

**Energy Facility Contractor Organization Group
Environmental Safety and Health Working Group
Environmental Subgroup**

Environmental Management System Surveys

**Environmental Management System &
National Environmental Policy Act Integration**

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Survey Questions	BNL	BWXT Pantex/	ICP	INL	LANL	NTS	RL - Hanford	SNL-CA	SNL-NM	WIPP	Y12
<p>1. Does your site have an EMS Process that integrates or includes the National Environmental Policy Act?</p> <p>Briefly explain how your site integrates the EMS & NEPA Process (provide examples, figures, charts, diagrams, checklists):</p>	<p>Yes</p> <p>NEPA is one of the Legal and Other requirements to which BNL subscribes. As such, BNL has developed a procedure on conducting NEPA reviews that is part of the overall EMS process.</p>	<p>Yes</p> <p>NEPA activities are provided to individuals on the EMS Aspects team. If a determination is made of a significant issue the team may convene and risk rank the activity. If a determination is made that there may be an issue a recommendation may be made to the EMS Sr. Management team for their consideration. If not significant at time of review and not already an identified aspect the type activity may be added to the next annual aspects review.</p>	<p>Yes</p> <p>All planned work starts with the preparation of an Environmental Checklist. The EC identifies the scope of the planned work and the potential environmental aspects of performing that work. That information is then used in the work control process to develop mitigation controls to those aspects. ECs are reviewed on a quarterly basis against the company list of significant environmental aspects to see if they need to be revised. This review is conducted by the company NEPA and EMS leads.</p>	<p>First,</p> <p>NEPA is part of INL's Environmental Management System. Integration is not the right word or context; INL uses an Environmental Checklist Process that incorporates NEPA values, including the appropriate level of environmental review for each project. The checklist identifies a project's work activities and environmental aspects. Review of the environmental aspects and the potential environmental impacts helps the Contractor and DOE personnel determine the appropriate level of environmental review required and the potential for significant environmental impacts.</p>	<p>Yes</p> <p>NEPA and EMS Teams coordinated in Office of Risk Reduction along with P2 and all new project review activities. NEPA staff integrated into EMS Objective and Target institutional projects as team leaders and organizers. Still a ways to go on this but we are working on it.</p>	<p>Yes</p> <p>Our EMS Process Description states that the NEPA documentation is one early way that the environmental staff learns of environmental activities, and our internal approval of NEPA Checklists give us a say in the mitigations.</p>	<p>Yes</p> <p>NEPA is integrated into the process by implementation of Hanford procedures, including HNF-RD-15332, HNF-PRO-15333, and HNF-PRO-15335.</p>	<p>Yes</p> <p>First, one of our EMS programs is "Environmental Planning and Ecology". The Environmental Planning piece includes managing the NEPA process. Second, our site has an Interdisciplinary Team that reviews all proposed projects and actions to identify ES&H concerns, issues and requirements with the line who is proposing the action. All environmental disciplines are represented on this review team including NEPA.</p>	<p>Yes</p> <p>The EMS Coordinator attends weekly NEPA staff meetings; The NEPA Subject Matter Expert is on the EMS Core Team; there are efforts to align the EMS aspects with NEPA, Long-Term Environmental Stewardship, and Site Wide Environmental Impact Statement.</p>	<p>Yes</p> <p>A flowchart and checklists used in our NEPA review process are attached as separate files. NEPA reviews of proposed actions and/or projects are accomplished through implementation of the WIPP NEPA Compliance Plan and the Environmental Compliance Review and NEPA Screening Procedure. This is a well defined process that requires any Engineering Change Order or Engineering Change Proposals to be screened for NEPA impacts and also for other environmental impacts (air, waste, water). For work proposed outside the immediate facility boundary but within the larger project area, the cognizant individual must perform the same NEPA screen. If a planned action requires further NEPA or NEPA/environmental media prevention or mitigating action, the cognizant individual (e.g. engineer, land use coordinator) works with the site environmental compliance staff to address the issues (e.g. elimination of issue, permit, proper waste disposal.) Requirements identified as needed from the NEPA/environmental</p>	<p>Yes</p> <p>NEPA process predates EMS aspect/impact identification process. NEPA reviews consider potential environmental impacts and identify appropriate controls (procedures, etc.) to be followed to minimize impacts. NEPA decisions and documentation are reviewed each year for "changing conditions" as part of aspect/impact update.</p>

										review are outlined in the project documentation and the project can only proceed after NEPA approval has been granted. The NEPA / environmental review coordinator is also part of the group of reviewers of the EMS environmental aspects and impacts each year to assure that any changes or new developments affecting the aspects and impacts are incorporated.	
<p>2. Does your EMS/NEPA Process consider environmental aspects?</p> <p>Briefly explain how or why not:</p>	<p>Yes</p> <p>The NEPA review process evaluates specific environmental aspects through the use of a NEPA checklist. In addition, all NEPA projects are reviewed by an Environmental Compliance Representative (ECR). The ECR is responsible for ensuring that environmental aspects of a project are reviewed within the framework of the EMS program.</p>	<p>Yes</p> <p>NEPA activities are provided to individuals on the EMS Aspects team.</p>	<p>Yes</p> <p>See above.</p>	<p>Yes</p> <p>The EMS considers environmental aspects in relationship to INL's missions and proposed work. Knowing the work activities and environmental aspects of a project helps the contractor determine if the project's work activity may have the potential to significantly impact the environment.</p>	<p>Yes</p> <p>-</p>	<p>Yes</p> <p>The EMS process considers aspects in pre-job hazard assessments and setting objectives and targets. However, the NEPA checklist (process) is a NNSA document that has no correspondence to our aspects. Of course there is a great deal of overlap.</p>	<p>Yes</p> <p>Environmental aspects (e.g., cultural and biological resources) are considered through implementation of the aforementioned Hanford procedures.</p>	<p>Yes</p> <p>For each NEPA review, 24 ES&H concerns are evaluated, including environmental aspects.</p>	<p>Yes</p> <p>They are considered through the NEPA checklist process.</p>	<p>Yes</p> <p>Aspects are considered as projects having environmental impact / compliance implications are reviewed and appropriate actions are taken to resolve concerns or issues or incorporate improvements</p>	<p>Yes</p> <p>Aspect categories (waste, air emissions, water discharges, etc.) are included on the NEPA checklist.</p>
<p>3. Does your EMS/NEPA Process consider "significant" (in terms of potential impacts and significant environmental aspects)?</p> <p>Briefly explain how or why not</p>	<p>Yes</p> <p>Similar to the response to question 1 the ECR reviews environmental aspects against BNL's significance criteria. If an aspect is significant then other EMS procedures, such as operational controls, become effective.</p>	<p>Yes</p> <p>If this activity has previously been identified as significant during the annual aspects evaluation. It will be called to the attention of the NEPA representative.</p>	<p>Yes</p> <p>All aspects are reviewed to determine which are considered "significant." The company maintains a list of significant environmental aspects; the EMS lead has the responsibility to maintain this list as current.</p>	<p>Yes</p> <p>INL uses the environmental checklist to identify both the environmental aspects and work activities. Understanding the potential environmental impacts of the work activities and related significant environmental aspects helps the contractor determine if the activity requires a higher level of environmental</p>	<p>Yes</p> <p>Much of the aspects process and NEPA has been integrated into our Project Requirements Identification (PRID) system. The Environmental Senior Management Steering Committee approved an institutional policy that requires all new and modified work at the Laboratory to be reviewed through PRID for potential</p>	<p>Yes</p> <p>Significance is based on potential to real environmental harm, compliance with regulations and Orders, and annual NSTec Executive priorities.</p>	<p>Yes</p> <p>The process is implemented using a 'graded' approach, considering the nature of the activity.</p>	<p>No</p> <p>The day-to-day NEPA process does not distinguish between significant and other aspects. Our sitewide EA also did not give greater weight to significant vs. other aspects because the EA was prepared prior to 2005 when the EMS requirement went into effect.</p>	<p>Yes</p> <p>They consider and address all aspects on the NEPA checklist, including those identified as significant by EMS.</p>	<p>Yes</p> <p>On a macro or WIPP EMS level, EMS Aspects and Impacts significance is determined based on a qualitative ranking process that considers probability of occurrence, scale, severity and duration of the impact as well as potential regulatory and legal issues.</p> <p>On a micro level, individual projects</p>	<p>No</p> <p>Attempt to identify and minimize/mitigate all potential impacts.</p>

				<p>review such as an environmental assessment or environmental impact statement.</p> <p>Note: Most of the work we do falls within the list of DOE's categorical exclusions. While some of those activities have the potential to significantly impact the environment, as demonstrated through our EMS, we have the appropriate controls in place to prevent such an impact.</p>	<p>environmental impacts. Since all of the EMS aspects are contained in PRID we get automated review. The same aspects are integrated into the Job Hazard Analysis tool as part of work approval so we get some back end coverage as well. Neither system is prefect but integrating EMS into operational systems is a priority.</p>					<p>must address potential environmental impacts as identified in the NEPA / environmental reviews.</p>	
<p>4. Does integrating the EMS/NEPA process add value; explain why and include lessons learned??</p> <p>Briefly Explain why or why not:</p>	<p>Yes</p> <p>-</p>	<p>Yes</p> <p>Consistency</p>	<p>Yes</p> <p>Ensures that the environmental aspects identified in your EMS are one and the same as the potential environmental impacts identified in your NEPA documents</p>	<p>Yes</p> <p>The EMS/NEPA process at the INL provides opportunities to identify those work activities that may have the potential to significantly impact the environment and allow project personnel to identify appropriate controls to prevent those impacts.</p>	<p>Yes</p> <p>More important part is integrating environment into all institutional systems. EMS is just a framework.</p>	<p>No</p> <p>At this point I don't feel the two are truly integrated, but hopefully that will change over the next two years.</p>	<p>Yes</p> <p>The process allows early introduction of NEPA into planning for activities, mitigating cost and schedule impacts.</p>	<p>Yes</p> <p>Value added occurs in several ways. Bringing the NEPA Program under the umbrella of the EMS allows for greater integration with other environmental functional areas. As an EMS Core Team member, the NEPA Program Lead has an opportunity to participate in setting objectives, targets, and actions thus keeping abreast of new actions that may require additional NEPA review.</p>	<p>Yes</p> <p>Although we are in the early stages of integration and full value has not been realized, we do have some success. EMS has promoted the inclusion of NEPA into the long-range site planning.</p>	<p>Yes</p> <p>-</p>	<p>Yes</p> <p>The current process needs to be improved to add value. Many project managers perceive the NEPA approval as a green light to do work, yet often overlook the need to implement the appropriate control or procedure.</p>
<p>Provide Lessons Learned:</p>	<p>Including the field deployed ECRs in the NEPA review process allows them to provide input early in the planning stages of a scientific proposal. It enables early input to potential hazardous materials use/controls, as well as opportunities for alternative materials and pollution prevention.</p>	<p>-</p>	<p>Frankly, I can't see how you operate them as separate systems.</p>	<p>The EMS/NEPA process successfully identified an activity that had the potential to significantly impact the environment. The process identified the appropriate level of environmental review as an 'Environmental Assessment'. INL & DOE prepared an EA and found that there were no significant impacts to the environment. The process allowed</p>	<p>Decreasing overhead budgets have forced us to be more creative in expanding environmental coverage. Putting subject matter expert knowledge into automated systems such as PRID has broadened our reach with the same or smaller staffing.</p>		<p>-</p>			<p>Because this is an ongoing program and procedure that has been followed for a significant time period, most people most likely do not understand that this is part of the EMS and how it links to aspects and impacts. We probably could improve visibility of the EMS by making it clearer this is the case.</p>	<p>Recent facility demolition project failed to implement controls identified in NEPA documentation to characterize and label equipment for PCBs and drain fluid prior to moving equipment.</p>

				resource personnel to identify those actions that project personnel must incorporate into their project to lessen the opportunity for significant impact. In addition, the process gave resource personnel the opportunity to suggest different locations that would cause less impact to the cultural and natural resources.							
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