

**EMS CORRECTIVE ACTION REQUEST STATUS**

Finding #	EMS Element	Finding	Location	Corrective Action Planned	Corrective Action Status	Date Completed
1	Policy and Leadership	NCCOS staff and partners demonstrated an awareness of the NCCOS EMS Policy, but not a strong awareness of the overall EMS. Auditors noted that there was no apparent display of the NCCOS EMS Policy memo, dated 8-8-2007. It was also noted that there was no documentation of the NCCOS EMS policy having been communicated to visitors or vendors upon sign in. Attention needs to be directed to informing on-site contractors about the NCCOS EMS at CCFHR, and what is expected by all site personnel and visitors.	NCCOS	CCFHR is implementing procedures that provide training to visitors or vendors. The NCCOS EMS Policy will be attached to new contracts as they are awarded. The NCCOS EMS Policy will be communicated to visitors or vendors upon sign in. The Policy will also be posted on the CCFHR Safety/EMS bulletin board. EMS awareness training will be provided to CCFHR NOS and NMFS staff, partners and contractors in January 2008 for 2nd QTR FY 2008 completion.	<b>Scheduled for Completion Mar 2008</b>	<b>March_2008</b>

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2	Roles and Responsibilities	Throughout NCCOS, EMS remains dependent on a few critical EMS team members. Absence of any of these individuals could result and has resulted in significant adverse impacts to the EMS. The recent departure of the Beaufort EH&S/EMS representative required that the NCCOS EMS Representative provide specialized training to prepare CCFHR staff for the EMS internal audit. When an EMS is fully functional, the system should continue to function in the absence of key employees. Senior NCCOS management and Center Facility Teams need to be more proactive in creating and sustaining an EMS culture.	NCCOS	CCFHR management is engaging the Center Facility Team as well as the EMS Team on how to be more proactive in creating and sustaining an EMS culture. Each NOS and NMFS Branch Chief will name an EMS chain of command to match the COOP. Expected completion is 3rd Qtr FY 2008.  Action Taken: Each Branch placed a member on the EMS committee which was confirmed by letter to file. EMS chair reports to Center Director and members liaise with Branches.	Scheduled for Completion Jun 2008	Jun_2008

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3	Environmental Impact Identification	All employees were knowledgeable of how their jobs could impact the local environment, but few had knowledge of the NCCOS Significant Environmental Aspects, Objectives, or Targets.	NCCOS	CCFHR is implementing activities that boost employee knowledge of the significant Environmental Aspects, Objectives, and Targets of NCCOS. Branch Chief meetings and EMS training will include discussion of the topic for completion in 2nd Qtr FY 2008.  Actions Taken: Center-wide training completed in association with OEP initiation; Intranet site created, IT chief requested to post Icon on every computer with link to the NCCOS EMS web site.	Scheduled for Completion Mar 2008	Sep_2008

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4	Environmental Laws, Regulations and Other Requirements	The Kasitsna Bay lab needs to improve documentation of environmental processes and determine if there is a legal requirement to apply for an EPA hazardous waste generator permit. Specific attention needs to be paid to the Spill Prevention Control and Countermeasure (SPCC) and Emergency Response Plans. Other environmental documents need to be formalized as applicable. Beaufort documentation needs to include Kasitsna Bay.	NCCOS	Kasitsna Bay Laboratory management with assistance from CCFHR, HML, and other entities will update the SPCC. The availability of funds for contract actions may have some impact. Other plans will be updated and incorporated into CCFHR documents or left as stand alone documents during 4th Qtr FY 2008.	<b>Scheduled for Completion Sep 2008</b>  <b>Probable completion date moved to first quarter FY09</b>	

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5	Personnel Performance Standards	In portions of NCCOS, there is a lack of EMS or environmental performance standards being formally included in employee performance plans (NOAA IT and safety performance statements provide examples of existing job performance standards). Employees can not dedicate adequate time to roles or collateral duties not specified and appropriately weighted in their employee performance plan. This is especially true for the NCCOS EMS and local facility team members.	NCCOS	EMS is required in all NCCOS performance plans.	Review of performance standards will take place during FY 2007 transition to DEMO system and then elements included in FY 2008 performance plans.  <b>Scheduled for 11/01/07</b>	Nov_2007

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6	Environmental Improvement Activities	<p>While Environmental Improvement Activities have been developed through Environmental Management Plans and purchasing training, there is no clear-cut method of tracking costs associated with environmental improvements NCCOS-wide, as required by EMS standards. More effective and trackable methods of environmental performance measurement need be established.</p> <p>Senior NOAA management (facilities and procurement staff) is not engaged in EMS and their decisions are often contradictory to and adversely affect the NCCOS EMS. NOAA contracts managed from Kansas City are not integrated into the site-specific EMS. Contractors and suppliers are not aware of site-specific environmental issues.</p>	NCCOS	<p>CCFHR management has inserted an EMS Line Item in its budget for FY 2008 as required by the references. Contractor and supplier training will be provided 2nd Qtr FY 2008. CCFHR can advise facilities and procurement offices to consider EMS, but we have little authority over their actions.</p> <p>NCCOS EMS Team will provide:                      1) Proposed language for inclusion in Statements of Work for new on-site contracts and 2) Proposed language for inclusion in Statements of Work for current/existing on-site contracts. (Ref: from FedCenter.gov, the Federal government's home for comprehensive environmental stewardship and compliance assistance information.)</p>	<p><b>Scheduled for Completion Mar 2008</b></p> <p>Within our chain of command this has been completed.</p> <p><b>Scheduled for Completion Jun 2008</b></p> <p><b>Completed</b></p> <p>EMS contract language for new and existing contracts is located on the NCCOS EMS website.</p>	<p><b>Mar_2008</b></p> <p><b>8/13/08</b></p>

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7	Environmental Awareness and Training	Environmental training requirements of specific job functions, roles and responsibilities are not defined. In some cases there is confusion among staff between "safety" and "environmental compliance", and "environmental management." The "Training Matrix" initially developed by the EMS team in FY06 needs to be further developed and implemented to identify environmental requirements of specific job functions and roles.	NCCOS	<p>CCFHR management and appropriate staff will conduct an Operational Analysis to break down the environmental training needed to do job activities, and establish plans and procedures for implementation in 3rd Qtr FY 2008.</p> <p>The "Training Matrix" should be enhanced to more effectively to identify the environmental requirements of specific job functions and roles.</p> <p>The NCCOS EMS Team and Local EMS Facility Teams will identify and enhance job competency training.</p>	<p><b>Scheduled for Completion Jun_2008</b></p> <p><b>Probable completion date moved to first quarter FY09</b></p> <p>Existing Training Matrix will be used as a guide and reference in accordance with DOC/NOAA policies and OSHA Standards and Training Guidelines. <b>Scheduled to begin Mar_2008</b></p> <p>Competency training being developed and initial module scheduled for completion 3/2008. Competency training modules for Lab Safety and Green Purchasing are available on the website.</p>	<p><b>2/27/08</b></p> <p><b>3/26/08</b></p>

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8	Environmental Operational Controls	<p>Many employees were not aware of written Work Instructions or SOPs. Those that have developed Work Instructions have not fully integrated environmental components into the day-to-day activities or plans. Education of employees and an emphasis on documenting, using, and improving work instructions is required.</p>	NCCOS	<p>EMS training will introduce the standard format for work instructions and SOPs to assist evaluating environmental impacts. Environmental impact will be evaluated prior to initiating experimental projects.</p> <p>CCFHR is continuing to develop plans and activities that increase employee awareness of work instructions through education, and peer reviews during 3rd Qtr FY 2008.</p>	<p>PowerPoint EMS refresher training was distributed to all NCCOS EMS Team Reps in Apr_2008 for use at their facility.</p> <p>A generic version of the presentation was made available on the EMS Training website on 6/3/08</p> <p><b>Scheduled for Completion Jun_2008</b></p>	<p><b>Apr_2008</b></p> <p><b>Jun_2008</b></p> <p><b>Jun 2008</b></p>

8

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9	Environmental Operational Controls	Not all partners are trained and/or full participants in the NCCOS EMS. NMFS partners have taken awareness training, but are not functionally implemented into the system; NC NEERS partners and cleaning contractors have not been included in any component of the EMS to date. There was no documentation of EMS awareness being provided to visitors. The level of EMS education for partners, visitors, and temporary persons needs to be improved. At the Kasitsna Bay facility, University of Alaska partners need to be made aware of the NCCOS EMS and have an appropriate degree of training and participation.	NCCOS	Kasitsna Bay will ensure University of Alaska partners receive NCCOS EMS awareness training. CCFHR is scheduling partner meetings to discuss inclusion in awareness training and how their participation is important to the overall EMS mission during 4th Qtr FY 2008.	Scheduled for Completion Jun_2008	Jun_2008

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10	Internal Communications	Employee perception of the degree of commitment by management to the EMS needs improvement. Many employees expressed the desire for upper management (NCCOS, Center Directors, and partners) to take a more active role in endorsing EMS. There is an apparent misperception by some employees that management only pays lip service to EMS that must be changed and better communicated. Scheduling of quarterly all hands meetings to discuss EMS issues would be an opportunity for improvement.	NCCOS	CCFHR management will communicate quarterly with personnel in congregated meetings/forums to discuss EMS initiatives and others issues as applicable.	Completed	The first such meeting was convened first quarter FY 2008 in December for 100% compliance.

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11	Internal Communications	Review of the NCCOS webpage revealed broken links, missing headers, missing footers, and dates. The present NOAA-SECO management, maintenance, and update of the NCCOS EMS website needs to be reviewed in its entirety. The website also needs to be made more useful and user-friendly. NCCOS management should consider involving the headquarters IT staff in the maintenance and updating of the NCCOS EMS website.	NCCOS	CCFHR management, EMS and Facility Teams, and individual employees will provide appropriate input into the NCCOS website.	NCCOS EMS public website went live on June 9, 2008.  This will continue to be an ongoing process as the content of the site will continually be updated and the website enhanced.	6/9/08

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12	Internal Communications	Local facility teams within the centers have been established, but some staff members are not aware of the local committee and their responsibilities relative to the Safety Committee. Minutes of local EMS team meetings are not regularly posted on the NCCOS EMS website. Facility teams need representation from each branch and job category and positive feedback to employees should occur from senior management through the Branch Chiefs.	NCCOS	CCFHR is implementing actions that include web posting of: minutes and recommendations of committee members, and EMS Team responsibilities vice Safety Team responsibilities. Team representation is being expanded to include all partners and players as applicable. Invigorating the communication lines between senior management through Branch Chiefs is being done with implementation during 3rd Qtr FY 2008.	Scheduled for Jun_2008	2/4/08

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13	Documents and Records Control of EMS	<p>EMS documents are stored and managed via the NCCOS EMS website, and the NCCOS facility-specific intranet. It is important that the NCCOS EMS website be the sole source of EMS program materials. In some cases, hardcopy versions of environmental documents such as plans, reports, permits, radiation safety plan, etc. were different than those on websites. Therefore, it was not clear which documents are current and which are obsolete. It is critical that an NCCOS wide Document Control System is developed and implemented to meet the document management demands of NCCOS. Local facility intranet postings should not be used in lieu of the official NCCOS EMS website.</p>	NCCOS	<p>CCFHR EMS Representative and IT personnel are coordinating efforts to comply with the reference regarding the intranet. The EMS Representative will lead the effort of eliminating obsolete documents by 4th Qtr FY 2008.</p> <p>All NCCOS Local Facility Teams will review documents relevant to their facility and <del>provide current documents to NCCOS EMS Representative</del> update where necessary. Obsolete documents will be removed.</p> <p>NCCOS and NOS EMS Representative will coordinate efforts to upload documents to NCCOS EMS website.</p>	<p><b>Scheduled for Sep_2008</b></p> <p>Documents are being reviewed.  <b>Scheduled for Sep_2008</b>  <b>Probable completion date moved to first quarter FY09</b></p> <p><b>This will continue to be an ongoing process across NCCOS in order to ensure that the most current document versions are available.</b></p>	Sept 2008

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14	Management Review	No documented feedback exists from senior NCCOS management on management reviews, actions and follow-up to be taken as a result of the review, and status of outstanding NCCOS non conformities.	NCCOS	CCFHR senior management is actively developing plans to abate the finding in accordance with the references for implementation during 1st Qtr FY 2008.	Scheduled for Completion Mar_2008	Dec_2007