

Integrated Safety Management Working Group
Environmental Subgroup
Meeting Notes
November 2, 2005

1. Introductions & Agenda Review [John Irving/Alice Ikenberry]
 - 1.1. Conference call for November 10th will be held as scheduled, to provide information to those unable to attend this meeting. Alice will lead the meeting.
 - 1.2. Steve Woodbury: DOE is expecting to have ~45 EMS programs.
 - 1.3. EH-41 issues of interest (more later in this meeting):
 - 1.3.1. Performance Improvement Initiative: Non-Compliance review;
 - 1.3.2. DOE implementation plan/revitalization of ISM;
 - 1.3.3. How will this support forwarding EMS – need to be on-board with the revitalization of ISM;
 - 1.4. EPA going forward with establishing RCRA performance indicators for Federal sites.
 - 1.5. Review and discussion of agenda
 - 1.6. Visit by J. Yanek: Recognitions from EFCOG in last Executive/Board meeting – based on the deliverables provided to the customers that add value to the businesses; EFCOG is looking at coordinating Continuing Training across the Working Group; new Oversight policy/Order Implementation (O-226.1) being flowed down into contracts; 10CFR851(PAA requirements for worker protection, Health & Safety Plans, enforcement) – working to support the development of implementation guides (working on developing Contactor Implementation guides for member use (3 in development) – more than a BP effort – *is there something that can be developed for environmental work*. HEADS UP: effort to be towards management of effort as ‘projects’; more effective partnerships between contractors and DOE line offices.
2. Best Practices Presentations
 - 2.1. **David Lester:** Rapid Response to Demolition Projects Affecting the Industrial Storm water Pollution Prevention Plan: See slides.
 - 2.2. **Eric Damberg:** You get what you measure – The need for performance metrics to support continual improvement in EMS – see slides. Manage system performance, not people; keep the data collection simple; get mgmt. team & staff buy-in early; good understanding and ownership by staff provide performance; Do not measure just because you can; Manage the metrics, don’t let metrics manage the work. These can assist in contract retention efforts.
 - 2.3. **David Lester:** Streamlined Execution of Radiological Air Sampling Program : (postponed to November 3rd).
3. President’s Management Council: Environmental Compliance Improvement Initiative [Steve Woodbury]
 - Source: Cabinet-level group; looking at management issues impacting federal agencies/sites; CEQ addressed the issue of Environmental Compliance & Stewardship functions. Response to inquiry for DOE posted at EH web-site, along with the plan to respond to synthesized findings. Three of the top 5 recommendations require obtaining more data & analysis of that data:

- 3.1. Non-Compliance Improvement Initiative: Finding the root causes for non-compliances, primarily from ECHO & OTIS databases; ORPS reporting. Working on assessing Causal Analysis codes used by DOE. Planned questionnaire to be sent to the DOE-site contact for response. Pilot study to be performed first (TBD). Offer to receive comments from EFCOG review of the draft questionnaire.
- 3.2. Compliance Audit and Corrective Action Process: HQ inquiring how the site/field offices are performing oversight functions to assure that contractors are performing correctly. Similarly, what process is being used to follow-up after oversight assessments.
- 3.3. Measures of Environmental Performance: How are the fields/sites measuring the 'environmental performance' of the sites. What are the metrics in use? There was some effort undertaken by ISMWG ~5 years ago, but what is the focus now.

How would comments be provided back on the 3 associated draft questionnaires? Feed back from the team through the 3 persons identified (**Lester (lead)**, Roulston, White) to keep the volume of messages minimized. Further involvement might be to assist EH-41 to evaluate the data that is collected and develop further actions and recommendations.

4. Preview of discussion of DNFSB recommendation 2004-01: Performance of High-Reliability/High-Consequence activities Joe Yanek: the following will be issues coming for contractors for flow into contracts:
 - 4.1. Strengthen Federal Safety Assurance
 - 4.2. Learn from Operating Experience
 - 4.3. Revitalize ISM
 Expecting issuance of a new DOE ISM Manual to be issued. **KEY CONSIDERATION: how will the 'E' fit into the re-vitalized ISM?** Concern voiced on assuring coordination, at site levels (both DOE & contractor) of 'E' into ISM.

November 3, 2005

1. Reports/Discussion on Current SG Tasks [John Irving/Alice Ikenberry]
 - 1.1. EMS Workshop of 3/2005 (Completed. See Slides)
 - All presentations available on EFCOG web-site
 - Concerns/Discussion: What is the DOE Standard for performance; Aspects associated with Intellectual Property; How to demonstrate ROI of an EMS (in terms that make sense to site management) – conformance vs performance; integration with multiple contractors/tenants; criteria for site office use in its verification process.
 - 1.2. Environmental Feedback (BPs) [Megan Proctor]
 - Four are posted: 2 were 'lost' during migration to new format web-site. Three practices pending for review. Thus, about 12 BPs have come from this sub-group.
 - 1.3. Subgroup Charter (Completed – Charter accepted and posted)
 - 1.4. Online Resource Center w/ links from Subgroup Websites [Susi Jackson]
 - Focus was on EMS information sharing. Surveys distributed to locate web-links for this information. (Concern: OPSEC reviews; new DHS requirements). Three

respondents – Susi has found the information very useful and interesting. Whether this information is useful now that sites are about to have to certify.

- We do have on EFCOG website a discussion forum page – which we can also download information to the forum. That might be another way of getting information out to group(s).

1.5. Pollution Prevention at the Task Level (Completed)

Survey results have been distributed.

1.6. President’s Management Council Environmental Compliance Initiative Team (Steve Woodbury to discuss later in meeting)

1.7. Material Release Criteria (Completed) Dealing with the moratorium on releasing certain metals. Information was developed and disseminated.

2. Best Practice – carry over from 11/2

2.1. David Lester: Streamlined Execution of Radiological Air Sampling Program (slides):

- New ANSI standard allowed sites to develop their own ‘graded approach’ to determination of need to monitor.
- Coordinated effort provided cost effective and defensible monitoring system – while still highly protective of human health & environment.

3. Sharing of Lessons Learned [Round table]

3.1. Using a Project Management Approach to EMS: Gary Shamber

3.2. Link your EMS goals with Corporate Self-Assessments (e.g. Chemical inventory reduction); Mark Brynildson

3.3. Changes in Projects when conditions change; Alice Ikenberry

3.4. Improvement in Environmental Goal Setting and flow-down to the line organizations; Eric Damberg

3.5. Worker Communication/Worker Injury; Megan Proctor

3.6. WIPP’s RCRA permit modification for TRU waste Sampling; Ron Reeves

3.7. TSCA disposal no in 12-months, contractor held responsible even though disposal firm had held the waste; Orin Haworth

3.8. Oil Sponge for Cleaning up hydrocarbon spills – Sonya

3.9. Involving registrant and lead auditor prior to ISO-14000 registration process; David Skipper

3.10. Retain the focus on Security while maintaining Safe operations; Bob Roulston

3.11. Relationship with ISO-14001 Lead Auditor – Open Access; John Irving

4. EPA’s Performance Track & Performance Measures [Alice Ikenberry/Eric Damberg]

4.1. Performance Track: Obtained ISO certification & now in the Performance track. PNNL now working to expand the land areas that it manages, and using some of the incentives w/ Performance track to assist it in meeting its requirements. To obtain use of the incentives, must make application to the state(s). Discussion: Is there a need to get consensus with EPA and states on the incentives for Environmental Performance Track? If so, can the EFCOG help promote the effort for consistency? Or, do we work to promote Performance track-type/style programs within the states? Suggestion that EPA consider evaluating the state programs, and if they are equivalent or ahead of Performance track, then EPA might consider entry into such a state program and joint membership into Performance Track.

- 4.2. P2 at the Sub-Group Task Level – Where to Now? Having completed a P2 survey of membership, what does the group want to do now? O-450.1 appendix has been proposed with additional goals – also an effort to allow sites/organizations to establish goals that are meaningful for their specific missions.

5. **LUNCH: Sub-group Business**

- 5.1. Leadership succession in revised Charter: If interested in V-C, contact John/Alice. Joe Yanek will contact company to encourage the support from the company.
- 5.2. Spring Working Group Meeting: to be in LVNV; Steve Woodbury suggest consideration of meeting in D.C. area. OFEE is co-sponsoring an Environmental Sustainable development 3-day workshop with other federal agencies (May 2-4th, 2006). Three primary tracts: EMS; Procurement; Sustainability. EFCOG could have a positive story to tell the other federal agencies on best practices. Support contractors, not consultants, are welcome to attend. There is some benefit as well to meeting with the full ISM group chairs to support some interchange between sub-groups.
- 5.3. Monthly Conference calls: 1 p.m. Mountain time, second Thursday of the month. Phone line; Alice will run the meeting; John will send out the call notice.
- 5.4. General Request to go & register to the ISMWG & ENV discussion forums. This can be used to quick alert folks about issues for sharing and considering.

6. **Implementation for DNFSB 2004-1: DOE's Plan** [Steve Woodbury]

Steve participated in a meeting of the ORPS reporting system subgroup, which frequently deals with 'near-misses', which are more safety than environmental. There may be some environmental 'near-misses' that are not routinely captured. There may be a benefit for liaison for this group.

- 6.1. Re-vitalizing ISM: The Feed-back & Improvement Subgroup discussed DOE has a large number of commitments proposed for responding to DNFSB 2004-01: one has to do with general Criteria/Requirements Approach Documents (CRAD) – Audit protocol for Feedback & Improvement on how to conduct an assessment. Suggested as reviewable to assure that Environmental issues are adequately integrated.
- 6.2. DOE Safety Oversight Manual/ISM Manual (M 450.4-x): P-226.1/O-226.1 (recently issued) established oversight of operations by DOE, with some flow-down Contractor Requirement clauses that will be in process. There is expected to be a Safety Oversight Manual developed, for use in re-verifying ISM (thus need to evaluate this and the ISM manual to assure appropriate processes are in place to bring in Environmental concerns. The Oversight Manual is to be developed to assure that adequate & consistent assessments are planned, performed, documented, and then used for further performance improvement. Steve indicated support through reviews of the Manuals for assurance that there is adequate inclusion of environmental aspects. ACTION: Steve will forward copies of the manuals to John, who will forward to the Subgroup for review/discussion/comment.

Joe Yanek convened a group of senior management responsible for ISM implementation to work on consensus on how the ISM WG may be best situated to assist the re-vitalization efforts. If it happens, this latter effort will come from DOE, not EFCOG.

7. **EPA's Performance Indicator Program** [Steve Woodbury]
EPA has established PI process for RCRA corrective action prioritization, which is used for providing reports back to Congress. This report noted 18 DOE facilities for prioritized actions. Two are currently Human Exposure control & Ground water Exposure control. They are looking for indicators for FY2008 and establishing goals for action. Issue is how DOE facilities are relative for future indicators and relative to the legal agreements that are in place.
8. **EMS Review & Status Report** [John Irving/Alice Ikenberry/Steve Woodbury] Quarterly status report (current through start of FY06) for EMS implementation passed around.
9. **Possible Task Ideas:** Obtained by John Irving – Recommended that personnel to review the draft tasks for language.