United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

TAKE PRIDE IN AMERICA

MAR 30 2006

Memorandum

To: Heads of Bureaus and Offices

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

Subject: Fiscal Year 2005 Departmental Summary Report on Bureau Environmental Auditing Programs (ER 05/792)

The Department of the Interior's (DOI) 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 70,600 employees, 200,000 volunteers, and thousands of partners. Behind all of the DOI's programs rests a management foundation that is vital to the accomplishment of our mission. The American people are demanding more from their public servants and calling for better business management practices, improved efficiency, financial transparency, and mission accountability.

The DOI 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). 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 bureaus' EMS efforts.

For Fiscal Year (FY) 2005, the bureaus reported a total of 3,479 facilities, with a total of 576 environmental audits performed. Collectively, bureaus reported a total of 6,055 environmental audit findings with 2,217 corrective actions completed, based upon audit findings in FY 2005. (An environmental audit finding is a statement of conditions identified at the time the environmental audit is performed requiring response in accordance with environmental audit protocols and applicable legal requirements). A cumulative total of 3,680 environmental audits have been completed to date for all-years (see attached table and chart) and 95 per cent of initial environmental audits have been completed exceeding the DOI's FY 2004 goal of 86 per cent. Another attached chart illustrates a comparison by bureau of environmental audit findings

corrected in FY 2004 and in FY 2005. Overall, it would appear that there is a decrease in the overall number of findings corrected by bureaus. However, since this is the first year that this data comparison was collected, we will continue to monitor it through ensuing years for trend analysis.

Overall, the DOI has made considerable progress in its environmental compliance efforts. However, as stated in the attached table on highest risk audit issues in FY 2005, there is a compelling need for bureaus to provide training for their personnel. These training requirements include environmental requirements, policies, and procedures associated with work activities.

The DOI is fully committed to reducing adverse environmental impacts to public lands and natural resources and to enhance compliance. Assistant Secretaries and Heads of Bureaus and Offices must ensure that senior level managers are fully implementing the requirements of Departmental and respective bureau environmental policies.

If you have any questions, please contact Willie R. Taylor, Director, Office of Environmental Policy and Compliance, at (202) 208-3891.

Attachments

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

ATTACHMENT

U.S. Department of the Interior Bureau Summary of Environmental Auditing Programs and Activities for Fiscal Year 2005

Bureau	Number of Reported Facilities in FY 2005	Number of Environmental Audits Performed in FY 2005	Number of Environmental Audit Findings Reported in FY 2005	Number of Findings per Audit (normalized)	Number of Environmental Audit Findings Corrected in FY 2005	Number of Environmental Audit Findings Corrected in FY 2004	Cumulative Audits Performed (all-years)
BIA	348	97	1,427	14.7 (1,427/97 = 14.7)	N/A	4	239
BLM*	120	36	1,557	43.2 (1,557/36 = 43.2)	1,254**	1,701***	286
BOR	410	45	95	2.1 (95/45 = 2.1)	108	81	323
FWS	860	208	1,143	5.5 (1,143/208 = 5.5)	435	385	1,628
MMS	-	-	-		-	-	-
NBC	47	-	-		-	-	-
NPS	388	27	959	35.5 (959/27 = 35.5)	313	430	458
NPS Concessions (NPS-C)	590	33	717	21.7 (717/33 = 21.7)	35	694	154
OSM	28	20	-		-	-	20
USGS	688	110	157	1.4 (157/110 = 1.4)	72	120	572
DOI Total	3,479	576	6,055	10.5 (6,055/576 = 10.5)	2,217	3,415	3,680

Notes:

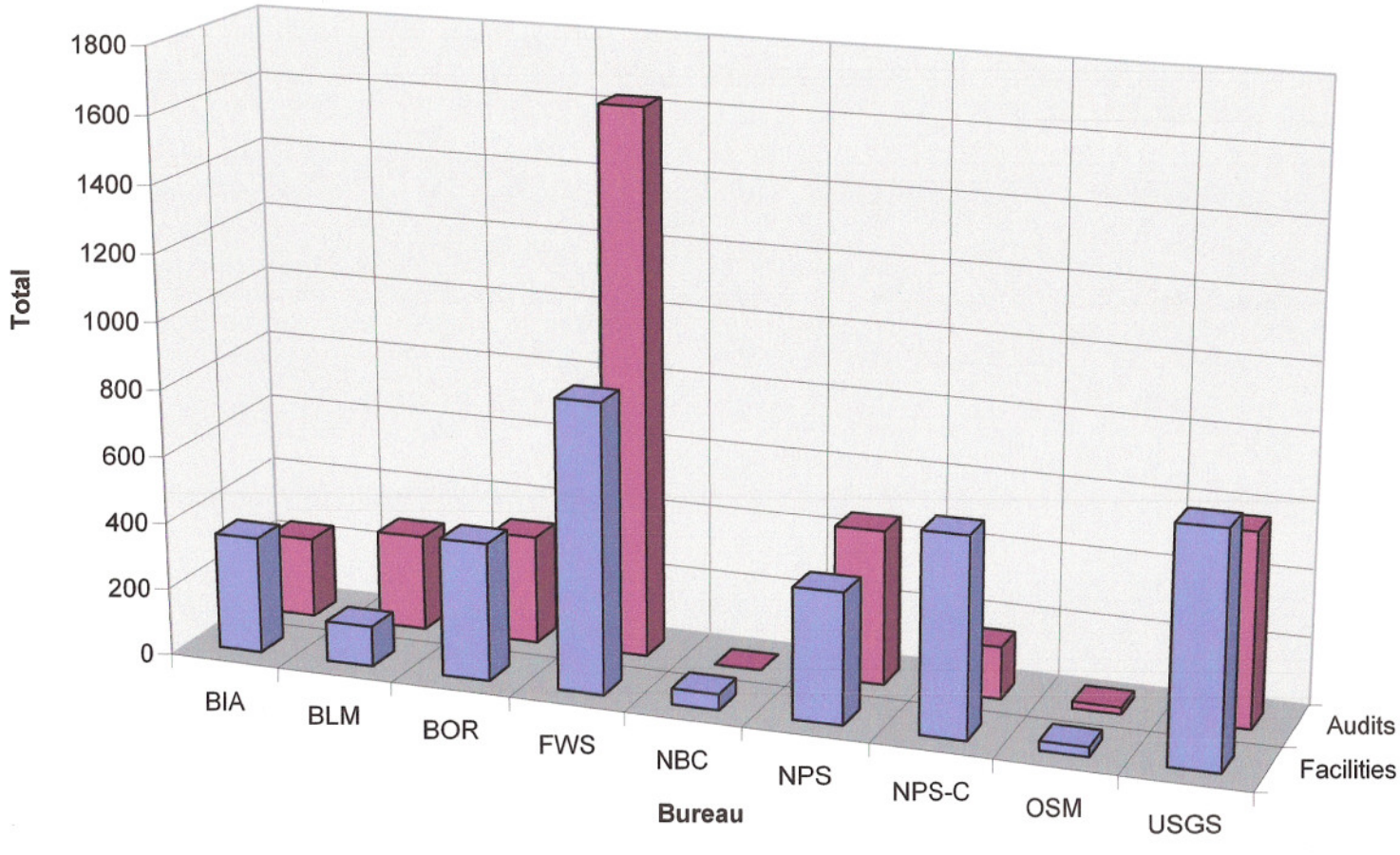
1. N/A = Data not available
2. * BLM uses the term "organizational units" and not facilities.
3. ** BLM: Corrected from 9/30/04 through 9/30/05. *** BLM: Corrected from 9/30/03 through 9/30/04.

Highest Risk Audit Issues Identified by Bureaus in Fiscal Year 2005

Bureau	Issues Identified by Bureau	Bureau Identified Root Cause
BIA	a. Storm water runoff contamination due to inadequate storage of equipment and waste. b. Improper handling, storage and disposal of solid waste.	a. Lack of management emphasis. b. Lack of management emphasis.
BLM	a. Inadequate operation and maintenance of drinking water systems. b. Improper storage and/or transportation of flammable liquids.	a. General lack of employee training on drinking water systems. b. Lack of guidance and the stocking of noncompliant storage containers.
BOR	a. Labeling containers. b. Spill Prevention Control and Countermeasures Plan (SPCC). c. Incompatible materials stored together. d. Flammable materials not stored properly. e. Hazardous waste determination.	a. General lack of employee training on proper labeling. b. General lack of employee understanding of SPCC requirements c. General lack of employee training on storage of flammable materials. d. General lack of employee training on storage of flammable materials e. General lack of employee training on hazardous waste disposal requirements.
FWS	a. Incompatible materials stored together. b. Open floor drains in vehicle maintenance areas.	a. Poor housekeeping and inadequate storage. b. General lack of employee

		training on open floor drains.
NPS **NPS Concessions**	a. Health and safety including hazard communication and hazardous materials management requirements. a. Fuel storage tanks. b. Incomplete or lack of planning to respond to hazardous substance releases.	a. Not available. a. Insufficient support to maintain the environmental program or to correct problems.
USGS	a. Lack of NPDES permit for discharge. b. Hazardous waste regulatory records are incomplete.	a. Lack of response by regulatory agency. b. Established regulatory environmental policies or procedures are not being followed.

Cumulative Bureau Environmental Audits and Facilities Reported (all-years)



	BIA	BLM	BOR	FWS	NBC	NPS	NPS-C	OSM	USGS
Facilities	348	120	410	860	47	388	590	28	688
Audits	239	286	323	1628	0	458	154	20	572