



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
National Centers for Coastal Ocean Science
Silver Spring, Maryland 20910

SEP 17 2008

MEMORANDUM FOR: B. William Gottholm
Environmental Management System Coordinator

FROM: *for Gary C. Matlock*
Gary C. Matlock, Ph.D.
Director

SUBJECT: Management Response to the NCCOS Environmental
Management System Internal Audit

The purpose of the National Centers for Coastal Ocean Science (NCCOS) Environmental Management System (EMS) internal annual audit is to verify through a review the system's health and effectiveness between the formal third-party audits, required every three years. The on-site annual audit provides a review, and supports credibility between the third party audits. The goal of the annual audit is to collect and evaluate objective evidence related to the EMS. The audits determine whether NCCOS' EMS is functioning as intended, that practices and procedures are conducted as documented, and that the EMS as implemented conforms to the International Organization for Standardization (ISO 14001) standard and EMS program objectives. I appreciate the extensive efforts of the audit team and I appreciate this opportunity to respond to the audit.

The results of the recent internal audit are positive. I have reviewed and approved the corrective actions for each of the non-conformances identified during the audit. Most appear to have already been addressed at each facility.

As has been mentioned previously, an EMS is a continuous improvement process, and the results of this and future audits will provide added value to our EMS system and should be viewed as an overall opportunity to improve. Since the audit is a snapshot in time, it cannot identify each and every area for improvement. However, the results of each of our audits do provide for an additional incremental step in the overall improvement of our EMS.

After review of the NCCOS EMS Internal Audit Report for the period June 17-25, 2008, I am submitting the following responses to you regarding the NCCOS Environmental Management System Internal Audit Report. Responses to Minor nonconformances and opportunities for improvement follow and are listed by item number in the sequence of the EMS element.



Non-Conformity #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.

References: EMS 004 Environmental Impact Identification; ISO 14001 4.3.1

Response. 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_checklist.pdf)

Documentation will be maintained at the local facility level by a person designated by the Center Director/NCCOS Deputy.

Non-Conformity #2. While Environmental Improvement Activities have been developed through Environmental Management Plans, the concept is not well grasped.

References: EMS 006 Environmental Improvement Activities; ISO 14001 4.3.3

Response. 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.

Non-Conformity #3. EMS training should help 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.

References: EMS 007 Environmental Awareness and Training; ISO 14001 4.4.2

Response. 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.

Non-Conformity #4. Although EMS Work instructions, also referred to as Standard Operating Procedures (SOPs) and Standard Operating Guidelines (SOGs), are available on the NCCOS EMS website, (some facility-specific instructions are on the NCCOS 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.

References: EMS 008 Environmental Operational Controls; ISO 14001 4.4.6

Response. 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.

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.

Non-Conformity #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

Response. 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/>).

Below, listed by number, are the Opportunities for Improvement, and the NCCOS response.

Opportunity for Improvement #1. Implement a system to provide feedback to employees on EMS suggestions for improvement. Determine whether EMS suggestions should be submitted/ reported through the NCCOS EMS website or utilize the NCCOS SharePoint sites to enhance communication to all NCCOS personnel.

References: EMS 009 Internal Communications; ISO 14001 4.4.3

Response. NCCOS agrees with the recommended action to have the NCCOS EMS Coordinator and NCCOS IT Manager investigate and work with the web development staff and Local Facility EMS Teams and IT leads to ensure that any recommended system to enhance website communication meets and complies with all Federal IT policies.

At the local level, successful systems of communication and responding to employee suggestions have been developed. This has been accomplished through use of the local facility intranet, email, and employee meetings.

Opportunity for Improvement #2. Groups within NCCOS that engage in contract and grant processes should include EMS language in relevant documents. Suggested EMS language for new and existing contracts, modified from FedCenter.gov, will be placed onto the NCCOS EMS website.

References: EMS 008 Environmental Operational Controls; ISO 14001 4.4.2 and 4.4.6

Response. EMS language for new and existing contracts was placed onto the NCCOS EMS website on August 13, 2008. Center Directors have indicated that the process is underway to include the EMS language into both new and existing contracts. The NCCOS Business Manager will ensure that the EMS language is incorporated into new and existing contracts implemented at the HQ level.

Opportunity for Improvement #3. Review the way that EMS is communicated to visitors and vendors at each site and modify on a site by site basis. Each facility access is unique and ways to communicate EMS to visitors and vendors should be discussed among facility management and the local facility EMS team. Suggestions from staff should also be sought.

References: EMS 009 Internal Communications; ISO 14001 4.4.3

Response. All NCCOS facilities have a procedure in place to communicate the EMS to visitors and vendors. Center Directors will provide a brief description of their facility procedure to the NCCOS EMS Coordinator by October 1, 2008. The procedure for SSMC has been reviewed by the Local EMS Facility Team and will be modified and a new procedure implemented by October 1, 2008.

Any future change or modification to a facility's procedure will be noted and a description sent to the NCCOS EMS Coordinator.

Opportunity for Improvement #4. Review the Compliance Awareness Program (CAP) procedure currently in place. Consider an NCCOS-wide subscription to Business & Legal Reports (BLR) or something similar to maintain an updated CAP.

References: EMS 005 Environmental Laws, Regulations and Other Requirements; ISO 14001 4.3.2

Response. NCCOS Management will review any recommendation that the NCCOS Environmental Health and Safety Officer and the NCCOS EMS Team make regarding alternatives.

I am directing that the NCCOS EH&S Officer/NCCOS EMS Team respond directly to me with any recommended action by October 6, 2008.

Opportunity for Improvement #5. Investigate the possibility of having a NOAA building management person assigned to the NCCOS EMS Team.

References: EMS 002 Roles and Responsibilities; ISO 14001 4.3.1

Response. Each of the NCCOS Centers has a building or maintenance operations representative on their Local EMS Facility Team. It would be desirable to add a representative to the NCCOS EMS Team from the NOAA level which would close the current gap of not having the job functionality of building management represented at the NCCOS Team level. This would provide an additional asset and increased ability to work with individual facilities on areas such as energy management and building performance.

The NOAA SECO Environmental Program Manager has agreed to serve in a consultant capacity for the NCCOS EMS Team.

Opportunity for Improvement #6. Ensure that the EMS training being provided is the latest. The facility management designee, responsible for new staff, should notify the facility NCCOS EMS Team Rep when new staff comes onboard to ensure that all environmental and safety training requirements are met and the training is documented. This should be a standard practice incorporated into all new staff orientation at each facility.

Reference: EMS 007 Environmental Awareness and Training; ISO 14001 4.4.2

Response. All NCCOS Centers have the latest EMS training included in their employee orientation. Each facility has access to the latest EMS web-based training located on the NCCOS EMS website.

Opportunity for Improvement #7. The NCCOS COOP (all facilities) should be reviewed and updated if necessary on a quarterly basis. NCCOS HQ IT should work with management to ensure that secure server space is available for each facility manager to

maintain updated COOP plans, accessible only to those persons designated by the facility Director and by Director, NCCOS.

References: EMS 009 Internal Communications; ISO 14001 4.4.3

Response. All NCCOS locations follow NCCOS protocols for maintenance of COOP documents. This includes updates of local employee call lists and active participation in COOP drills. Center Directors and the NCCOS Business Manager (for NCCOS HQ) are responsible for the review and maintenance of their respective facility documents. I will direct the NCCOS IT Manager to provide secure server space for Center and HQ COOP plans and to secure access to those plans as indicated by myself and the NCCOS Center Directors.

Opportunity for Improvement #8. Work (with NOAA SECO & others) to develop a means of establishing baselines for energy and water consumption at NCCOS facilities. Determine appropriate methods of reporting and develop recommendations, where the need exists, for improving energy and water use diagnostics such as energy use indices (EUI). One example is kilowatt-hours used per square foot (kWh/SF).

References: EMS 006 Environmental Improvement Activities; ISO 14001 4.3.3

Response. NCCOS Centers track utilities as well as vehicle and vessel energy consumption. The NOAA SECO Environmental Program Manager has recently provided guidance to NCCOS in how to appropriately report our energy and water consumption data for 2008. Each facility will provide their data to you as requested. The Environmental Program Manager will then use the reported data from NCCOS to show calculated energy and water consumption/reduction at our sites. Note: Energy and water consumption data for NCCOS HQ, CSCOR and CCMA are included in the data that NOAA reports for the Silver Spring Metro Campus (SSMC). There is not a separate breakout of data.

In addition, the U.S. Department of Energy, National Renewable Energy Laboratory, is scheduled to conduct energy management audits at four NCCOS sites in FY09.

I am directing NCCOS Center Directors to monitor and report on the progress of the corrective and improvement actions, as applicable to their Center, to you.

The EMS Management Review is scheduled for **October 2, 2008 at the regularly scheduled NCCOS Center Directors Video Conference.**

The Management Review will include assessing opportunities for improvement and the need for changes to the EMS, including a review of the NCCOS Environmental Policy and environmental objectives and targets.

The Management Review will also include

- a. review of the internal audit and evaluation of compliance with legal and other requirements,
- b. communication(s) from external interested parties, including complaints,

- c. environmental performance of the organization,
- d. the extent to which objectives and targets have been met,
- e. the status of corrective and preventive actions,
- f. any follow-up actions from previous management reviews,
- g. any changing circumstances, such as developments in legal and other requirements related to our environmental aspects, and
- h. recommendations for improvement.

cc:

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NCCOS EMS Team