

**EMS CORRECTIVE ACTION REQUEST STATUS**

| Finding # | EMS Element                | Finding  | Location | Corrective Action Planned   | Corrective Action Status   | Date Completed  |
|-----------|----------------------------|--|----------|---|--|-----------------|
| 1         | Roles and Responsibilities | The EMS at NCCOS is still dependent on just a few EMS team members at each facility. As the system matures, emphasis should be placed on system continuity regardless of people.   | NCCOS    | The EMS Team should be broadened to include other functions such as HR, Budget, Training, Procurement, IT, research and facility level teams should be formalized. Training should be provided (if necessary), procedures written and roles and responsibilities clearly defined. | <b>Completed</b><br>NCCOS EMS Team – Broadened to include budget, communications, procurement and IT<br>Facility EMS teams formalized for SSMC, Beaufort, Oxford, and Charleston | <b>03/03/06</b> |
| 2         | Training                   | Compliance and other competency training (such as regulatory required training) are given on a recurring basis; this forms the knowledge to perform work in an environmentally sound manner. Tracking of competency training at CCFHR needs improvement. | CCFHR    | Continue to robust the existing system for tracking Competency Training at CCFHR.   | <b>Completed</b><br>Training matrix was changed to include the date that training is next due in addition to tracking the dates training was last completed by staff.            | <b>11/15/05</b> |

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| 3         | Operational Controls | Numerous work instructions are available at the EMS website, both generic and facility specific, but they are not yet integrated into day-to-day activities. Further emphasis on improving work instructions is required. | NCCOS    | <p>Plan and schedule training sessions on Work Instructions.</p> <p>Update or modify work instructions to better meet facility specific requirements.</p> <p>2</p> | <p>Training on the work instructions completed by each of the facilities.</p> <p>The NCCOS Activities with Significant Impacts were reviewed and combined into 10 activities. <b>Completed 3/10/06.</b> Work instructions will now be reviewed and updated based on those changes and facility specific requirements:</p> <p><b>Scheduled for 06/10/06</b></p> | <p>12/1/05</p> <p>6/30/06</p> |

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| 4         | Procurement | Local procedures for communicating significant environmental aspects to contractors and suppliers were not available at Charleston or Beaufort.                       | CCFHR<br>CCEHBR | Develop procedure for communicating with suppliers and vendors.<br><br>Train Procurement professionals on their responsibilities, ensure appropriate steps are taken and monitor performance.   | The NCCOS EMS Teams have been made aware that NCCOS uses the NOAA SECO standard for communicating significant environmental aspects to contractors and suppliers.<br><br>Scheduled for <b>06/10/06</b> | <b>6/30/06</b> |
| 5         | Procurement | 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. | NCCOS           | Communicate, to facility managers, the importance of discussing environmental requirements of construction or renovation with contracting officials. NCCOS EMS Team will provide EMS language for new and existing contracts.<br><br>Include a local EHS representative in the pre-construction planning process. | <b>Completed</b><br><br>EMS contract language for new and existing contracts is located on the NCCOS EMS website.<br><br>Scheduled for <b>03/2008</b>  | <b>8/13/08</b> |

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| 6         | Document Control | EMS documents are stored and well managed via the EMS Intranet website. However, general housekeeping of documentation needs improvement. For example, historical environmental documents such as plans, reports, permits, etc. are kept in hardcopy thus it is difficult to know what is current and what is obsolete. Obsolete documents should be discarded or marked appropriately. | NCCOS    | <p>Develop a list of NCCOS EMS documents subject to document control requirements</p> <p>Review the electronic document management system in use by MOC and decide whether it would be of assistance to NCCOS</p> | <p><b>Completed</b></p> <p>Completed list of NCCOS EMS documents subject to document control requirements.</p> <p><b>Scheduled for 03/10/06.</b> Reviewed the MOC system and determined it could be of assistance to NCCOS. Will present recommendation at NCCOS Manager Retreat in April 2006. In the meantime, obsolete documents will be archived on the NOAA SECO webfolders site.</p> | <p><b>01/30/06</b></p> <p><b>3/10/06</b></p> |

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| 7         | Records Management   | The records retention system in place in Charleston needs improvement. The File Plan did not direct the reader to the storage location and some of the files identified with in the File Plan could not be located, although these were eventually found.  | NCCOS    | NCCOS facilities will review the process by which they are maintaining environmental records to ensure that the records retention procedure is adequately applied and the requirements of NOAA's EMS standards are met. | Record retention process was reviewed to ensure the standard was applied.  | 12/6/05        |
| 8         | Performance Measures | Measurement of environmental performance, needs improvement. At this time, only objectives and targets established within the EMPs are being tracked. Other performance indicators that are already monitored to satisfy reporting requirements for NOAA, DOC, and Executive Orders should be included in the EMS. | NCCOS    | NCCOS will institute measures of performance on its compliance with environmental legal and other requirements.   | The Federal EMS Reporting has been implemented and completed. This will now be an annual process.<br><br><b>Scheduled for end of fiscal year</b> | 12/15/06       |

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| 9         | Training           | The "Training Matrix" that is being developed needs improvement. Currently this matrix relates the employees' names and the types of training they have received. Although this is a good instrument to keep a record of training, it is necessary to tie the training requirements to job functions and roles/responsibilities. | NCCOS    | NCCOS will review the training matrix as part of the EMS Training Improvement Plan and will focus on identifying the training needs of specific job functions.          | <b>Scheduled for 03/10/06</b>           | <b>3/10/06</b> |
| 10        | Emergency Response | The COOP process could be strengthened by including hurricane and evacuation planning, especially related to the destruction of "science" and the movement of chemicals to prevent releases to the environment.  | NCCOS    | Ensure that NCCOS facility Occupant Emergency Plans (OEP) adequately consider the environmental consequence resulting from reasonably foreseeable emergency situations. | <b>Scheduled for end of fiscal year</b> | <b>9/30/06</b> |

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| 11        | Management Review | The existing management review process could become more effective in moving the EMS forward by measure improvements to the management system resulting from reduced process inefficiencies. Current measures are essentially waste reductions and baselining not process improvements. Consider applying Six Sigma techniques to identify efficiency measures. | NCCOS    | (Also see finding 8) NCCOS will institute measures of performance on its compliance with environmental legal and other requirements. | The Federal EMS Reporting has been implemented and completed. This will now be an annual process.<br><br><b>Scheduled for end of fiscal year</b> | <b>12/15/06</b> |