

**PROGRAM STATUS
ENVIRONMENTAL MANAGEMENT SYSTEM**

May 14, 2008

<p style="text-align: center;">DOE OPERATIONS/FIELD/SITE OFFICE MANAGER REQUIREMENTS DOE Order 450.1 Environmental Protection Program</p>	<p style="text-align: center;">STATUS</p>
<p>Report by December 31, 2005, to the Cognizant Program Secretarial Officer the status regarding whether the EMS requirements of DOE O 450.1 have been integrated into ISMSs by site contractors.</p>	<ul style="list-style-type: none"> • Letter transmitted to the Office of Science (SC) from TJSO on December 15, 2005.
<p>Ensure contractors with approved ISMS descriptions update the ISMS descriptions, as necessary, to include the EMS requirements of this Order.</p>	<ul style="list-style-type: none"> • ISMS Description Revision 11, dated March 2008 describes the Jefferson Lab EMS and the requirement to comply with the contract commitments.
<p>Obtain, as appropriate, local community advice relevant to aspects of Executive Order 13101; Executive Order 13221, “Energy Efficiency Standby Power Devices”; Executive Order 13123, “Greening the Government Through Efficient Energy Management;” Executive Order 13148; and Executive Order 13149, “Greening the Government Through Federal Fleet and Transportation Efficiency,” through new or existing outreach programs.</p>	<ul style="list-style-type: none"> • An Annual Site Environmental Report (ASER) is published annually that meets this requirement. • TJSO Environmental Program Manager participates with the contractor in the Peninsula Clean Community Forum meetings.
<p>Incorporate, where appropriate, environmentally and economically beneficial landscape practices into all new landscaping programs, policies, and practices for facilities under their purview, in furtherance of compliance with Executive Order 13148.</p>	<ul style="list-style-type: none"> • An annual contract is issued by the site office for landscaping. • Municipal Stormwater Permit has a best management practice for minimizing use of water in landscaping.
<p>Where appropriate, ensure implementation of centralized procurement and distribution programs (e.g., pharmacy) for purchasing, tracking, distributing, and managing materials with toxic or hazardous content at facilities under their purview.</p>	<ul style="list-style-type: none"> • The contractor has a centralized requisition system for procurements that is utilized by TJSO. • No federal buildings located at the Thomas Jefferson National Accelerator Facility.

<p>Conduct operational assessments, such as pollution prevention opportunity assessments, of site operations to identify opportunities for source reduction including material segregation and substitution, recycle/reuse, or other P2 projects. Based on the results of these assessments, implement cost-effective P2 projects, using life-cycle assessment concepts and practices in determining ROI.</p>	<ul style="list-style-type: none"> • TJSO was invited to participate in the contractor’s assessment of pollution prevention in April of 2008; however, the assessment has been postponed until later in the year.
<p>Ensure site annual budgetary processes include the funding and resources needed to implement this Order, including P2 program implementation and monitoring.</p>	<ul style="list-style-type: none"> • A process is in place for the existing contract. There is an annual budget review that is attended by the TJSO Site Manager, and periodically, budgetary changes that have programmatic operational impacts are communicated through contract modifications.
<p>Notify the Director, Office of Strategic Materials, Office of Legacy Management as to the type and quantity of ODS transferred to the Department of Defense (DoD) ODS Reserve.</p>	<ul style="list-style-type: none"> • Not applicable.
<p>Monitor progress toward meeting the requirements of paragraph 4b(3) of this Order, and make such information available annually to the Office of Health, Safety and Security.</p> <p><i>4b(3) reads - Reduce or eliminate the generation of waste, the release of pollutants to the environment, and the use of Class I ozone-depleting substances (ODS) through source reduction including segregation and substitution, re-use, recycling, and sustainable development, and by procuring environmentally preferable products and services, pursuant to the DOE P2 and Sustainable Environmental Stewardship Goals found in Attachment 2.</i></p>	<ul style="list-style-type: none"> • Not applicable.

<p>Develop and implement a program and procedures to maximize the use of safe alternatives to ODS whereby—</p> <p>(a) procurement of Class I ODS for all nonexcepted uses is discontinued by December 31, 2010, consistent with Executive Order 13148, and</p> <p>(b) coordination is conducted within DOE and with DoD, as appropriate, before disposal of ODS removed or reclaimed from equipment (including disposal as part of a contract, trade, or donation), and for situations in which the recovered ODS is a critical requirement for DoD missions, the DOE facility transfers the ODS to DoD.</p>	<ul style="list-style-type: none"> • Not applicable.
<p>Consider P2 in the specification and acquisition of departmental supplies to cost effectively maximize procurement of recycled content and biobased content materials, and other environmentally preferable products.</p>	<ul style="list-style-type: none"> • The contractor has a centralized requisition system for procurements that is utilized by TJSO. • TJSO has four direct support contractors: <ul style="list-style-type: none"> – Village Greenery (WSHP approved May 4, 2007) – Smithfield Lawn Service (WSHP approved May 8, 2007) – Prestige Maintenance, Inc. (Worker Safety and Health Plan [WSHP] approved May 18, 2007) – A-Active Termite & Pest Control (WSHP approved June 15, 2007)
<p>Coordinate all acquisitions with the Department’s “Green Acquisition Advocates” established pursuant to Acquisition Letter AL-2002-05, dated 07/10/02.</p>	<ul style="list-style-type: none"> • The contractor has a centralized requisition system for procurements that is utilized by TJSO. The contractor complies with the green procurements requirement, and it is reported annually.
<p>Comply with the requirements of the Emergency Planning and Community Right-to-Know Act (EPCRA or Title III of Superfund Amendments and Reauthorization Act of 1986), 42 U.S.C. 11001, and the Pollution Prevention Act of 1990, 42 U.S.C. 13101, et seq.</p>	<ul style="list-style-type: none"> • Draft TJSO SOPP-2.1, <i>Emergency Planning and Community Right to Know (EPCRA) Reporting and Oversight</i>

<p>Conduct environmental monitoring, as appropriate, to support the site’s ISMS, to detect, characterize, and respond to releases from DOE activities; assess impacts; estimate dispersal patterns in the environment; characterize the pathways of exposure to members of the public; characterize the exposures and doses to individuals, to the population; and to evaluate the potential impacts to the biota in the vicinity of the DOE activity.</p>	<ul style="list-style-type: none"> • TJSO does not perform monitoring. As part of oversight activities, the TJSO Manager reviews and approves all environmental monitoring reports submitted by the contractor according to Draft SOPP 2.2, <i>Environmental Permits Requirements and Oversight</i>.
<p>Ensure the analytical work supporting environmental monitoring is implemented using—</p> <ul style="list-style-type: none"> (a) a consistent system for collecting, assessing, and documenting environmental data of known and documented quality; (b) a validated and consistent approach for sampling and analysis of radionuclide samples to ensure laboratory data meets program-specific needs and requirements within the framework of a performance-based approach for analytical laboratory work; and (c) an integrated sampling approach to avoid duplicative data collection. 	<ul style="list-style-type: none"> • TJSO has not formally reviewed sampling plans from the contractor from a quality assurance standpoint. Sampling plans will be reviewed in the future.
<p>Ensure contractor ES&H self-assessment programs are established within the framework of DOE O 226.1 and continue to be effective.</p>	<ul style="list-style-type: none"> • An oversight program is in place. See Program Status DOE Order 226.1A. An oversight program is in place. See Program Status DOE Order 226.1A.
<p>Ensure, through the annual ISM review process [established pursuant to DEAR 970.5223-1 (e)] that contractor ES&H performance objectives, performance measures, and commitments include appropriate environmental elements based on the environmental risks, impacts of activities at the site and established Departmental P2 and Sustainable Environmental Stewardship Goals found in Attachment 2.</p>	<ul style="list-style-type: none"> • The FY08 performance metrics address environmental management system and pollution prevention activities:

<p>Determine which contracts are affected by the requirements of this Order and ensure that the CRD is incorporated into only those contracts for which it is appropriate.</p>	<ul style="list-style-type: none"> • The JSA contract includes this order (March 2008).
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<p align="center">DOE FIELD ELEMENTS</p> <p align="center">430.2B Departmental Energy, Renewable Energy and Transportation Management</p>	<p align="center">STATUS</p>
<p>Lead in negotiating performance objectives, measures, and annual expectations for management of energy, utilities, sustainable buildings and fleets with their contractors. These objectives, measures and annual expectations will be reflected in the Site's Executable Plan and as appropriate in the Site's environmental management system.</p>	<ul style="list-style-type: none"> • Order was entered into the contract effective May 8, 2008. An implementation plan will follow from the contractor.
<p>Evaluate, at least annually, the performance of the contractors against the Site's Executable Plan, field and FEMP established performance objectives and the TEAM Initiative, other Department leadership goals and E.O. 13423 requirements set forth in this Order.</p>	<ul style="list-style-type: none"> • Order was entered into the contract effective May 8, 2008. An implementation plan will follow from the contractor.
<p>Incorporate performance objectives using a graded approach into energy, utilities, sustainable buildings and fleets management processes.</p>	<ul style="list-style-type: none"> • Order was entered into the contract effective May 8, 2008. An implementation plan will follow from the contractor.
<p>Prepare annual budget requests and planning, as necessary, for their site(s) to meet the E.O. 13423 and DOE requirements in their respective Ten Year Site Plan(s)/Executable Plans. Support budgets at their sites to accomplish management objectives for management of energy, utilities, sustainable buildings and fleets including compliance with LEED Gold certification for new construction and major renovations and the Guiding Principles for existing building assets.</p>	<ul style="list-style-type: none"> • Order was entered into the contract effective May 8, 2008. An implementation plan will follow from the contractor.

<p>Promptly inform Contracting Officers of procurement actions affected by this Order so that the CRD will be included in affected contracts as soon as possible. Prompt action is necessary because of deadlines imposed on DOE elements for amendment of affected contracts, and there are also deadlines imposed on contractors within the CRD.</p>	<ul style="list-style-type: none"> • Order was entered into the contract effective May 8, 2008. An implementation plan will follow from the contractor.
<p>Provide timely reporting as required by this Order and pertinent input into guidance or other information requests as appropriate.</p>	<ul style="list-style-type: none"> • Order was entered into the contract effective May 8, 2008. An implementation plan will follow from the contractor.
<p>Integrate the requirements of this Order with the facilities management plan and align with the activities required under Executive Order 13327 (real property).</p>	<ul style="list-style-type: none"> • Order was entered into the contract effective May 8, 2008. An implementation plan will follow from the contractor.
<p>With respect to energy management:</p> <p>(a) Set individual site goals that contribute to the Department achieving the TEAM Initiative leadership goals. These site goals will be reflected in the Site's Executable Plan.</p> <p>(b) Demonstrate implementation of the requirements and achievement of the goals in section 4 of this Order at the sites by ensuring that the sites participate in the Department's centralized data collection efforts for the TEAM initiative and providing FEMP with the input for reports required by statute and regulation.</p> <p>(c) Submit all ESPC proposals to FEMP, in coordination with their line management, for coordination of comments and concurrences from DOE's ESPC Review Board before signing the contract.</p>	<ul style="list-style-type: none"> • Order was entered into the contract effective May 8, 2008. An implementation plan will follow from the contractor.
<p>With respect to utilities management:</p> <p>(a) Lead the verification of a life cycle cost-effective approach to utilities planning, acquisition, and management in</p>	<ul style="list-style-type: none"> • Order was entered into the contract effective May 8, 2008. An implementation plan will follow from the contractor.

<p>coordination with program offices and FEMP.</p> <p>(b) With the Office of the General Counsel and FEMP, participate in DOE's utilities intervention process.</p> <p>(c) Submit to FEMP, in coordination with their line management, for concurrence or recommendation for approval to NNSA, all contracts, contract modifications (excluding administrative or incremental funding modifications), or other arrangements with a utility company for the acquisition and sale of utility services.</p> <p>(d) Support FEMP in the development of a system for the collection of energy and water use data from all advanced metering devices at DOE facilities for reporting and analysis purposes and coordinating with FEMP on which field and PSO representatives should have access to such data.</p> <p>(e) Ensure that water reduction goals are included in the Executable Plans.</p>	
<p>With respect to sustainable buildings:</p> <p>(a) Identify a sustainability coordinator for each facility who has responsibility to meet the requirements of the TEAM Initiative and ensure that site infrastructure plans and plans for new buildings comply with the Guiding Principles.</p> <p>(b) Ensure that budget submissions for new buildings and major renovations are adequate to ensure a rating of LEED Gold with compliance to the Guiding Principles.</p> <p>(c) Ensure that site specifications for architectural, engineering, construction,</p>	<ul style="list-style-type: none"> • Order was entered into the contract effective May 8, 2008. An implementation plan will follow from the contractor.

<p>and maintenance services and products specify compliance with the Guiding Principles.</p> <p>(d) Beginning in FY 2008 and annually thereafter, submit to FEMP in coordination with their line management, and the DOE Intra-agency Sustainable Building Working Group, an inventory of new construction buildings entering CD-1.</p> <p>(e) Beginning in FY 2008 and annually thereafter, submit to FEMP, in coordination with their line management, and the DOE Intra-agency Sustainable Building Working Group, an inventory of new and existing buildings certified as LEED Gold and in compliance with the High Performance Sustainable Buildings MOU.</p> <p>(f) Demonstrate implementation of the requirements and achievement of the sustainability goals by ensuring that the sites participate in the Department's centralized data collection efforts for the TEAM Initiative and providing FEMP with the input for reports required by statute and regulation.</p> <p>(g) Submit all ESPC proposals to FEMP, in coordination with their line management, for coordination of comments and concurrences from DOE's ESPC Review Board for consideration of sustainability goals before signing the contract.</p>	
<p>With respect to transportation/fleet management:</p> <p>(a) Lead the verification of a cost-effective approach to transportation/fleet management in coordination with program offices and FEMP.</p> <p>(b) Set individual site goals that contribute to the Department achieving the petroleum</p>	<ul style="list-style-type: none"> • Order was entered into the contract effective May 8, 2008. An implementation plan will follow from the contractor.

<p>reduction and TEAM Initiative leadership goals.</p> <p>(c) Demonstrate implementation of the requirements and achievement of the transportation/fleet goals by ensuring that the sites participate in the Department's data and tracking efforts and provide FEMP with the compliance data for the annual reports.</p>	
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ADDITIONAL RESOURCES

- DOE Policy 450.4, *Safety Management System Policy*
- DOE Guide 450.4-1B, *Integrated Safety Management System Guide for Use with Safety Management System Policies...*
- DOE-HDBK-3027-99, *Integrated Safety Management System Verification Team Leader's Handbook*
- DEAR 970.5223-1, *Integration of environment, safety, and health into work planning and execution*

KEY DOCUMENTS

- TJSO SOPP-4.9, *ISM Program Description*

TJSO ASSESSMENTS

- *Thomas Jefferson Site Office Management Assessment of the Thomas Jefferson National Accelerator Facility Environment, Safety, and Health Oversight Program*, May 2007, Assessors: Randy Smyth, DOE ORO, Steve Neilson, DOE TJSO, and Scott Davis, DOE ORO.

AREAS OF CONCERN

- Current DOE Order 450.1 has a set of DOE-wide pollution prevention goals that will be modified in 450.1A as Attachment 2, Sustainable Environmental Stewardship (SES) Goals, to match up better with the EO. The new SES Goals will have to be addressed in TJ's EMS.
- Ensure contractor has an Energy Efficiency/Management and Alternatively-Fueled Vehicle Executable Plan in place by end of calendar year (required by DOE Order 430.2B).
- DOE Order 450.1 has a set of DOE-wide pollution prevention goals that will be modified in 450.1A as Attachment 2, Sustainable Environmental Stewardship (SES) Goals, to match up better with the Executive Order. The new SES goals will need to be addressed in TJ's EMS.
- Additional follow-up is needed by TJSO to determine the status of the contractor's corrective actions from previous EMS assessments.

CONTRACTOR ASSESSMENTS/OVERSIGHT

- December 5-9, 2005, *EMS Self-Declaration Assessment of DOE Order 450.1/ISO 14001*, Assessors: Steve Neilson and T. Sumner (DOE TJSO) and Richard Martin (DOE ORO)
- IA-2006-05, Independent Assessment Report, *2006 Annual Evaluation of the EMS for Continued Performance Improvement* (Assessment – September 4-15, 2006; Audit – September 19-21, 2006) Assessors: Don Sayre (Lead Assessor) and Richard Martin (DOE ORO)
- *Management Self Assessment of Environmental Aspects* (Assessment No. 07-16) – 9/26/07

PATH FORWARD

- DOE Order 450.1A (expected to be issued in the near future) and needs to be added to the JSA Contract. DOE Order 430.2B will be added to the JSA Contract on April 8, 2008.
- Work with the contractor to ensure an Energy Efficiency/Management and Alternatively-Fueled Vehicle Executable Plan is in place prior to the end of the calendar year (in accordance with 430.2B).
- Ensure the contractor has the new SES goals addressed in its EMS.
- Meetings will be held with the landscaping contractor in January and August of each year to discuss incorporation of environmental and economical beneficial landscape practices.
- TJSO should discuss with the four subcontractors the P2 program to ensure an understanding of the requirements.
- Finalization of TJSO SOPP-2.1 and TJSO SOPP-2.2 procedures.
- Review environmental sampling plans.

TJSO POINT OF CONTACT: Patty Hunt