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# **EFCOG Task – EO 13423 Survey Feedback**

**DOE/EFCOG Training Workshop**

**Environmental Management Systems:  
Integration, Lessons Learned,  
and Best Practices  
June 20, 2008**

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# EFCOG Environmental Subgroup Member Survey - EO 13423 Implementation

EFCOG Internal Survey	
Number of Surveys returned: <b>14</b>	Facility/Site: <b>Received from</b>
Date Completed: <b>2/14/2008 – 5/30/2008</b>	<b>Idaho Clean-up Project; ORNL; Pantex; DynMcDermottSPR; Fluor Hanford; ETPP; PNNL; Washington Closure Project; SNL; LANL; WIPP; INL; Y-12; NTS</b>

A. Does your EMS currently conform to ISO 14001:2004?	<b>13</b> Yes	<b>1</b> No
B. Is your EMS registered to ISO 14001:2004	<b>6</b> Yes	<b>8</b> No
If no, do you plan to pursue registration in the next one to two years?	<b>2</b> Yes	<b>6</b> No
Why or why not? <b>NTS is actively pursuing registration. SNL will (focus of parent company, promote public image). Others – May pursue depending on contact decisions; Not cost effective; No value in maintaining registration.</b>		
C. What approach or techniques is your site using (has your site used) to evaluate your EMS and determine the changes that are needed to align it with EO 13423? (Check all that apply)		
<input type="checkbox"/> Conduct(ed) a gap analysis to determine conformance of the EMS with EO 13423.		<b>10</b>
<input type="checkbox"/> Establish(ed) a cross-functional team to review the order and identify changes needed.		<b>8</b>
<input type="checkbox"/> Hired independent EMS auditor (e.g. certified ISO 14001:2004 auditor) to evaluate EMS.		<b>2</b>
<input type="checkbox"/> Other:		
D. Has or will your site incorporate requirements from EO 13423 into your site operating contract?	<b>9</b> Yes	
Why or why not? <b>NO - Waiting on flow-down of requirement in DOE Orders; DOE O 450.1 and/or 430.2B not in contract; Closure contract; YES – Management decision; Performance Evaluation Plan milestones; Support DOE</b>		<b>5</b> No / Unknown



# EFCOG Environmental Subgroup Member Survey - EO 13423 Implementation (cont.)

<p><b>E. Has or will your site request an exclusion/exemption from any EO 13423 requirement?</b></p> <p>If yes, please list the requirements: <b>Possible exemptions noted were on-site power generation, alternative fuel use, sustainable practices of existing building inventory, water reduction goal, metering. Tailor to closure contract.</b></p>	<p><b>4</b> Yes</p> <p><b>8</b> No / Unknown</p>
<p><b>F. Has your site reviewed/commented the draft DOE Orders that flow-down requirements/goals?</b></p>	<p>DOE O 450.1A, <i>Environmental Protection Program</i>   <b>14</b> Yes   <b>0</b> No</p> <p>DOE O 430.2B, <i>Departmental Energy, Utilities and Transportation Management</i>   <b>12</b> Yes   <b>2</b> No</p>
<p><b>G. What is your primary funding mechanism for planning and implementation?</b></p>	
<p><b>10</b> Site Overhead/Common Site Support</p>	
<p><b>3</b> Direct appropriated funding</p>	
<p><b>2</b> Utility Energy Service Contacts (USECs)</p>	
<p><b>0</b> "Tax" to site programs</p>	
<p><b>4</b> Other: (see Comments)</p>	
<p><b>Comments</b> P2 and EMS implementation funded by Generator Set Aside Fund; Will request addition to baseline; Major issue of new requirements needing additional funding; No additional overhead funding will be provided for implementation; ESPCs expected to be primary funding source to achieve new goals. Projects funded via usual routes.</p>	



# Most Changes to Conform

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- 11 of 14 will develop one or more new program element.
  - Most noted “Develop new”
    - ✓ 5 - Contract with ESCO
    - ✓ 4 - New funding / work scope for FY 09 or beyond
    - ✓ 3 - Environmental / Energy / Transportation metrics
    - ✓ 3 - Procurement / Acquisition specifications
- 13 of 14 will revise one or more program element
  - Most noted “Revise existing”
    - ✓ 10 – Site environmental objectives / targets
    - ✓ 10 – Site level procedures for operations
    - ✓ 9 – Engineering specifications
    - ✓ 9 – Site level procedures of design
    - ✓ 8 – Aspects /Impacts list
    - ✓ 7 – Metrics

# Least Changes to Conform

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## Most noted (by 9 or more sites) “No Changes”

- Organization Changes
- Chemical Inventory tracking system
- Environmental Policy
- Aspect / Impact identification procedure
- Roles, responsibilities, authorities
- Pollution Prevention
- Prioritized chemical use reductions
- EMS audit process/procedure
- Awards / recognition program
- Partnerships with community
- Management/employee performance plans
- ODS phase out / management plan

## Most noted “Not Applicable”

- By at least 3 sites
  - Green landscaping strategies
  - Contract with an ESCO
  - Compliance management plan

# EFCOG Environmental Subgroup Member Survey - EO 13423 Implementation (cont.)

H. Which of the following changes have you made, or expect to make, at your site to align your EMS in conformance to requirements of EO 13423? (Please check the appropriate box and provide a brief summary explanation as appropriate.)

	Develop New	Revise Existing	No Changes	Not Applicable*	Selected Notes of Explanation
1. Environmental Policy	-	4	10	-	Already incorporated energy/fleet/ high performance sustainable buildings or recently updated to do so.
2. Site Environmental Aspects and Impacts List	-	8	5	-	May add some new aspects. Dependent on contract requirements.
3. Environmental Aspect / Impact Identification Procedure	1	2	10	-	May revise scoring or add emphasis to energy/water.
4. Site Environmental Objectives / Targets	2	10	2	-	EMS O/Ts identified annually. Dependent on contract requirements.
5. Environmental / Energy / Transportation Metrics	3	7	4	-	Targets for Energy metrics have changed.
6. EMS Awareness Training	-	7	6	-	Update emphasis for energy / sustainability awareness.
7. Other Environmental / Energy / Transportation Training	3	4	4	2	New training targeted to Projects and Engineering
8. Awards/Recognition Program	1	3	9	-	
9. Communication Processes and Strategies	-	5	8	-	Update as necessary; Develop procedure for existing process
10. Annual Site Environmental Report (ASER)	-	6	5	2	Communicate progress in achieving goals.
11. Partnerships with Community / Other	-	3	9	1	

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	Develop New	Revise Existing	No Changes	Not Applicable*	Selected Notes of Explanation
12. Voluntary Environmental Partnership Programs (State or Federal)	2	1	8	2	Join EPA Performance Track; Energy Star programs; Already participate
13. Contract Performance Based Incentives	-	2	8	2	
14. Performance Evaluation and Management Plan / Award Fee	-	3	7	2	Revised by DOE to add as 2008 award fee item; DOE may do so.
15. Management / Employee Performance Plans	-	3	9	1	Sr. management and key staff have goals.
16. Define Roles, Responsibilities, and Authorities	-	3	10	-	Any changes depend on inclusion of DOE O 430.2 to contract.
17. FY 08 Funding Supplement (above FY 07 Baseline)	1	2	8	2	Unknown; FY 08 funding addresses ISO 14001 registration and EO 13423; Requested, not approved.
18. New Funding / Work Scope for FY 08	1	4	7	1	Unknown;
19. New Funding / Work Scope for FY 09 or Beyond	4	4	4	1	Unknown; Plan for new funding for high priced items.
20. Organization Changes	1	-	11	1	Requested 2 FTEs
21. Subcontract Requirements / Specifications	1	5	7	-	Update as applicable; Already in subcontractor requirements.
22. Procurement / Acquisition Specifications	3	7	4	-	Most difficult to change; Strengthen flow-down of requirements for green purchasing;
23. Building Lease / Tenant Agreements	1	4	6	2	

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H. Which of the following changes have you made, or expect to make, at your site to align your EMS in conformance to requirements of EO 13423? (Please check the appropriate box and provide a brief summary explanation as appropriate.)

	Develop New	Revise Existing	No Changes	Not Applicable*	Selected Notes of Explanation
24. Engineering Specifications	-	9	3	-	Changes as funding allows; LEED requirements already exist; Revised Div 1 of Master Design Criteria.
25. Site Level Procedures for Design	1	9	2	1	Changes as funding allows.
26. Site Level Procedures for Construction	-	8	3	1	
27. Site Level Procedures for Operations	-	10	2	-	
28. Contract with an Energy Service Contractor (ESCO)	5	-	5	3	Pursuing; Awarded contract in '08; Recently updated; ESCO identified no projects; Not viable.
29. Pollution Prevention Operational Assessments	1	1	10	-	Being evaluated; Continue as applicable.
30. Recycling Program	1	4	8	-	Being evaluated.
31. Prioritized Chemical Use Reductions	-	1	10	1	Being evaluated.
32. Ozone depleting substances phase-out and Management Plan	-	1	9	2	
33. Chemical Inventory Tracking System	-	2	11	-	
34. Green Building Strategies	1	4	6	2	Incorporating LEED into new buildings; In Ten-year Site Plan.

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H. Which of the following changes have you made, or expect to make, at your site to align your EMS in conformance to requirements of EO 13423? (Please check the appropriate box and provide a brief summary explanation as appropriate.)

	Develop New	Revise Existing	No Changes	Not Applicable*	Selected Notes of Explanation
35. Green Landscaping Strategies	1	2	7	3	
36. Compliance Management Plan	1	4	5	3	Compliance programs in place.
37. Energy Management Plan	2	7	3	1	
38. Electronic Stewardship Plan	2	5	5	-	Registered as FEC Partner. Comply with EPEAT.
39. Fleet Management Plan	1	4	7	1	
40. EMS Management Review Process	1	2	10	-	
41. Internal EMS Audit / Assessment Process / Procedure	-	3	10	-	13423 areas will be added to assessment list.
42. Environmental Compliance Audit / Assessment Process / Procedure	-	5	8	-	
Other Changes (Please identify, use extra page as necessary)					
Sustainability team to be chartered	1	-	-	-	
Sustainability index to be developed	1	-	-	-	

I. **Additional comments:** Just began a crosswalk of requirements; Information is preliminary based on best judgment; Addition of 430.2B to contract is a major unknown; Most already in our EMS, minimal changes; EMS core team being established to address cross-cutting issues; New goals are challenging considering past improvements and no additional funding; Expanding program will require 1 to 2 new FTEs; Need DOE Orders to be finalized to determine impact; Working group performing gap analysis; Doubtful that additional funds will be available.

\*Not applicable, or not necessary, to align EMS in conformance to EO13423.

