United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

TAKE PRIDE IN AMERICA

JAN 30 2008

9043

In Reply Refer To:
ER 07/755

Memorandum

To: Heads of Bureaus and Offices

From: Willie R. Taylor, Director
Office of Environmental Policy and Compliance

Subject: Fiscal Year 2007 Departmental Summary Report on Bureau Environmental Auditing Programs and Activities

The Department's mission is complex, multi-faceted, and challenging. We provide recreation opportunities, access to resources and protect some of the Nation's most significant cultural, historic, and natural places. We serve communities and fulfill our trust and other responsibilities to American Indians, Alaska Natives, and the Nation's affiliated island communities. As the Nation's premier conservation agency, our responsibility to leave a legacy of healthy lands and waters, thriving communities, and dynamic economies depends upon our compliance with environmental laws and regulations. We accomplish this with the help of our 73,000 employees, 200,000 volunteers, and thousands of partners. Behind all of the Department's programs rests a management foundation that is vital to the accomplishment of our mission.

The Department continues to support the President's Management Agenda that builds on a foundation for management excellence. As part of the President's Management Agenda, the President's Management Council directed all Federal agencies to improve their overall environmental compliance and performance through implementation of environmental management systems (EMS). The EMS are a set of processes and practices that enable an organization to reduce environmental impacts and increase operating efficiency. It consolidates various environmental requirements and other activities or initiatives. Environmental auditing was specifically targeted for management improvement of the Department's environmental compliance and performance. Since environmental compliance serves as the foundation for a successful EMS program, environmental auditing was incorporated into all Bureau and office EMS efforts. Furthermore, environmental compliance remains a high priority for the Department.

For FY 2007, Bureaus and offices reported a total of 2,635 facilities, with a total of 491 environmental audits completed and a total of 4,880 environmental audit findings as shown in Table 1 in the attachment. (An environmental audit finding is a statement of conditions identified at the time the environmental audit is performed requiring a response in accordance

with environmental audit protocols and applicable legal requirements). A total of 2,292 environmental audit findings were corrected in FY 2007 and a cumulative total of 4,154 environmental audits have been completed to date (all-years). For FY 2007, the average number of findings per audit Department-wide was 9.93 (range 54.20 – 1.01).

The Office of Environmental Policy and Compliance examined trends from a comparison of the total number of environmental audit findings corrected and the total number of audit findings reported for FY 2004 through 2007, when this data was available. (See Figure 1 in the attachment). The highest risk audit issues identified were for chemical and fuel storage, drinking water systems, hazard communication, managing hazardous materials, spill control, and waste management principally due to three root causes: (1) lack of employee training, (2) insufficient resources for environmental compliance, and (3) insufficient management/leadership support. Furthermore, as shown in Figure 2 in the attachment, analysis revealed that these three root causes identified during the period FY 2004 through FY 2007 continue to remain problematic and impact Departmental leadership.

Executive Order (E.O.) 13423 of January 24, 2007, sets broad goals to strengthen environmental, energy, and transportation management across Federal agencies. It combines multiple previously issued E.O.'s into one and requires Federal agencies to implement EMS at all appropriate organizational levels. The E.O. requires the use of EMS as the primary management approach for addressing environmental aspects of internal agency operations and activities, including energy and transportation functions. EMS will clearly identify training needs, clarify and streamline processes, and reduce audit findings.

The Department is fully committed to reduce adverse environmental impacts to public lands and natural resources and to enhance compliance. Thus, we encourage Assistant Secretaries and Heads of Bureaus and offices to take the following actions: (1) ensure commitment of their managers to environmental compliance, (2) ensure commitment to necessary resources to correct non-compliance issues, and (3) provide environmental compliance training for staff across all Bureaus and offices. Finally, environmental auditing is currently tracked as a performance element on the Department's Organizational Assessment toward management excellence. Our role as the Nation's premier conservation agency requires that we exercise leadership across the Department to ensure overall compliance with regulatory requirements.

If you have any questions, please contact Jim Ortiz, of my office at 202-208-7553.

Attachment

cc: Solicitor
Assistant Secretaries
Deputy Assistant Secretary – P&IA
REOs
HazMat Contacts

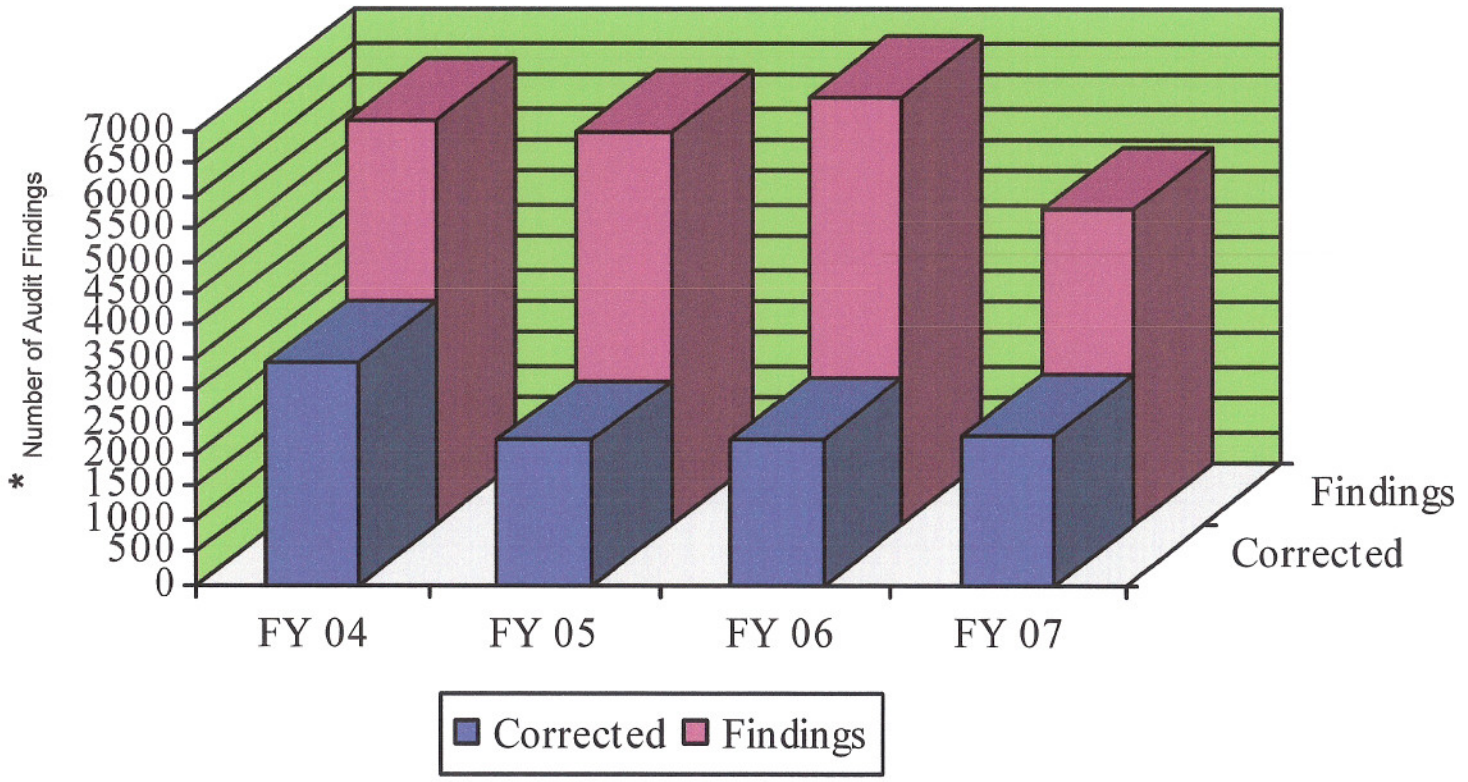
ATTACHMENT

Table 1: Bureau Summary of Environmental Auditing Programs and Activities for Fiscal Year 2007

Bureau	Number of Facilities Reported in FY 2007	Number of Environmental Audits Performed in FY 2007	Number of Environmental Audit Findings Reported in FY 2007	Number of Findings per Audit (normalized)	Number of Environmental Audit Findings Corrected in FY 2007	Number of Environmental Audit Findings Corrected in FY 2006	Cumulative Audits Performed (all-years)
BIA	33	37	126	3.40 (126/39 = 3.40)	Not Available	Not Available	276
BLM*	120	31	1,187	38.3 (1187/31 = 38.3)	1,113	1,505	346
BOR	444	45	273	6.06 (273/45 = 6.06)	71	110	289
FWS	872	172	597	3.47 (597/172 = 3.47)	235	360	2,065
MMS**	-	-	-	-	-	-	-
NBC	3	3	94	31.33 (94/3 = 31.33)	70	-	4
NPS***	391	39	2,114	54.20 (2114/39 = 54.20)	718	69	601
NPS Concessions (NPS-C)+	580	24	351	8.95 (215/24 = 8.95)	35	27	215
OSM**	-	-	-	-	-	-	-
USGS++	192	140	138	1.01 (140/138 = 1.01)	50	157	358
DOI Total	2,635	491	4,880	9.93 (4880/491 = 9.93)	2,292	2,228	4,154

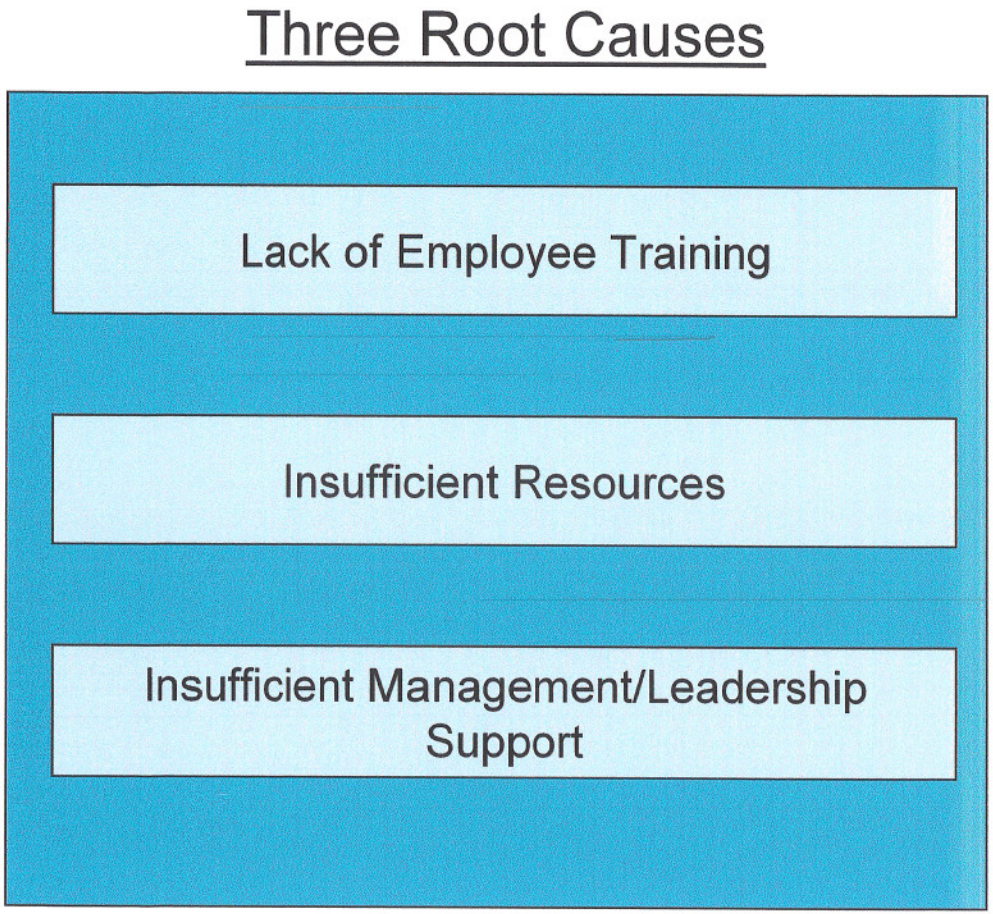
Notes:
1. Not available. BIA has not sufficiently developed their database system to capture information on corrected audit findings.
2. *BLM uses the term "organizational units" and not facilities. FY 2007 audits from 10/1/06 through 9/30/07. FY 2006 audits from 10/1/05 through 9/30/06.
3. **MMS and OSM occupy primarily GSA-leased space.
4. ***NPS: Some audits were begun in FY 2007 but will not be finalized until FY 2008.
5. + NPS Concessions: Based on 580 facilities in 121 parks. Only third party concessioners are reported.
6. ++USGS: Includes FY 2006 carryover audits.

Figure 1. Total Number of DOI Audit Findings vs. Total Number of Audit Findings Corrected for Fiscal Years 2004 - 2007



* Audit findings may not correspond to the year finding was identified.

Figure 2. Root Causes of High Risk Environmental Auditing Issues Impacting Departmental Leadership for FY 2004 - FY 2007



* Majority of high risk environmental, safety, and health findings were found in spill control, drinking water systems, waste management, and hazard communication.