



# United States Department of the Interior

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



In Reply To:  
ER 03/256

JUN 23 2004

Mr. David Kling  
Director  
Federal Facilities Enforcement Office (MC-2261A)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Dear Mr. Kling:

This letter is in response to the request by Assistant Administrator Juan Suarez for a report by the Department of the Interior (DOI) on 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) 2003.

As you will see in our report, DOI has made significant progress in CY 2003 on the implementation of E.O. 13148. Furthermore, DOI is 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 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 2003 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 in calendar year (CY) 2003 by Departmental Bureaus and Offices in fulfilling the requirements of Executive Order (E.O.)13148. The attached report that follows provides a more in-depth description of these activities.

**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 sponsored the 2003 DOI Conference on the Environment in Phoenix, Arizona, that had a heavy emphasis on EMS including training and technical sessions. The OEPC has prepared annual reports on Bureau environmental auditing programs for fiscal years (FY) 1999-2003. In FY 2003, the cumulative total of all DOI owned/operated facilities audited to date (all years) was 2,541 with an additional 426 compliance audits scheduled during FY 2004. Finally, the OEPC provides the Bureaus with the Federal environmental protocols developed by the U.S. Army Construction Engineering Research Laboratories.

**National Business Center (NBC):** The NBC requires custodial contractors to use environmentally friendly custodial products that provide a safer and healthier workplace in the Interior Complex. Chemical cleaning products used meet or exceed mandatory criteria for reducing the release of toxic chemicals. 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 Environmental Leadership (LEED) pilot project. Work being accomplished as part of this project will earn credit toward building certification if/as permitted by the LEED pilot program.

**Office of Acquisition and Property Management (PAM):** PAM has issued policies relating to ozone-depleting substances that are available on its website: <http://www.doi.gov/pam>. Since FY 1998, DOI has been able to meet or exceed the Environmental Protection Agency (EPA) requirements for alternative fuel vehicle acquisition (AFV). PAM is active in the Government-wide Federal Automotive Statistical Tool implementation as it evolves as an important management system for reporting AFV acquisition information and alternative fuel consumption.

**Bureau of Indian Affairs (BIA):** The BIA's efforts focused in the areas of Bureau-level policy, goals and objectives, environmental guidance and data management, and communication to address gaps identified in the Bureau-level EMS and to support a more robust EMS Bureau-wide. The BIA also continued efforts to improve field unit-level EMSs through additional pilot activities, and development of BIA field-level guidance materials. The CY 2004 is planned as a building year for the BIA EMS. EMS gap assessments and awareness will continue through the Bureau-wide Environmental Management Audit Program and plans and expectations will continue to be communicated to senior managers within central office, regions and at the facility level, setting the stage for successful roll-out of the Bureau EMS program in CY 2005. In FY 2003, BIA conducted 16 compliance audits of its facilities and 15 are scheduled in FY 2004.

**Bureau of Land Management (BLM):** A formal BLM EMS policy is currently being developed. However, the BLM has already adopted a number of EMS elements. For example, BLM's Compliance Assessment Safety, Health, and Environment (CASHE) Program incorporates many EMS elements. Baseline CASHE audits have been completed at every field office and major facilities in BLM and follow-up CASHE audits are currently conducted on a three-year cycle. Also, BLM offers in-house environmental compliance and hazardous materials management training for technical specialists and managers. One course in particular, *Managers Guide to Environmental Compliance and Pollution Prevention*, prepares managers to fulfill their legal responsibilities for environmental compliance and protection. In FY 2003, BLM conducted 42 compliance audits of its facilities and 28 are scheduled in FY 2004.

**Bureau of Reclamation (WBR):** The WBR established and implemented environmental compliance audit programs and policies that emphasize compliance and pollution prevention. Many parts of an EMS are already in place throughout WBR, and a WBR EMS Team has been established to facilitate WBR EMS implementation. The WBR has its Environmental Policy Directive No. 02-08, Hazardous Materials and Hazardous Waste Auditing and Review Implementation, that addresses the WBR compliance audit program. It has been in place since 1996 and gives audit protocol and guidance. The program provides for conducting baseline audits of all WBR facilities. In FY 2003, WBR conducted 50 compliance audits of its facilities and 77 are scheduled in FY 2004.

**U.S. Fish and Wildlife Service (FWS):** The FWS Director's Order No. 144, Greening the Service Through Environmental Leadership was established May 7, 2002. Section 7 (a) (3) directed the FWS to implement an EMS. In addition, a Director's memo dated February 4, 2003, established the FWS Environmental Management Commitment. The FWS EMS implementation strategy focused on the development of an EMS at the field station level where FWS activities have the most direct and immediate impact on the environment. The FWS recognized that EMS benefits could be realized at all field stations, regardless of size and complexity, but that EMS development will focus on field stations that are larger and more complex and have the greatest environmental aspects and impacts. The FWS has selected 70 appropriate facilities for implementing EMS over a three-year period (FY 2003-2005). In FY 2003, FWS conducted 133 compliance audits of its facilities and 140 are scheduled in FY 2004.

**Minerals Management Service (MMS):** The MMS is involved in a wide array of operating regulations, lease stipulations and other mitigation measures. The MMS encourages Outer Continental Shelf operators to use a company-wide voluntary Safety and Environmental Management Program (SEMP) plan to organize their activities and their contractors' activities in ways that minimize risks to workers and the environment. SEMPs incorporate many of the features found in EMS programs. They also encourage and support offshore operators in implementing their own EMS plans according to standards such as International Standards Organization 14000. Many offshore operators have implemented such plans.

**National Park Service (NPS):** The NPS developed the EMS Toolkit, which provides step-by-step guidance for developing a park-level EMS. The EMS Task Group also developed ideas for a sample EMS Manual and templates to accompany the EMS Toolkit and assist parks in this process. These guidance documents are designed to help parks create an EMS tailored to each park's unique set of activities, functions, and needs, but still provide for the service-wide consistency desired by NPS leadership. The NPS believes that this approach will result in the most effective EMS for each park. To provide additional support, NPS will offer a Help Desk/Hotline and EMS Website to assist parks as they develop their EMS, once the program is rolled out in CY 2004. In FY 2003, the NPS conducted compliance audits at 46 applicable parks and 67 are scheduled in FY 2004. The NPS Concessions Program completed 87 site visit audits of concession operations and has dedicated \$600,000 in CY 2004 to administer the Concession Environmental Management Program.

**Office of Surface Mining (OSM):** Although OSM does not own, operate, or maintain facilities subject to the requirements of E.O. 13148; OSM actively promotes environmentally friendly practices under other "Greening" executive orders, including those governing procurement, recycling and waste prevention activities. An OSM EMS national team will be convened across the various disciplines in OSM to ensure that a practical and realistic EMS program is implemented throughout the agency. This team has drafted an EMS policy which will be sent to senior OSM management for review.

**U.S. Geological Survey (USGS):** USGS EMS requirements and implementation guidance are incorporated into USGS environmental policy manual, SM 445-1-H Environmental Management and Compliance Program Requirements Handbook. EMS guidance, templates, and a variety of EMS worksheets were developed to assist facilities with the planning and implementation of their individual EMS. The USGS funded EMS pilot programs for one facility per region for EMS gap analysis to assess environmental challenges along with facility environmental training and implementation. The USGS Executive Leadership Team, consisting of all USGS Senior Executive Service level personnel received EMS training in the form of an informational briefing in February 2003. In FY 2003, the USGS conducted 26 compliance audits of its facilities and 98 are scheduled in FY 2004.

The CY 2003 DOI report is presented in two parts: (a) Progress of departmental Offices, and (b) Progress of departmental Bureaus (e.g., Bureau of Indian Affairs). The Appendix contains supplemental information including a list of the DOI EMS Council members who may be contacted for further information.