



# United States Department of the Interior

OFFICE OF THE ASSISTANT SECRETARY  
POLICY, MANAGEMENT AND BUDGET  
Washington, DC 20240



JUL 21 2005

In Reply To:  
ER 05/225

Mr. David Kling  
Director  
Federal Facilities Enforcement Office  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Dear Mr. Kling:

This letter is in response to the request by the Administrator – Office of Enforcement and Compliance Assurance, Environmental Protection Agency, for a report by the Department of the Interior on the implementation of Executive Order (E.O.) 13148, “Greening the Government through Leadership in Environmental Management.” The enclosed progress report by DOI is for calendar year (CY) 2004.

As you will see in our report, DOI has made significant progress in CY 04 on the implementation of E.O. 13148. Furthermore, we are firmly committed to the implementation of environmental management systems among its Bureaus and Offices and across its many Department-wide activities and functions.

If you have any questions, please contact Mr. Willie R. Taylor, Director, Office of Environmental Policy and Compliance, at (202) 208-3891.

Sincerely,

P. Lynn Scarlett

Enclosures

cc: Deputy Assistant Secretary – P&IA

**U. S. Department of the Interior  
Calendar Year 2004 Progress Report  
on the Implementation of Executive Order 13148  
“Greening the Government through Leadership in Environmental Management”**

**EXECUTIVE SUMMARY**

The U.S. Department of the Interior (DOI) consists of many Bureaus and Offices with different missions that serve a diverse customer and public base. Within DOI, managing the environment is a critical component of our mission of being good stewards of our Nation’s natural and cultural resources. This executive summary provides a brief overview of the activities by Departmental Bureaus and Offices in fulfilling the requirements of Executive Order 13148. The attached report that follows provides a more in-depth description of these activities.

**DEPARTMENTAL OFFICES**

**Office of Environmental Policy and Compliance (OEPC):** The OEPC chairs the DOI Environmental Management Systems (EMS) Council and continues to coordinate E.O. 13148 activities and EMS implementation to ensure that environmental accountability is integrated into agency day-to-day activities and long-term planning. The OEPC has prepared annual reports on bureau environmental auditing programs since Fiscal Year (FY) 1999. For FY 2004, the Bureaus reported a total of 3,343 facilities, with a total of 539 environmental audits performed. Collectively, Bureaus reported a total of 6,241 audit findings with 3,411 corrective actions completed, based upon these audit findings. A cumulative total of 2,831 environmental audits have been completed to date for all-years. Also, for Calendar Year (CY) 2004, there were 393 designated appropriate facilities reported by DOI Bureaus and Offices. Environmental auditing and EMS performance goals and measures were developed by the DOI EMS Council and are already implemented which is linked to overall Departmental management excellence as part of DOI’s Strategic Plan. For FY 2005, scorecards for both environmental auditing and EMS were developed.

**Office of Acquisition and Property Management (PAM):** The PAM issued policy guidance on May 27, 1993, in a DOI Acquisition Policy Release (DIAPR) 93-18 which calls for taking action to minimize the procurement of ozone depleting substances (ODS) by informing engineering and environmental staffs of E.O.12843 requirements; initiating program review of standards and specifications to remove ozone-depleting substances; and initiating data collection by program offices on actions taken to prepare for subsequent progress reporting. Under DIAPR 97-2, issued December 2, 1996, DOI established policy to maximize the use of alternatives to ODS in specifications and contracts in accordance with FAR clause requirements. Federal Acquisition Regulation (FAR) 52-223.11, "ODS" and FAR 52-223-12, "Refrigeration Equipment and Air Conditioners" are required clauses for inclusion in contract requirements. Also, during

the past nine fiscal years, DOI consistently has been one of the Federal Government's most successful programs, increasing its inventory of Alternative Fuel Vehicles (AFVs) in the fleet from about 200 AFVs in FY 1998 to approximately 2,700 by FY 2005.

**National Business Center (NBC):** The NBC addressed reduction goals for Federal agency release of toxic chemicals by awarding a multi-year custodial contract, which began using environmentally safe and healthful custodial products in the Interior Complex. Chemical cleaning products used under this contract meet or exceed mandatory criteria for reducing the release of toxic chemicals. The NBC also recycles computers, Ni-Cad batteries, carpet and padding, toner cartridges, and fluorescent tubes. The NBC is working with the General Services Administration to utilize the Main Interior Building Modernization Project to evaluate environmentally preferable products, as it is a U.S. Green Building Council Leadership in Energy and Developmental Design (LEED) for existing buildings (EB) pilot project. The work that is being accomplished, as part of this project, will earn credit toward building certification if/as permitted by the LEED-EB pilot program.

## **BUREAUS**

**Bureau of Indian Affairs (BIA):** The BIA continues to conduct multimedia environmental audits under the BIA Environmental Management Audit Program (EMAP). Fifteen "agency" audits were conducted in FY 2004 that included 66 individual locations throughout the United States that included BIA agencies, schools, and detention centers and police departments. The BIA is currently working to complete all its baseline environmental audits. The BIA is developing an EMS strategy that builds on the foundation of its audit program with achieving compliance using sustainable, pollution prevention approaches as a top priority. Also, it has developed EMS audit criteria as part of the EMAP. A significant portion of BIA facilities are operated under contract or grant to Tribes. The BIA has been challenged in developing an EMS that will address these facility operations in a manner that is effective and sensitive to Tribal issues. The BIA cannot mandate these entities to develop an EMS but plans to encourage the development of EMS within tribal operations and will make EMS development tools available to them.

**Bureau of Land Management (BLM):** The BLM continues to incorporate energy efficiency, conservation, and environmental preferable, and performance provisions into policies, plans, operations, and activities. Baseline Compliance Assessment - Safety, Health, and the Environment (CASHE) program audits have been completed at every field office and major facility in the BLM. In FY 2004, follow-up audits were completed at 25 organizational units, most of which were third-round audits. The field offices update the status of their CASHE findings and corrective actions annually. In FY 2004, 87 percent of organizational units were rated in good Safety, Health, and Environmental condition. A formal EMS is under development; however, the BLM has already adopted a number of EMS elements in BLM's CASHE program. Findings, root causes, and corrective actions are tracked, used to identify systemic problems, and evaluated against BLM-wide performance goals.

**Bureau of Reclamation (WBR):** Each WBR Region has the Regional HazMat Coordinator assigned as the Regional EMS coordinator. Environmental audits are conducted to determine facility compliance with applicable Federal, state, and local rules, regulations, and standards. A WBR compliance audit summary report is sent to the Department's OEPC annually and the WBR environmental auditing program itself is reviewed every three years. The two WBR pilot implementation facilities, Yuma and Lake Berryessa, have the facility managers as their EMS coordinators. Although implementation has begun at these facilities the remainder of WBR facilities, Regions and Area Offices are awaiting WBR-wide guidance and review of the pilots to begin EMS implementation. EMS specific resources have been allocated at the bureau level for contract support of EMS implementation. Regional allocation is limited to the two pilot regions and the pilots projects themselves.

**Fish and Wildlife Service (FWS):** The seven FWS Regions conduct approximately 100 compliance audits per year. Compliance findings are tracked on a centrally managed database. The FWS is presently in its second cycle of environmental audits. One Regional Environmental Compliance Coordinator in each of seven Regions allocates 15-20 percent of his/her time implementing and managing the EMS program as part of their environmental management duties. Field station staffs implement and manage the EMS programs as a collateral duty. The amount of time spent on EMS activities varies considerably from facility to facility. With future budget cuts, environmental programs must compete with other critical safety programs for limited funding resources. Policies are in place and training was provided to Senior Managers, Regional Office personnel and field station personnel where EMS has been implemented. The FWS will have 67 EMS's in place by December 31, 2005.

**Minerals Management Service (MMS):** The MMS leases all buildings from the General Services Administration. Therefore, MMS is not required to have an EMS, nor is MMS required to perform environmental audits of its facilities. The MMS supports environmental friendly procurement practices and has drafted two procurement policies for "buying green." The Environmentally Preferable Purchasing Policy and Affirmative Procurement Program policy will be final within the next few months and will be posted on the MMS Pipeline. In addition to requiring consideration of environmental factors in acquisition planning, these policies require all acquisition personnel to attend green procurement training, preferably through the Office of Personnel Management's Gov Online Learning Center.

**National Park Service (NPS):** The NPS developed an environmental audit closure tracking tool that facilities are required to use to record progress. Also, NPS deployed an NPS-wide EMS tracking system that is accessible to all parks via the Park Facilities Management Division Intranet. Individual park and overall regional progress toward EMS implementation is tracked via a 15-step protocol. The data show that, as of February 2005, 55 percent (approximately 295 units) of all NPS facilities have

documented progress toward EMS implementation. Recognizing the overall importance of NPS concessioner environmental performance as part of the NPS mission, the NPS Concession Program established the Concession Environmental Management Program (CoEMP) as a component of the overall NPS Concession Program. EMS concepts are used as a basis for how the CoEMP is structured, how it plans for, and how it implements its activities.

**Office of Surface Mining (OSM):** Although OSM does not own, operate, or maintain facilities subject to the requirements of E.O. 13148, OSM supports Departmental efforts to develop sound EMS. Furthermore, OSM actively promotes environmentally friendly practices under other Greening executive orders, including those governing procurement, recycling and waste prevention. The OSM has conducted four EMS training classes for its 20 collateral duty safety officers and has conducted four EMS training classes for its representatives on the EMS Council. Also, OSM has conducted and completed its baseline audits at each OSM office and is now interpreting the data and developing next steps to further implement its EMS program.

**U.S. Geological Survey (USGS):** Resources for EMS are included as a part of the overall safety, health, and environmental budget request. The USGS environmental auditing and EMS implementation are accomplished through collateral duty staffs who often serve as ad-hoc environmental coordinators. Twenty of the 29 USGS designated appropriate facilities (70 percent) signed and issued a facility EMS policy statement in CY 04. The USGS is implementing a phased approach to train all employees involved with EMS implementation. In CY 03, USGS provided an informational EMS briefing to its Senior Executive Leadership Team. In CY 04, USGS developed on-line EMS training, in conjunction with DOIU, which will be available in CY 05. This training includes EMS awareness and implementation modules in a mandatory Collateral Duty Environmental Program Coordinators and Supervisors training course.

**U. S. Department of the Interior  
Calendar Year 2004 Progress Report  
on the Implementation of Executive Order 13148  
“Greening the Government Through Leadership in Environmental Management”**

The U.S. Department of the Interior (DOI) is the Nation’s principal conservation agency. Our mission is to: (1) protect America’s treasures for future generations, (2) provide access to our Nation’s natural and cultural heritage, (3) offer recreation opportunities, (4) honor our trust responsibilities to American Indians and Alaska Natives and our responsibilities to island communities, (5) conduct scientific research, (6) provide wise stewardship of energy and mineral resources, (7) foster sound use of land and water resources, and (8) conserve and protect fish and wildlife. The work that we do affects the lives of millions of people.

The DOI is a large decentralized agency with over 70,600 employees and 200,000 volunteers located at approximately 2,400 operating locations across the United States, Puerto Rico, U.S. territories and freely associated states. The DOI accomplishes its responsibilities on a \$10 billion total annual budget and manages 504 million acres of surface land, or about one-fifth of the land in the United States including:

- 261.9 million acres managed by the Bureau of Land Management (BLM);
- 96 million acres managed by the Fish and Wildlife Service (FWS);
- 84.4 million acres managed by the National Park Service (NPS);
- 8.7 million acres managed by the Bureau of Reclamation (WBR) associated with reclamation projects;
- 55.7 million acres managed by the Bureau of Indian Affairs (BIA);
- the management of mineral resources in approximately 1.76 billion acres of the Outer Continental Shelf by the Minerals Management Service (MMS);
- over 190,000 acres of abandoned coal mine sites reclaimed through the Office of Surface Mining’s (OSM) Abandoned Mine Land Program; and,
- groundwater and surface water studies conducted in all states by the U.S. Geological Survey (USGS).

The DOI consists of many Bureaus and Offices with different missions that serve a diverse customer and public base. However, as a Department, we reflect a citizen-focused vision for effective stewardship that is centered on the “4C’s” – communication, consultation, and cooperation, all in the service of conservation.” Within DOI, managing the environment is a critical component of our mission of being good stewards of our Nation’s natural and cultural resources. In keeping with our citizen-focused stewardship role, sound management practices are the keys to success, and lead to more efficient and effective Government practices in support of the President’s Management Agenda. This report reflects both our stewardship role and support of the President’s Management Agenda. In keeping with this role, many of our Bureaus and Offices have already incorporated many innovative practices in their respective environmental management programs.

The report is consistent with the Calendar Year 2004 (CY) E.O. 13148 guidance provided by the U.S. Environmental Protection Agency (EPA). It is divided into two main areas: (a) Progress of Departmental Offices and (b) Progress of Departmental Bureaus on E.O. 13148 implementation. To facilitate questions raised in the 2004 guidance, responses by Bureaus and Offices are grouped under major headings. However, since Bureau and Office programs differ, their responses will reflect those differences. The Appendix contains supplemental information including a list of the DOI EMS Council members who may be contacted for further information.

## **PROGRESS OF DEPARTMENTAL OFFICES – E.O. 13148 IMPLEMENTATION**

### **OFFICE OF ENVIRONMENTAL POLICY AND COMPLIANCE**

The Office of Environmental Policy and Compliance (OEPC) develops policy and coordinates and oversees Department-wide compliance with a wide variety of environmental statutes, executive orders, and regulations. OEPC provides for a coordinated and unified approach and response to environmental issues that affect multiple Bureaus in order to ensure that the DOI speaks as one entity with respect to those issues. Also, OEPC provides independent environmental and technical advice to the Secretary of the Interior and other Departmental officials.

These missions are met nationwide through the OEPC Headquarters and Regional Offices. The Headquarters Office located in Washington, D.C. is organized into three teams – Natural Resources Management, Solid and Hazardous Materials Management, and Natural Resources Trust and Response. The OEPC has eight Regional Offices located in Boston, Philadelphia, Atlanta, Denver, Albuquerque, Oakland, Portland, and Anchorage. Each Regional Office is headed by a Regional Environmental Officer who reports to the Deputy Director, and is responsible for all environmental functions within the assigned region. Additional information may be obtained from the OEPC website at: <<http://www.doi.gov/oepc>>.

**NOTE: (The following sections in *italicized* text refer to certain portions of the 2004 E.O. 13148 guidance. Only those applicable portions of the 2004 E.O. 13148 guidance are listed initially and are not repeated throughout the report. The responses (in regular text) by DOI Bureaus and Offices to the applicable sections of the 2004 E.O. 13148 guidance will vary according to their respective programs).**

*Reporting under Section 307 (Sections 502, 503, and 505) of E.O. 13148.*

*Sections 502, 503, and 505 are specifically cited as sections of E.O. 13148 that must be addressed in the agency annual report. Section 502 addresses reduction goals for Federal agency release of toxic chemicals as reported under Section 313 of the Emergency Planning and Community Right-to-Know Act. This section establishes calendar year 2001 as the baseline year for reduction goals. EPA maintains the TRI database. The baseline data that were reported by each affected agency in July of 2002 have been summarized and provided to TRI reporting agencies. Agencies are not required to provide additional data from the TRI reporting process. Agencies are requested to report the status of agency plans to address the reduction*

*requirements in this section as well as particular success stories that have enabled agencies or facilities to address the goals of Section 502.*

The OEPC does not operate any facilities; therefore, OEPC does not have anything to report under sections 502 (toxic chemical release reduction goals), 503 (reduction goals for specified chemicals), and 505 (use of ozone-depleting substances) under E.O. 13148.

*Section 503 addresses reduction goals for the reduction in use of specified chemicals for specific uses by Federal agencies. Efforts of the Office of the Federal Environmental Executive and Interagency Environmental Leadership Workgroup during 2004 resulted in initial completion of the list of chemicals called for in Section 503(b). That list has been provided to the Interagency Environmental Leadership Workgroup for distribution to Federal facilities. In accordance with Section 503(e), CY 05 will be the baseline year from which progress towards the reductions goals of this section are measured. Additional guidance specific to implementation of this section, including metrics for reporting progress during CY 05, will be prepared by the Interagency Environmental Leadership Workgroup in early 2005 and forwarded to Agency Environmental Executives. Agencies do not need to provide additional information on Section 503 of the order at this time. Section 505 of E.O. 13148 establishes a variety of actions that are to be taken by agencies to reduce and manage the use of ozone depleting substances (ODS) at Federal facilities, including the development of a plan to phase out acquisition of Class I ODS by December 31, 2010. Agencies are requested to report on the implementation of their baseline plans to address the requirements of this section, including available descriptions of successes in replacing ODS at Federal facilities, as well as identification of challenges encountered in reducing use of ODS.*

The Class I ODS policy is the responsibility of DOI's Office of Acquisition and Property Management. This Department-wide policy has in its plan to phase out all acquisition of Class I ODS by December 31, 2010 (see under the Office of Acquisition and Property Management section).

#### *Environmental Management Systems.*

*The Interagency Environmental Leadership Workgroup (Workgroup) has identified criteria to describe the status of Environmental Management System implementation at Federal agencies. These criteria are provided below. Each agency is requested to provide concise information on their EMS implementation activities for each criterion. Please respond specifically to the requested information and provide any information or evidence to support your response. For each criterion, if your agency did not achieve the EMS implementation objective in CY 04, please include information on progress to date and future plans to achieve the objective. In addition to agency-wide information, agencies may elect to provide information in the agency annual report specific to various component agencies, bureaus, or services or to provide individual reports from those agencies, bureaus, or services.*



*Each agency annual report should address the following agency-level and facility-level criteria.*

### *Agency-Level*

#### *Agency-Level Policies*

*CY 04 Objective: Agency has incorporated the EMS goals and requirements of E.O. 13148 into existing agency environmental directives, policies, and documents. Specific E.O. 13148 EMS goals and requirements that are relevant to this requirement include: (1) Section 401(b)--EMS implementation at all appropriate facilities by December 31, 2005 and (2) Section 404(a)--establishment of EMS training program for senior managers and other appropriate personnel.*

*If your agency has incorporated the above E.O. 13148 EMS goals and requirements into agency directives, policies, and/or documents, please provide a copy of, or public web link to, those directives, policies, and documents (please note that internal web links that do not allow public access to the document preclude review of the document by EPA).*

*If your agency has not yet incorporated the above E.O. 13148 EMS goals and requirements into agency directives, policies, and documents, please provide the status of this critical CY 04 Objective.*

*If your agency has other directives, policies, or documents (e.g.; pollution prevention planning documents, green procurement guidance) that reflect consideration of EMS concepts and design, please provide copies of, or public web links to, those documents.*

To assist in DOI-wide EMS implementation, the DOI EMS Council makes recommendations to senior DOI management on EMS implementation (see Appendix). Environmental auditing and EMS performance goals and measures were developed by the DOI EMS Council and are already implemented which is linked to overall Departmental management excellence as part of DOI's Strategic Plan. For CY 04, there are 393 designated appropriate facilities reported by DOI Bureaus and Offices (see Appendix).

For FY 2005, both environmental auditing and EMS scorecards were developed. These goals and measures are reflected in DOI's Annual Accountability Report that may be found at the following website: <<http://www.doi.gov/pfm>>. The DOI fully supports EMS implementation of all its appropriate facilities and the training of its senior managers and other appropriate personnel. However, resource constraints may prevent DOI from meeting the December 31, 2005 deadline.

Various EMS resources and other guidance documents (pollution prevention, green procurement, recycling, electronics disposal, etc.) have been issued to Bureaus and Offices and are available on the Greening the DOI website at: <<http://www.doi.gov/greening>>.

### *Self-Declaration Protocol*

*CY 04 Objective: Agency has issued a Self-Declaration Protocol based on the Federal Self-Declaration Protocol guidance.*

*If your agency has issued an EMS Self-Declaration Protocol, please provide a copy of, or public web site link to, that document. If subordinate agencies, commands, services or bureaus within your agency issued a Self-Declaration Protocol, please provide a copy of, or public web site link to, that document as well.*

The DOI's EMS Self-Declaration Protocol for Appropriate Facilities is posted on the Office of the Federal Environmental Executive website at <<http://www.ofee.gov>>.

*If your agency has issued an EMS Self-Declaration Protocol, please provide a brief description of the procedures for declaring when each appropriate facility has an EMS in- place. If your agency has information to report this year about implementation of this protocol that may aid other Federal agencies, please provide that information.*

Several National Parks were certified under ISO 14001 and others were enrolled in EPA's National Environmental Performance Track Program. Such third-party recognition automatically satisfies DOI Self-Declaration.

*If your agency has issued an EMS Self-Declaration Protocol, please describe how that document was issued and communicated throughout your agency (i.e., issued by memorandum from the Agency Environmental Executive to all field facilities on (date); issued through agency directives system).*

The DOI EMS Self-Declaration Protocol for Appropriate Facilities was developed by the DOI EMS Council and codified as Environmental Compliance Memorandum (ECM04-2) that was issued on July 7, 2004. The Environmental Compliance Memorandum is part of DOI's directive system and was communicated to all Bureaus and Offices and through the DOI EMS Council. It may be found on the Office of the Federal Environmental Executive website at:  
< <http://www.ofee.gov> >.

### *Resources Distributed.*

*CY 04 Objective: Agency has provided resources (e.g., dollars, FTE) for EMS implementation to its appropriate facilities.*

*Please state how your agency's appropriate facilities receive adequate funding for EMS development and implementation.*

Overall, funding for EMS development and implementation is constrained. Bureaus and Offices must compete with other priorities.

*Please describe your agency's current or intended process for providing EMS funding resources for operation/maintenance of and continual improvement of facility EMS efforts.*

The OEPC in coordination with DOI's Office of Budget developed criteria for DOI's FY 2004 and FY 2005 Budget Formulation Guidance for Bureaus to request funding specifically for EMS implementation. The criteria specifically provided funding request guidance to Bureaus for corrective actions as a result of environmental audit findings at facilities and for EMS program implementation. The OEPC has no line item budget and is funded principally through the budget of the Office of the Secretary. Therefore, EMS implementation must compete along with other equally important statutory requirements. Within OEPC, the Solid and Hazardous Materials Management Team has 4 employees involved with environmental compliance management. Furthermore, Section 4.8 (E) in DOI's EMS policy (515 DM 4) requires Heads of Bureaus and Offices to ensure that adequate resources and funding are available for EMS implementation. Section 4.8 (F) requires that program managers (e.g., area/field office managers, district managers, refuge managers, park superintendents) must ensure EMS implementation and to request such funding through their respective Bureau budget process. The Budget Fact Sheet on EMS that was developed by the E.O 13148 Workgroup was distributed to both program and budget offices.

*The following CY 03 Criteria are provided as follow-up to the CY 03 annual report. In 2004, if your agency reported that it did not fully meet the CY 03 objective for one or more of these criteria, you are requested to provide an update of progress in addressing these important criteria.*

*Resources.*

*CY 03 Objective: Resources for EMS implementation are included in the agency's FY 2004 budget request.*

*Please describe how resources (e.g. dollars, staff) for EMS implementation are included in your agency's 2004 budget request.*

EMS implementation is included as part of OEPC's budget request under the Office of the Secretary.

*Please describe how your agency provides resources (dollars, staff) for EMS implementation. For example, is EMS implementation support a separate line item or incorporated as part of a larger resource allocation item such as management overhead?*

EMS implementation is not a separate line item but is just part of the overall resource allocation for the Office of the Secretary.

*Please identify/describe the specific organization(s) or personnel who are tasked with implementing EMS within your agency; briefly describe their roles. Describe any fulltime equivalent (FTE) resources identified at the headquarters and/or facility level.*

OEPC has one full-time FTE devoted to environmental auditing and EMS implementation.

*Please describe any obstacles encountered and/or specific success stories in obtaining resources for EMS.*

In general, resources are very constrained throughout the Department.

*Guidance.*

*CY 03 Objective: Agency has issued EMS implementation guidance for use by appropriate facilities.*

*Please describe any guidance (manual(s), directive(s), order(s)) your agency has issued to assist your facilities and organizations in implementing EMS.*

*Please describe how the guidance was issued (for example: issued by memorandum from the Agency Environmental Executive to all field facilities on (date); issued through agency directives system).*

*If your agency has developed agency-specific EMS guidance, please provide a brief description, as well as a copy or a web site link that can be shared with other Federal agencies.*

See previous CY 04 section on policy.

*EMS Training for Senior-Level Managers*

*CY 03 Objective: Agency has provided EMS training for appropriate agency-level senior managers.*

*Please describe the EMS awareness or implementation training provided or planned for senior-level managers at your agency.*

The Department plans to eventually incorporate EMS web-based training for its senior managers.

*Please describe (by position or title) who has received and who is to receive training, and the content of the training. Note: Training could include (for example) computer or web-based deployment, incorporation in newcomers' training, and/or briefings at senior staff meetings.*

At the Department level, the DOI Conferences on the Environment are the principal means to exchange technical information on various environmental procedures and provide environmental training for senior managers and staff of DOI Bureaus and Offices. It is the only Department-wide environmental conference available where representation of DOI leadership is visible and that offers both staff and senior level management opportunities to receive technical information and training in a variety of environmental areas. The OEPC sponsors such conferences along with a Bureau host. These conferences took place in 1993-1995, 1999, 2001, and 2003. In addition, training in various environmental areas, including EMS was offered and supported by EPA headquarters and regional personnel and representatives from the Office of the Environmental Executive.

Some Bureaus and Offices have developed environmental compliance and EMS training for their senior-level management. Such training is described under specific Bureau and Office sections of this report.

#### *Agency-Level Policies.*

*CY 04 Objective: Agency has incorporated the EMS goals and requirements of E.O. 13148 into existing agency environmental directives, policies, and documents. Specific E.O. 13148 EMS goals and requirements that are relevant to this requirement include: (1) Section 40 1 (b)-- EMS implementation at all appropriate facilities by December 31,2005 and (2) Section 404(a)-- establishment of EMS training program for senior managers and other appropriate personnel.*

#### *Environmental Management Systems.*

To assist in DOI-wide EMS implementation, a DOI EMS Council was established under the provisions of 515 DM 4 and formally chartered under Environmental Compliance Memorandum (ECM) 03-02. (The ECM is publicly available at: <<http://www.oepc.gov/ecms.html>>. The Council is chaired by OEPC. The Council makes recommendations to senior DOI management on EMS implementation and provides a forum to raise EMS crosscutting issues that affect Departmental Bureaus and Offices. Furthermore, the Council promotes common efficiencies and sharing of resources in order to foster environmental stewardship throughout DOI. Various EMS resources and guidance documents have been issued to the Bureaus and are available on the Greening the DOI website at: <<http://www.doi.gov/greening>>.

Frequency of training depends upon the level of funding available and the individual Bureaus are responsible for training of their personnel. The OEPC does occasionally sponsor special sessions where outside experts may discuss various environmental issues. For example, in February 2005, OEPC sponsored a special session of the DOI EMS Council in Phoenix, Arizona, and invited the Federal Environmental Executive to address the Council about the President's Management Council Compliance Improvement Recommendations.

### *Facility Environmental Compliance Audits*

Secretary Norton has repeatedly emphasized that compliance with environmental laws and regulations remains a high priority for DOI. The policy (Departmental Manual, Part 515, Chapter 2, "Environmental Auditing") requires environmental auditing of all DOI facilities. The policy is publicly available at the following Internet website address:  
<<http://www.elips.doi.gov/elips/release/3172.htm>>.

Each Bureau and Office is responsible for developing and implementing its respective environmental auditing program. However, as part of DOI's annual audit reporting requirement, Bureaus provide summary information on their auditing programs and activities to OEPC. Such information includes the cumulative number of facilities audited to date, number of facility audits scheduled for the next fiscal year, major audit issues identified in the reporting year, and the total cost of the Bureau audit program for the reporting fiscal year. The OEPC then prepares a DOI Summary of the FY Annual Report on Bureau Environmental Auditing Programs and Activities. Summary reports were completed for fiscal years 1999-2004. For FY 2004, the Bureaus reported a total of 3,343 facilities, with a total of 539 environmental audits performed. Collectively, Bureaus reported a total of 6,241 audit findings with 3,411 corrective actions completed, based upon these audit findings. A cumulative total of 2,831 environmental audits have been completed to date for all-years. A copy of the FY 2004 environmental auditing report is provided in the Appendix.

### *Other.*

#### President's Management Council (PMC) Compliance Improvement Recommendations.

The OEPC coordinated the DOI and Bureau and Office responses to the PMC Compliance Improvement Recommendations. A summary of DOI's response is provided in the Appendix.

#### Award Recognition Programs.

The OEPC administers both the White House Closing the Circle Award for DOI and the DOI Environmental Achievement Award. The DOI Environmental Achievement Award recognizes exceptional environmental achievements that highlight conservation of resources through cooperation, consultation and communication within Bureaus or Offices, either by individual employees or teams, or by contractors to a Bureau or Office. The Award follows the intent of the following: DOI policy for comprehensive waste management for its lands and facilities (518DM 1); Executive Order (E.O.) 12856, Federal Compliance With Right-To-Know Laws and Pollution Prevention Requirements; E.O. 13101, Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition; and E.O. 13148, Greening the Government Through Leadership in Environmental Management, and the Strategic Plan for Greening the Department of the Interior Through Waste Prevention, Recycling, and Federal Acquisition.

Areas of recognition include: Waste/pollution prevention, recycling, environmentally preferable and affirmative procurement, facility environmental excellence, EMS, environmental stewardship, and education and outreach. Since its inception, in 1995, a total of 69 recipients have received the DOI Environmental Achievement Award.

Other environmental and conservation improvement initiatives are also considered as well. An Awards Committee consisting of representatives of DOI Bureaus and Offices review nominations that are submitted and perform the selection of award recipients. A total of 11 recipients were selected for the DOI Environmental Achievement Award in 2004 and there was one DOI recipient of the White House Closing the Circle Award in 2004. Information about the recipients of both awards may be obtained at the Greening Interior website: <http://greeninginterior.doi.gov/awards/index.html>.

## **OFFICE OF ACQUISITION AND PROPERTY MANAGEMENT**

*Reporting under Section 307 (Sections 502, 503, and 505) of E.O. 13148.*

The Office of Acquisition and Property Management (PAM) issued policy guidance on May 27, 1993, in a DOI Acquisition Policy Release (DIAPR) 93-18 which calls for taking action to minimize the procurement of ozone depleting substances (ODS) by informing engineering and environmental staffs of E.O.12843 requirements; initiating program review of standards and specifications to remove ozone-depleting substances; and initiating data collection by program offices on actions taken to prepare for subsequent progress reporting.

A policy memorandum was issued in October 1995, apprising property managers about chlorofluorocarbon and "Halon" turn-in program for maintaining reserves of these products by the Defense Logistics Agency of the Department of Defense. Under DIAPR 97-2, issued December 2, 1996, DOI established policy to maximize the use of alternatives to ODS in specifications and contracts in accordance with FAR clause requirements. Federal Acquisition Regulation (FAR) 52-223.11, "ODS" and FAR 52-223-12, "Refrigeration Equipment and Air Conditioners" are required clauses for inclusion in contract requirements.

*Other.*

Alternative Fuel Vehicle Acquisition.

During the past nine fiscal years, DOI consistently has been one of the Federal Government's most successful programs, increasing its inventory of Alternative Fuel Vehicles (AFVs) in the fleet from about 200 AFVs in FY 1998 to approximately 2,700 by FY 2005. In FY 1996 and 1997, with few AFVs on the market, limited fueling and no financing options, DOI fell short of the Energy Policy Act (EPACT) of 1992's AFV acquisition requirements. This policy requires that 75% of new light-duty vehicles leased or purchased in Metropolitan Statistical Areas (cities with populations of 200,000 or more) are AFVs. Since FY 1998, DOI has been able to meet or

exceed the EPA requirements. This can be attributed to DOI's commitment to environmental stewardship, increased AFV production by vehicle manufacturers, growth in the fueling infrastructure, and a creative financing arrangement with GSA. Individual Bureau goals are compliant with EPACT.

The uses of AFVs are cleaner burning than conventionally fueled vehicles. AFVs are important to DOI's energy strategy, to help reduce the Nation's dependence on foreign crude oil. The Government-wide Federal Automotive Statistical Tool (FAST) implemented in FY 2000 is evolving as an important management system for reporting AFV acquisition information and alternative fuel consumption. The DOI is committed to work with the Department of Energy and GSA on strengthening FAST. The FAST consolidates reporting of AFV-related information through a web-based system merging information generated by DOI, the Bureaus and facilities Nation-wide, as well as GSA.

Computer Demanufacturing.

DOI facilities dispose of electronics in a safe and environmentally compliant way. In 2001, DOI and the Bureau of Prison's Federal Prison Industries (FPI) signed a Memorandum of Understanding (MOU). The MOU provides recycling and demanufacturing service for DOI's excess unserviceable and obsolete electronic equipment nationwide. Under this MOU, which remains in force, FPI is charged with dismantling and recycling transferred electronic equipments and components, and removing and disposing of hazardous substances, material and wastes from the equipment, in accordance with Federal, state and local laws and regulations.

## **NATIONAL BUSINESS CENTER**

*Reporting under Section 307 (Sections 502, 503, and 505) of E.O. 13148.*

The NBC addressed reduction goals for Federal agency release of toxic chemicals by awarding a multi-year custodial contract, which began using environmentally safe and healthful custodial products in the Interior Complex. Chemical cleaning products used under this contract meet or exceed mandatory criteria for reducing the release of toxic chemicals. Contract specifications include the following:

- Must not be a hazardous waste (when disposed of),
- Must not be packaged in an aerosol container,
- Must not contain any probable or known carcinogens,
- Must not contain any ingredients that are designated as "Toxics of Concern" to the Chesapeake Bay,
- Minimize use of dyes and fragrances, and
- Minimize skin, eye, and respiratory irritation.

Additionally, all the paper products have the desirable characteristic of having been manufactured without the use of elemental chlorine for dyeing and bleaching.



We also recycle computers, Ni-Cad batteries, carpet and padding, toner cartridges, and fluorescent tubes.

We are working with GSA to utilize the Main Interior Building Modernization Project to evaluate environmentally preferable products, as it is a U.S. Green Building Council Leadership in Energy and Developmental Design (LEED) for existing buildings (EB) pilot project. The work being accomplished, as part of this project, will earn credit toward building certification if/as permitted by the LEED-EB pilot program.

*Section 505. Reduction and Management of Use of Ozone Depleting Substances (ODS).*

The following actions were taken by the NBC to reduce and manage the use of ozone depleting substances:

- a. We replaced two of the three chillers that service the Main Interior Building with R-134-A, which is an HCFC (hydro-chlorofluorocarbon) refrigerant and is much more environmentally-friendly than a CFC refrigerant. As part of the Main Interior Building Modernization Project, the remaining chiller that services the building has been replaced and contains R-134-A. We are working with GSA to have them replace the two chillers in our building that service their Headquarters building that is across the street from our facility.
- b. As part of the South Interior Building Chiller Replacement Project, the chillers were replaced in CY 04. The refrigerant chosen by GSA is R-123, which is an HCFC (hydro-chlorofluorocarbon) refrigerant and is much more environmentally-friendly than a CFC refrigerant
- c. The custodial contract for the Interior Complex requires the use of environmentally-friendly products including low- or no-VOC cleaning compounds and chemicals.
- d. Banned aerosol containers from use in the Interior Complex. Only pump sprayers can be used to dispense cleaning chemicals.
- e. Prohibited the sale of products in aerosol containers at the Main Interior Building, office supply store.

*Environmental Management Systems*

*Agency - Level*

*Agency-Level Policies*

*CY 04 Objective: Agency has incorporated the EMS goals and requirements of E.O. 13148 into existing agency environmental directives, policies, and documents. Specific E.O. 13148 EMS goals and requirements that are relevant to this requirement include: (1) Section 401(b)-EMS implementation at all appropriate facilities by December 31, 2005 and (2) Section 404(a)-establishment of EMS training program for senior managers and other appropriate personnel.*

*If your agency has incorporated the above E.O. 13148 EMS goals and requirements into agency directives, policies, and/or documents, please provide a copy of, or public web link to, those directives, policies, and documents (please note that internal web links that do not allow public access to the document preclude review of the document by EPA).*

The NBC has not incorporated EMS goals and requirements into our documents to date.

*If your agency has not yet incorporated the above E.O. 13148 EMS goals and requirements into agency directives, policies, and documents, please provide the status of this critical CY 04 Objective.*

The NBC is in the process of doing this.

*If your agency has other directives, policies, or documents (e.g.; pollution prevention planning documents, green procurement guidance) that reflect consideration of EMS concepts and design, please provide copies of, or public web links to, those documents.*

The NBC does not have formal documents in place, however, we are working with all our directorates regarding pollution prevention, recycling, green procurement, conservation of utilities, and the use of biobased products.

*Self-Declaration Protocol.*

*CY 04 Objective: Agency has issued a Self-Declaration Protocol based on the Federal Self-Declaration Protocol guidance.*

*If your agency has issued an EMS Self-Declaration Protocol, please provide a copy of, or public web site link to, that document. If subordinate agencies, commands, services or bureaus within your agency issued a Self-Declaration Protocol, please provide a copy of, or public web site link to, that document as well.*

The NBC plans to use the guidance issued by the Department for our EMS Self-Declaration Protocol.

*If your agency has issued an EMS Self-Declaration Protocol, please provide a brief description of the procedures for declaring when each appropriate facility has an EMS in-place. If your agency has information to report this year about implementation of this protocol that may aid other Federal agencies, please provide that information.*

Not applicable at this time.

*If your agency has issued an EMS Self-Declaration Protocol, please describe how that document was issued and communicated throughout your agency (i.e., issued by memorandum from the Agency Environmental Executive to all field facilities on (date); issued through agency directives system).*

Not applicable at this time.

*If your agency has not yet developed and issued an EMS Self-Declaration Protocol, please provide status of, and estimated completion date for, accomplishing this important CY 04 Objective.*

We anticipate issuing our own EMS Self-Declaration Protocol in CY 07.

*Resources Distributed.*

*CY 04 Objective: Agency has provided resources (e.g., dollars, FTE) for EMS implementation to its appropriate facilities.*

*Please state how your agency's appropriate facilities receive adequate funding for EMS development and implementation.*

We have not received any funding to date for EMS.

*If your agency has not yet provided resources for EMS implementation, please explain the status of any plans to provide such resources.*

The NBC requested \$150K in the FY 2005 Departmental Budget request. The Department did not fund our request, and as a result we will be unable to comply with the mandate to establish an EMS.

*Please describe your agency's current or intended process for providing EMS funding resources for operation/maintenance of and continual improvement of facility EMS efforts.*

The NBC is relying on the Department to fund EMS implementation. The NBC is legally authorized to operate as a fee-for-service, full-cost-recovery business operation. We cannot subsidize one customer at the cost of another. To implement this absent funding would be counter to our legal mandate. Included as part of the Division of Facilities Management Services budget request as stated in the question above, we did not receive the \$150K funding request. We have an individual working part-time with our seven directorates to implement EMS. Until funding is received, we will not be able to implement an EMS program fully.

## *Resources*

*CY 03 Objective: Resources for EMS implementation are included in the agency's FY04 budget request.*

*Please describe how resources (e.g. dollars, staff) for EMS implementation are included in your agency's 2004 budget request.*

The NBC requested \$100K in the FY 2004 Departmental Budget request. The Department did not fund our request, and as a result we will be unable to comply with the mandate to establish an EMS.

*Please describe how your agency provides resources (dollars, staff) for EMS implementation. For example, is EMS implementation support a separate line item or incorporated as part of a larger resource allocation item such as management overhead?*

The NBC is relying on the Department to fund EMS implementation. The NBC is legally authorized to operate as a fee-for-service, full-cost-recovery business operation. We cannot subsidize one customer at the cost of another. To implement this absent funding would be counter to our legal mandate. Included as part of the Division of Facilities Management Services budget request as stated in the question above, we did not receive the \$100K funding request. We have an individual working part-time with our seven directorates to implement EMS. Until funding is received, we will not be able to fully implement an EMS program.

*Please identify/describe the specific organization(s) or personnel who are tasked with implementing EMS within your agency; briefly describe their roles. Describe any full-time equivalent (FTE) resources identified at the headquarters and/or facility level.*

The NBC Division of Facilities Management Services; Safety, Health, and Environmental Team has been tasked with implementing EMS NBC-wide. There are no full-time FTE resources assigned to EMS; it is a collateral duty assignment.

*Please describe any obstacles encountered and/or specific success stories in obtaining resources for EMS.*

Lack of funding to develop, implement, and maintain a complete EMS program.

## *2. Guidance*

*CY 03 Objective: Agency has issued EMS implementation guidance for use by appropriate facilities.*

*Please describe any guidance (manual(s), directive(s), order(s)) your agency has issued to assist your facilities and organizations in implementing EMS.*

The NBC has not issued guidance to our facilities and organizations in implementing EMS to date.

*Please describe how the guidance was issued (for example: issued by memorandum from the Agency Environmental Executive to all field facilities on (date); issued through agency directives system).*

Guidance issued is distributed through e-mail to environmental coordinators.

*If your agency has developed agency-specific EMS guidance; please provide a brief description, as well as a copy or a web site link that can be shared with other federal agencies.*

We have not issued organization-specific EMS guidance to date.

*EMS training for senior-level managers.*

*CY 03 Objective: Agency has provided EMS training for appropriate agency-level senior managers.*

*Please describe the EMS awareness or implementation training provided or planned for senior-level managers at your agency.*

We plan to provide EMS training to our senior-level management.

*Please describe (by position or title) who has received and who is to receive training, and the content of the training. Note: Training could include (for example) computer or web-based deployment, incorporation in newcomers' training, and/or briefings at senior staff meetings.*

Our Industrial Hygienist has received limited EMS training from EPA during October and November 2003. The training included an overview of EMS, implementation steps, and auditing requirements.

*If your agency elected to use outside training resources, please provide relevant references or contact information.*

Not applicable.

*If your agency developed agency-specific training materials; please provide a brief description, as well as a copy, or a web site link that can be shared with other Federal agencies.*

We plan to use training materials developed by the DOI Bureaus and other Federal agencies where they exist.

*Agency EMS policy.*

*CY 02 Objective: Agency top management has signed an agency EMS policy.*

*If your agency has signed agency EMS policy since the time of last year's annual report, please provide a copy. Otherwise, please describe the current status of such a policy.*

We are in the process of formalizing an EMS policy.

*Program to conduct facility environmental compliance audits.*

*CY 02 Objective: Agency has developed and implemented a program to conduct facility environmental compliance audits.*

*If your agency has developed and implemented a program to conduct facility environmental compliance audits since the time of last year's annual report, please briefly describe that program. If not, please describe your current status.*

We have not developed nor implemented a program to conduct compliance audits to date.

*Environmental Management Systems.*

*Facility - Level*

*Current List of "Appropriate Facilities" for EMS Implementation.*

*E.O. 13148 states that each agency should determine its appropriate facilities based on the "size, complexity, and the environmental aspects of facility operations." The E.O. 13148 Interagency Environmental Leadership Workgroup has defined an appropriate facility for EMS implementation as: "Any Federal property, properties, organization or operation that conducts activities that can have a significant impact on the environment, either directly or indirectly, individually or cumulatively, due to operations of that facility's mission, processes or functions."*

*Annual Reporting Requirement: Agency has updated the list of facilities where an EMS will be implemented.*

*Please include in the annual report the current list of your agency's "appropriate facilities" by name and location for EMS implementation. Identify what appropriate facilities were added or removed from the list provided in your CY 03 annual report.*

NBC is in the process of identifying its "appropriate facilities".

*Please provide or describe the criteria or process used to determine your agency's appropriate facilities. Absent that document, it will be assumed that the process is informal.*

*Facilities with Measurable Objectives and Targets.*

*CY 04 Objective: Percent of appropriate facilities that have documented measurable environmental objectives and targets.*

*Based on the list of appropriate facilities for your agency, identify the number and percentage that have documented, measurable objectives and targets based on significant environmental aspects.*

This has not yet been accomplished.

*Facilities with Environmental Management Programs.*

*CY 04 Objective: Percent of appropriate facilities that have established environmental management programs specifically to achieve each of their environmental objectives and targets.*

*Based on the list of appropriate facilities for your agency, identify the number and percentage that have environmental management programs in-place to accomplish established objectives and targets.*

This has not yet been accomplished.

*Facilities with Awareness Training Program.*

*CY 04 Objective: Percent of appropriate facilities that have developed a program for EMS awareness training.*

*Based on the list of appropriate facilities for your agency, identify the number and percentage that have developed an EMS awareness-training program. Awareness training provides the workforce with the understanding of how their daily processes interact with the environment and their role in implementation of the EMS.*

Not applicable at this time.

*Facility EMS policy.*

*CY 03 Objective: Appropriate facilities have issued an EMS policy statement.*

*Based on the list of appropriate facilities for your agency, identify how many have signed and issued a facility EMS policy statement. Note: To be counted for this category, EMS policy statements must have been issued after the issuance of EO 13148 (April, 2000) or must be*

*specific to EMS. The document need not be a “stand-alone” document. For example, it may be part of an integrated facility environment, safety and health management system policy statement.*

We have not issued facility EMS policy statements to date.

*Facility implementation training.*

*CY 03 Objective: Appropriate facilities have provided EMS implementation training to the personnel responsible for implementing EMS.*

*Based on the list of appropriate facilities for your agency, identify how many have conducted EMS training for the facility staff who will develop and implement the EMS.*

We have not provided EMS training to the facility staff to date.

*Facility significant environmental aspects.*

*CY 03 Objective: Appropriate facilities have identified and documented their significant environmental aspects.*

*Based on the list of appropriate facilities for your agency, please identify the number of appropriate facilities that have identified and documented their significant environmental aspects.*

The NBC is in the process of identifying its “appropriate facilities” list.

## **PROGRESS OF DEPARTMENTAL BUREAUS – E.O. 13148 IMPLEMENTATION**

### **BUREAU OF INDIAN AFFAIRS**

The Bureau of Indian Affairs (BIA) is pleased to report the following activities as part of the Department’s CY 04 report.

*Reporting under Section 307 (Sections 502, 503, and 505) of E.O. 13148.*

The BIA’s use of toxic chemicals and associated releases of toxic chemicals continue to be limited. BIA facilities that are required to report requirements under Section 311 (TIER I and II) and Section 313 (Toxic Release Inventory) are minimal. BIA facilities are audited under the Bureau-wide Environmental Management Audit Program (EMAP) against EPCRA Compliance



and Green Procurement criteria. Potential toxic substance reductions are identified during EMAP audits using these criteria, and noted in the associated audit report. Best Management Practices (BMPs) are recommended on a facility-by-facility basis to purchase products with reduced toxicity.

Toxics reduction at BIA facilities is also being handled as part of a comprehensive BIA-wide Greening Program. The 2004 strategy to address Section 502 was not fully achieved in 2004 but additional progress is anticipated for completion in 2004. Components of this strategy are as follows:

- Division of Environmental and Cultural Resources Management (DECRM) will conduct a BIA-wide survey to identify those facilities that report under EPCRA and obtain information on use of toxic chemicals within the BIA.
- DECRM will analyze this information and identify potential toxic chemicals for targeted substitution and reduction.
- DECRM will report its results to the Environmental Management System (EMS) and Green Procurement Workgroups.
- Based upon direction from the Workgroups, DECRM will develop and issue field guidance on reduction of these targeted substances, if any.

Conformance with this field guidance will be monitored through the BIA EMAP and green procurement data calls to be developed.

*Section 505 of E.O. 13148 establishes a variety of actions that are to be taken by agencies to reduce and manage the use of ozone depleting substances (ODS) at Federal facilities, including the development of a plan to phase out acquisition of Class I ODS by December 31, 2010. Agencies are requested to report on the implementation of their baseline plans to address the requirements of this section, including available descriptions of successes in replacing ODS at Federal facilities, as well as identification of challenges encountered in reducing use of ODS.*

BIA continues to assess the use of Class I ODSs at Bureau facilities during EMAP Audits. Class 1 ODSs are primarily used in Halon fire suppression systems for critical file storage facilities. Recommendations to replace or retrofit Class I ODS systems are provided on a facility-by-facility basis.

*Environmental Management Systems.*

#### Agency -Level

##### *Agency-Level Policies*

*CY 04 Objective: Agency has incorporated the EMS goals and requirements of E.O. 13148 into existing agency environmental directives, policies, and documents. Specific E.O. 13148 EMS goals and requirements that are relevant to this requirement include: (1) Section 401(b)--EMS*

*implementation at all appropriate facilities by December 31, 2005 and (2) Section 404(a)-- establishment of EMS training program for senior managers and other appropriate personnel.*

*If your agency has incorporated the above E.O. 13148 EMS goals and requirements into agency directives, policies, and/or documents, please provide a copy of, or public web link to, those directives, policies, and documents (please note that internal web links that do not allow public access to the document preclude review of the document by EPA).*

*If your agency has not yet incorporated the above E.O. 13148 EMS goals and requirements into agency directives, policies, and documents, please provide the status of this critical CY 04 Objective.*

The BIA has developed draft revised and updated policies in Part 59 of the Indian Affairs Manual (IAM). These revisions include a chapter dedicated to EMS as well as chapters that address environmental management policies, authorities and responsibilities, environmental compliance, and others. The revised policies are currently undergoing final review and revision by the BIA EMS workgroup prior to submission to the BIA Policy office for their review. A specific timeline for adoption and promulgation of the revised IAM is not available. Currently, release of the latest IAM is anticipated in FY 2006. It should be noted, promulgation of the revised IAM has been held up in part to reorganization efforts by the BIA over the last several years which have limited the ability to finalize organizational roles and responsibilities.

To assure that management commitment to the Bureau's EMS efforts is communicated BIA-wide while the IAM goes through the necessary directives review and approval process, a memorandum on the bureau's intentions relative to EMS and associated environmental management responsibilities is being prepared.

*If your agency has other directives, policies, or documents (e.g.; pollution prevention planning documents, green procurement guidance) that reflect consideration of EMS concepts and design, please provide copies of, or public web links to, those documents.*

The BIA EMAP has EMS criteria as part of its protocol (i.e., EMAP Operating Guide). The EMAP also includes Green Procurement and NEPA compliance in its scope. Pollution prevention opportunities are also addressed in the audit protocol.

*Self-Declaration Protocol.*

*CY 04 Objective: Agency has issued a Self-Declaration Protocol based on the Federal Self-Declaration Protocol guidance.*

*If your agency has issued an EMS Self-Declaration Protocol, please provide a copy of, or public web site link to, that document. If subordinate agencies, commands, services or bureaus within your agency issued a Self-Declaration Protocol, please provide a copy of, or public web site link to, that document as well.*

*If your agency has issued an EMS Self-Declaration Protocol, please provide a brief description of the procedures for declaring when each appropriate facility has an EMS in place. If your agency has information to report this year about implementation of this protocol that may aid other Federal agencies, please provide that information.*

*If your agency has issued an EMS Self-Declaration Protocol, please describe how that document was issued and communicated throughout your agency (i.e., issued by memorandum from the Agency Environmental Executive to all field facilities on (date); issued through agency directives system).*

*If your agency has not yet developed and issued an EMS Self-Declaration Protocol, please provide status of, and estimated completion date for, accomplishing this important CY 04 Objective.*

The BIA has not developed an EMS Self Declaration Protocol. The Self Declaration Protocol will be integrated into the Bureau EMS Indian Affairs Environmental Management System Handbook currently under development (see below). The Protocol is anticipated to be completed in FY 2006.

*Resources Distributed.*

*CY 04 Objective: Agency has provided resources (e.g., dollars, FTE) for EMS implementation to its appropriate facilities.*

*Please state how your agency's appropriate facilities receive adequate funding for EMS development and implementation.*

The BIA has not provided any dedicated funding directly to facilities specifically for the purpose of developing EMSs. The BIA strategy for EMS development and implementation has been focused on the provision of funding at the Bureau and Regional level to develop and deliver training, EMS development assistance, and EMS tools to facilities rather than directing funds to these field locations. This provides broader EMS support with scarce resources. This strategy is consistent with the BIA philosophy that the primary resource needed at the facility level for EMS development and implementation is person hours rather than funds. For BIA, a successful facility-level EMS will be a grass-roots, people-driven process, not one based on purchase of equipment, software, or contractors to do the work.

BIA does recognize the need to fund environmental projects to support (but not develop) the facility-level EMS. As such, BIA has established various budget mechanisms to fund environmental projects at the field level such as environmental remediation and audit corrective action. Some of these projects include aspects that can cultivate a management system approach and foster development and implementation of EMS elements such as operational controls (e.g., one-time/baseline plans and procedures and emergency response planning).

*If your agency has not yet provided resources for EMS implementation, please explain the status of any plans to provide such resources.*

As noted in responses above, the BIA EMS strategy focuses on providing resources other than funding to facilities to foster development and implementation of EMS. Activities to support EMS development at the facility level will include development of an EMS toolkit, training and on-site EMS coaching as an add-on to baseline audits and through follow-up activities.

*Please describe your agency's current or intended process for providing EMS funding resources for operation/maintenance of and continual improvement of facility EMS efforts.*

See response above.

*The following CY 03 Criteria are provided as follow-up to the CY 03 annual report. In 2004, if your agency reported that it did not fully meet the CY 03 objective for one or more of these criteria, you are requested to provide an update of progress in addressing these important criteria.*

*Resources.*

*CY 03 Objective: Resources for EMS implementation are included in the agency's FY 2004 budget request.*

*Please describe how resources (e.g. dollars, staff) for EMS implementation are included in your agency's 2004 budget request.*

Budget requirements including contractor support and internal resources (e.g., person hours contributed by DECRM staff and Regional Environmental Scientists) were estimated in the FY 2005 budget request. However, only the contractor EMS budget was specifically tagged as EMS-related.

*Please describe how your agency provides resources (dollars, staff) for EMS implementation. For example, is EMS implementation support a separate line item or incorporated as part of a larger resource allocation item such as management overhead?*

Funding for contractor support to assist the BIA in EMS development and implementation is estimated as a line item. BIA Regional Environmental Scientists and other applicable staff time for EMS is accounted for as part of the annual planning process but is not specifically identified as EMS-related. EMS development or implementation resources are not otherwise accounted for at this time.

*Please identify/describe the specific organization(s) or personnel who are tasked with implementing EMS within your agency; briefly describe their roles. Describe any fulltime equivalent (FTE) resources identified at the headquarters and/or facility level.*

The following roles and responsibilities related to EMS are defined in the draft IAM Part 59, Chapter 2, Environmental Management Systems:

- Chief, Division of Environmental and Cultural Resources Management, Office of Management Support Services.
  - Convene and direct an Indian Affairs EMS Workgroup to assist in Bureau-wide EMS development;
  - In consultation with the EMS Workgroup, develop and maintain the Indian Affairs strategy and plan for development and implementation of Indian Affairs EMSs including consultation with Bureau representatives, establishment of criteria for identifying appropriate locations and offices for a
  - formal EMS, identification of Bureau EMS elements and EMS implementation;
  - Document and maintain the Indian Affairs EMS Handbook;
  - Provide assistance to regions, offices and locations in EMS development and implementation;
  - Conduct Bureau-wide EMS training and communication;
  - Oversee the development, implementation and maintenance of the Central Office EMS;
  - Develop and administer the Bureau EMS quality assurance program and monitor and report to Bureau managers, on Bureau-wide EMS activities and performance.
- BIA EMS Workgroup Members.
  - Provide guidance to the Chief DECRM, in the development and implementation of the BIA EMS including participation in strategic planning, policy development, review of guidance materials and procedures, communication, training development and delivery.
- Regional Environmental Scientists.
  - Provide EMS guidance and assistance to location and office managers and staff within their region;
  - Lead the development and maintenance of the Regional EMS; and
  - Monitor and report on Regional EMS activities and performance;

- All Indian Affairs Managers.
  - Lead, coordinate, provide resources for, and actively endorse the establishment, implementation and maintenance of an appropriate EMS or EMS components within their area of responsibility as defined in Indian Affairs guidance.
- All Indian Affairs Employees.
  - Comply with applicable Indian Affairs procedures, and documented responsibilities that relate to environmental management systems.

Note that all Indian Affairs Managers applies to managers at all levels of the BIA organization (i.e., Central Office to facility level) and throughout the Bureau (i.e., Office of Indian Education Programs, Office of Law Enforcement Services, and Balance of the Bureau). Specific roles and responsibilities may be revised and refined based on changes in EMS planning and the ongoing reorganization of BIA. These will be reflected in both EMS memorandum and the final IAM.

*Please describe any obstacles encountered and/or specific success stories in obtaining resources for EMS.*

The DECRM has had success with its EMS Workgroup which has had broad and enthusiastic participation by Bureau personnel. Workgroup membership has included a diverse group of individuals including OIEP and OLES representatives, Superintendents and facility managers, OFMC, Regional Environmental Scientists, DECRM and others. This has allowed the Bureau to develop a strategy for EMS development and roll-out that is realistic and that should be able to account for the great diversity and varied issues present in the BIA.

There have been a number of challenges in developing the BIA EMS. Several of the most significant challenges are outlined below:

- Level of Environmental Sophistication. Paramount among the challenges to establishing EMS at BIA facilities is the existing level of environmental management present at field locations. There has historically not been significant environmental training or assistance to personnel at BIA facilities. Many facility staff are not aware of core compliance requirements. BIA is rapidly responding to these needs: BIA is currently working to complete all its baseline environmental audits and in the last several years various training and assistance tools have been developed and provided. However, BIA facilities collectively are still relatively unsophisticated when it comes to environmental management. As a result, BIA facility personnel are generally not ready for complex EMSs.

To overcome this obstacle, BIA is developing an EMS strategy that builds on the foundation of its audit program with achieving compliance using sustainable, pollution prevention approaches as a top priority. Through the audit program, BIA will introduce EMS concepts and procedures at the facility level gradually. EMS assistance will be provided based on the identified level of the facility performance established during the course of each audit. EMS assistance will first target the establishment of EMS elements that provide the most benefit, such as standard operating procedures (SOPs) for common compliance issues and environmental impacts (e.g. universal waste, fuel storage). More sophisticated elements of the system will be introduced as environmental management matures at the facility level and personnel gain confidence in managing their facility's compliance and environmental aspects. This strategy means the overall BIA EMS will take longer to implement but will be better received, more sustainable and deeply ingrained over the long-term.

- Bureau Reorganization. The Bureau has been analyzing and testing various organizational changes at the Central Office and regional level. The reorganization has slowed progress. Activity in this area has begun to stabilize.
- Bureau Variability. BIA facilities have great variability, including schools ranging from elementary schools to colleges, detention centers and police forces, operations and maintenance shop complexes, large irrigation projects, and office-based operations. The Bureau has had to consider this great variability in developing an EMS that is a right-fit and that is useful and practical for these varied facilities. To address this variability, BIA is planning to undertake EMS pilots in FY 2005 at a school and a detention center (or other suitable OLES facility) with the intention of developing templates that are tailored for these types of facilities. (Pilot EMSs are already underway at agency operations and maintenance facilities.)
- BIA Ownership versus Operation. A significant portion of BIA facilities are operated under contract or grant to Tribes. Many of these facilities have some of the most significant aspects and impacts on a BIA-wide basis. The BIA has been challenged in developing an EMS that will address these facility operations in a manner that is effective and sensitive to tribal issues. BIA cannot mandate these entities to develop an EMS but plans to encourage the development of EMS within tribal operations and will make EMS development tools available to them. BIA will also strongly encourage the incorporation of provisions to require adoption of EMS components into contracts and grants involving BIA-owned facilities, and may require this in some circumstances.

*Guidance.*

*CY 03 Objective: Agency has issued EMS implementation guidance for use by appropriate facilities.*

*Please describe any guidance (manual(s), directive(s), order(s)) your agency has issued to assist your facilities and organizations in implementing EMS.*

The BIA has developed various EMS training materials for use in Bureau EMS workgroups and conferences. BIA has also developed EMS audit criteria as part of the EMAP. In addition, BIA has developed various EMS operational control guidance including SOPs for key facility-level activities and model environmental program plans.

The BIA has developed a model EMS Plan that has been used on a pilot-basis to document facility-level EMSs. This plan is currently under review and is being updated based on input from the BIA EMS workgroup and analysis of EMS pilot activities.

The BIA is developing a comprehensive Environmental Management System Handbook that will provide detailed guidance and procedures to implement the BIA EMS in accordance with the strategy outlined above. The Handbook will be completed in FY 2006.

*Please describe how the guidance was issued (for example: issued by memorandum from the Agency Environmental Executive to all field facilities on (date); issued through agency directives system).*

EMS training materials were provided through on-site workgroup meetings and conferences. Model SOPs and plans have been integrated into an Environmental Management Assistance Tool (EMAT) which has been distributed at various training sessions and during EMAP audits. Plans are underway for broader distribution both through a CD-ROM and intranet, with full Bureau-wide distribution achieved by the end of FY 2005.

The model EMS Plan was not widely distributed but was shared with pilot facilities and used to document facility EMS's at these pilot locations.

The BIA Environmental Management Systems Handbook currently under development will also be provided via CD and intranet along with the model EMS Plan and templates.

*If your agency has developed agency-specific EMS guidance, please provide a brief description, as well as a copy or a web site link that can be shared with other Federal agencies.*

No guidance is available at this time.



*EMS Training for Senior-Level Managers.*

*CY 03 Objective: Agency has provided EMS training for appropriate agency-level senior managers.*

*Please describe the EMS awareness or implementation training provided or planned for senior-level managers at your agency.*

EMS training has not occurred for central office or regional senior managers. A briefing for senior central office managers is anticipated in FY 2006 following the development of the BIA Environmental Management System Handbook.

The DECRM recently developed and piloted Environmental Management training in one BIA region for BIA facility managers and superintendents. The training focused on the BIA EMAP, audit corrective action process and compliance assistance tools and EMS approaches to solving environmental problems. Several additional trainings in other regions are anticipated in FY 2005 and 2006.

The DECRM will continue to explore new ways and find additional opportunities to train senior managers on EMS and other critical environmental topics and will augment the existing strategy as appropriate.

*Please describe (by position or title) who has received and who is to receive training, and the content of the training. Note: Training could include (for example) computer or web based deployment, incorporation in newcomers' training, and/or briefings at senior staff meetings.*

See descriptions above.

*If your agency elected to use outside training resources, please provide relevant references or contact information.*

No outside training resources were utilized or are identified for use in EMS training at this time.

*If your agency developed agency-specific training materials, please provide a brief description, as well as a copy or a web site link that can be shared with other Federal agencies.*

No EMS-specific training materials have been developed at this time. See description of training provided above.

*The following CY 02 Criteria are provided as follow-up to the CY 02 annual report. In 2003, if your agency reported that it did not fully meet the CY 02 objective for one or more of these criteria, you are requested to provide an update of progress in addressing these important criteria.*

*Agency EMS Policy CY 02 Objective: Agency top management has signed an agency EMS policy.*

*If your agency has signed agency EMS policy since the time of last year's annual report, please provide a copy. Otherwise, please describe the current status of such a policy.*

The BIA EMS policy is under development as part of the IAM. The finalized policy is anticipated in the first quarter of FY 2006.

#### *Program to Conduct Facility Environmental Compliance Audits*

*CY 02 Objective: Agency has developed and implemented a program to conduct facility environmental compliance audits.*

*If your agency has developed and implemented a program to conduct facility environmental compliance audits since the time of last year's annual report, please briefly describe that program. If not, please describe your current status.*

BIA continues to conduct multimedia environmental audits under the BIA EMAP. Fifteen "agency" audits were conducted in FY 2004 that included 66 individual locations throughout the U.S. These included BIA OIP (i.e., agencies), OIEP (i.e., schools) and OLES (i.e., detention centers and police departments). The BIA also conducted an additional 39 fast tracked OLES audits. An EMAP plan for 2005 has been prepared and is being implemented. The Plan calls for the completion of an additional 15 audits including approximately 50 facilities. Additional facilities may be audited under special circumstances.

#### *Facility -Level*

##### *1. Current List of "Appropriate Facilities" for EMS Implementation*

*E.O. 13148 states that each agency should determine its appropriate facilities based on the "size, complexity, and the environmental aspects of facility operations."*

*The E.O. 13148 Interagency Environmental Leadership Workgroup has defined an appropriate facility for EMS implementation as:*

*"Any Federal property, properties, organization or operation that conducts activities that can have a significant impact on the environment, either directly or indirectly, individually or cumulatively, due to operations of that facility's mission, processes or functions."*

*Annual Reporting Requirement: Agency has updated the list of facilities where an EMS will be implemented.*

*Please include in the annual report the current list of your agency's "appropriate facilities" by name and location for EMS implementation. Identify what appropriate facilities were added or removed from the list provided in your CY 03 annual report.*

The BIA EMS workgroup is in the process of developing an updated definition of appropriate facilities based on the BIA reorganization and other factors. A list of facilities, based on these revised criteria will be completed in FY 2005.

*Please provide or describe the criteria or process used to determine your agency's appropriate facilities. Absent that document, it will be assumed that the process is informal.*

*The revised process for defining appropriate facilities identified during the May 2005 EMS Workgroup Meeting is currently being documented and will be provided in the BIA Environmental Management Systems Handbook.*

Note: EPA and the Office of the Federal Environmental Executive recognize that appropriate facility listings are subject to change. In the report for CY 05, agencies will again be requested to list their appropriate facilities and to identify additions and deletions from their list as well as those facilities that have self declared conformance to the requirements of Section 401 of E.O. 13148. Updates of agency appropriate facility lists will be required in the E.O. 13148 Annual Reports at least through FY 2006, and on an as-needed basis thereafter.

*Facilities with Measurable Objectives and Targets.*

*CY 04 Objective: Percent of appropriate facilities that have documented measurable environmental objectives and targets.*

*Based on the list of appropriate facilities for your agency, identify the number and percentage that have documented measurable objectives and targets based on significant environmental aspects.*

With the exception of several pilot facilities, the process for identifying aspects and impacts and determining measurable objectives and targets has not been formally instituted within BIA. However, the BIA has completed environmental audits at over 193 of approximately 348 facilities. Findings associated with these audits have been informally defined as significant aspects and impacts at these facilities. The closure of findings associated with these audits has been defined as objectives for these facilities with targets established as part of their corrective action plans.

*Facilities with Environmental Management Programs.*

*CY 04 Objective: Percent of appropriate facilities that have established environmental management programs specifically to achieve each of their environmental objectives and targets.*

*Based on the list of appropriate facilities for your agency, identify the number and percentage that have environmental management programs in-place to accomplish established objectives and targets.*

There has been no formal process yet instituted to establish complete environmental management programs at BIA facilities. Facilities that have had environmental audits may have developed corrective action plans to address environmental audit findings. However, these plans do not constitute complete environmental management programs in the context of EMS.

BIA will continue efforts to further develop, pilot, and begin to implement its EMS process in FY 2005. Several additional EMSs are anticipated at BIA facilities in FY 2005.

#### *Facilities with Awareness Training Program*

*CY 04 Objective: Percent of appropriate facilities that have developed a program for EMS awareness training.*

*Based on the list of appropriate facilities for your agency, identify the number and percentage that have developed an EMS awareness training program. Awareness training provides the workforce with the understanding of how their daily processes interact with the environment and their role in implementation of the EMS.*

*If any of your facilities or organizations developed facility-specific EMS training materials that you would like to share, please provide a brief description as well as a copy or a public web site where the training is available.*

BIA facility-level awareness training has not been conducted at this time. DECRM has recently piloted environmental management training in one BIA region that includes EMS awareness. This training, in conjunction with other compliance assistance training materials provided as part of the BIA EMAT, will provide tools for BIA managers to implement facility-level training in the future.

*Please provide an update of the CY 03 criteria, provided below.*

*Facility EMS Policy CY 03 Objective: Appropriate facilities have issued an EMS policy statement.*

*Based on the list of appropriate facilities for your agency, identify how many have signed and issued a facility EMS policy statement. Note: To be counted for this category, EMS policy statements must have been issued after the issuance of E.O. 13148 (April, 2000) or must be*

*specific to EMS. The document need not be a “stand-alone” document. For example, it may be part of an integrated facility environment, safety, and occupational health management system policy statement.*

Facility-level policies have not been developed within BIA. Guidance will be provided to facility-level managers using the BIA Environmental Management System Handbook which is currently under development.

#### *Facility Implementation Training.*

*CY 03 Objective: Appropriate facilities have provided EMS implementation training to the personnel responsible for implementing EMS.*

*Based on the list of appropriate facilities for your agency, identify how many have conducted EMS training for the facility staff that will develop and implement the EMS.*

*If any of your facilities or organizations have developed facility-specific EMS training materials which you would like to share, please provide a brief description as well as a copy or a web site.*

The BIA has provided EMS awareness during audits, and more recently through a pilot environmental management training in one region, which was attended by facility managers and superintendents. It is anticipated that additional environmental awareness trainings will be conducted Bureau-wide.

#### *Facility Significant Environmental Aspects*

*CY 03 Objective: Appropriate facilities have identified and documented their significant environmental aspects.*

*Based on the list of appropriate facilities for your agency, please identify the number of appropriate facilities that have identified and documented their significant environmental aspects.*

*The identification and review of aspects have been critical issues in development and implementation of EMSs at Federal facilities. In order to assist in implementation efforts across the Federal Government, you are requested to provide a copy (or a web site reference) of available facility aspect lists.*

See comments above regarding the process for identification of significant aspects and impacts through the audit process.

## **BUREAU OF LAND MANAGEMENT**

The Bureau of Land Management (BLM) is pleased to report the following activities as part of the Department's CY 04 report.

*Reporting under Section 307 (Sections 502, 503, and 505) of E.O. 13148.*

*Section 502 Reduction goals for releases of toxic chemicals as reported under Section 313 of the Emergency Planning and Community Right-to-Know Act.*

The BLM reports its use of fire retardant, which is mixed on a batch basis as an aqueous solution and applied to wildland fires. The active constituents, ammonium sulfate, and/or ammonium phosphate, contain the ammonium ion in a stable form. The fire retardant is used as intended and the amount released to the environment depends on the fire season. There are no viable substitute products at this time.

However, decreasing fire retardant use is expected to be a side benefit of the national fuels reduction program. The need for fire retardant will decline as the federal government and its state partners reduce heavy fuel loads arising from past disruptions of natural fire cycles and other land management practices. Applying a variety of fuel treatment types, such as mechanical thinning and controlled burning, will reduce the intensity and severity of wildland fires and restore health to fire-adapted ecosystems. The primary fuels reduction efforts are in wildland-urban interface areas where fire suppression is most critical and use of fire retardant has been extensive. Eliminating heavy fuel loads in wildland-urban interface areas will reduce the risks to communities and result in a corresponding decrease in fire retardant applications.

*Section 505 Reduction in use of Ozone Depleting Substances (ODS).*

The BLM incorporates sustainable design features in new construction to the greatest extent possible. A number of features reduce air conditioning load and consequently the use of coolants and refrigerants. These include direct/indirect evaporative cooling, interior/exterior light shelves on south windows, Lo-E glazing, increased building shell insulation, and systems commissioning.

The BLM has installed a new humidification system at the Anasazi Heritage Center in Colorado. Located within the Canyons of the Ancients National Monument, the Anasazi Heritage Center is an interpretive and cultural resource facility with permanent and temporary exhibits, collections storage, conservation and research laboratories. There is also a library, theater and bookstore. Priceless Native American artifacts are stored and displayed at the facility. The Center preserves approximately 2 million artifacts and records for current and future researchers and historians. The humidification system consisted of a boiler and centralized air conditioning and heating system with duct work. The chiller uses R-22, chlorodifluoromethane - the most environmentally friendly refrigerant available for this application.

*Section 305 Amended or updated policies, strategies, and plans.*

The BLM continues to incorporate energy efficiency, conservation, and environmental preferability and performance provisions into policies, plans, operations, and activities. For example:

Green procurement policies, guidance, and case studies are posted on BLM's Acquisition Internal Homepage.

One web page lists 10 green purchasing actions for purchasers and requisitioners, such as: ask existing suppliers about environmentally friendly alternatives and give them a try, and ask vendors to provide supplies in reusable packaging that can be returned to the supplier.

- Energy efficiency, water conservation, recycling, and green cleaning clauses are included in all new space lease agreements and service contracts to the greatest extent practicable.
- BLM offices and centers prepare space leasing and fleet plans to:
  - adjust for changing program needs,
  - maximize the cost effectiveness and efficient use of space, and
  - reduce fleet size and vehicle sizes.
- Employees holding government credit cards receive comprehensive procurement training and refresher courses which include environmental preferability and performance.
- Photovoltaics and other renewable energy systems are used to generate electricity for security lighting, water pumping, weather/water monitoring, and other power needs at off-grid locations such as campgrounds, visitor contact stations, fire stations, and communication sites.

*Section 401 Environmental management systems.*

A formal Environmental Management System (EMS) is under development. However, the BLM has already adopted a number of EMS elements in BLM's Compliance Assessment - Safety, Health, and the Environment (CASHE) program. Findings, root causes, and corrective actions are tracked, used to identify systemic problems, and evaluated against Bureau-wide performance goals. In addition, the BLM offers a curriculum of in-house environmental compliance and hazardous materials management training for technical specialists and managers.

Specific items to be addressed from the Guidance for CY 04 Annual Report:

- Agency-level policies — The EMS policy will be issued by the end of FY 2005.
- Self-declaration protocol — The BLM expects to develop an EMS self-declaration protocol in FY 2006.

- Resources distributed — Funding for EMS development and implementation is provided in BLM’s hazard management and deferred maintenance budgets.
- Current list of “Appropriate Facilities” for EMS implementation — The BLM expects to identify Appropriate Facilities in FY 2006.
- Facilities with measurable objectives and targets — Specific objectives and targets are part of BLM’s CASHE program and are evaluated against Bureau-wide performance goals.
- Facilities with environmental management programs — All BLM facilities are covered under the CASHE program which essentially and effectively establishes and tracks environmental management objectives.
- Facilities with awareness training program — In addition to state and field office workshops, the BLM offers a curriculum of in-house environmental compliance and hazardous materials management training at its National Training Center.

*Section 402 Regulatory compliance auditing program.*

The BLM instituted its CASHE program in 1993. The scope of the CASHE audits was expanded in 2001 to include all occupational safety and health regulations and applicable nationally recognized standards related to facility compliance. This comprehensive scope helps to ensure that BLM field offices are complying with the regulation or standard that is most protective of human health and the environment. The purpose of the CASHE program is to evaluate all BLM facilities and operations in order to: 1) identify compliance issues and policy and training needs; 2) increase safety, health, and environmental awareness of all employees; 3) expand ownership for compliance by promoting implementation of collaborative solutions; and 4) facilitate budgeting for the implementation of those solutions. Specific benefits include: 1) improved protection of the public’s and employees’ safety and health; 2) prevention of environmental damage and accidents and potential savings of thousands of dollars in environmental restoration or worker’s compensation costs; 3) enhanced opportunities for training personnel in environmental and hazardous material safety and health issues specific to BLM facilities and operations; and 4) improved transfer of environmental and hazardous material safety and health information and technology to the field.

Baseline CASHE audits have been completed at every field office and major facility in the BLM. In FY 2004, follow-up audits were completed at 25 organizational units, most of which were third-round audits. The field offices update the status of their CASHE findings and corrective actions annually. This update is used to identify policy and funding requirements. A portion of BLM’s deferred maintenance appropriation is earmarked specifically for corrective actions. The BLM’s Annual Performance Plan includes an intermediate goal to improve the safety, health, and environmental condition of its organizational units. In FY 2004, 87 percent of organizational units were rated in good Safety, Health, and Environmental condition.



*Section 601 Environmentally and economically beneficial landscape practices.*

In the BLM, “Xeriscaping,” i.e., use of native plants, and water conservation are routine land management practices. Opportunities to apply environmentally and economically beneficial landscaping techniques are extensive. They range from Xeriscape demonstration plots at offices and recreation sites to testing native vegetative covers on closed landfills and abandoned mine tailings.

The BLM is using low water native landscaping at facilities in BLM’s first national monument, the Grand Staircase-Escalante National Monument in Utah. In addition, the new Rawlins Field Office building in Wyoming, currently under construction, will have water efficient landscaping, stormwater management, and erosion and sedimentation control. Also, in light of the multiyear drought in the West where BLM has the majority of its facilities and operations, field offices are encouraged to evaluate their existing landscaping for water conservation and drought resistant modifications.

*Section 701 Roles and responsibilities of procurement officials and acquisition program managers.*

The BLM acquisition policy is to consider environmental performance and purchase environmentally preferable products and services, including EPA designated Comprehensive Procurement Guideline (CPG) items. In light of BLM’s environment-based mission, managers and acquisition personnel consider the potential environmental effects of the eventual disposal of purchases and acquisitions. Considerations include possible injury to wildlife, the potential for recycling, and biodegradability.

Environmental performance and preferability clauses are standard in solicitations, contracts, and other procurement and acquisition documents. However, not all purchasing is performed by acquisition personnel. Employees with government credit cards make most small purchases and it is their responsibility to select green products. The Green Procurement icon on BLM’s Acquisition Internal Homepage opens extensive information about green purchasing.

**BUREAU OF RECLAMATION**

The Bureau of Reclamation (WBR) is pleased to provide the following information on its activities relating to E.O. 13148.

*Reporting Elements Cited in Section 307 of E.O 13148.*

The WBR is in the process of integrating the reduction requirements by revising existing Pollution Prevention (P2) Plans. The Lower Colorado Region (LCR) plans on integrating this into their Regional Environmental Management System in CY 05. WBR facilities recycle the majority of their hazardous waste and substitutes for hazardous chemicals are constantly being evaluated for use whenever they become available. The Yuma Area Office, in the LCR recently

changed the amount of chlorine stored on-site as a result reevaluating their operational requirements for hazardous materials. This reduction took them below the threshold requirement to have a Risk Management Plan (CAA) or Process Safety Management Plan (OSHA).

#### *Section 505 Reductions in Ozone-Depleting Substances.*

Offices in the Great Plains (GP) Region purchase products through the GSA catalog, which supplies products that comply with E.O. 13148. When a product is not available through GSA, employees are reminded to use products that do not contain ozone-depleting substances.

R-12 and/or R-22 are still used by WBR facilities, typically in air conditioning systems. Bulk Halon is used in fire extinguishing systems in many dam control rooms and large computer rooms. Regions are evaluating environmentally friendly alternatives to these substances but use of Halon for these systems will likely continue for the foreseeable future. The two factors driving this are many alternatives with no one clear choice with an advantage and replacement, once a choice is made, by regularly scheduled maintenance.

#### *Environmental Management Systems*

##### *Agency-Level*

##### *Agency-Level Policies*

*CY 04 Objective: Agency has incorporated the EMS goals and requirements of E.O. 13148 into existing agency environmental directives, policies, and documents. Specific E.O. 13148 EMS goals and requirements that are relevant to this requirement include: (1) Section 401(b)--EMS implementation at all appropriate facilities by December 31, 2005 and (2) Section 404(a)-- establishment of EMS training program for senior managers and other appropriate personnel.*

The WBR's Office of Program and Policy Services (OPPS) is responsible for developing bureau-wide policy and directives and standards and for overall program coordination. Each Region has the Regional HazMat Coordinator assigned as the Regional EMS coordinator. The two WBR pilot implementation facilities, Yuma and Lake Berryessa, have the facility managers as their EMS coordinators. Although implementation has begun at these facilities the remainder of WBR facilities, Regions and Area Offices are awaiting WBR-wide guidance and review of the pilots to begin EMS implementation.

*If your agency has incorporated the above E.O. 13148 EMS goals and requirements into agency directives, policies, and/or documents, please provide a copy of, or public web link to, those directives, policies, and documents (please note that internal web links that do not allow public access to the document preclude review of the document by EPA.*

When the guidance is final, copies will be sent to OEPC.

*If your agency has not yet incorporated the above E.O. 13148 EMS goals and requirements into agency directives, policies, and documents, please provide the status of this critical CY 04 Objective.*

An EMS Policy and EMS Directive and Standard (D&S) are both in the final stages of the approval process. This guidance is in support of existing Departmental Manual guidance 515 DM 4, and makes the Regional and Area Offices responsible for the Regional and facility-specific EMS programs. The WBR has a Commissioner formed EMS team that developed the guidance and is in the process of developing a workable definition of “appropriate facility” based the current compliance audit program. The EMS Team consists of representation from all Regional Offices and representatives from Yuma Area Office (LCR) and Lake Berryessa (Mid-Pacific Region.). The two pilot Regions have draft guidance memorandum awaiting the approval of the draft WBR EMS Policy and Directives and Standards.

The LCR has incorporated the E.O. 13148 goals into a draft regional memorandum, which is currently being reviewed by the Regional Director. It is anticipated that directives and other documents that incorporate the E.O. 13148 goals will be developed once the EMS is complete.

*If your agency has other directives, policies, or documents (e.g.; pollution prevention planning documents, green procurement guidance) that reflect consideration of EMS concepts and design, please provide copies of, or public web links to, those documents.*

At this time the WBR does not have examples of these types of documents. Currently Regions use directives, policies, and other guidance documents developed by the DOI.

*Self-Declaration Protocol CY 04 Objective: Agency has issued a Self-Declaration Protocol based on the Federal Self-Declaration Protocol guidance.*

*If your agency has issued an EMS Self-Declaration Protocol, please provide a copy of, or public web site link to, that document. If subordinate agencies, commands, services or bureaus within your agency issued a Self-Declaration Protocol, please provide a copy of, or public web site link to, that document as well.*

No facility within the WBR has issued an EMS Self-Declaration protocol, nor is there a requirement established to do that. The WBR Office of Policy is currently working to get basic program guidance through the approval process. The WBR EMS Team is developing a EMS Self-Declaration Protocol in the form of a Reclamation D&S based on DOI guidance.

*If your agency has issued an EMS Self-Declaration Protocol, please provide a brief description of the procedures for declaring when each appropriate facility has an EMS in-place. If your agency has information to report this year about implementation of this protocol that may aid other Federal agencies, please provide that information.*

Not in place at this time.

*If your agency has issued an EMS Self-Declaration Protocol, please describe how that document was issued and communicated throughout your agency (i.e., issued by memorandum from the Agency Environmental Executive to all field facilities on (date); issued through agency directives system).*

Not in place at this time.

*If your agency has not yet developed and issued an EMS Self-Declaration Protocol, please provide status of, and estimated completion date for, accomplishing this important CY 04 Objective.*

With the approval of the EMS Program D&S, the WBR will use the EMS Self-Declaration Protocol guidance developed by DOI to develop and implement an EMS Self-Declaration D&S by December 31, 2005.

#### *Resources Distributed*

*CY 04 Objective: Agency has provided resources (e.g., dollars, FTE) for EMS implementation to its appropriate facilities.*

*Please state how your agency's appropriate facilities receive adequate funding for EMS development and implementation.*

EMS specific resources (\$67,000) have been allocated at the Bureau level for contract support of EMS implementation. Regional allocation is limited to the two pilot regions and the pilots projects themselves.

The LCR has obligated \$60,000 for development and implementation of an EMS and awarded a contract to PRIZIM for its support and assistance to the Region. The Yuma Area Office obligated \$50,000, the Phoenix Area Office obligated \$7076.54, and we anticipated that the LCR Dams Office will obligate \$7076.54 as well.

The Mid-Pacific Region (MPR) HazMat Coordinator performs work as the Environmental Management System Coordinator. In April/May 2005 this region will hire an environmental specialist to work principally on EMS. EMS Staff and training time for the collateral and the new environmental specialist will be paid out of the existing Hazmat management budget. The region is forming an EMS Team in April 2005 to deal with implementation issues. Area Office/Facility/Division specific EMS teams are scheduled to assemble in August 2005. Funding for team members will be provided from their respective offices from overhead or other budgets, with no specific EMS budget available.

*If your agency has not yet provided resources for EMS implementation, please explain the status of any plans to provide such resources.*

*Resources have been provided in the LCR and MPR.*

Please describe your agency's current or intended process for providing EMS funding resources for operation/maintenance of and continual improvement of facility EMS efforts. The EMS Program will be considered in the budget planning process to ensure that adequate resources are provided.

*The following CY 03 Criteria are provided as follow-up to the CY 03 annual report. In 2004, if your agency reported that it did not fully meet the CY03 objective for one or more of these criteria, you are requested to provide an update of progress in addressing these important criteria.*

#### *Resources*

*CY 03 Objective: Resources for EMS implementation are included in the agency's FY 2004 budget request.*

*Please describe how resources (e.g. dollars, staff) for EMS implementation are included in your agency's 2004 budget request.*

Resources for implementation are included in the WBR's FY 2005 budget request. EMS is not a separate line item in the WBR budget, but is incorporated in operational budgets for Regional and Area Offices and the environmental portion of the WBR-wide program budget. The WBR has one Bureau-level full time equivalent position supporting EMS staff in five Regional and two Area Offices (as collateral duties). The need for funding is recognized at the Regional level.

The two pilot Regions (LCR and MPR) have employees in full time equivalent positions that manage EMS activities as part of their regular job duties. The LCR has an employee in a full time equivalent position who as part of his/her regular job duties, acts as the EMS Coordinator for the Region.

*Please describe how your agency provides resources (dollars, staff) for EMS implementation. For example, is EMS implementation support a separate line item or incorporated as part of a larger resource allocation item such as management overhead?*

EMS is not a separate line item in the WBR budget request for 2005 although some activities (consultant contracting) are tracked separate. The EMS budget is incorporated in the environmental portion of Policy and Operational budgets in Bureau, Regional, and Area Offices.

*Please identify/describe the specific organization(s) or personnel who are tasked with implementing EMS within your agency; briefly describe their roles. Describe any full-time equivalent (FTE) resources identified at the headquarters and/or facility level.*

The Regional HazMat Coordinators are tasked with the coordination and implementation of a Region's EMS. Area Offices are responsible for Area Office and facility-specific tasks. A WBR EMS Team has been appointed by the Commissioner and includes eight FTEs from different offices in the LCR to assist in the EMS development and implementation.

*Please describe any obstacles encountered and/or specific success stories in obtaining resources for EMS.*

The Policy, and the associated EMS Program D&S, that is awaiting signature demonstrates the WBR Commissioner's support of EMS. Both the MPR and LCR Regional Directors have acknowledged the importance of EMS and are committed to providing the resources needed for EMS development, implementation, and maintenance.

## 2. Guidance

*CY 03 Objective: Agency has issued EMS implementation guidance for use by appropriate facilities.*

*Please describe any guidance (manual(s), directive(s), order(s)) your agency has issued to assist your facilities and organizations in implementing EMS.*

WBR policy is awaiting signature by the Commissioner with concurrence of the Regions. The LCR EMS Coordinator has distributed (via email) an EMS Implementation Plan to the Regional and Area Offices to assist them in tailoring the EMS to their specific facility needs. LCR also has an EMS Manual in draft form to be distributed May 2005 for comment.

*Please describe how the guidance was issued (for example: issued by memorandum from the Agency Environmental Executive to all field facilities on (date); issued through agency directives system).*

So far, no formal guidance has been distributed within WBR. The first will be the EMS Program D&S currently awaiting signature. It is anticipated that a follow-on EMS Self-Declaration D&S detailing self declaration requirements will be in place by end of this calendar year. An official memorandum was sent from the Commissioner to the Regional Directors requesting that they appoint personnel to the Reclamation EMS Team. A similar letter was sent by the Regional Directors of LCR and MPR and to their Area and Field Managers.

*If your agency has developed agency-specific EMS guidance; please provide a brief description, as well as a copy or a web site link that can be shared with other Federal agencies.*

Although some guidance is being developed with contractor support in LCR in the form of an EMS Manual, it is still in draft form and not available for distribution to other Federal agencies.

*EMS Training for Senior-Level Managers.*

The WBR has briefed senior managers in the Washington Office and prepared a notebook of EMS resources for managers. The WBR has made available EPA's web-based training materials and a generic manager's guide to interested Regional and Area Offices. The WBR has prepared in-person training for senior managers Reclamation-wide; it has not been possible to schedule this training yet. The Director and Deputy Director of Operations, the Director, Policy Management and Technical Services, and the Director, OPPS, have all been individually briefed on EMS. Regional staff has briefed some individual facility managers, Area Office managers, and Regional Directors. The WBR's EMS coordinator and environmental auditing coordinator have attended several EPA-sponsored EMS training sessions. The EMS team will receive special training as it proceeds with its work. Several Regional EMS coordinators have attended EMS training as well. The two pilot facilities have received training for their staff.

MPR: EPA Region IX (San Francisco, CA, Larry Woods, 415-972-3857)  
and Environment International (Seattle, WA, Pam Bridgen, 206-525-3362)

Yuma Area Office (YAO): HDR/Charis Corporation (Phoenix, AZ); OPPS: PRIZIM Inc., (Gaithersburg, MD, Frank Priznar, 301-840-9316).

*CY 03 Objective: Agency has provided EMS training for appropriate agency-level senior managers.*

*Please describe the EMS awareness or implementation training provided or planned for senior-level managers at your agency.*

One facility conducted informal training for facility staff in the fall of 2003. Another facility plans to conduct training for facility staff in spring 2004. Training in EMS is being scheduled for June 2004. The establishment of a WBR-wide EMS team is a major accomplishment of 2003. The team will review draft policy and guidance and advise on EMS implementation. To date, one facility has issued an EMS policy statement: Lake Berryessa, California. When other facilities are identified for EMS implementation, training will be given to those employees who will be working on the facilities selected.

Training for senior-level managers in the LCR will be provided by PRIZIM as part of their contract. Training is anticipated to take place in late spring or early summer 2005.

*Please describe (by position or title) who has received and who is to receive training, and the content of the training. Note: Training could include (for example) computer or web-based deployment, incorporation in newcomer's training, and/or briefings at senior staff meetings.*

The EMS Coordinator and EMS Team have received orientation training from PRIZIM. Additional training will be conducted for this group in April 2005. The Regional Management Team received a briefing by PRIZIM in 2004.

*If your agency elected to use outside training resources, please provide relevant references or contact information.*

The LCR awarded a contract to PRIZIM in 2004 for support and assistance in developing and implementing an EMS. Contact information: PRIZIM, 7 Park Avenue, Olde Towne Gaithersburg, MD 20877, 301.840.9316.

*If your agency developed agency-specific training materials; please provide a brief description, as well as a copy or a web site link that can be shared with other Federal agencies.*

None available at this time.

*The following CY 02 Criteria are provided as follow-up to the CY 02 annual report. In 2003, if your agency reported that it did not fully meet the CY 02 objective for one or more of these criteria, you are requested to provide an update of progress in addressing these important criteria.*

*Agency EMS Policy CY 02 Objective: Agency top management has signed an agency EMS policy.*

The WBR has (via e-mail memorandum) issued guidance for a new EMS team and has drafted an EMS policy, along with directives and standards, which are being reviewed by WBR's EMS team. The WBR is relying on Departmental Manual guidance 515 DM 4 for general direction and WBR Regions and Area Offices are awaiting WBR-wide guidance to begin EMS implementation. The Commissioner will issue reclamation policy shortly. WBR directives and standards are also in process for signature by the Director, OPSS. The EMS program is acknowledged as a valuable initiative. As noted above, specific funding is being identified for the program within the overall budget for the WBR.

The WBR's two pilot facility assessments will help identify the need for consistent audit procedures or protocols and the WBR considers life-cycle costing of its requirements, including environmental considerations. Furthermore, the WBR-wide EMS Team will advise on EMS implementation and develop protocols as appropriate. In addition, one region has developed an EMS web page. With two facilities proceeding as pilot projects, WBR hopes to soon have experience on the costs and benefits of EMS implementation at Federal facilities.

*If your agency has signed agency EMS policy since the time of last year's annual report, please provide a copy. Otherwise, please describe the current status of such a policy. Policy has been drafted and is proceeding through the approval process for signature by the Commissioner.*

#### *Program to Conduct Facility Environmental Compliance Audits*

The WBR has D&S, ENV 02-08, (Hazardous Materials and Hazardous Waste Auditing and Review Program Implementation) which addresses the WBR compliance audit program. It has been in place since 1996 and gives audit protocol and guidance. This guidance is currently being updated by the Program and Policy Services HazMat Coordinator and the Regional HazMat Coordinators. The program provides for conducting compliance audits of all WBR facilities,



which are reasonably expected to purchase, use, store, treat, or dispose of hazardous materials/wastes through the course of their normal activities. Audits are conducted to determine facility compliance with applicable Federal, state, and local rules, regulations, and standards. The audit reports consist of a summary of findings based on completed checklists applicable to the facility, including any necessary follow-up actions, and a transmittal letter or memorandum to the facility manager. As required by the D&S, the audit program itself is reviewed every three years. An annual compliance audit summary report is sent to the Department's OEPC. Compliance issues and follow-up corrective actions identified in the audit report are tracked to completion. The GRPA Goal for the audit program was reviewed in April of this year and revised to more accurately reflect the health of the audit program.

### *Facility Level*

#### *Current List of "Appropriate Facilities" for EMS Implementation*

The WBR's internal EMS team is defining "appropriate facility," using the Interagency Environmental Leadership Workgroup definition as a starting point, and will identify the number of "appropriate facilities." To date, two facilities have been informally identified. One region will complete nearly all of the baseline audits of project facilities in CY 04. Information from these audits will be used to select facilities for EMS, once "appropriate facility" is defined. A recent meeting of the Bureau HazMat Coordinator's and Program Manager resulted in a draft definition of "appropriate facility" based on experience with the audit program. This definition will be finalized and incorporated in the EMS Self-Declaration D&S and echoed in the revision of the Audit Program D&S and guidance.

*Annual Reporting Requirement: Agency has updated the list of facilities where an EMS will be implemented.*

*Please include in the annual report the current list of your agency's "appropriate facilities" by name and location for EMS implementation. Identify what appropriate facilities were added or removed from the list provided in your CY 03 annual report.*

Due to the limited number of WBR owned or operated facilities; LCR is the only region to finalize a list of appropriate facilities. All other regions are awaiting definition of appropriate facility in guidance.

*Please provide or describe the criteria or process used to determine your agency's appropriate facilities. Absent that document, it will be assumed that the process is informal.*

The LCR informally designated facilities as appropriate for EMS implementation based on their operations. The Southern California Area Office has a limited number of staff and has no operational function that make it necessary to implement an EMS there at this time. The other

offices in the region all conduct work that has an obvious impact on the environment, therefore, they were deemed appropriate facilities. The guidance definition of appropriate facility is being based and quantified on handling of hazardous materials and Reclamation ownership of lands or facilities and their operation.

*Facilities with Measurable Objectives and Targets*

*CY 04 Objective: Percent of appropriate facilities that have documented measurable environmental objectives and targets.*

*Based on the list of appropriate facilities for your agency, identify the number and percentage that have documented, measurable objectives and targets based on significant environmental aspects.*

Only the two pilot regions are involved in identifying targets and objectives: (1) MPR has scheduled this for completion in November 2005, and (2) The LCR is still in the process of identifying objectives and targets and a percentage is not available at this time. It is anticipated that the objectives and targets will be identified between April and June of 2005.

*Facilities with Environmental Management Programs.*

*CY 04 Objective: Percent of appropriate facilities that have established environmental management programs specifically to achieve each of their environmental objectives and targets.*

*Based on the list of appropriate facilities for your agency, identify the number and percentage that have environmental management programs in-place to accomplish established objectives and targets.*

The WBR regions are still in the process of implementing EMS. The LCR has a list of facilities in place with PN soon to follow. Regions are scheduled to have a final list in December 2005. The emphasis in WBR at this point is on compliance. The resulting WBR EMS will be based on the existing successful Audit program in place since 1996. At this point there are no programs to specifically develop and achieve objectives and targets. Most are to maintain compliance.

*Facilities with Awareness Training Program.*

*CY 04 Objective: Percent of appropriate facilities that have developed a program for EMS awareness training.*

One of the components of the WBR EMS Program D&S is awareness training. The follow-up Self-Declaration D&S will echo this requirement.

MPR has scheduled development of an EMS training program to be completed in March 2006.

Great Plains Region (GPR) continues to work on development of policy and guidance for implementation of EMS. Once policy and guidance have been established, the GPR will work with “appropriate facilities” to develop and EMS awareness training program.

The LCR’s contract with PRIZIM includes EMS awareness training for all employees. The training is scheduled for October-November 2005.

*Please provide an update of the CY 03 criteria, provided below.*

*1. Facility EMS Policy*

*CY 03 Objective: Appropriate facilities have issued an EMS policy statement.*

*Based on the list of appropriate facilities for your agency, identify how many have signed and issued a facility EMS policy statement. Note: To be counted for this category, EMS policy statements must have been issued after the issuance of E.O. 13148 (April, 2000) or must be specific to EMS. The document need not be a “stand-alone” document. For example, it may be part of an integrated facility environment, safety, and occupational health management system policy statement.*

The WBR continues to work on development and implementation of EMS policy and guidance. Once policy and guidance have been established, the Regions will work with “appropriate facilities” to implement EMS protocols, identify significant environmental aspects and develop EMS awareness training programs.

The UCR is currently drafting a Regional Letter that shall serve as the Regional EMS policy memorandum. It will be in place before December 2005 and will identify the number of facilities that have environmental aspects for EMS purpose.

The MPR Draft Environmental Policy Memorandum has been prepared. The final document is scheduled to be completed in April 2005. The MPR does not presently plan to have a separate EMS policy for each facility.

The LCR’s EMS memorandum is waiting on the Regional Director’s approval and signature.

*Facility Implementation Training.*

*CY 03 Objective: Appropriate facilities have provided EMS implementation training to the personnel responsible for implementing EMS.*

*Based on the list of appropriate facilities for your agency, identify how many have conducted EMS training for the facility staff that will develop and implement the EMS.*

No formal EMS training has yet been conducted at the bureau level, although management has been briefed and updated on program progress and needs. The Executive Order and related documents have been distributed to all personnel throughout the Region down to the facility level.

The two pilot regions are in the process of developing EMS training programs for applicable Region and facility personnel. MPR has a completion date of August 2005 and LCR EMS Team, including employees from the Regional, Phoenix, and Yuma offices, has received orientation training. Additional training in LCR was accomplished in April of 2005. At this point Reclamation has no facility-specific EMS training materials.

*Facility Significant Environmental Aspects CY 03 Objective: Appropriate facilities have identified and documented their significant environmental aspects.*

To date in WBR, one facility has identified its significant environmental aspects, and a second is in the process of doing so. The Yuma Area Office (YAO) conducted an EMS Gap Analysis during the fall of 2003 to see where YAO stands relative to general EMS requirements with respect to both strengths and needs for improvement. The Gap Analysis was based on the International Standards Organization (ISO) 14000 model. In addition to the Gap Analysis, an implementation plan with a schedule was prepared. Two facilities have conducted a Gap Analysis as ISO 14000: Desalting Plant and Office in Yuma, Arizona. A facility environmental management review took place in March 2004 at Lake Berryessa, California.

*Based on the list of appropriate facilities for your agency, please identify the number of appropriate facilities that have identified and documented their significant environmental aspects.*

With the exception of the two pilot regions this has not yet been accomplished, but is currently being worked on in UCR as they develop their EMS memorandum. Indications are that the storage and use of oil at hydropower plants will be one of the most significant environmental aspect Reclamation-wide with use of herbicides by irrigation and water conservation districts running a close second; however, this has not been formally identified and documented at this time.

MPR has identification of Lake Berryessa's aspects and impacts scheduled for completion in October 2005.

LCR's facilities (Yuma Area Office and Lower Colorado Dam Facilities Office) are in the process of identifying significant environmental impacts. The WBR anticipates these will be identified and documented in the next few months.

*The identification and review of aspects have been critical issues in development and implementation of EMS at Federal facilities. In order to assist in implementation efforts across the Federal Government, you are requested to provide a copy (or a web site reference) of available facility aspect lists.*

WBR facilities are identified on the WBR intranet. This information is being currently being used to identify significant facility environmental aspects. Once identified, a list will be provided to OEPC.

## **FISH AND WILDLIFE SERVICE**

The Fish and Wildlife Service (FWS) reports the following E.O. 13148 activities for CY 04.

*Reporting Elements Cited in Section 307 of E.O. 13148.*

*Sections 502, 503, and 505 are specifically cited as sections of E.O. 13148 that must be addressed in the agency annual report.*

There are no FWS facilities that report releases of toxic chemicals under Emergency Planning and Community Right To Know Act (EPCRA) Section 313 provisions. Consequently no baseline has been established. FWS policies address all the requirements of Section 503 of E.O. 13148. The few Service facilities to which the policies are applicable, manage use of any ODS effectively and have plans to phase out all acquisition of Class I ODS by December 31, 2010.

### *Environmental Management Systems*

*Each agency annual report should address the following agency-level and facility-level criteria.*

#### *Agency-Level Policies*

*CY 04 Objective: Agency has incorporated the EMS goals and requirements of E.O. 13148 into existing agency environmental directives, policies, and documents. Specific E.O. 13148 EMS goals and requirements that are relevant to this requirement include: (1) Section 401(b)-- EMS implementation at all appropriate facilities by December 31, 2005 and (2) Section 404(a)-- establishment of EMS training program for senior managers and other appropriate personnel.*

The FWS has complied with Sections 401(b) and 404(a). Policies are in place and training was provided to Senior Managers, Regional Office personnel and field station personnel where EMS has been implemented. The FWS will have 67 EMS's in place by December 31, 2005.

*If your agency has incorporated the above E.O. 13148 EMS goals and requirements into agency directives, policies, and/or documents, please provide a copy of, or public web link to, those directives, policies, and documents (please note that internal web links that do not allow public access to the document preclude review of the document by EPA).*

Director's Order No. 144, "Greening the Service through Environmental Leadership" (copy attached) was established May 7, 2002. Section 7a.3) directed the Service to implement an Environmental Management System (EMS) per E.O. 13148. In addition, a Director's memorandum dated February 4, 2003, established the Services Environmental Management Commitment.

Director's Order No. 144 will be converted to permanent FWS policy by June 30, 2005.

*If your agency has not yet incorporated the above E.O. 13148 EMS goals and requirements into agency directives, policies, and documents, please provide the status of this critical CY 04 Objective.*

*If your agency has other directives, policies, or documents (e.g.; pollution prevention planning documents, green procurement guidance) that reflect consideration of EMS concepts and design, please provide copies of, or public web links to, those documents.*

#### *Self-Declaration Protocol*

*CY 04 Objective: Agency has issued a Self-Declaration Protocol based on the Federal Self-Declaration Protocol guidance.*

*If your agency has issued an EMS Self-Declaration Protocol, please provide a copy of, or public web site link to, that document. If subordinate agencies, commands, services or bureaus within your agency issued a Self-Declaration Protocol, please provide a copy of, or public web site link to, that document as well.*

*If your agency has issued an EMS Self-Declaration Protocol, please provide a brief description of the procedures for declaring when each appropriate facility has an EMS in-place. If your agency has information to report this year about implementation of this protocol that may aid other Federal agencies, please provide that information.*

*If your agency has issued an EMS Self-Declaration Protocol, please describe how that document was issued and communicated throughout your agency (i.e., issued by memorandum from the Agency Environmental Executive to all field facilities on (date); issued through agency directives system).*

*If your agency has not yet developed and issued an EMS Self-Declaration Protocol, please provide status of, and estimated completion date for, accomplishing this important CY 04 Objective.*

The FWS developed an EMS Self-Declaration Protocol. It is currently in the coordination and comment phase of implementation.

The final protocol will be issued by September 30, 2005.

### *Resources Distributed*

*CY 04 Objective: Agency has provided resources (e.g., dollars, FTE) for EMS implementation to its appropriate facilities.*

*Please state how your agency's appropriate facilities receive adequate funding for EMS development and implementation.*

FWS appropriate facilities receive \$5,000 each for initial development and implementation of EMS. Other EMS related expenses needed to maintain the EMS program must come from existing operation accounts.

*If your agency has not yet provided resources for EMS implementation, please explain the status of any plans to provide such resources.*

*Please describe your agency's current or intended process for providing EMS funding resources for operation/maintenance of and continual improvement of facility EMS efforts.*

FWS facilities will have to rely on existing operational program funding or request funds through other accounts such as the Maintenance Management System. There are no specific plans to provide EMS funding resources beyond FY 2006.

*The following CY 03 Criteria are provided as follow-up to the CY 03 annual report. In 2004, if your agency reported that it did not fully meet the CY 03 objective for one or more of these criteria, you are requested to provide an update of progress in addressing these important criteria.*

### *Resources*

*CY 03 Objective: Resources for EMS implementation are included in the agency's FY 2004 budget request.*

*Please describe how resources (e.g. dollars, staff) for EMS implementation are included in your agency's 2004 budget request.*

Resources in the amount of \$150,000 for EMS implementation were included in the 2004 and 2005 budget allocations. Budget cuts in future years require facilities to implement their EMS's solely with their program dollars and maintenance management funds. Due to significant 2007 budget cuts, this funding will be further reduced.

*Please describe how your agency provides resources (dollars, staff) for EMS implementation. For example, is EMS implementation support a separate line item or incorporated as part of a larger resource allocation item such as management overhead?*

A small amount of funding (\$150,000) is listed as a line item in the construction budget. Additional funding needed to implement EMS is taken from existing operating budgets at the Regional and Headquarters level.

*Please identify/describe the specific organization(s) or personnel who are tasked with implementing EMS within your agency; briefly describe their roles. Describe any fulltime equivalent (FTE) resources identified at the headquarters and/or facility level.*

Through FY 2005 the following applies:

Three staff in the Environmental and Facility Compliance (EFC) Branch, Division of Engineering (DEN) (Washington Office) allocate an average of 15 percent of their time implementing and managing the EMS program. No one single person is dedicated to the program.

One Regional Environmental Compliance Coordinator in each of seven Regions allocates 15-20 percent of his/her time implementing and managing the EMS program as part of their environmental management duties.

Field station staffs implement and manage the EMS programs as a collateral duty. The amount of time spent on EMS activities varies considerably from facility to facility.

With future budget cuts, environmental programs must compete with other critical safety programs for limited funding resources.

*Please describe any obstacles encountered and/or specific success stories in obtaining resources for EMS.*

*Budget cuts in FY 2006 and 2007. It is our understanding that Service, DOI and GAO budget personnel will be trained in the future to address our funding requirements. This action is currently required as a goal by the Presidents Management Council (PMC).*

### *Guidance*

*CY 03 Objective: Agency has issued EMS implementation guidance for use by appropriate facilities.*

*Please describe any guidance (manual(s), directive(s), order(s)) your agency has issued to assist your facilities and organizations in implementing EMS.*

FWS Director's Order No. 144, "Greening the Service through Environmental Leadership" was established May 7, 2002. Section 7 (a.(3)) directed the Service to implement an Environmental Management System (EMS) as directed by E.O. 13148. In addition, a Director's memorandum dated February 4, 2003, established the Services Environmental Management Commitment.



*Please describe how the guidance was issued (for example: issued by memorandum from the Agency Environmental Executive to all field facilities on (date); issued through agency directives system).*

The Director's Order was posted on the FWS Directives Home Page and sent to each Regional Office for distribution to all Service facilities. Site visits to facilities through the environmental auditing program and environmental management systems are used to verify that policy has been implemented. The Order addresses greening initiatives in the FWS through:

- 1) Employee responsibilities;
- 2) Training, environmental audits, Environmental Management Systems, accountability through performance evaluations and awards;
- 3) Environmentally preferable procurement, contracting and designs;
- 4) Conservation planning;
- 5) Community outreach;
- 6) Energy management;
- 7) Landscape management;
- 8) Water and wastewater management; and
- 9) Solid and hazardous waste management.

*If your agency has developed agency-specific EMS guidance; please provide a brief description, as well as a copy or a web site link that can be shared with other Federal agencies.*

We have a standard template to implement EMS on a consistent basis Service-wide.

#### *EMS Training for Senior-Level Managers*

*CY 03 Objective: Agency has provided EMS training for appropriate agency-level senior managers.*

*Please describe the EMS awareness or implementation training provided or planned for senior-level managers at your agency.*

FWS senior level managers in Washington, D.C., and Regional Offices were interviewed and educated about EMS and its planned implementation. In addition, Regional Environmental Compliance Coordinators have briefed senior staff at various Regional meetings. No future formal training other than initial on-site implementation is planned for the field station level.

*Please describe (by position or title) who has received and who is to receive training, and the content of the training. Note: Training could include (for example) computer or web-based deployment, incorporation in newcomers' training, and/or briefings at senior staff meetings.*

See 3.I. above. Appropriate facility personnel receive an EMS and Greening in-brief during the initial EMS site visit. The Washington Office Directorate and Regional senior managers have received training on this program during the Environmental Management Review (EMR) phase of the EMS program.

*If your agency elected to use outside training resources, please provide relevant references or contact information.*

Training was provided by an independent contractor, PRIZIM, Inc. The training was provided to engineering personnel who would take part in EMS facility site visits and implementation follow up.

*If your agency developed agency-specific training materials, please provide a brief description, as well as a copy or a web site link, that can be shared with other Federal agencies.*

PRIZIM, Inc. developed a training manual for those personnel implementing EMS. This was used to further train field personnel during implementation. This manual is not on a web site. We can provide a hard copy upon request.

*The following CY 02 Criteria are provided as follow-up to the CY 02 annual report. In 2003, if your agency reported that it did not fully meet the CY 02 objective for one or more of these criteria, you are requested to provide an update of progress in addressing these important criteria.*

#### *Agency EMS Policy*

*CY 02 Objective: Agency top management has signed an agency EMS policy.*

*If your agency has signed agency EMS policy since the time of last year's annual report, please provide a copy. Otherwise, please describe the current status of such a policy.*

No new policy since last years report. See 2.I & II above.

#### *Program to Conduct Facility Environmental Compliance Audits*

*CY 02 Objective: Agency has developed and implemented a program to conduct facility environmental compliance audits.*

*If your agency has developed and implemented a program to conduct facility environmental compliance audits since the time of last year's annual report, please briefly describe that program. If not, please describe your current status.*

The FWS initiated a comprehensive environmental compliance-auditing program in 1994. The DEN developed a sustainable program by training and certifying Regional personnel while maintaining central control of an audit database, training and distribution of funds. Federal and

State auditing handbooks are provided for auditor use in the field. Our seven Regions conduct approximately 100 compliance audits per year. Compliance findings are tracked on a centrally managed database.

We are presently in our second cycle of audits.

### *Facility Level*

#### *Current List of "Appropriate Facilities" for EMS Implementation*

*E.O. 1.31.48 states that each agency should determine its appropriate facilities based on the "size, complexity, and the environmental aspects of facility operations."*

*The E.O. 13148 Interagency Environmental Leadership Workgroup has defined an appropriate facility for EMS implementation as:*

*"Any Federal property, properties, organization or operation that conducts activities that can have a significant impact on the environment, either directly or indirectly, individually or cumulatively, due to operations of that facility's mission, processes or functions."*

*Annual Reporting Requirement: Agency has updated the list of facilities where an EMS will be implemented.*

*Please include in the annual report the current list of your agency's "appropriate facilities" by name and location for EMS implementation. Identify what appropriate facilities were added or removed from the list provided in your CY 03 annual report.*

A list of appropriate facilities is included in the Appendix.

*Please provide or describe the criteria or process used to determine your agency's appropriate facilities. Absent that document, it will be assumed that the process is informal.*

A formal committee of FWS Environmental Engineers from each Region developed a list of facilities that would most benefit from EMS. This method produced buy-in into the program from our Regional facilities. Criteria used for "appropriate" facilities were based on:

- Size, complexity and impact on the environment;
- Number of personnel at the field stations (10 or more); and
- Commitment of field station manager.

Senior management has agreed with the committee's recommendation and a letter was written to our Regions to implement EMS identifying 67 appropriate facilities. A schedule was developed to implement EMS over a 3 - year period.

### *Facilities with Measurable Objectives and Targets*

*CY 04 Objective: Percent of appropriate facilities that have documented measurable environmental objectives and targets.*

*Based on the list of appropriate facilities for your agency, identify the number and percentage that have documented, measurable objectives and targets based on significant environmental aspects.*

44/67 = 66% of appropriate facilities have documented, measurable objectives and targets based on environmental aspects.

#### *Facilities with Environmental Management Programs*

*CY 04 Objective: Percent of appropriate facilities that have established environmental management programs specifically to achieve each of their environmental objectives and targets.*

*Based on the list of appropriate facilities for your agency, identify the number and percentage that have environmental management programs in-place to accomplish established objectives and targets.*

44/67 = 66% of appropriate facilities have environmental management programs in place to accomplish objectives and targets.

#### *Facilities with Awareness Training Program*

*CY 04 Objective: Percent of appropriate facilities that have developed a program for EMS awareness training.*

*Based on the list of appropriate facilities for your agency, identify the number and percentage that have developed an EMS awareness-training program. Awareness training provides the workforce with the understanding of how their daily processes interact with the environment and their role in implementation of the EMS.*

Unknown. We have not accomplished any EMS status assessments to determine if an awareness-training program is in place. This work is planned for FY 2006.

*If any of your facilities or organizations developed facility-specific EMS training materials that you would like to share, please provide a brief description as well as a copy or a public web site where the training is available.*

*Please provide an update of the CY 03 criteria, provided below.*

#### *Facility EMS Policy*

*CY 03 Objective: Appropriate facilities have issued an EMS policy statement.*

*Based on the list of appropriate facilities for your agency, identify how many have signed and issued a facility EMS policy statement. Note: To be counted for this category, EMS policy statements must have been issued after the issuance of E.O. 13148 (April, 2000) or must be specific to EMS. The document need not be a "stand-alone" document. For example, it may be part of an integrated facility environment, safety, and occupational health management system policy statement.*

44/67 = 66% of appropriate facilities have signed and issued EMS policy statements.

#### *Facility Implementation Training*

*CY 03 Objective: Appropriate facilities have provided EMS implementation training to the personnel responsible for implementing EMS.*

*Based on the list of appropriate facilities for your agency, identify how many have conducted EMS training for the facility staff who will develop and implement the EMS.*

Initial EMS training was provided to field station personnel during the implementation phase by a team who spent one week at each facility. All of this training was conducted at the facility and no follow-up training is planned.

*If any of your facilities or organizations have developed facility-specific EMS training materials which you would like to share, please provide a brief description as well as a copy or a web site.*

#### *Facility Significant Environmental Aspects*

*CY 03 Objective: Appropriate facilities have identified and documented their significant environmental aspects.*

*Based on the list of appropriate facilities for your agency, please identify the number of appropriate facilities that have identified and documented their significant environmental aspects.*

44/67 = 66% of appropriate facilities have identified and documented their environmental impacts.

*The identification and review of aspects have been critical issues in development and implementation of EMSs at Federal facilities. In order to assist in implementation efforts across the Federal Government, you are requested to provide a copy (or a web site reference) of available facility aspect lists.*

*Agencies are urged to use the annual report to address and describe the general status of agency efforts to implement EMS at their facilities. This could include such topics as:*

*Development of EMS audit procedures or protocols as well as plans to apply the protocols at your facilities.*

*Success (or difficulties) in addressing the goals of E.O. 13148 to consider life-cycle concepts in facility and agency procurement procedures.*

*Description of products or activities (e.g., policy development, guidance development, identification of aspects, training, software development, etc.) that were developed using EMS funds at the agency level and at appropriate facilities.*

*Description of what that EMS FTE/personnel support accomplishes at agency and appropriate facility levels. Please state if this support was appropriated via additional funding (i.e., for contractors) or taken from existing personnel.*

*Finally, Federal agencies are encouraged to use the E.O. 13148 annual report as an opportunity to share information regarding agency environmental successes and challenges with their community and other interested parties.*

Summary:

The accomplishments in establishing EMS's at appropriate facilities have been significant and can be attributed to the dedication of the FWS Regional Environmental Compliance Coordinators, Refuge/Hatchery Staff and the Division of Engineering, Environmental Facilities Compliance Branch implementation team.

FWS Service field managers have unique opportunities to partner with many other government agencies, environmental groups and private landowners to work cooperatively for the protection of the environment and in support of the Service mission.

During the EMS process, Standard Operating Procedures have been written and utilized by our facilities, thus improving documentation and encouraging a sustainable environmental management system.

## **MINERALS MANAGEMENT SERVICE**

*Sections 502, 503, and 505 address reduction goals for toxic chemicals and management actions for ozone depleting substances.*

The MMS does not purchase toxic chemicals or ozone depleting substances; therefore, MMS has a negative response to report.

*Environmental Management Systems.*

The MMS leases all buildings from the General Services Administration. Therefore, MMS is not required to have an EMS, nor is MMS required to perform environmental audits of its facilities.

*Other.*

The MMS supports environmental friendly procurement practices and has drafted two procurement policies for “buying green.” The Environmentally Preferable Purchasing Policy and Affirmative Procurement Program policy will be final within the next few months and will be posted on the MMS Pipeline. In addition to requiring consideration of environmental factors in acquisition planning, these policies require all acquisition personnel to attend green procurement training, preferably through the Office of Personnel Management’s Gov Online Learning Center at <<http://www.GoLearn.gov>>.

## **NATIONAL PARK SERVICE**

The National Park Service (NPS) is pleased to offer the following summary of its activities relating to the implementation of Executive Order (E.O.) 13148 in CY 04.

*Section 502 Plans/goals to reduce release of toxic chemicals.*

The NPS is currently developing Director’s Order (DO) 30A: Management of Hazardous Materials, Solid and Hazardous Waste and Environmental Contamination, which underwent revisions in CY 04 and will undergo further review in CY 05. This DO requires parks to annually inventory specific hazardous chemicals and determine if there are environmentally preferable substitutes. It also encourages parks to reduce on-site inventories of hazardous chemicals and materials. Additionally, as part of its Environmental Audit Program (EAP), the NPS audits parks on their efforts to develop and implement an environmentally preferable purchasing program. These criteria include stipulations for reducing the purchase of toxic chemicals. Finally, the NPS has developed guidance documents to assist parks in reducing and managing toxic chemicals. These documents are available to parks on the Park Facilities Management Division Intranet.

NPS concessioners utilize relatively small amounts of toxic chemicals in their operations. These materials are typically used for facility and equipment maintenance and cleaning. The NPS Concession Program has instituted specific procedures to encourage reductions in the use of toxic chemicals at NPS concession facilities. The Standard Concession Contract (<http://concessions.nps.gov/document/StandardContract%2Epdf> and <http://concessions.nps.gov/document/SimplifiedContract%2Epdf>) states that concessioners “shall submit to the Director, at least annually, an inventory of Occupational Safety and Health Administration (OSHA) designated hazardous chemicals used and stored in the Area by the Concessioner. In addition, it states that the “use of extremely hazardous chemicals by concessioners must first be approved by the NPS Director.” The Director may prohibit the use of any OSHA hazardous chemical by the Concessioner in operations under this contract.”

Concession contracts and their associated Operating and Maintenance Plans may encourage or require concessioners to use environmentally preferable products. Environmentally preferable products may also be recommended through the Concession Environmental Audit System (CEAS), which is administered by the Concession Environmental Management Program (CoEMP).

*Section 503 Goals for the reduction in use of specified chemicals.*

Interagency Workgroup has yet to develop the list of chemicals; per Annual Report Guidance provided by the Department, no information is required at this time.

*Section 505 Plans to reduce the use of Ozone Depleting Substances (ODS) and phase out acquisition of Class I ODS by 12/31/10.*

DO 30A (currently under development by NPS) states that all park facilities must phase out the use of Class I ODS by 12/31/10. Additionally, the NPS EAP includes criteria relating to chlorofluorocarbon and Halon management, encouraging parks to scale back their purchase and consumption of these substances. Because of this influence, several parks have been proactive in the removal of Halon from park facilities, and others are taking steps to develop phase-out plans.

The NPS primary use of ODS is for facility and vehicle air conditioning. Therefore, the NPS would like to identify and acquire cost-effective ODS-free substitutes for its air conditioning needs. Unfortunately this is proving to be quite a challenge for the Service due to the lack of commercial availability of these substitutes. The Service is eagerly anticipating the increase in supply of ODS-free air conditioning units, and plans to incorporate them into its purchasing programs once they are available at a reasonable price.

Concessioners can contribute to the use of ODS in national parks. These ODS are used in air conditioning and refrigeration equipment in lodges, restaurants and other visitor service facilities. Concessioners are encouraged to use less ODS through the CEAS and, where applicable, in concession contract specifications and requirements.

*Environmental Management Systems*

*Agency Level*

*Agency-Level Policies*

*CY 04 Objective: Agency has incorporated the EMS goals and requirements of E.O. 13148 into existing agency environmental directives, policies, and documents.*

The NPS finalized Director's Order (DO) 13A, Environmental Management Systems, to establish NPS-wide EMS policy. DO 13A articulates the principles and priorities of NPS environmental management system development. Specifically, it outlines NPS policy for developing and implementing a facility-specific EMS that guides environmental decision-



making and actions at all agency levels to ensure compliance with regulatory requirements and a commitment to pollution prevention, sustainable planning, and the use of environmental best management practices.

DO 13A provides overarching guidance for all other DOs, mandates, regulations, and other guidance that governs implementation of our environmental management responsibilities. The DO also provides a framework for other decisions that may involve environmental evaluations where no stand-alone DO exists, such as procurement. DO 13A recognizes and supports actions that have taken place in parks and regional offices that have furthered development and implementation of environmental management systems and builds on the successful efforts to create a systematic approach to this issue. In addition, DO 13A sets forth the policy and special delegations under which the NPS will develop and implement an EMS consistent with the requirements of the E. DO 13A can be viewed at <<http://www.nps.gov/policy/DOrders/DO-13A.html>>. Additional guidance on procedures and requirements, including a model EMS and EMS toolkit, have been developed as part of Reference Manual (RM) 13A.

For the NPS Concession Program, this objective is relevant to both the establishment and implementation of EMSs by the NPS Concession Program and by individual NPS concessioners. EMS goals and requirements of E.O. 13148 for the Concession Program are identified in NPS policy and guidance, concession contracts, organizational structure, and operating practices, including:

NPS Management Policies 2001. The NPS Management Policies 2001 <<http://www.nps.gov/policy/mp/policies.html>> establish policies to meet Departmental goals and objectives related to environmental compliance and enhancement. Section 10.2.2.2 specifies that “a decision to authorize a park concession will be based on a determination that the facility or service...will be provided in a manner that furthers the protection, conservation and preservation of the park environment ...” Section 10.2.4.10 specifies that “concessioners will be required by contract to meet environmental compliance objectives by: complying with all applicable laws pertaining to protection of human health and the environment; and incorporating best management practices (BMPs) in all operations....” This is further reinforced in 36 CFR Part 51 <<http://concessions.nps.gov/program1.cfm>> in which principal and secondary selection criteria for concession contracts have been established which relate to environmental performance.

DO 13A. In reviewing the specialized environmental aspects and impacts of concessioner operations in national parks, the NPS determined that dedicated EMSs were appropriate for certain larger and more complex concessioner operations. As a result, EMS requirements have been integrated into applicable concession contracts. DO 13A specifically states that “[a]ll concessioners operating under a Category I or II Concession Contract are required under Section 6(b) of the new Standard Concession Contract to develop and implement an EMS.” The Standard Concession Contract requirements were published in the Federal Register on May 4, 2000 (65 FR 26051-26086).”

DO 48. Specific procedural requirements to meet the policies articulated in the NPS Management Policies 2001 are incorporated into DOs. The DO for Concession Management

(DO 48) will be undergoing a revision to respond to a new Concession Law and to ensure consistency with NPS policy changes. When finalizing, DO 48 will reinforce policy requirements and establish procedures concerning the integration of environmental performance as an important consideration in NPS concessioner management. The date for updating/revisions to this DO is not known at this time.

NPS Concession Environmental Management Program. Recognizing the overall importance of NPS concessioner environmental performance as part of the NPS mission, the NPS Concession Program established a long-term goal that “Commercial operators demonstrate sound environmental management and support NPS resource protection.” To meet this goal, the Concession Program established the Concession Environmental Management Program (CoEMP) as a component of the overall NPS Concession Program. The CoEMP is responsible for developing and implementing a national program to promote concessioner environmental compliance, environmental program enhancement, and operation in accordance with applicable environmental management requirements provided in DO 13A. EMS concepts are used as a basis for how the CoEMP is structured, how it plans for, and how it implements its activities. This process includes goal setting based on an analysis of CoEMP aspects and impacts; establishment of structural program components including budget, staffing, documented procedures, and training; and monitoring and measurement of performance.

Standard Concession Contract Language. Concession contracts authorize the provision of visitor services in national parks by private businesses. Section 6 of the Standard Concession Contract requires all concessioners that are assigned NPS facilities (i.e., Category I or II concession contracts) being issued new concession contracts since 1998 to develop EMSs. The EMSs developed by concessioners must include specific EMS elements defined in Section 6 of the Standard Concession Contract. Concessioners operating with contracts that do not have EMS requirements (i.e., older contracts and new Category III contracts) are still being encouraged by the CoEMP to develop and implement an EMS or elements of an EMS that are appropriate to the type and size of concession activities provided.

Guidance Documents. A number of guidance documents were developed that incorporated EMS goals and requirements of E.O. 13148. These include eleven finalized concession service type-specific EMS resources on how to develop a written EMS, a draft general guideline on how to develop a written EMS, and numerous other CoEMP-developed resources that reference the requirement for an EMS under Category I and II concession contracts currently being issued. The CoEMP assists parks in reviewing concessioner EMSs to ensure compliance with concession contract requirements and identify areas for improvement. However, due to resource constraints at this time, not all new concession contracts and associated EMSs submitted receive review by the CoEMP.

#### Self-Declaration Protocol

*CY 04 Objective: Agency has issued a Self-Declaration Protocol based on the Federal Self-Declaration.*

The NPS developed an EMS Self-Declaration Protocol in CY 04. This protocol will be included in the NPS EAP guidance in CY 05.

The NPS Concession Program does not intend to develop a Self-Declaration Protocol for concessioner EMSs; instead, it will utilize various policies, guidance and procedures that are either already in place or being developed to provide a self-declaration process. Concessioners operating under contracts requiring documented EMSs are required to have their initial EMS reviewed and approved by the NPS Director within 60 days of the effective date of the contract and annually thereafter (Standard Concession Contract, Section 6(b)(1)). As a practical matter, this responsibility is delegated to the park Superintendent. In addition, concessioners are subject to annual contract and operational compliance evaluations that include a review of a concessioners' EMS compliance (Standard Concession Contract, Section 6(c)) and overall environmental management practices. Environmental evaluation criteria are currently under development; training for NPS personnel that conduct concessioner environmental performance evaluations are typically conducted every two years.

In addition to these external EMS assessment processes, an internal EMS review element is required for concessioner EMSs under their concession contracts: Monitoring, Measurement and Corrective Action (Standard Concession Contract, Section 6(b)(3)(ix)). This EMS element includes an annual self-assessment of concessioner performance relative to its EMS. Some concessioners have decided to demonstrate that their EMS also meets third party EMS standards, such as the International Organization of Standards (ISO) 14001.

#### *Resources Distributed*

*CY 04 Objective: Agency has provided resources (e.g., dollars, FTE) for EMS implementation to its appropriate facilities.*

To ensure adequate personnel resources for the development and implementation of a NPS-wide EMS program, NPS utilized the services of a contractor. Additionally, an EMS Task Group composed of NPS headquarters and regional staff, formed in CY 03, oversaw NPS-wide EMS efforts.

Headquarters allocated \$761,900 to the NPS regions and \$528,348 to a contractor in FY 2004 to support EMS training and development. Additionally, NPS has integrated an EMS component into its EAP, allowing park EMS activity to be reviewed during audits. Because these reviews are part of the audit, they are financially supported by the EAP budget.

For the NPS Concession Program, this objective relates to resources needed to implement the CoEMP and therefore facilitate EMS development by concessioners, as well as resources to develop concessioner EMSs. CoEMP resources are allocated through the NPS Washington Office Concession Program budgeting process. The NPS Washington Office Concession Program dedicated \$600,000 in CY 04 to administer the CoEMP in support of its mission to

“provide assistance and guidance that advances the environmental performance of businesses offering visitor services in national parks.” There was no dedicated portion of this budget exclusively targeting EMS as most CoEMP activities provide technical support and guidance to assist concessioners in developing such systems.

In 2004, the CoEMP staff included three full-time staff, a full-time research associate, a volunteer, and environmental consultant support. Partnership efforts to share information, expertise, experiences, and resources between the CoEMP and the U.S. EPA National Center for Environmental Innovation continued in 2004 under a Memorandum of Understanding (MOU); one effort was to promote EMS as an approach that is good for the environment and good for business. In addition, the CoEMP received a Department of Energy grant in 2004 to help develop an Internet-based training course on EMS topics for NPS concession staff, focusing initially on energy and water conservation. Moving forward, the fiscal reality is that Concession Program has a number of high priority programs and activities that affect the CoEMP budget. As a result, the ideal schedule for implementing elements of the CoEMP has been affected – most noticeably, the completion of concessioner environmental audits through the Concession Environmental Audit System (CEAS) has been slower than desired, assistance in providing parks with information on EMS development has been constrained, and environmental training for NPS and concessioner staff has not yet been fully developed.

At the park and regional level, budgets limit the ability to fund CoEMP involvement in park and regional concession environmental activities – such as contract development, evaluation panel, and EMS review participation – in addition to limiting their ability to support full-time environmental and/or concession staff. Legal review for CoEMP documents was also slow due to the NPS Solicitor’s Office workload in 2004. Given the current overall NPS Washington Office Concession Program budget, contracting priorities and staff needs, it is unlikely that the CoEMP will receive significant funding increases over the next few years.

In terms of developing concessioner EMSs, since concessioners are contracted entities working within the national parks, the NPS does not provide concessioners with resources (i.e., funding, staffing) for operating their businesses. Under the concession contracts currently being issued, developing and implementing EMSs is a standard business practice and requirement to which concessioners must adhere. The Concession Program has the responsibility to ensure that concessioners working within the national parks have the financial capability to provide the required visitor services stated in their concession contracts. Therefore, in preparing a request for proposal (RFP) for a concession contract, the Concession Program has accounted for costs in developing and implementing an EMS; in evaluating proposals responding to the RFP, the Concession Program has analyzed whether offerors have accounted for costs in developing and implementing an EMS.

*Follow-up on CY 03 Agency Level Activities*

### *EMS Guidance*

*CY 03 Objective: Agency has issued EMS implementation guidance for use by appropriate facilities.*

NPS has developed guidance for EMS implementation throughout the Service. The EMS Task Group developed a unique EMS program that borrowed from ISO 14001 standards and the Environmental Protection Agency's Code of Environmental Management Principles (CEMP): the NPS Model EMS. From the Model EMS, NPS developed the EMS Toolkit, which provides step-by-step guidance for developing a park-level EMS. The final Toolkit was completed and distributed NPS-wide in early CY 04 and posted to the Park Facilities Management Division Intranet. Templates, examples, and the OFEE Manager's Guide were also posted to help parks create an EMS tailored to each park's unique set of activities, functions, and needs, but still provide for the NPS-wide consistency desired by NPS leadership. The NPS believes that this approach will result in the most effective EMS for each park.

Concession Program efforts to provide EMS implementation guidance to appropriate facilities was documented in the 2003 Annual Report on Executive Order 13148, and no specific shortfalls were identified. However, last year's report stated that the broad distribution of some CoEMP EMS guidance had not taken place since they were awaiting finalization of the NPS EMS Program and legal review. Currently, these documents are still awaiting legal review. Yet in 2004, the CoEMP did promulgate several some new and improved guidance documents. For example, to assist primarily small and medium-sized businesses (which comprise the majority of concessioners working in the NPS) in developing EMSs, the CoEMP released Version 2.0 of the GreenLine CD, which included CoEMP-developed EMS resources for ten concession service types. (An additional CoEMP-developed EMS resource for another concession service type was finalized during CY 04, and will be added to Version 3.0 of the GreenLine CD. It is also anticipated that EMS resources will be developed for all concession service types.) The CD also includes links to EMS Internet resources to which users can connect if they are online.

### *Facility Level*

#### *"Appropriate facilities" for EMS Implementation*

Because NPS sees great value in EMS implementation for facilities of all types and sizes, headquarters determined that all facilities (i.e., parks) are appropriate facilities. Therefore, all parks have been encouraged to take advantage of the NPS EMS Toolkit, and implement an EMS by the end of CY 05. A list of all parks is available on the Park Facilities Management Division Intranet.

As indicated in the 2003 Annual Report on Executive Order 13148 and reiterated here, the Concession Program policy concerning the designation of applicable facilities subject to the requirement to develop and implement an EMS has not changed. Category I and II concession contracts have NPS buildings and property assigned to the concessioner; concessioners with these types of concession contracts have been required in their contract to develop and

implement an EMS. Category III concession contracts are those where concessioners do not typically have NPS buildings and property assigned to them; these contracts are, in general, smaller and less complex than Category I and II contracts. Because of their more limited operations and corresponding limited impacts on the environment, concessioners with Category III contracts issued after Category III concession contract language was finalized in 2002 are not required to develop and implement a written EMS since they are not considered to be appropriate facilities. Since EMS are required of concessioners only if they are written into concession contracts, the list of concessioners requiring an EMS is dynamic from year to year. (The Category I and II concession contract language requiring EMS was finalized in 2000). The current list of concessioners requiring an EMS in CY 04 as of March 18, 2005, is provided as Attachment B. The list includes concessioners who were required to have EMS in CY 03 but were not listed in the CY 03 E.O. 13148 Annual Report since there was a lag time from the parks and regions in reporting CY 03 issue dates for new concession contracts.

#### *Facilities with Measurable Objectives and Targets*

*CY 04 Objective: Percent of appropriate facilities that have documented measurable environmental objectives and targets.*

NPS deployed an NPS-wide EMS tracking system that is accessible to all parks via the Park Facilities Management Division Intranet. Individual park and overall regional progress toward EMS implementation is tracked via a 15-step protocol. The current tracking data are available on the Park Facilities Management Division Intranet (user ID and password required). The data show that, as of February 2005, 55% (approximately 295 units) of all NPS facilities have documented progress toward EMS implementation.

Under the current concession contract regulations, Category I and II concession contracts require the development and implementation of an EMS. One of the nine required EMS elements identified in Section 6 of the Category I and II Standard Concession Contract language is Goals and Targets, which specifies that the concessioner establish environmental goals as part of its EMS consistent with the objectives of environmental compliance and incorporation of environmental best management practices. This section also requires that the concessioner set targets that have measurable results and a schedule to achieve the environmental goals. As new Category I and II concession contracts are issued, the requirement for a documented EMS is being incorporated, including the need for the Goals and Targets element. When the park reviews a concessioner's EMS to approve it initially and annually thereafter, the Goals and Targets element should be reviewed to ensure it is in compliance with the concession contract.

As of December 31, 2004, it is estimated that out of the 172 concessioners that are considered appropriate facilities that require an EMS, 55 (i.e., 32 percent) of them have been issued new concession contracts that require an EMS that incorporates the Goals and Targets element. When requested by parks, the CoEMP has reviewed the draft documented EMSs of concessioners to provide guidance on concessioner conformance with contract requirements; as of December 31, 2004, the CoEMP has reviewed 25 EMSs of these 172 appropriate facilities. It

should be noted that these data do not reflect those concessioners that have proactively and voluntarily established documented measurable environmental objectives and targets even if an EMS is not required by their contract (e.g., they are operating under an older concession contract or under a Category III contract).

#### *Facilities with Environmental Management Programs*

*CY 04 Objective: Percent of appropriate facilities that have established environmental management programs specifically to achieve each of their environmental objectives and targets.*

The EMS tracking system shows that 10% of NPS facilities have implemented an EMS with another 55% having an EMS under development, as of February 2005.

As described above, under the current concession contract regulations, Category I and II concession contracts require the development and implementation of an EMS. As new Category I and II concession contracts are issued, the requirement for a documented EMS is being incorporated. The data for the percentage of appropriate facilities that have established environmental management programs specifically to achieve each of their environmental objectives and targets are the same as for the percentage of appropriate facilities that have documented measurable environmental objectives and targets; please refer to the information in the previous CY 04 objective in response to this CY 04 objective.

#### *Facilities with Awareness Training Program*

*CY 04 Objective: Percent of appropriate facilities that have developed a program for EMS awareness training.*

The EMS tracking system shows that, as of February 2005, 27% of all NPS facilities have developed an awareness-training program. Another 38% of facilities are working toward training program development.

One of the nine required EMS elements identified in Section 6 of the Category I and II Standard Concession Contract is Training, which requires that a concessioner describe its environmental training, including identifying staff that should be trained, training subjects, training frequency, and how training will be documented. EMS guidance issued by the CoEMP thus far encourages concessioners to train all staff on the EMS since each employee's work impacts the environment. As new concession contracts are issued, it is expected the EMS developed will include this Training element, including the need to make all staff aware of the EMS. As indicated above, when the park reviews and approves the concessioner's EMS, it is expected that the Training element will be reviewed to ensure compliance with the concession contract. The data for the percentage of appropriate facilities that have developed a program for EMS awareness training are the same as for the percentage of appropriate facilities that have documented measurable environmental objectives and targets; please refer to the information in the previous CY 04 objective in response to this CY 04 objective.

## *Follow-up on CY 2003 Facility Level Activities*

### *Facility EMS Policy*

*CY 03 Objective: Appropriate facilities have issued an EMS policy statement.*

Each facility is required to develop and document a commitment statement affirming the facility's intent to strive for exemplary environmental management. The commitment statement is site-specific to the facility that is undertaking an EMS as well as incorporating appropriate broader regional and service-wide goals and objectives. The statement commits the facility to compliance with all applicable laws, including Federal, state, and local laws, regulations, requirements, policies, and Executive Orders addressing the protection of the environment. The statement also commits to environmental leadership by incorporating pollution prevention, waste reduction, best management practices, and environmentally preferable purchasing in all park management activities. In addition, the statement commits facilities to strive for continual environmental improvement in those areas identified within the park EMS. Sixty-five (65) percent of all NPS facilities have issued an EMS policy statement as of February 2005.

One of the nine required EMS elements identified in Section 6 of the Category I and II Standard Concession Contract is a Policy, which requires a clear statement of a concessioner's commitment to Environmental Management Objectives. As new concession contracts are issued, it is expected the EMSs developed will include this policy statement. When the park reviews a concessioner's EMS, it is expected that the policy will be reviewed to ensure it is in compliance with the concession contract. The data for the percentage of appropriate facilities that have issued an EMS policy statement are the same as for the percentage of appropriate facilities that have documented measurable environmental objectives and targets; please refer to the information in the previous CY 04 objective in response to this CY 03 objective.

### *Facility Implementation Training*

*CY 03 Objective: Appropriate facilities have provided EMS implementation training to the personnel responsible for implementing EMS.*

The EMS tracking system shows that, as of February 2005, 27% of all NPS facilities implemented training of responsible personnel. Another 38% of facilities are working toward providing the training.

As noted above, one of the nine required EMS elements identified in Section 6 of the Category I and II Standard Concession Contract is Training. EMS guidance issued by the CoEMP thus far requires that concessioners train all staff with environmental management responsibilities on how to properly carry out their duties to protect the environment. As new concession contracts are issued, it is expected the EMSs developed will include this Training element, including the need to train staff that have environmental management responsibilities on how to properly carry out their duties. When the parks review a concessioner's EMS, it is expected that inclusion of



the Training element will be reviewed to ensure compliance with the concession contract. The data for the percentage of appropriate facilities that have provided EMS implementation training to the personnel responsible for implement EMS are the same as for the percentage of appropriate facilities that have documented measurable environmental objectives and targets; please refer to the information in the previous CY 04 objective in response to this CY 03 objective.

#### *Facility Significant Environmental Aspects*

*CY 03 Objective: Appropriate facilities have identified and documented their significant environmental aspects.*

The EMS tracking system shows that, as of February 2005, 27% of all NPS facilities have an identified and documented their significant environmental aspects and impacts. Another 38% of facilities are working toward identifying environmental aspects.

Section 6 of the Category I and II Standard Concession Contract describes how a concessioner will develop, document, implement, and comply with a comprehensive EMS. The concession contract specifies that the EMS “shall account for all activities with potential environmental impacts conducted by the Concessioner or to which the Concessioner contributes.” This equates to identifying significant aspects and impacts. As new concession contracts are issued, it is expected the EMSs developed will document a concessioner’s significant environmental aspects. When the park reviews a concessioner’s EMS, it is expected that inclusion of significant environmental aspects will be reviewed to ensure compliance with the concession contract.

#### **OFFICE OF SURFACE MINING**

Although the Office of Surface Mining (OSM) does not own, operate, or maintain facilities subject to the requirements of E.O. 13148, OSM supports Departmental efforts to develop sound EMS. Furthermore, OSM actively promotes environmentally friendly practices under other Greening executive orders, including those governing procurement, recycling and waste prevention. OSM also serves as a member of the DOI EMS Council to address Departmental EMS implementation issues. As a member of the Interior planning group carrying out the mandates of E.O. 13101, OSM played a key role in developing the Strategic Plan for Greening the Department of the Interior through Waste Prevention, Recycling and Federal Acquisition. Following the release of the strategic plan in May 2000, OSM actively worked with other DOI Bureaus and Offices in preparing a detailed action plan describing the specific steps the Department will take to implement the Greening strategy.

The OSM serves on the Departmental committee developing the second annual memorandum of understanding (MOU) with UNICOR—the trade name for the Federal Prison Industries. The MOU on Recycling and Reuse of Electronic and automation Equipment supports both E.O. 13101 and E.O. 13148. For the past five years OSM has participated in the transit subsidies

program authorized under E.O. 13150 – Federal Workforce Transportation. And, where feasible follows the guidelines for procurement of Alternative Fueled Vehicles and reduction of fossil fuel usage, in support of E.O. 13149 – Greening the Government through Federal Fleet and Transportation Efficiency.

The OSM has conducted four EMS training classes for its 20 collateral duty safety officers. OSM has conducted four EMS training classes for its representatives on the EMS Council. OSM has conducted and completed its baseline audits at each OSM office and is now interpreting the data and developing next steps to further implement its EMS program. OSM has sent a response package of worksheets that are the management-completed recommendations to the President's Management Council Compliance Improvement Recommendations through the OEPC. This package also included a time line for actions. Finally, OSM has prepared a response on the MOU for Federal Leadership in High Performance Sustainable Buildings and sent it to OEPC.

## **U. S. GEOLOGICAL SURVEY**

### *Section 502 Release Reduction: Toxic Chemicals*

The newly formed USGS Environmental Management (EM) Council will address bureau wide implementation of the reduction requirements of Section 502 regarding the release of toxic chemicals reported under Section 313 of the Emergency Planning and Community Right-to-Know Act. To date, the bureau has taken a decentralized approach, with local level supervisors and managers addressing these requirements on a facility-specific basis. The EM Council oversight of bureau activities to implement Section 502 requirements will improve consistency in implementation across the bureau.

Local efforts at individual facilities have resulted in unused chemicals, otherwise destined for disposal or treatment, being offered to other organizations for use, resulting in waste reduction and disposal costs.

### *Section 505 Reductions in Ozone-Depleting Substances (ODS)*

The newly formed USGS Environmental Management Council will develop a bureau wide plan to phase-out the procurement of Class I ozone- depleting substances (ODS) by the required date of December 31, 2010. The plan will rely primarily upon existing tools (such as a computerized facilities maintenance management system, and condition assessments) to identify the present use of ODS, and to monitor efforts to phase-out procurement of these substances. It is likely that initial efforts will focus on the USGS EMS facilities.

Individual facilities are implementing measures to address the goals of Section 502. For example, the USGS National Center has a refrigerant management procedure, which requires the Operations and Maintenance Contractor to track the use of all refrigerants onsite. The procedure includes maintenance of a standardized log that identifies equipment currently in use, the type of refrigerant used, quantities used, quantities purchased, and quantities removed from the site.

In addition, the National Center recently upgraded a chiller plant, which included the removal of refrigeration units (i.e., chillers) that used a combined total of 12,800 pounds of R-11 refrigerant (trichlorofluoromethane), an ozone depleting substance. These units were replaced with units that use R-134A refrigerant, a replacement compound for ozone-depleting substances. This project also added a monitoring system to detect if the units are leaking refrigerant.

### *Environmental Management Systems*

#### *Agency-Level*

#### *Agency-Level Policies*

The USGS has incorporated the EMS goals and requirements of E.O. 13148 into existing agency environmental directives, policies, and documents. In December 2003, the Director issued a memorandum that outlined his expectation that all appropriate USGS disciplines and facilities would implement EMS by December 31, 2005. The Director announced the formation of a USGS-wide EMS Council to direct and oversee implementation efforts throughout the USGS, and he issued the USGS Environmental Management Policy and Commitment Statement. The Director requested that the policy be prominently displayed in each facility throughout the Bureau.

In April 2004, the Chief, Office of Administrative Policy and Services (APS), issued a memorandum which identified the USGS facilities that were considered appropriate for implementation of EMS, and announced the availability of EMS guidance, templates, and worksheets on the intranet (memorandum attached). These tools define the scope and elements of EMS, and provide a template for USGS facilities to document environmental procedures and systems.

The USGS prepared a draft memorandum late in CY 04, to be distributed in CY 05, which reaffirms the bureau's environmental management policy and commitment statement, and announces formation of the USGS Environmental Management Council, as provided for in the Director's December 2003 memorandum.

The USGS maintains an internal website, "Environmental Purchasing," which provides guidance on Government procurement of products and services. The website reflects EMS concepts, and addresses the environmental consequences of choices in products and services. Specifically, the website addresses:

- considering the relative energy consumption of competing alternatives;
- avoiding hazardous materials when there is a safer alternative;
- avoiding ozone-depleting substances;
- selecting items with recycled content and/or biobased product alternatives; and
- considering the eventual disposal costs of alternative products (Is it recyclable or destined to take up space in a landfill? Can we avoid generation of hazardous waste?)

In addition, the “Environmental Purchasing” website provides access to an environmentally preferable purchasing database, and identifies relevant requirements and references.

The Safety and Environmental Branch in the Office of Management Services, also maintains an internal website with comprehensive information related to Environmental Management Systems. Information provided includes the USGS EMS manual, policy memoranda, guidance, templates, and links to related websites.

### *Self-Declaration Protocol*

The Department of Interior issued a Self-Declaration Protocol on July 7, 2004, based on the Federal Self-Declaration Protocol Guidance. Environmental Compliance Memorandum No. ECM04-2, from the Director of the Office of Environmental Policy and Compliance, outlined the purpose and requirements of EMS self-declaration protocols. The USGS developed an EMS Self-Declaration Protocol for use at the 29 appropriate facilities, which is described in more detail below. The USGS Self-Declaration protocol is in conformance with the Department’s Environmental Compliance Memorandum No. ECM04-2.

The USGS developed a Self Declaration Protocol, which will be used in conjunction with an automated annual EMS self-audit, beginning in CY 05. The EMS self-audit will be completed by every appropriate USGS facility at the time that they conduct their annual environmental self-audit. Upon completion of the EMS self-audit, each facility will self-declare the status of their EMS, which will result in an EMS status determination in one of three categories: (1) EMS in development; (2) EMS in place with implementation underway; or (3) EMS fully implemented. Criteria for determining a facility’s EMS status category will be provided with the questionnaire. In addition, Regional Environmental Program Coordinators will conduct an independent external review of each EMS facility, in conjunction with the formal environmental audit. Formal environmental compliance audits are conducted on a four-year cycle. These external audits will verify the EMS status of each of the facilities on a periodic basis.

The Self-Declaration Protocol will be provided as a final step in the annual EMS self-audits. These EMS status assessments will be entered into an automated system so that implementation across the bureau can be readily evaluated. This evaluation will form the basis of the bureau’s annual EMS certification regarding EMS implementation, as required by ECM04-2.

As stated above, USGS developed a Self Declaration Protocol that will be implemented in CY 05. Criteria for determining the EMS status categories described above also will be developed in CY 05.

### *Resources Distributed*

Resources for EMS are included as a part of the overall safety, health, and environmental budget request. In CY 04, \$16,000 was allocated to develop on-line training for Collateral Duty Environmental Program Coordinators, their supervisors, and Regional Executives, which will be available in CY 05. (Note that this DOIU funding was in addition to \$40,000 in CY 03, for a

combined total of \$56,000.) This training includes the following three modules addressing Environmental Management Systems: EMS – Overview; EMS – Design; and EMS – Implementation. In addition, approximately \$100,000 was allocated in March 2005 for an EMS facilitation system, which is a web-based tool designed to assist with the administrative and recordkeeping requirements associated with an effective EMS. This tool will be provided to each of the 29 USGS appropriate facilities, together with training on EMS and the new system, to facilitate implementation of EMS at the facility level. Additional facility-specific resources for EMS implementation are allocated out of the respective regional and field office budgets.

As described above, USGS plans to provide an EMS facilitation system to each of the 29 facilities implementing EMS in CY 05.

The USGS has committed approximately \$34,000 per year to continue operation of the EMS facilitation system, and the Regional Environmental Program Coordinators will provide technical support to the EMS locations. In addition, the Chief, Safety and Environmental Management Branch, allocates resources to bureau projects based on elements identified in the Annual Work Plan. Resources at the regional and field office levels are allocated out of their respective budget.

#### *Facility Level*

#### *Current List of “Appropriate Facilities” for EMS Implementation*

The following USGS facilities are “appropriate facilities” for EMS implementation:

#### USGS Western Region:

- 1) Columbia River Research Lab, Cook, Washington
- 2) Pacific Island Ecosystems Research Center, (Kilauea Field Station, Volcano, Hawaii)
- 3) Alaska Science Center, Anchorage, Alaska
- 4) Western Fisheries Research Center, Seattle, Washington
- 5) Menlo Park, California
- 6) Hawaii Volcano Observatory
- 7) Water Resources (Placer Hall), Sacramento, California

#### USGS Central Region:

- 1) EROS Data Center, Sioux Falls, South Dakota
- 2) Northern Prairie Wildlife Center, Jamestown, North Dakota
- 3) Columbia Environmental Research Center, Columbia, Missouri
- 4) Ecological Toxicology Research Station, Yankton, South Dakota
- 5) National Water Quality Lab, Denver, Colorado
- 6) Denver Federal Center, Denver, Colorado
- 7) Mid-Continent Mapping Center, Rolla, Missouri
- 8) Albuquerque Seismological Laboratory, New Mexico

USGS Eastern Region:

- 1) Patuxent Wildlife Research Center, Laurel, MD
- 2) Leetown Science Center, Research and Development Laboratory, Wellsboro, PA
- 3) Leetown Science Center, SO Conte Anadromous Fish Laboratory, Turner Falls, MA
- 4) Great Lakes Science Center, Ann Arbor MI
- 5) Great Lakes Science Center, Hammond Bay Biological Station, Millersburg, MI
- 6) Great Lakes Science Center, Tunison Laboratory of Aquatic Science, Cortland, NY
- 7) Upper Midwest Environmental Sciences Center, LaCrosse WI
- 8) National Wildlife Health Center, Madison WI
- 9) Leetown Science Center (LSC), Kearneysville, WV
- 10) Florida Caribbean Science Center (FCSC), Gainesville, FL
- 11) Coastal and Marine Geology Team, St. Petersburg FL
- 12) Coastal and Marine Geology Team, Woods Hole, MA
- 13) District Office, Atlanta GA
- 14) National Center, Reston VA

Two facilities were removed from the list provided in the USGS CY 03 annual report:

Fredericksburg Geo Magnetic Research Center, Corbin, Virginia (very small facility – no significant environmental impacts); and Ocala Water Quality Lab, Ocala, Florida (facility closed).

It is likely that additional facilities will be added to the list in CY 05. For example, USGS is evaluating facilities such as the National Wetlands Research Center in Lafayette, Louisiana, to determine whether they are appropriate EMS facilities.

The USGS used a risk-based approach to identify which facilities were appropriate for EMS implementation. A facility questionnaire was fielded in CY 99 to gather facility operational information to assist with this identification process. The USGS used the information gathered from these questionnaires to identify the facilities to include in the environmental compliance audit program, and these facilities received a comprehensive external baseline environmental audit. These same facilities are considered appropriate for EMS implementation.

*Facilities with Measurable Objectives and Targets*

To date, one facility (3 percent of USGS facilities) has developed documented, measurable objectives and targets based on significant environmental aspects. Development of facility-specific objectives and targets has been delayed pending acquisition of an automated tool to assist in identifying and tracking measurable objectives and targets. USGS believes that this number will increase significantly with implementation of the newly acquired EMS facilitation system, and USGS expects that the majority of appropriate facilities will have documented, measurable objectives and targets by December 31, 2005.

### *Facilities with Environmental Management Programs*

To date, USGS appropriate facilities do not have environmental management programs specifically to achieve each of their environmental objectives and targets. As discussed in 2.I above, USGS facilities currently are in the process of developing measurable objectives and targets. Once this task is accomplished, each appropriate facility will develop an environmental management program specifically to achieve each of their environmental objectives and targets.

### *Facilities with Awareness Training Program*

To date, USGS facilities have not developed an EMS awareness-training program for all employees at the 29 appropriate facilities. Upon completion of the tasks described in 2.I and 3.I above, each of the facilities will provide appropriate environmental training so that all staff are adequately prepared to enhance the facilities' performance in accordance with facility-specific objectives, targets, and written environmental management programs.

### *Update of CY 03 Criteria*

#### *Facility EMS Policy*

Twenty of the 29 appropriate facilities (70 per cent) signed and issued a facility EMS policy statement in CY 04. Each facility was instructed by the USGS Director in his December 29, 2003, environmental commitment memorandum to endorse and prominently post the bureau policy. Facility policy statement templates and guidance are posted on the USGS EMS intranet website to aid all facilities with preparation of the policy statement. The remaining facilities are developing their policy statement in CY 05.

#### *Facility Implementation Training*

Twenty-two of the 29 appropriate facilities (76 per cent) have received or conducted EMS training for the facility staff responsible for developing and implementing the EMS. All of this training was provided in CY 04. The remaining facilities are conducting training in CY 05.

In addition, USGS is implementing a phased approach to train all employees involved with EMS implementation. In CY 03, USGS provided an informational EMS briefing to the Executive Leadership Team. In CY 04, USGS developed on-line EMS training, in conjunction with DOIU, which will be available in CY 05. This training includes EMS awareness and implementation modules in a mandatory Collateral Duty Environmental Program Coordinators and Supervisors training course.

*Facility Significant Environmental Aspects*

Nine of the 29 appropriate facilities (31 per cent) identified and documented their significant environmental aspects in CY 04. USGS is providing a web-based EMS facilitation system that will assist the remaining facilities in completing this important step in the EMS process. The EMS facilitation system is expected to be available in mid-2005.

As a generalization, the USGS has taken a decentralized approach to managing the requirements of this section, with local level supervisors and managers responsible herein. Local efforts have resulted in unused chemicals destined for disposal or treatment at headquarters and regional facilities being offered to other organizations for use, resulting in waste reduction and disposal costs.



# APPENDIX

1. Improving Environmental Compliance and Performance through Environmental Management Systems, DOI Secretarial Memorandum of August 26, 2003.
2. DOI EMS Council Bureau and Office Contacts.
3. FWS, NPS, USGS List of “Appropriate Facilities.”
4. NPS Concessions Contracts List



THE SECRETARY OF THE INTERIOR  
WASHINGTON

MEMORANDUM

To: Solicitor  
Inspector General  
Assistant Secretaries  
Heads of Bureaus and Offices

AUG 26 2003

From: Secretary *Gale A. Norton*

Subject: Improving Environmental Compliance and Performance through Environmental Management Systems

This memorandum commits the Department of the Interior to implement Environmental Management Systems (EMS) and directs Departmental Bureaus and offices to implement such plans by the required implementation date of December 2005. EMS provides a systematic framework to identify and address environmental impacts of our activities, ensures compliance with regulatory requirements, and provides opportunities for continuous environmental improvement and innovation, thus promoting effective and efficient Government-wide operations. It was developed as a result of the President's initiative to make the Federal Government lead by example in its environmental responsibilities.

The President's Management Council has directed Federal agencies to work together to improve their overall environmental compliance and performance. EMS implementation provides opportunities for partnerships to occur and to expand the Department of the Interior's ability to promote healthy lands and thriving communities. The DOI is fully committed to reducing adverse environmental impacts to public lands and natural resources and to enhance compliance. Departmental Bureaus and offices should encourage innovation and creativity in meeting environmental challenges and also harness 21<sup>st</sup> Century technology to improve our responsibilities and to minimize our environmental impact. Through a process of continuous improvement, the EMS encourages ways to be innovative, adaptive and flexible in sustaining a healthy environment.

In support of the President's initiative, I am directing the EMS implementation by departmental Bureaus and offices in all departmental facilities nationwide, where applicable. While I expect all Bureaus and offices to have the EMS's in place well before the required implementation date of December 2005, as required by Executive Order 13148 (Greening the Government Through Leadership in Environmental Management), I am pleased that many of our Bureaus and offices are already on their way toward the EMS implementation.

An EMS Council has been established within the DOI to aid in Department-wide EMS implementation. The Council is chaired by the Office of Environmental Policy and Compliance (OEPC). That Office can assist Bureaus and offices in this endeavor and other areas as well. Their telephone number is (202) 208-3891.



**U.S. Department of the Interior  
Environmental Management Systems Council  
Bureau and Office Contacts**

<b>Bureau/Office</b>	<b>Representative(s)</b>	<b>Telephone</b>	<b>Fax</b>	<b>E-mail</b>
Office of Environmental Policy and Compliance	Jim Ortiz Ken Naser Heather Davies	202-208-7553 202-208-3901 202-208-7884	202-208-6970 (primary) 202-208-6032 (secondary)	james_ortiz@ios.doi.gov kenneth_naser@ios.doi.gov heather_davies@ios.doi.gov
Bureau of Indian Affairs	Debbie McBride George Padilla	202-208-3606 202-208-6364	202-208-1605 Same as above	Use fax number
Bureau of Land Management	Elliott Ng Nancy Dean	202-557-3564 202-557-3585	202-452-5046 Same as above	Elliot_Ng@blm.gov Nancy_Dean@blm.gov
Bureau of Reclamation	Cynthia Dyballa Hank Kaplan	202-513-0593 303-445-2802	202-513-0301 303-445-6465	cdyballa@usbr.gov hkaplan@do.usbr.gov
Fish and Wildlife Service	Billy Umsted V.A. Sridhar	303-984-6865 303-984-6871	303-969-5444 Same as above	Billy_Umsted@fws.gov VA_Sridhar@fws.gov
Geological Survey	Dave Johnson Bill Miller	703-648-7550 703-648-7552	703-648-7475 Same as above	dwjohnson@usgs.gov wrmiller@usgs.gov
Minerals Management Service	James Bennett Staci Atkins	703-787-1660 703-787-1620	703-787-1026 703-787-1575	James.F.Bennett@mms.gov Staci.Atkins@mms.gov
National Business Center	Ian Rosenblum	202-208-5795	202-208-3777	Ian_M_Rosenblum@nbc.gov
National Park Service	Carl Wang Wendy Berhman	202-513-7033 303-987-6913	202-371-6675 303-987-6901	Carl_Wang@nps.gov Wendy_Berhman@nps.gov
Office of Surface Mining	William Bass Darlene Carter	412-937-2840 202-208-2593	412 937-2888 202-219-3100	wbass@osmre.gov dcarter@osmre.gov

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FWS

**Appropriate Facilities  
Service Facilities for EMS Implementation**

Region	Refuge	Hatchery
1	Klamath Basin NWR Complex	Coleman NFH Complex
1	Malheur NWR	Dworshak Fisheries Complex
1	San Francisco Bay NWR Complex	Leavenworth NFH
1	San Luis NWR Complex	Quinalt NFH
1	Willamette Valley NWR Complex	Spring Creek NFH
2	Aransas/Matagorda Island NWR Complex	Willow Beach NFH
2	Bosque Del Apache	
2	Chemier Plain (Anahac Complex)	
2	Imperial NWR	
2	Santa Ana NWR /LRGV	
2	South Texas Refuges Complex	
2	Texas Chemier Plain Refuges Complex	
2	Texas Midcoast Refuges Complex	
2	Wichita Mountains	
3	Crab Orchard NWR	Jordan River NFH
3	DeSoto NWR	Neosho NFH
3	Fergus Falls WMD	Onalaska - LaCrosse Fish Health Center
3	Horican NWR	Pendills Creek / Hiawatha Forest NFH Complex
3	Neal Smith NWR	
3	Sea Lamprey Control Office	
4	Alligator River NWR	Dale Hollow NFH
4	Ding Darling	Warm Springs NFH
4	Merritt Island NWR	
4	Okefenokee NWR	
4	Reelfoot NWR	
4	Savannah NWR	
4	Southeast Louisiana Refuges	
4	Wheeler NWR	
4	Yazoo NWR	
5	Blackwater NWR	
5	E B Forsythe	
5	Eastern Massachusetts Refuge Complex	
5	Eastern Neck NWR	
5	John Heinz at Tinicum NWR	
5	Long Island Refuge Complex	
5	Ohio River Islands NWR	
5	Parker River NWR	
5	Rhode Island Refuge Complex	
6	Arrowwood NWR Complex	Bozeman Fish Technology Center
6	Audubon NWR Complex	Creston Fish and Wildlife Center
6	Charles M. Russell NWR Complex	
6	Crescent Lake-North Platte NWR Complex	
6	Des Lacs NWR Complex	
6	Devils Lake WM Complex	
6	Flint Hills NWR/Marais des Cygnes NWR	
6	Ft. Niobrara - Valentine NWR Complex	
6	National Bison Range/Lost Trails NWR	
6	Rocky Mountain Arsenal	
6	Sand Lake NWR/WMD	
7	Alaska Maritime NWR	
7	Alaska Peninsula/Becharof NWR	
7	Arctic NWR	
7	Kanuti NWR	
7	Kenai NWR	
7	Tedlin NWR	
7	Yukon Delta NWR	

# Attachment A

NPS

## ALASKA REGION PARKS

Alaska Support Office (Alaska Public Lands Info Ctr - Anchorage/Alaska Public Lands Info Ctr - Fairbanks)
Denali NP
Gates of the Arctic NP
Glacier Bay NP
Katmai NPres (Aniakchak NP/Alagnak Wild River)
Kenai Fjords NP
Klondike Gold Rush NHP
Lake Clark NP
Sitka NHP
Western Arctic National Parklands (Bering Land Bridge NP/Cape Krusenstern NM/Kobuk Valley NP/Nqatak Npres)
Wrangell-St Elias NP
Yukon-Charley Rivers NP

## INTERMOUNTAIN REGION PARKS

Amistad NRA
Arches NP
Aztec Ruins NM
Bandelier NM
Bent's Old Fort NHS
Big Bend NP
Bighorn Canyon NRA
Big Thicket NP
Black Canyon of the Gunnison NM
Bryce Canyon NP
Canyon de Chelly NM
Casa Grande Ruins NM
Canyonlands NP
Capitol Reef NP
Carlsbad Caverns NP
Capulin Volcano NM
Cedar Breaks NM
Chamizal NM
Chaco Culture NHP
Chickasaw NRA
Chiricahua NM
Colorado NM
Coronado NM
Curecanti NRA
Devils Tower NM
Dinosaur NM
El Malpais NM
El Morro NM
Florissant Fossil Beds NM
Fort Bowie NHS
Fossil Butte NM
Fort Davis NHS
Fort Laramie NHS
Fort Union NM
Gila Cliff Dwellings NM
Glacier NP
Glen Canyon NRA
Golden Spike NHS
Grand Canyon NP
Grant-Kohrs Ranch NHS

Great Sand Dunes NM
Grand Teton NP
Guadalupe Mountains NP
Hovenweep NM
Hubbell Trading Post NHS
Lake Meredith NRA
Little Bighorn Battlefield NM
Lyndon B. Johnson NHP
Mesa Verde NP
Natural Bridges NM
Navajo NM
Organ Pipe Cactus NM
Palo Alto Battlefield NHS
Padre Island NS
Pecos NHP
Petrified Forest NP
Petroglyph NM
Pipe Spring NM
Rocky Mountain NP
San Antonio Missions NHP
Santa Fe NHT
Saguaro NP
Salinas Pueblo Missions NM
Sunset Crater Volcano NM
Timpanogos Cave NM
Tonto NM
Tumacacori NHP
Tuzigoot NM
Washita Battlefield NHS
Walnut Canyon NM
White Sands NM
Wupatki NM
Yellowstone NP
Zion NP

**MIDWEST REGION  
PARKS**

Agate Fossil Beds NM
Apostle Islands NL
Arkansas Post NM
Badlands NP (Mississippi NRR)
Brown v. Board of Education NHS
Buffalo NR
Central High School NHS
Cuyahoga Valley NRA (James A. Garfield NHS)
Dayton Aviation Heritage NHP
Effigy Mounds NM
Fort Larned NHS (Nicodemus NHS)
Fort Scott NHS
Fort Smith NHS
Fort Union Trading Post NHS
George Rogers Clark NHP
Grand Portage NM
George Washington Carver NM
Herbert Hoover NHS
Hopewell Culture NHP
Homestead NM of America
Hot Springs NP

Harry S Truman NHS
Ice Age NST
Indiana Dunes NL
Isle Royale NP
Jewel Cave NM
Jefferson NEM
Keweenaw NHP
Knife River Indian Village NHS
Lincoln Boyhood NM
Lincoln Home NHS
Little Rock Central High School NHS
Mount Rushmore NM
Mississippi River Corridor Study Comm.
Midwest Archeological Center
Midwest Region (Lewis & Clark NHT)
Niobrara National Scenic River (Missouri National Recreational Rivers)
Ozark NSR
Pea Ridge NMP
Perry's Victory & International Peace Memorial
Pipestone NM
Pictured Rocks NL
Saint Croix/Lower St. Croix NSR
Scotts Bluff NM
Sleeping Bear Dunes NL
Tallgrass Prairie NP
Theodore Roosevelt NP
Ulysses S. Grant NHS
Voyageurs NP
Wind Cave NP
Wilson's Creek NB
William Howard Taft NHS

**NATIONAL CAPITAL REGION  
PARKS**

Antietam NB
Catoctin Mountain Park
Chesapeake & Ohio Canal NHP
George Washington MP (Arlington House, The Robert E. Lee Memorial)
Harpers Ferry NHP
Manassas NBP
National Capital Parks-Central (Vietnam Veterans Memorial/Washington Monument/Thomas Jefferson Memorial/Lincoln Memorial/National Mall/Old Post Office Observation Tower)
National Capital Parks-East (Baltimore-Washington Parkway)
President's Park
Prince William Forest Park
Rock Creek Park
White House Liaison, Office of
Wolf Trap Farm Park

**NORTHEAST REGION  
PARKS**

Acadia NP
Adams NHS
Allegheny Portage Railroad NHS (Johnstown Flood NM)
Appomattox Court House NHP
Assateague Island NS
Boston NHP (Boston African-American NHS)
Booker T. Washington NM

Cape Cod NS
Colonial NHP
Delaware Water Gap NRA
Edison NHS
Fire Island NS
Fort McHenry NM & Historical Shrine (Hampton NHS)
Fort Necessity NB (Friendship Hill NHS)
Fort Stanwix NM
Frederick Law Olmsted NHS
Fredericksburg & Spotsylvania NMP
Gateway NRA Floyd Bennett Field
Gateway NRA Sandy Hook
Gateway NRA Staten Island
Gettysburg NMP (Eisenhower NHS)
George Washington Birthplace NM (Thomas Stone NHS)
Hopewell Furnace NHS
Independence NHP
Lowell NHP
Marsh-Billings-Rockefeller NHP
Manhattan Sites
Martin Van Buren NHS
Minute Man NHP
Morristown NHP
New Bedford Whaling NHP
New River Gorge NR
Petersburg NB
Richmond NBP (Maggie L Walker NHS)
Home of Franklin D. Roosevelt NHS
Roger Williams NM (Blackstone River Valley National Heritage Corridor)
Saint-Gaudens NHS
Sagamore Hill NHS
Salem Maritime NHS (Saugus Iron Works NHS)
Saratoga NHP
Shenandoah NP
Springfield Armory NHS
Steamtown NHS
Statue of Liberty NM (Ellis Island)
Upper Delaware Scenic and Recreational River
Valley Forge NHP
Weir Farm NHS
Women's Rights NHP

**PACIFIC WEST REGION  
PARKS**

American Memorial Park
Big Hole NB
Cabrillo NM
Columbia Cascades Support Office
Channel Islands NP
Crater Lake NP
Craters of the Moon NM
Devils Postpile NM
Death Valley NP
Ebey's Landing NHR
Eugene O'Neill NHS (John Muir NHS)



Fort Clatsop NM
Fort Vancouver NHS (McLoughlin House NHS)
Golden Gate NRA (Fort Point NHS)
Great Basin NP
Hagerman Fossil Beds NM (City of Rocks N RES)
Haleakala NP
Hawaii Volcanoes NP
John Day Fossil Beds NM
Joshua Tree NP
Kaloko-Honokohau NHP
Kalaupapa NHP
Klondike Gold Rush--Seattle Unit
Lava Beds NM
Lake Mead NRA
Lake Roosevelt NRA
Lassen Volcanic NP
Manzanar NHS
Mojave NP
Mount Rainier NP
Muir Woods NM
Nez Perce NHP
Fire Management Program Center
North Cascades NP (Lake Chelan NRA/Ross Lake NRA)
National Park of American Samoa
Olympic NP
Oregon Caves NM
Pacific Great Basin Support Office
Pinnacles NM
Pacific Islands Support Office
Point Reyes NS
Presidio of San Francisco
Puukohola Heiau NHS
Pu'uhoonua o Honaunau NHP
Pacific West Region
Redwood NP
San Francisco Maritime NHP
San Juan Island NHP
Santa Monica Mountains NRA
Sequoia and Kings Canyon National Parks (Kings Canyon NP)
U.S.S. Arizona Memorial
War in the Pacific NHP
Whiskeytown-Shasta-Trinity NRA
Whitman Mission NHS
Yosemite NP

**SOUTHEAST REGION  
PARKS**

Abraham Lincoln Birthplace NHS
Andersonville NHS (Jimmy Carter NHS)
Andrew Johnson NHS
Big Cypress NP
Biscayne NP
Big South Fork NRRRA
Blue Ridge Parkway
Cape Hatteras NS (Wright Brothers NM/Fort Raleigh NHS)
Cape Lookout NS

Canaveral NS
Cane River Creole NHP
Carl Sandburg Home NHS
Castillo de San Marcos NM (Fort Matanzas NM)
Chattahoochee River NRA
Chickamauga & Chattanooga NMP
Christiansted NHS (Buck Island Reef NM)
Congaree Swamp NM
Cowpens NB
Cumberland Gap NHP
Cumberland Island NS
De Soto NM
Everglades NP (Dry Tortugas NP)
Fort Caroline NM (Timucuan Ecological & HP)
Fort Donelson NB
Fort Frederica NM
Fort Pulaski NM
Fort Sumter NM (Charles Pinckney NHS)
Great Smoky Mountains NP
Guilford Courthouse NMP
Gulf Islands NS
Horseshoe Bend NMP
New Orleans Jazz NHP
Jean Lafitte NHP&P
Kennesaw Mountain NBP
Kings Mountain NMP
Little River Canyon Npres (Russell Cave NM)
Mammoth Cave NP
Martin Luther King Jr NHS
Moore's Creek NB
Natchez NHP
Natchez Trace NST (Brices Cross Roads NBS)
Ninety Six NHS
Obed Wild and Scenic River
Ocmulgee NM
San Juan NHS
Salt River Bay NHP & Ecological Pres
Shiloh NMP
Stones River NB
Tuskegee Institute NHS (Tuskegee Airmen NHS)
Tupelo NB
Vicksburg NMP
Virgin Islands NP

**U.S. Geological Survey Identified "Appropriate Facilities"**  
**FY 2003 Calendar Year E.O. Report**

- a. USGS Western Region
  - 1) Columbia River Research Lab, Cook, Washington
  - 2) Pacific Island Ecosystems Research Center, (Kilauea Field Station), Volcano, HI
  - 3) Alaska Science Center, Anchorage, Alaska
  - 4) Western Fisheries Research Center, Seattle, Washington
  - 5) Menlo Park, California
  - 6) Hawaii Volcano Observatory
  - 7) Sacramento, California
  
- b. USGS Central Region
  - 1) Earth Resources Observation Systems Data Center, Sioux Falls, South Dakota
  - 2) Northern Prairie Wildlife Center, Jamestown, North Dakota
  - 3) Columbia Environmental Research Center, Columbia, Missouri
  - 4) Ecological Toxicology Research Station, Yankton, South Dakota
  - 5) National Water Quality Lab, Denver, Colorado
  - 6) Denver Federal Center, Denver, Colorado
  - 7) Mid-Continent Mapping Center, Rolla, Missouri
  - 8) Albuquerque Seismological Laboratory, New Mexico
  
- c. USGS Eastern Region:
  - 1) Patuxent Wildlife Research Center, Laurel, Maryland  
Leetown Science Center (LSC), Research and Development Laboratory,  
Wellsboro, PA
  - 2) Leetown Science Center, SO Conte Anadromous Fish Laboratory,  
Turner Falls, MA
  - 3) Great Lakes Science Center (GLSC), Ann Arbor, Michigan
  - 4) GLSC, Hammond Bay Biological Station, Millersburg, MI
  - 5) GLSC, Tunison Laboratory of Aquatic Science, Cortland, NY
  - 6) Upper Midwest Environmental Sciences Center, LaCrosse, Wisconsin
  - 7) National Wildlife Health Center, Madison, Wisconsin
  - 8) Leetown Science Center, Kearneysville, West Virginia
  - 9) Florida Caribbean Science Center, Gainesville, Florida
  - 10) Fredericksburg Geo Magnetic Research Center, Corbin, Virginia
  - 11) Coastal and Marine Geology Team, St. Petersburg, Florida
  - 12) Coastal and Marine Geology Team, Woods Hole, Massachusetts
  - 13) Ocala Water Quality Lab, Ocala, Florida
  - 14) District Office, Atlanta, Georgia
  - 15) National Center, Reston, Virginia

## Attachment B - Concessions Contracts

Item	Contract Number	Park Unit	Effective Date	Contract Category
1	CC-ACAD012-00	Acadia NP	9/6/2000	III
2	CC-ACAD013-01	Acadia NP	5/9/2001	III
3	CC-ACAD014-02	Acadia NP	1/1/2002	III
4	CC-CACO003-02	Cape Cod NS	1/1/2002	
5	CC-CACO004-02	Cape Cod NS	1/1/2002	II
6	CC-CANY031-02	Canyonlands NP	1/1/2002	
	CC-CANY032-02	Canyonlands NP	1/1/2002	
	CC-CANY033-02	Canyonlands NP	1/1/2002	III
	CC-CANY034-02	Canyonlands NP	1/1/2002	III
	CC-CANY035-02	Canyonlands NP	1/1/2002	III
	CC-COLO001-02	Colonial NHP	1/1/2002	
	CC-COLO003-02	Colonial NHP	1/1/2002	II
	CC-CRLA001-02	Crater Lake NP	11/1/2003	II
	CC-CRLA002-02	Crater Lake NP	4/8/2002	II
15	CC-DENA001-03	Denali NP & Pres	1/1/2003	
16	CC-DENA901-02	Denali NP & Pres	1/1/2002	III
17	CC-DENA904-02	Denali NP & Pres	1/1/2002	
18	CC-FIIS002-02	Fire Island NS	6/13/2002	II
19	CC-FIIS002-03	Fire Island NS	5/2/2003	II
20	CC-FIIS004-02	Fire Island NS	1/1/2002	II
21	CC-GATE015-03	Gateway NRA	4/15/2003	

Item	Contract Number	Park Unit	Effective Date	Contract Category
22	CC-GATE017-03	Gateway NRA	5/1/2003	
23	CC-GATE019-01	Gateway NRA	6/22/2001	II
24	CC-GLCA-007-03	Glen Canyon NRA	1/1/2003	
25	CC-GRCA001-02	Grand Canyon NP	1/1/2002	
26	CC-GRSA004-02	Great Sand Dunes NM	1/1/2002	III
27	CC-GRTE005-03	Grand Teton NP	1/1/2003	II
28	CC-GRTE006-02	Grand Teton NP	1/1/2002	III
29	CC-GRTE008-02	Grand Teton NP	1/1/2002	III
30	CC-GRTE010-02	Grand Teton NP	1/1/2002	III
31	CC-GRTE011-02	Grand Teton NP	1/1/2002	III
32	CC-GRTE014-02	Grand Teton NP	1/1/2002	III
33	CC-GRTE015-02	Grand Teton NP	1/1/2002	III
34	CC-GRTE017-02	Grand Teton NP	1/1/2002	III
35	CC-GRTE020-02	Grand Teton NP	1/1/2002	III
36	CC-GRTE022-02	Grand Teton NP	1/1/2002	
37	CC-GRTE040-02	Grand Teton NP	1/1/2002	III
38	CC-GRTE041-02	Grand Teton NP	1/1/2002	III
39	CC-GRTE043-02	Grand Teton NP	1/1/2002	III
40	CC-GRTE045-02	Grand Teton NP	1/1/2002	III
41	CC-KATM001-01	Katmai NP & Pres	1/1/2001	
42	CC-ORCA001-01	Oregon Caves NM	5/8/2001	II
43	TC-ORCA002-03	Oregon Caves NM	4/25/2003	
44	CC-ROMO002-02	Rocky Mountain NP	1/1/2002	

Item	Contract Number	Park Unit	Effective Date	Contract Category
45	CP-ROMO004-03	Rocky Mountain NP	1/1/2003	II
46	CC-ROMO009-02	Rocky Mountain NP	1/1/2002	III
47	CC-ROMO010-02	Rocky Mountain NP	1/1/2002	III
48	CC-ROMO011-02	Rocky Mountain NP	1/1/2002	III
49	CC-ROMO012-02	Rocky Mountain NP	1/1/2002	III
50	CC-ROMO013-02	Rocky Mountain NP	1/1/2002	III
51	CC-ROMO016-02	Rocky Mountain NP	1/1/2002	III
52	CC-ROMO017-02	Rocky Mountain NP	1/1/2002	III
53	CC-ROMO018-02	Rocky Mountain NP	1/1/2002	III
54	CC-ROMO019-02	Rocky Mountain NP	1/1/2002	III
55	CC-ROMO021-02	Rocky Mountain NP	1/1/2002	III
56	CC-ROMO022-02	Rocky Mountain NP	1/1/2002	III
57	CC-ROMO028-02	Rocky Mountain NP	1/1/2002	III
58	CC-ROMO029-02	Rocky Mountain NP	1/1/2002	III
59	CC-ROMO030-02	Rocky Mountain NP	1/1/2002	III
60	CP-SLBE004-01	Sleeping Bear Dunes NL	12/1/2001	III
61	CC-YELL001-03	Yellowstone NP	3/1/2003	
62	CC-YELL004-03	Yellowstone NP	1/1/2003	
63	CC-YOSE006-01	Yosemite NP	5/21/2001	