

EMS CORRECTIVE ACTION REQUEST STATUS

Finding #	EMS Element	Finding	Location	Corrective Action Planned	Corrective Action Status	Date Completed
1	EMS 004 Environmental Impact Identification ISO 14001 4.3.1	When a new activity, product or service is initiated there is a lack of evidence of employee knowledge on how to ascertain if any new significant environmental aspects have been introduced.	NCCOS	NCCOS Center Directors will instruct Branch Chiefs and/or staff to work with the local NCCOS EMS Team Representative and review existing projects and assess the potential for environmental impacts to determine the level of significance. Management will ensure that local NCCOS EMS Team Representative and Local Facility EMS Team members help all Branch Chiefs and/or staff to formalize their assessment for potential environmental impacts and fill out a Project Environmental Checklist for new projects, activities or services. At NCCOS HQ, the Deputy Director will instruct the Business Manager to work with staff to review projects and activities and complete the Project Environmental Checklist. The Project Environmental Checklist can be found on the NCCOS EMS website at: http://coastalscience.noaa.gov/ems/documents/Forms/proj_env_checklilst.pdf Documentation will be maintained at the local facility level by a person designated by the Center Director/NCCOS Deputy.	Ongoing Each facility will report status by Dec_2008	
2	EMS 006 Environmental Improvement Activities ISO 14001 4.3.3	While Environmental Improvement Activities have been developed through Environmental Management Plans, the concept is not well grasped.	NCCOS	NCCOS Center Directors and the NCCOS Deputy Director (for HQ staff) will direct the local NCCOS EMS Team Representative and Local Facility EMS Team members to continue to communicate to staff, through general training and on an individual basis as needed, the NCCOS EMS Objectives, Targets and Environmental Management Programs and their relationship to NCCOS' significant environmental aspects, legal requirements and environmental policy.	Ongoing Each facility will report status by Dec_2008	

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3	EMS 007 Environmental Awareness and Training ISO 14001 4.4.2	EMS training should help to provide employees and contractors (where applicable) the necessary skills and knowledge to perform their work in an environmentally sound manner. Besides training, records generated during training must be retained.	NCCOS	NCCOS Center Directors and the NCCOS Deputy Director (for HQ staff) will encourage Branch Chiefs and staff to look for ways to expand and improve environmental education (through such means as on-line training, extramural training and encourage and support of employee attendance at environmental conferences and symposiums). Management will continue to ensure that the National Oceanic and Atmospheric Administration (NOAA) and Department of Commerce (DOC) requirements for training are followed and tracked. Management will be instructed to encourage staff to make suggestions for additional on-line training to add to the EMS website, which will be forwarded to the NCCOS EMS Coordinator.	Ongoing Each facility will report status by Dec_2008	

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4	EMS 008 Environmental Operational Controls ISO 14001 4.4.6	Although EMS Work instructions, also referred to as SOPs and SOGs, are available on the NCCOS EMS website, (some facility-specific instructions are on the intranet), the majority of employees interviewed were not aware of them. Those that were aware of the Work Instructions had not integrated them into day-to-day activities. Therefore, further education of employees and emphasis on improving work instructions is required.	NCCOS	<p>NCCOS requires documented SOPs/SOGs to ensure quality science and the safety of personnel. All Center Directors have responded that SOPs/SOGs are developed for conducting laboratory and field research. Center Directors and the NCCOS Deputy Director (for HQ staff) will direct Branch Chiefs and/or staff to review existing SOPs/SOGs and update if necessary. The local NCCOS EMS Team Representative will assist where needed. The following recommended EMS statement will be incorporated in all NCCOS SOPs/SOGs "This protocol of standard operating procedures (SOPs)/ guidelines (SOGs) fully incorporates the NOAA/NCCOS Environmental Management Systems (EMS) requirements and conforms to E.O.13423. The SOPs/SOGs include appropriate considerations regarding evaluating and minimizing an environmental footprint, and implementing energy and water conservation directives." Branch Chiefs and/or staff will also give appropriate consideration to the Compliance Assurance Program (CAP) requirements and to ensure that their staff is aware of the necessity to adhere to them.</p> <p>NCCOS Management will review any recommendation that the NCCOS Environmental Health & Safety Officer (EH&S) and the NCCOS EMS Team make regarding alternatives to ensure that all CAP requirements are up-to-date and maintained.</p>	<p>Ongoing Each facility will report status by Dec_2008</p>	

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5	EMS 011 Documentation and Control of EMS Documents and Records ISO 14001 4.4.5	EMS documents are stored and managed via the NCCOS EMS website, and the NCCOS facility-specific intranet. In some instances, there were different versions of environmental documents, plans, reports, etc. Therefore, it was not clear to either the auditors or those staff which documents were current and which were obsolete. While an NCCOS-wide Document Control System is being reviewed there is a need to do a document review at each facility in order to ensure that employees have access to all relevant documents and that those documents are up-to-date. References: EMS 011 Documentation and Control of EMS Documents and Records; ISO 14001 4.4.5	NCCOS	Center Directors and the NCCOS Deputy Director (for HQ staff) will ensure the review of operational documents in order to eliminate duplicate or out of date documents. At the NCCOS level, the NCCOS EMS Coordinator and NCCOS IT Manager will work on the development of an NCCOS-wide system where key documents will be controlled. At all facilities, staffs are taught during their EMS training to access the NCCOS EMS website (http://coastalscience.noaa.gov/ems/welcome.html) only through the NCCOS homepage (http://coastalscience.noaa.gov/). This will ensure that staffs are accessing the latest information.	<p>Ongoing</p> <p>Each facility will report status by Dec_2008</p>	