Manager	electronic _____ Signature	9- 18 -09 _____ Date	Debbie Begalle _____ FMFM Dist Supervisor	electronic _____ Signature	10-2-09 _____ Date
CORRECTIVE ACTION PLAN ACCEPTED					
<p>Forest Cert Specialist: Dennis Nezich</p> <p>Date: 10-05-09</p>					
Actual Completion Date (mm/dd/yyyy)					
<p>Responsible Manager:</p> <p>Date</p>					
Verified by:			Verified by:		
Responsible Mgr Supervisor _____ Signature	Signature	Date	FMFM FC Specialist _____ Signature	Signature	Date
Follow Up Comments					



Michigan Department of Natural Resources - Forest, Mineral and Fire Management

INTERNAL AUDIT
NON CONFORMANCE REPORT

Unit Name Gwinn		Site location Swanzy Lake		Non Conformance Report Number (Unit Code - yyyy - #): 32-2009-7	
Lead Auditor Les Homan		Team Member(s) Gary Roloff, Bob Burnham, Tom Haxby			
Date (mm/dd/yyyy) 06/24/2009		Work Instruction or Standard and Clause Number W.I. 6.2. Integrating Public Recreational Opportunities with Management on State Forest Lands			
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor		Other Documents (if applicable)		Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): FMFM Unit Manager	
Requirement of Audited Standard/ Work Instruction					
5) Resource Impacts as a result of recreational use are reported, monitored and addressed. b) Impacts on lands adversely affected are reported, monitored or addressed (e.g. excessive ORV damage).					
Observed Nonconformity:					
Auditors observed excessive ORV damage immediately adjacent to Swanzy Lake that has not been addressed. Interviews with staff indicated that although restoration grant funding has been secured, no action has been taken to date. Additionally, no signs have been posted making law enforcement for illegal access difficult.					
Root Cause Analysis (Describe the cause of the problem.)					
Prepared by: Bill Brondyke, August 31, 2009					
We were aware of ORV damage at Swanzy Lake, and had been working on correcting the situation since the summer of 2008.					
Corrective Action - Proposed corrective action - To be completed by the Unit and relevant Divisions.					
Prepared by: Bill Brondyke, August 31, 2009.					
Correction of the ORV damage will be accomplished by contract. The contract requires large rocks to be placed in predetermined positions to discourage use of the area. The contract paperwork has been approved, contract bids will be opened 9-17-09 and work will be completed Fall, 2010.					
Proposed Completion Date (mm/dd/yyyy) Fall, 2010					
Bill Brondyke		Signature		9-16-09	
Responsible Manager				Date	
Bill Brondyke	electronic	9-18-09	Debbie Begalle	electronic	10-2-09
_____	Signature	Date	_____	Signature	Date
FMFM Unit Manager			FMFM Dist Supervisor		
CORRECTIVE ACTION PLAN ACCEPTED					
Forest Cert Specialist: Dennis Nezych					
Date: 10-05-09					
Actual Completion Date (mm/dd/yyyy)					
Responsible Manager:					
Date					
Verified by:			Verified by:		
_____	Signature	Date	_____	Signature	Date
Responsible Mgr Supervisor			FMFM FC Specialist		
Follow Up Comments					