

Minutes of NSLS ESH Management Review Meeting for 2005

9/29/05

Present: NSLS Management – S. Dierker, J. Murphy, C. Kao, R. Casey; ESHQ Management - J. Tarpinian, P. Williams, D. Paquette, J. Selva, R. Selvey, R. Lee; NSLS OHSAS Committee - B. Chmiel, M. Corwin, M. Buckley, N. Gmur, D. Bauer, A. Ackerman; NSLS Work Control Manager – A. Boerner; NSLS ESH Improvement Committee - R. D’Alsace, P. Singh; Quality Management Office – S. Stein

This meeting was held to review progress on the NSLS ESH management systems, and the performance objective and targets for FY 2005. The meeting was conducted in accordance with BNL management review requirements and satisfies the ISO 14001 and OHSAS 18001 requirements for an annual management review. A copy of the detailed presentation made by R. Casey (the NSLS EMS and OHSAS Management Rep) is available on the NSLS web pages.

The presentation addressed the following issues:

- Overview of NSLS ESH Management System
- Review of ESH Performance Measures
- Stakeholder Involvement
- Financial Costs
- Targets for FY 06
- Senior Management Questions

After discussing the responsibilities, staffing and the organizational structure of the NSLS ESH program, Casey reviewed the primary objective of the NSLS ESH program as stated in NSLS FY 05 Performance Objective # 6:

**Objective 6 - Ensure operational excellence in ESH and waste management programs.**

*Implementation Strategy for FY 2005 - The tenets of ISM and ISO 14001 will continue to be implemented, with on-going emphasis of work planning, training, pollution prevention, and compliance with BNL ESH regulations. This year will involve a move into OHSAS 18001 and will also focus on electrical safety issues in a substantial way.*

R. Casey presented a detailed review of NSLS ESH performance with particular emphasis on specific performance measures which are tracked as indicators of program success. These performance measures are:

- Progress on ESH Targets
- Results of assessments and audits
- Status of OSHA audit follow-up
- Traffic violations

- Training statistics
- Injuries
- Incidents
- Radiation exposure
- Hazardous waste generation
- Spills
- Compliance rates as measured through audits

Casey noted that all performance indicators were positive for the year. He began with a review of progress on the 14 targets established for NSLS in FY 2005. He noted that substantial progress on the targets had been accomplished and that significant improvements in the ESH program had resulted.

Casey reported that 19 different assessments or audits had been conducted at the NSLS in FY 2005. No significant deficiencies were noted in the reviews. He reported that a major assessment had been conducted on ISO 14001 implementation and that 2 assessments had been made of OHSAS implementation. Two noteworthy practices had been given to the NSLS programs following these reviews. Casey provided detailed information regarding the Tier 1 audit program managed by Bob Chmiel and praised the overall quality of the NSLS program.

Casey reviewed the status of findings from the 2003 OSHA audit and provided statistics on training compliance and traffic violations received by NSLS staff, users and guests. J. Tarpinian asked if the traffic enforcement had resulted in a reduction in the number of tickets. Casey reported that it was hard to tell at this point since the traffic enforcement had been episodic and that it would take a longer time to see the trend. He noted that management followed up all tickets at the NSLS.

Casey also reviewed trends in the past several years for injuries, radiation exposures and reportable occurrences. Of particular interest was the continuing trend in the reduction of frequency and severity of injuries. Pat Williams noted that guests would be included in future BNL injury statistics in a separate category. She noted that at ANL the injury rates were computed with the hours worked by users included. S. Dierker asked that NSLS also evaluate the possibility of using the hours worked by users in our statistics.

Casey reported the efforts in pollution prevention/waste minimization during FY 05. The effort to evaluate synthetic oils as a means of reducing generation rates for waste oils has continued with no conclusive results as yet. The evaluation to determine a means of reducing hazardous wastes associated with the use of Rydlime<sup>®</sup> yielded positive indicators but will need more study in FY 06 to determine the practicality of the proposed process which involves acid neutralization and metal filtration from the waste streams. Although mercury is not a major issue at the NSLS, two projects to remove mercury thermometers were initiated and a P2 proposal to replace mercury filled ignitrons was submitted. This proposal was not funded but will be re-submitted in FY 2006. Tarpinian suggested that we consider submitting the request over several years in order to get a start in eliminating the mercury components.

Waste minimization efforts over the past several years have resulted in a continuing decline in the waste generation rates at the NSLS. Casey presented detailed data regarding sources and quantities of waste oil generation over the past 8 years. It is clear from the data that a substantial reduction in waste generation has occurred.

Casey reviewed compliance with hazardous waste regulations in the 90-Day area and the Satellite Accumulation Areas (SAAs) as indicated through the self-assessment program. He noted that compliance in general was excellent. Two minor RCRA infractions were reported in one SAA area, which had resulted in a follow-up discussion with the responsible person and a repeat audit the next month. Casey commented that considerable support and over-sight of the SAAs was provided by John Alois and his diligence contributed in a significant way to the strong performance in this area.

Casey reported on interaction with internal and external stakeholders, including the involvement with internal staff through the ESH Improvement Committee and the safety stand-down. J. Tarpinian noted that it was important to keep a record of actions taken as the result of employee input. He suggested that NSLS prepare such a record.

Casey reviewed financial costs associated with the ESH program. J. Tarpinian suggested that it would be worthwhile to estimate implementation costs associated with the development of the OHSAS program in FY 2005.

Casey listed a number of ESH issues that were under discussion at the NSLS which may result in targets for emphasis during FY 06. The area of discussion included:

- Handling of lead
- Implementation of NRTL requirements
- Completion of OHSAS Implementation
- IH monitoring program
- Preparation for ISM assessment
- Maintaining program gains in 70E, equipment hazard identification, work planning, and crane and hoist use
- Support and oversight of our visiting users
- Training Issues
  - Supervisor understanding of JTAs
  - Verification that users have completed required training
  - Adequacy of training completion rates by users
  - Appropriateness of lab level training for the general user

- Implication of emergency planning hazard assessment
- High sensitivity fire detectors in interior of X-ray ring power supply area

Casey asked for further comments and suggestions for FY 06 targets. J. Tarpinian noted that it would be important to complete the updating of the NSLS SAD prior to the ISM assessment this year.

At the conclusion of the presentation, Casey asked those present to comment on the following set of management questions regarding program performance:

1. Are the NSLS occupational safety and health and environmental management systems effective in achieving ESSH policy commitments?

Response: Yes - there was agreement that the program was effective. J. Tarpinian noted that there was good evidence of continuous improvement in the NSLS program.

2. Are the NSLS occupational safety and health and environmental management systems effective in achieving NSLS ESH objectives and measures?

Response - Yes - there was agreement that the ESH management system had been effective at achieving its objectives and targets.

3. Are the NSLS occupational safety and health and environmental management systems adequate in terms of:
  - Identifying significant environmental aspects, hazards and impacts?
  - Resource allocations?
  - Communication?
  - Organizational issues (e.g. staff expertise, procedural requirements)?

Response - Yes - There was consensus that the ESH management systems have been effective.

J. Tarpinian commented that we should seek ways to ensure that employees felt comfortable raising ESH problems or concerns to management's attention. It was important that we seek identification of issues from our employees as an important mechanism rather than through just audits and assessments. He noted that recognition of such input was important.

4. Are the objectives and measures for OSH and E related programs suitable in terms of:
  - Environmental impacts, hazards and current conditions
  - Concerns of stakeholders
  - Current and future regulatory requirements
  - Business interests
  - Technological capability

- Internal organizational or process changes
- Should additional measures be established?

Response - Yes - There was agreement that the objectives, targets and measures used at the NSLS were suitable.

John Selva noted that there were environmental targets under discussion for the Lab that NSLS should consider in the development of its targets. These included:

- Improving the recycling of electronic equipment
- Implementation of the new mercury products rule which prohibits the disposal or recycling of even small amounts of mercury; e.g. switches
- Examination of document control practices to ensure that forms and procedures established by departments are consistent with the BNL SBMS.

5. Are there any recommended revisions to:

- ESSH policy and commitments
- Objectives, targets and measures
- OSH or E related management systems

Response – no comments or suggestions were made.

The review resulted in the conclusion that the NSLS ESH management systems were effectively functioning. Comments raised during this review will be considered in the development of the NSLS ESH targets for FY 06.