United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

In Reply for To:
ER 02/201

APR 2 9 2002

Mr. Craig Hooks
Director
Federal Facilities Enforcement Office (MC-2261A)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Mr. Hooks:

This letter is in response to Administrator Whitman's February 20, 2002, request for a report by the Department of the Interior (DOI) on implementation of Executive Order (E.O.) 13148, "Greening the Government Through Leadership in Environmental Management." The enclosed progress report by DOI bureaus and offices is for Calendar Year 2001.

As you will see in our report, DOI has made significant progress in many areas relating to the implementation of E.O. 13148. Also, we were pleased to learn the Office of the Federal Environmental Executive recently announced that DOI was selected as a recipient of the 2002 White House Closing the Circle Agency Award.

If you have any questions, please contact Jim Ortiz, Solid and Hazardous Materials Team, at (202) 208-7553.

Sincerely,

Willie R. Taylor
Director
Office of Environmental Policy
and Compliance

Enclosure

cc: Assistant Secretary - PMB
Deputy Assistant Secretary - PMB

U. S. Department of the Interior
Calendar Year 2001 Progress Report
on the Implementation of Executive Order 13148
"Greening the Government Through Leadership in Environmental Management"

PROGRESS OF DEPARTMENTAL OFFICES

NATIONAL BUSINESS CENTER

The National Business Center (NBC) NBC, Division of Facilities Management Services, provides the following Executive Order 13148 progress report for the Main and South Interior Buildings (Interior Complex):

Section 305. Amended or Updated Policies, Strategies, and Plans.

The NBC reports the following environmental policies, strategies and plans which have been implemented at the Interior Complex:

- Recycling Program and Guide;
- Carpet Policy (DRAFT);
- Spring Clean Up;
- Modernization Move-Out and Office Spruce Up;
- Computer Recycling Program;
- Office Eagle Store Agreement; and
- Waste Diversion Rate of 50% for FY01

Section 502. Reduction Goals for Releases of Toxic Chemicals as Reported under Section 313 of the Emergency Planning and Community Right-to-Know Act.

The NBC addressed reduction goals for Federal agency release of toxic chemicals by awarding a multi-year custodial contract which began using environmentally-safe and -healthful custodial products in the Interior Complex. Chemical cleaning products used under this contract meet or exceed mandatory criteria for reducing the release of toxic chemicals. Contract specifications include the following:

- Must not be a hazardous waste (when disposed of),
- Must not be packaged in an aerosol container,
- Must not contain any probable or known carcinogens,
- Must not contain any ingredients that are designated as "Toxics of Concern" to the Chesapeake Bay,
- Minimize use of dyes and fragrances, and
- Minimize skin, eye, and respiratory irritation.

Additionally, all the paper products have the desirable characteristic of having been manufactured without the use of elemental chlorine for dyeing and bleaching.

Section 505. Reduction and Management of Use of Ozone Depleting Substances (ODS).

The following actions were taken by the NBC to reduce and manage the use of ozone depleting substances:

a. Selected replacement chillers for the Main Interior Building requiring the use of R-134-A which is an HCFC (hydro-chlorofluorocarbon) refrigerant and is much more environmentally-friendly than a CFC refrigerant.

b. Implemented a custodial contract that requires the use of environmentally-friendly products including low- or no-VOC cleaning compounds and chemicals.

c. Banned aerosol containers from the Interior Complex. Only pump sprayers can be used to dispense cleaning chemicals.

d. Severely restricted the purchase and use of aerosol dispensers and, like the cleaning contract, has converted to pump-sprayer applications.

e. Prohibited the sale of products in aerosol containers at the Main Interior Building, office supply store.

Section 601. Environmentally and Economically Beneficial Landscape Practices.

The General Services Administration (GSA) has responsibility for the landscape maintenance and design at the Interior Complex, and has issued guidelines to comply with the Presidential Executive Memorandum.

Section 701. Roles and Responsibilities of Procurement Officials and Acquisition Program Managers.

The NBC, Division of Acquisition Services, is aware of the requirements of Executive Order 13148, Section 701, Limiting Procurement of Toxic Chemicals, Hazardous Substances, and Other Pollutants, and is currently in the process of determining its applicability to the types of products the NBC and the Office of the Secretary procure.

OFFICE OF ACQUISITION AND PROPERTY MANAGEMENT

Progress in Reducing Ozone Depleting Substances.

The Office of Acquisition and Property Management issued policy guidance on May 27, 1993, in a Department of the Interior (DOI) Acquisition Policy Release (DIAPR) 93-18 which called for action taken to minimize the procurement of ozone-depleting substances by: (1) informing engineering and environmental staffs of Executive Order 12843 requirements; (2) initiating program review of standards and specifications to remove ozone-depleting substances; and (3) initiating data collection by program offices on actions taken to prepare for subsequent progress reporting. On Oct. 24, 1995, a memorandum alerting property managers on the CFC and Halon turn-in program for maintaining reserves of these products by DOD's Defense Logistics Agency was issued. Under DIAPR 97-2, issued December 2, 1996, DOI established policy calling for maximizing the use of alternatives to ozone-depleting substances in specifications and contracts in accordance with FAR clause requirements. Clauses FAR 52-223.11, "Ozone-Depleting Substances" and FAR 52-223-12, "Refrigeration Equipment and Air Conditioners" are required clauses for inclusion in contract requirements.

Alternative Fuel Vehicle Acquisition.

In FY 1996 and 1997, with few Alternative Fuel Vehicles (AFV's) on the market, limited fueling and no financing options, DOI fell short of the Energy Policy Act of 1992's AFV acquisition requirements. Since FY 1998, thanks to increased AFV production by vehicle manufacturers, growth in the fueling infrastructure, and a creative financing arrangement with GSA, DOI has been able to meet or exceed the Environmental Protection Agency (EPA) requirements. During the past four fiscal years, DOI has been consistently one of the most successful programs in the Federal government, increasing its inventory of AFV's in the fleet from about 200 AFV's at the start of FY 1998 to almost 1250 by the end of FY 2001. Individual bureau goals have not been established due to changing bureau vehicle acquisition requirements, the availability of funding for new vehicles, and the availability of new AFV's that meet mission needs. The uses of AFV's, which are cleaner burning than conventionally fueled vehicles, are important to DOI's energy strategy for helping to reduce the Nation's dependence on foreign crude oil. The Government-wide Federal Automotive Statistical Tool (FAST) implemented in FY 2000 is evolving into an important vehicle for reporting AFV acquisition information and alternative fuel consumption. The DOI is committed to work with the Department of Energy and GSA on strengthening FAST. The FAST consolidates reporting of AFV-related information through a web-based system merging information generated by DOI, the bureaus and facilities nationwide, as well as GSA.

OFFICE OF ENVIRONMENTAL POLICY AND COMPLIANCE

Progress in Environmental Compliance.

The DOI Conferences on the Environment have been very successful as a means to provide Interior bureaus and offices with training and technical information on various environmental procedures and requirements. It is the only Department-wide environmental conference available where representation of DOI leadership is visible. The Office of Environmental Policy and Compliance (OEPC) sponsors such conferences with a bureau host. These conferences took place in 1993, 1994, 1995, 1999 and in 2001.

Our most recent conference, hosted by the Bureau of Indian Affairs and held in Albuquerque, NM, on March 13-15, 2001, featured more than 145 technical and panel sessions on all environmental areas, 58 technical exhibits and poster sessions, 26 training courses, and four field trips. The conference was organized around the theme "The Path Before Us: Environmental Stewardship for The 21st Century," with more than 625 participants from around the nation - including industry specialists, university researchers, DOI, and other Federal scientists and natural resource managers - shared ideas, findings, and recommendations on a spectrum of environmental issues.

We are currently planning for our 2003 DOI Conference on the Environment which will be held in Phoenix, Arizona on May 13-15, 2003 and will be hosted by the Fish and Wildlife Service. There will be a strong emphasis on environmental compliance and environmental management systems (EMS) through technical sessions and training provided to DOI personnel at this conference. Many of these technical sessions and training will be given by EPA headquarters and regional personnel. Finally, the Secretary has emphasized that compliance with environmental laws and regulations remains a high priority for the Department.

Progress in Agency Environmental Management System Self-Assessments and Pilot Projects.

The OEPC was a part of the EPA's "Gap Analysis"entitled, "Environmental Management System Review of the National Park Service: Based on the Code of Environmental Management Principles." The OEPC will sponsor an EMS Workshop on May 29-30, 2002 in Phoenix, Arizona to work on finalizing a Department-wide EMS policy which will be incorporated into our Departmental Manual. The workshop has strong support and high visibility from our senior level Departmental management since the opening session of this workshop will be given by the Assistant Secretary - Policy, Management and Budget. OEPC participates in the Interagency E.O. 13148 Workgroup and the EMS Sub-Workgroup. Finally, there will be EMS training and technical sessions provided to our bureaus at the 2003 DOI Conference on the Environment.

Progress in Compliance Audits.

Environmental auditing is the systematic, documented, periodic, and objective review of facility operations and practices related to meeting environmental requirements. Interior policy requires environmental auditing of all DOI facilities (Departmental Manual, Part 515, Chapter 2, "Environmental Auditing"). Environmental compliance remains a high priority for the Department. Each bureau is responsible for developing and implementing its respective environmental auditing program.

The OEPC provides the bureaus with the Federal environmental protocols developed by the U.S. Army Construction Engineering Research Laboratories called the Environmental Assessment Management (TEAM) Guide. The TEAM Guide is available to bureaus on the OEPC website for use by the bureaus and has been updated on a quarterly basis. The OEPC intends to work with bureaus accordingly to improve their overall environmental compliance.

As part of the Department's annual audit summary reporting requirement, the bureaus provide information concerning their environmental auditing programs to OEPC. Such information includes the cumulative number of facilities audited to date, number of facility audits scheduled for the next fiscal year, major audit issues identified in the reporting year, and the total cost of the bureau audit program for the reporting fiscal year. The Department expects that the base number of facilities will continue to change over the years, which affects both projections and reported outcomes. As part of DOI's annual audit reporting requirement, bureaus provide summary information on their auditing programs and activities to OEPC. The OEPC then prepares a "DOI Summary of the Fiscal Year Annual Report on Bureau Environmental Auditing Programs and Activities." Summary reports were completed for Fiscal Years (FY) 1999, 2000, and 2001.

For FY 2001, a total of 522 facilities was audited of the 2,266 DOI-owned and operated facilities reported by the bureaus. In addition, several bureaus reported that they had conducted environmental audits of their facilities in prior years and a cumulative total of 1,998 facilities have been audited to date. Bureaus also reported an estimated 576 audits are scheduled for FY 2002. For the Department as a whole, it appears that bureaus are making progress in the implementation of their environmental auditing programs.

Progress in Environmental Leadership and Agency Awards Programs.

The OEPC administers the Department of the Interior Environmental Achievement Award. This Award recognizes exceptional environmental achievements that highlight conservation of resources through cooperation, consultation and communication within bureaus or offices, either by individual employees or teams, and by contractors to a bureau or office. The Award follows the intent of the following: Departmental policy for comprehensive waste management for its

lands and facilities (518 DM 1); Executive Order (E.O.) 12856, Federal Compliance With Right-To-Know Laws and Pollution Prevention Requirements; E.O.13101, Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition; and E.O. 13148, Greening the Government Through Leadership in Environmental Management. Areas of recognition include:

- Waste/pollution prevention
- Recycling
- Environmentally preferable and affirmative procurement
- Facility environmental excellence
- Environmental management systems
- Environmental stewardship
- Education and outreach.

Other environmental and conservation improvement initiatives are also considered as well. The selection of award recipients is performed by an Awards Committee consisting of representatives of Departmental Bureaus and Offices who review nominations which are submitted. To date, a total of thirty-forty recipients received this award since its inception in 1995.

Progress in Acquisition and Procurement - Greening the DOI.

The "Strategic Plan for Greening the Department of the Interior Through Waste Prevention, Recycling and Federal Acquisition" outlines goals and strategies for the management of DOI facility operations in a manner that is less wasteful and more resource-efficient, by minimizing solid waste, preventing pollution, saving energy and other resources. The Strategic Plan was initially developed in response to Executive Order 13101. In the Plan, particular emphasis is placed on developing policies and practices to incorporate environmental considerations into acquisition planning, and the development of model facilities that demonstrate sustainable design and construction practices. The DOI supports this bureau-led initiative that has spawned a community of innovative leaders at the field levels who share information and success stories for the general benefit of DOI. The Greening the Interior Partnership was recently chartered to oversee implementation of this Strategic Plan and the accompanying FY00-01 Action Plan. The Partnership includes bureau designated representatives from environmental management, facilities management, property management and procurement.

Green Purchasing.

The DOI green procurement and property management strategies will be implemented to purchase products that have the highest percentage of recovered materials practicable, considering product price, availability, and performance. Interior will focus this effort on products designated by the Environmental Protection Agency (EPA) for Federal procurement. The indicator products that are vehicle-related include re-refined oil, retread tires, and reclaimed

engine coolant. At Interior facilities, recycled-content and process-chlorine-free copy paper, paper towels and bathroom tissue will be used, as well as recycled plastic trash bags. Recycled-content or factory-refurbishable carpeting will be emphasized as will the use of biodegradable, bio-based lubricating and hydraulic oils.

Interior developed a training on the use of environmentally preferable janitorial products in conjunction with NISH, a nonprofit agency that employs persons with mental disabilities. NISH is the largest supplier of custodial services to the federal government. The class was presented during FY2001 twice to 50 participants. Interior established a policy that only re-refined oil would be used in its vehicles and equipment. To ensure compliance with the policy, Interior requested that the Defense Logistics Agency substitute re-refined oil when virgin lubricating oil is ordered. This resulted in $60,000 of re-refined oil being purchased through this source.

The reporting system on the use of green products is integrated into the web-based survey system developed to collect waste diversion data. Data on green product use will be collected for the first time during FY 2002 and this data will be used to establish the baseline for this measure. Goal attainment was promoted during FY 2001 through activities focused on raising the awareness of Interior personnel regarding the market availability of environmentally preferable products have resulted in the acquisition of these products. At the 2001 DOI Conference on the Environment, there was entire track running throughout the conference on topics related to green products and sustainable practices.

Waste diversion data for FY 2001 was collected and analyzed for DOI's largest office complex, The Main Interior Complex in Washington, D.C. Collection of FY 2001 data on waste diversion throughout the Department was suspended due to the loss of Internet connection. Once restored, data collection for FY 2001 will proceed as planned and be reported when available. Facility managers at the Main Interior Complex with nearly 2,400 occupants worked very hard to increase the rate of waste diversion through recycling and source reduction. Whereas the diversion rate within the Main Interior Complex for FY 2000 was at approximately 30%, the diversion rate for FY 2001 reached 51.24%. Interior started recycling electronics in 2001 and this practice substantially reduced the volume of material going to the landfill.

In preparation for modernization construction, Main Interior Building occupants cleaned out their offices, recycling, and donated excess and gently used office supplies to District of Columbia Public Schools. The Office Spruce Up! Campaign has provided office supplies worth an estimated $9,000 directly to ten area elementary and high schools. The long term goal Interior-wide is to reach 50% waste diversion by 2010. By exceeding this goal nine years ahead of schedule, facility managers at the Main Interior Complex have demonstrated that reaching this target should be possible using cost-effective method at facilities with comparable waste streams (primarily office waste) and situated in or near an urban center.

PROGRESS OF DEPARTMENTAL BUREAUS

BUREAU OF INDIAN AFFAIRS

The Bureau of Indian Affairs (BIA) Division of Environmental and Cultural Resources Management (DECRM) has been an active participant on Executive Order 13148, Greening the Government through Leadership in Environmental Management. In accordance with Executive Order 13148, DECRM developed BIA's Environmental Management Audit Program (EMAP). Under the EMAP, numerous BIA staff from headquarters, regions and field locations participated in preparing important guidance to develop an EMAP handbook for environmental audits.

The EMAP handbook will be used as a training guide to conduct environmental audits, to promote education and awareness of environmental compliance at audited BIA federal facilities. The first pilot project using the recently developed EMAP handbook were conducted in late March 2002. The results of the pilot project will further facilitate the development and implementation of environmental management systems with compliance requirements for BIA federal facilities. DECRM is encouraged the EMAP offers an opportunity to identify and learn about compliance requirements for our operations and directing resources to address these requirements.

In addition, the BIA has hired a Greening Coordinator, George Padilla. Among other things, Ms. Padilla will develop BIA's plans for integrating greening into Bureau operations, and will develop policies and handbooks to facilitate that process for our field staff.

The BIA also met with OEPC to explore ideas in promoting green design and construction practices in building high performance schools. The BIA is committed to continuing their efforts to develop environmental design-criteria that build sustainable BIA schools.

BUREAU OF LAND MANAGEMENT

Section 305. Amended or Updated Policies, Strategies, and Plans.

The BLM's policy is to purchase environmentally preferable products. All service contracts include environmental preferability provisions. Green procurement policies, guidance, and case studies are posted on BLM's Acquisition Internal home page.

The vast majority of the BLM's office space is in commercially leased buildings and BLM's goal is to be a leader in greening space leases. Among other provisions, BLM's new lease agreements require energy efficiency, water conservation, recycling, and green cleaning in leased spaces.

Section 401. Environmental Management Systems.

While a formal Environmental Management System (EMS) is still under development, the BLM has adopted a number of EMS elements. For example, BLM's Compliance Assessment Safety, Health, and the Environment (CASHE) Program incorporates root cause analysis of CASHE findings of noncompliance. Findings, root causes, and corrective actions are tracked, used to identify systemic problems, and evaluated against performance measures.

In addition, BLM offers a curriculum of in-house environmental compliance and hazardous materials management training for technical specialists and managers. One course in particular, *Managers Guide to Environmental Compliance and Pollution Prevention*, prepares managers to fulfill their legal responsibilities for environmental compliance and protection. It covers discretionary and nondiscretionary actions, institutional controls, risk management, and reducing liabilities.

Section 402. Regulatory Compliance Auditing Program.

The BLM instituted its Compliance Assessment Safety, Health, and the Environment (CASHE) Program in 1993. The purpose is to evaluate all BLM facilities and operations in order to: 1) identify compliance issues and policy and training needs; 2) increase safety, health, and environmental awareness of all employees; 3) expand ownership for compliance by promoting implementation of collaborative solutions; and 4) facilitate budgeting for the implementation of those solutions. Specific benefits include: 1) improved protection of the public's and employees' safety and health; 2) prevention of environmental damage and accidents and potential savings of thousands of dollars in environmental restoration or worker's compensation costs; 3) enhanced opportunities for training personnel in environmental and hazardous material safety and health issues specific to BLM facilities and operations; and 4) improved transfer of environmental and hazardous material safety and health information and technology to the field.

Baseline CASHE audits have been completed at every field office and major facility in BLM. Follow-up assessments are underway. The plan is to conduct follow-up CASHE audits on a three-year cycle.

Section 502. Reduction Goals for Releases of Toxic Chemicals as Reported under Section 313 of the Emergency Planning and Community Right-to-Know Act.

The Bureau of Land Management (BLM) reports its use of fire retardant, which is mixed on a batch basis as an aqueous solution and applied to wildland fires. The active constituent, ammonium sulfate, contains the ammonium ion in a stable form. The fire retardant is used as intended and the amount "released to the environment" depends on the fire season. There are no viable substitute products at this time.

However, decreasing fire retardant use is expected to be a side benefit of the national fuels program. The need for fire retardant will decline as the federal government and its state partners reduce heavy fuel loads arising from past disruptions of natural fire cycles as well as other management practices. Applying a variety of fuel treatment types, such as mechanical thinning and controlled burning, will reduce the intensity and severity of wildland fires and restore health to fire-adapted ecosystems. The main focus is on wildland-urban interface areas where fire suppression is most critical and use of fire retardant has been extensive. Eliminating heavy fuel loads in wildland-urban interface areas will reduce the risks to communities and result in a corresponding decrease in fire retardant applications.

Section 505. Reduction and Management of Use of Ozone Depleting Substances (ODS).

The BLM has been phasing out equipment containing ozone depleting substances (e.g., air conditioners) and eliminating other ODS uses (e.g., solvents). In addition, equipment servicing and disposal is done by technicians certified in the recovery and disposal of ozone depleting substances. This is a routine business practice and part of standard operating procedures.

Section 601. Environmentally and Economically Beneficial Landscape Practices.

In the BLM, Xeriscaping (a trademark landscaping method using drought-resistant plants for water conservation), use of native plants, and water conservation are routine land management practices. Opportunities to apply environmentally and economically beneficial landscaping techniques are extensive. They range from Xeriscape demonstration plots at offices and recreation sites to testing native vegetative covers on closed landfills and abandoned mine tailings.

Section 701. Roles and Responsibilities of Procurement Officials and Acquisition Program Managers.

The BLM's policy is to purchase environmentally preferable products. All service contracts include environmental preferability provisions. Procurement personnel have developed standard language and make sure that the appropriate green provisions are in all purchase agreements and contract documents. However, all purchasing is not done by procurement personnel. Most small purchases are made by employees with government bank cards and it is their responsibility to select green products. The Green Procurement icon on BLM's Acquisition Internal homepage opens extensive information about environmentally preferable purchasing, including a Power Point presentation, product information, and case studies. The product information specifically identifies Comprehensive Procurement Guideline items that BLM routinely purchases and gives vendor and ordering information.

BUREAU OF RECLAMATION

Sections 202 and 402. Progress in Environmental Compliance and Facility Compliance Audits.

In accordance with DOI's Departmental Manual (515 DM 2) and Reclamation's internal guideline for program reviews (Directives & Standards ENV 02-08), Reclamation Regional Offices continued conducting baseline environmental reviews of facilities located on lands under the agency's jurisdiction. Reviews were conducted where hazardous materials are used or where hazardous wastes could be generated. Areas of compliance that are evaluated by Reclamation's field offices during a facility review include:

- Hazardous Waste Management
- Underground Storage Tanks
- Above Ground Storage Tanks
- Spill Prevention, Control and Countermeasure Plans
- Toxic Substance Control Act
- Land Acquisition and Disposal
- Pest Management Practices
- Waste Minimization/Pollution Prevention
- Hazardous Materials Training
- Hazard Communication
- Community-Right-to-Know (EPCRA)
- Point Source Discharge
- Safe Drinking Water

Fully revised all 10 hazardous materials Policy and Directives & Standards documents to ensure better compliance with Departmental and Federal regulations. In addition, the intent of the reviews is to establish a facility baseline by evaluating compliance with Federal, State and local hazardous materials regulations.

Other Activities.

Pollution Prevention Activities:

BOR supports many pollution prevention activities, at its field sites and/or BOR-wide, including:

a. Successful coordination of waste reduction/waste monitoring programs (Glen Canyon Dam Area Office/Upper Colorado Region employee received the DOI Environmental Achievement Award for this effort).

b. Purchase of products made from recyclable materials (paper), as well as low hazard solvents (citric-based) and cleaners (biodegradable).

c. Implemented programs to recycle as many materials commonly used as possible (e.g., oil, batteries, scrap iron and steel, used solvents and empty used drums).

Environmental Education Activity:

BOR developed a presentation for primary school students explaining the value of water as a central resource to human life, with emphasis on the need to conserve it wherever possible.

FISH AND WILDLIFE SERVICE

Section 305. Amended or Updated Policies, Strategies, and Plans.

The FWS's environmental policies are published through the Policies, Directives and Management office and are being updated. Copies of existing policies are available through the Internet, ensuring wide dissemination. A copy of the booklet, titled "Published Chapters" that includes Chapters relating to environmental policies, is attached.

Section 401. Environmental Management Systems.

The FWS has conducted a bureau headquarters level self assessment based on EPA's Code of Environmental Management Principles for Federal Facilities (CEMP). EPA has conducted Environmental Management Reviews (EMRs) in three of the seven Regions of FWS (Regions 5, 6, and 7).

The FWS contracted the services of a consultant to conduct EMRs at the headquarters level and the remaining four Regional Offices. A Gap Analysis was carried out at the Headquarters Offices in Arlington, VA ,Washington, DC and Denver, CO, during the months of July and August, 2001. EMRs have been conducted in Regions 2, 3 and 4 in February - March 2002. Region 1 will be undergoing an EMR during the week of Mar 18, 2002. There are also plans in place to complete EMRs of pilot facilities this year. The assessment documents will not be finalized until the later part of this year.

Section 402. Regulatory Compliance Auditing Program.

The FWS has an effective auditing program that has been in place since 1994. The program emphasizes pollution prevention and greening as a means to both achieve and maintain environmental compliance. Approximately 834 of the 850 FWS field station facilities have been audited (>98%) and the second cycle of audits has been started in all of the Regions. The FWS has prepared a comprehensive Federal Environmental Compliance Auditing Handbook consisting of 11 environmental protocols (including greening and pollution prevention) covering all applicable federal regulations. The manual is updated annually. The FWS also has prepared 50 State Handbooks that address the State environmental regulations. The State manuals are updated every 2 years.

Section 502. Reduction Goals for Releases of Toxic Chemicals as Reported under Section 313 of the Emergency Planning and Community Right-to-Know Act

There are no Fish and Wildlife Service (FWS) facilities that report release of toxic chemicals under the Emergency Planning and Community Right-to-Know Act's (EPCRA) Section 313 provisions. Consequently, there are no plans to establish a baseline under this section for Calendar Year 2001.

Section 505. Reduction and Management of Use of Ozone Depleting Substances (ODS).

The FWS has published a Director's Order, D.O. 138, dated August 7, 2001, Ozone Depleting Substances (ODS) Phaseout Plan, that provides guidance for phasing out procurement of Class I ODSs. The plan gives information about EPA alternatives to ODSs. It also spells out procedures to schedule phase-out of equipment that uses Class I ODSs. As requested, a copy of the plan is attached.

Section 601. Environmentally and Economically Beneficial Landscape Practices.

The FWS recognizes the environmental importance of beneficial landscaping and has initiated policies that promote these landscaping practices in new construction and major rehabilitation projects.

The FWS strives to promote the sustainable management of Federal facility lands through the implementation of environmentally sound landscaping practices and programs to reduce adverse impacts to the natural environment. This is achieved by implementing:

a. Beneficial landscaping that generates long-term cost savings by using wise choices for landscaping practices that have a lesser or reduced effect on human health and the environment. For example, the use of native plants best suited to the local environment and climate will help conserve water and prevent pollution. Native plants use less fertilizer, pesticide, and water than non-native species.

b. Landscaping principles that contribute to the health of the air, water, and soils with designs that reflect bio-regional conditions and reduce the impacts of human use.

c. Environmental education of visitors regarding beneficial landscaping in the natural and cultural settings found within wildlife refuges and fish hatcheries that can affect immediate behaviors and long-term beliefs and attitudes.

Examples of FWS projects in 2001 that incorporated native landscaping plant species are the National Conservation Training Center Dormitory No. 3, West Virginia and the Walnut Creek Prairie Learning Center, Iowa.

Sections 701 and 704. Limiting Procurement of Toxic Chemicals, Hazardous Substances, and Other Pollutants and Roles and Responsibilities of Procurement Officials and Acquisition Program Managers.

The FWS's Contracting and General Services Office has written a Director's Order on Greening the Service Through Environmental Leadership. This directive, to be issued shortly, provides guidelines and establishes priorities for our endeavors to support Environmental Leadership through conservation and education.

In addition, the FWS is completing a Statement of Work to hire a support contractor to provide a strategic plan for managing, training, and continued implementation of the FWS Greening Program. We continue to emphasize to the Regional Greening Coordinators and Contracting Office personnel the significance and requirements of E.O. 13101, Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition, and E.O. 13148, Greening the Government Through Leadership in Environmental Management.

Additional Information on Environmental Successes.

a. The environmental audit program of the FWS is a great success and as stated earlier, we have completed a full cycle of compliance audits on 834 of the Service's 850 field station facilities.

b. The audit program is complemented by a popular and successful environmental training class titled, "RCRA Waste Management and Regulations Course," tailored to meet the requirements of Service personnel. Since 1994, more than 1200 Service personnel have been trained and facilities staffed by personnel who underwent training have a sharply reduced number of audit findings. The two-day course, among other things, emphasizes Pollution Prevention and Greening the Government through Zero Waste and Source Reduction, Reuse and Recycling. Copies of some of the training materials (Pollution Prevention, Pollution Prevention Handbook, Handbook on Hazardous Waste Management and Solid Waste Management Handbook) are attached.

c. The FWS also conducts an Environmental Audit Training program every 2 years for the Regional environmental program auditors.

d. Annually, the FWS publishes a document titled, "Environmental Stewardship and Greening the Government." The document highlights the Auditing and Training programs, Remediation projects, Energy Management program, Sustainable Design, Natural Resource Damage Assessments, Green Acquisition and Recycling.

e. Using resources offered by EPA's Region 4 Safe Drinking Water Group, the FWS successfully conducted a training course for Transient Water Systems in June 2001, at Atlanta, GA.
f. The FWS issued a February 22, 2002, memorandum to provide guidance and information on the new reporting requirements for lead releases in FWS facilities (see attached). The FWS worked with EPA's Dr. Bushman and Jon Harmon in developing this guidance.

NATIONAL PARK SERVICE

Section 305. Agency Policies, Strategies, and Plans.

A recently issued National Park Service (NPS) Director's Memorandum, dated February 19, 2002, established plans for an NPS Environmental Management System (EMS). To facilitate implementation, this memorandum authorized the establishment of an EMS team composed of representatives from each WASO-based Associate Directorship and each NPS Region. This team's mandate is to define the scope of an NPS EMS, prepare the formal EMS plan, and manage the beginning stages of its implementation. Meetings will take place during the summer of 2002 to begin this process. The NPS Environmental Auditing Program (EAP) audits NPS facilities against program criteria related to the EMS. These criteria require that each park develop and implement procedures to foster a park-based EMS in the interim period, before the NPS EMS Development Team completes the framework for linking up all parks and regional offices. These procedures include setting facility-based performance goals, designating roles and responsibilities, allocating resources, institutionalizing procedures and measuring performance, all in pursuit of constant improvement in Service-wide environmental management.

Section 401. Agency Environmental Self-Assessments.

The NPS was selected as the first bureau within DOI to participate in an agency-wide environmental self-assessment. In August 2000, the EPA issued its final analysis of how the NPS conforms to the Code of Environmental Management Principles for Federal agencies. In response to the major concern of the study, identifying the lack of an overarching environmental policy, the NPS is currently in the process of finalizing a comprehensive environmental policy, Director's Order (DO) #30A, "Solid Waste and Hazardous Waste Management." This DO is expected to be released for a comprehensive, Service-wide 60-day review this year.

Section 402. Compliance Auditing Program.

As required by 515 DM 2, the DOI policy on environmental auditing, the NPS has developed an NPS EAP to complete comprehensive baseline environmental audits of all units within NPS. DO #30A, "Solid and Hazardous Waste Management," reiterates the requirement to complete comprehensive baseline environmental audits. The NPS EAP has a separate component, managed by the Concessions Environmental Management Program, to audit businesses that provide visitor services (concessioners) in national parks. Once baseline comprehensive

environmental audits are completed, routine audits will occur every three to five years thereafter, based upon the complexity of the NPS unit being audited. Audit findings, as well as corrective actions taken to resolve the findings, are tracked in a database managed by the Washington Office (WASO) Hazardous Waste Management Program (HWMP).

Section 502. Release Reduction: Toxic Chemicals.

Director's Order #30A, "Solid and Hazardous Waste Management," requires that specific products from a park's hazardous chemical inventory be reviewed annually to determine if there are environmentally preferable products that can be substituted in their place. DO #30A also requires units of the NPS to reduce on-site inventories of hazardous materials and chemicals in an effort to prevent the accumulation of waste, and to reduce the overall toxicity of chemical inventories. In addition, the WASO HWMP annually sets aside funds to subsidize the additional costs associated with the purchase of environmentally preferable products used for facility management. In FY 2001, the WASO HWMP provided $300,000 to field units requesting funds to switch to environmentally preferable alternative products. The NPS EAP audits park facilities against program criteria related to green procurement. These criteria require that each park develop and implement a "green procurement program" that includes such key elements as the establishment of a task force, development of a mission statement, and integration of criteria into the procurement process.

Section 505. Development of an Ozone-Depleting Substance (ODS) Plan.

Director's Order #30A requires that each park eliminate the use of Class I ODS, which include Freon 12, halons, carbon tetrachloride, methyl chloroform, hydro-bromo-fluorocarbons, and methylbromide, by December 31, 2010. The NPS EAP audits their facilities against program criteria related to Chlorofluorocarbon and Halon Management. These criteria require that each park develop an inventory of all ODS equipment and demonstrate that park environmental program coordinators have educated park-based procurement officers regarding their role in purchasing replacement equipment that is free of ODS.

Section 601. Landscaping Management Practices – Implementation.

Since the mid-1980s, the Denver Service Center, the NPS central planning, design, and project management office, has managed a re-vegetation program intended to supply the site-adapted native plants and seed needed for landscape restoration after NPS construction projects. This program has been developed in concert with the "Guidance for Presidential Memorandum on Environmentally and Economically Beneficial Landscaping Practices on Federally Landscaped Grounds," dated August 10, 1995. A summary of the NPS accomplishments in this area is included as Attachment 1.

Section 701. Limiting Procurement of Toxic Chemicals, Hazardous Substances, and Other Pollutants.

The NPS is in the process of finalizing an NPS guidance document entitled "How to Purchase Environmentally Preferable Products in the National Park Service." The guidance emphasizes education of park employees on the opportunities to purchase EPA designated, bio-based, and other environmentally preferable products and promoting the opportunities where these products can be used. The document also stresses the importance of purchasing products and materials that are made from recycled or recovered content. The main objective of this guidance is to ensure that environmental considerations are incorporated into all material and contract acquisitions, as well as all aspects of planning, development of work plans and specifications, and contract administration.

U.S. GEOLOGICAL SURVEY

Section 305. Policies, Strategies, and Plans.

Prior to Calendar Year (CY) 2001, environmental policy within the U.S. Geological Survey (USGS) was limited in scope to primarily hazardous material and waste management functions. Realizing the need to address the full range of environmental requirements and standards, the USGS 441-H, Environmental Management and Compliance Program Requirements Handbook was developed to mirror The Environmental Assessment Management Guide and is currently in the final editing stage. Projected release date: April 2002.

In an effort to standardize and simplify the compliance auditing and management review process at all organizational levels, the USGS has entered into a joint effort with the U.S. Army Corps of Engineers Construction Engineering Research Laboratory to develop a Web-based tracking and auditing assistance program. The WEB-Based Compliance Assessment System (WEBCASS) is a unique program that enables personnel at all levels to access the tools necessary to comply with environmental compliance requirements, track compliance progress, generate compliance and management reports, and assist with tracking actual and projected corrective action funding. This system will be a critical component of the USGS Environmental Management Systems, as described in Section 401 below. The USGS has developed a system overview on CD ROM to be used to create initial awareness and benefits of the system. The CD ROM is currently being distributed. In addition, the USGS is also scheduling formal hands-on training for system users during the second and third quarters of CY 2002. Full System Implementation Date: October 2002.

The USGS has embraced the "Strategic Plan for Greening the Department of the Interior Through Waste Prevention, Recycling and Federal Acquisition"as their own, with the Director issuing a policy statement in CY 2001 fully supporting its goals. The USGS plans to fully

integrate the full range of environmental program requirements within our internal program planning process for CY 2003. This process formally addresses program weaknesses and the subsequent development of initiatives that strengthen overall compliance.

Section 401. Agency and Facility Environmental Management Systems (EMS).

The Director has issued a policy statement as required by the EMS and as previously mentioned in paragraph 1c, above. In addition, the Bureau Environmental Program Manager has attended DOI-sponsored EMS training and incorporated EMS program requirements and implementation into the USGS 445-1-H Environmental Management and Compliance Program Requirements Handbook.

The Bureau Occupational Safety, Heath, and Environmental Program and Bureau Environmental Program Managers have developed and incorporated checklists for EMS self-assessment at each level of the organization that are included in the WEBCASS program.

The Bureau Safety and Environmental Management Branch conducted a management review of the Western Region Headquarters in CY 2001. The Central Region Headquarters is scheduled for review in CY 2002.

Section 402. Facility Compliance Audits.

The bureau began to fully implement an environmental auditing program in CY 1999, identifying high-hazard facilities that posed the greatest environmental risk and subsequently scheduling formal audits of these locations to meet 515 Departmental Manual baseline audit requirements. Individual facility data collected was assessed based on the degree of risk and extent of environmental activities, resulting in the identification of 35 organizational components with 414 buildings that fall under formal baseline auditing requirements. Of the 414 buildings, 71 percent (all of Central and Western Region) have been audited, with the remaining 29 percent (Eastern Region) targeted for accomplishment by the close of CY 2002. The remaining locations that were audited during CY 2001 had no significant findings.

Section 502. Release Reduction: Toxic Chemicals.

In general, the bureau has taken a decentralized approach to managing the requirements of this section, with responsibility delegated to local-level supervisors and managers. Local efforts have resulted in unused chemicals destined for disposal or treatment at headquarters and regional facilities being offered to other organizations for use, resulting in significant waste reduction and disposal costs. Beginning in CY 2003, the Safety and Environmental Management Branch, in concert with regional safety/environmental personnel, will begin to develop a formal bureau plan and identify additional economies with respect to reducing toxic chemical quantities.

Section 505. Reductions in Ozone-Depleting Substances (ODS).

Information from the implementation of WEBCASS will be used to develop a realistic plan to meet the goal to phase-out Class I ODS by December 31, 2010. Although a formal plan has not been drafted, the USGS is moving forward with reducing ODS, as evidenced by the removal of four each 1500-ton chillers at the National Center in Reston, Virginia. Each unit contains 3,250 pounds of R-11 refrigerant and is being replaced with units that contain HFC-134. This replacement coincides with a chiller plant upgrade that includes a refrigerant monitoring system.

Section 601. Landscaping Management Practices: Implementation.

Elements of the Guidance for Presidential Memorandum on Environmentally and Economically Beneficial Landscape Practices on Federal Landscaped Grounds have been incorporated into the USGS 441-H, Environmental Management and Compliance Program Requirements Handbook.

Section 701. Limiting Procurement of Toxic Chemicals, Hazardous Substances, and Other Pollutants.

The USGS procurement officials are aware of the requirements of E.O 13148 and are following them. Affirmative procurement programs are assessed during the environmental compliance audits at management reviews. This is an evolving program in the bureau and new initiatives will be studied and implemented, as appropriate.

Additional Information.

The environmental program within the USGS is a continually evolving program. To ensure that these requirements are adequately addressed at the bureau level, the USGS recently reconstituted the standing safety committee and re-chartered under the title of Occupational Safety, Health, and Environmental Council to include environmental personnel as members, with the Bureau Designated Agency Safety and Health Official as a full member. The Western and Eastern Regions have approved, funded, and hired full-time Environmental Protection Specialists to provide oversight and compliance assistance to field organizations.