

**FEB 26 2001**

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

Dear Mr. Hooks:

This letter is in response to your November 3, 2000, request for a progress 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 DOI progress report by DOI bureaus and offices is for calendar year 2000.

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

Sincerely,

**/signed/**

Willie R. Taylor  
Director  
Office of Environmental Policy  
and Compliance

Enclosure

cc: Assistant Secretaries  
Heads of Bureaus and Offices

**Calendar Year 2000 Progress Report by the U. S. Department of the Interior  
on Implementation of Executive Order 13148  
“Greening the Government Through Leadership in Environmental Management”**

**PROGRESS OF DEPARTMENTAL OFFICES**

**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 Interior 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, Interior established policy calling for maximizing 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.

**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. These conferences took place in 1993, 1994, 1995, and most recently in 1999. It is the only Department-wide environmental conference available where representation of DOI leadership is visible. The OEPC sponsors such conferences with a bureau host.

The 2001 DOI Conference on the Environment will be held in Albuquerque, New Mexico on March 13-15, 2001 and will be hosted by the Bureau of Indian Affairs. The theme of this conference is “The Path Before Us: Environmental Stewardship for the 21<sup>st</sup> Century.” There will be a strong emphasis on environmental compliance through technical sessions and training provided to DOI personnel at this conference. Many of these technical sessions and training will be given by Environmental Protection Agency (EPA) headquarters and regional personnel.

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

The Office of Environmental Policy and Compliance (OEPC) prepared a draft policy guidance

statement on the Use of Environmental Management Systems (EMS) which is being reviewed by bureaus. The OEPC was also a part of EPA's "gap analysis" entitled, "Environmental Management System Review of the National Park Service: Based on the Code of Environmental Management Principles." In addition, OEPC currently serves on the interagency E.O. 13148 Workgroup and the EMS Sub-Workgroup. There will be strong EMS training component and technical sessions provided to our bureaus at the March 2001 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 compliance. In 1997, DOI issued its policy requiring environmental audits of all DOI facilities (Departmental Manual Chapter, 515 DM 2, "Environmental Auditing"). In addition, 518 DM 2, "Compliance with Waste Management Requirements" addresses the commitment of DOI to comply with applicable Federal, state, and local environmental requirements. Each bureau is responsible for developing and implementing its own environmental auditing program and bureaus are at different stages in developing and implementing their environmental auditing programs.

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." Based upon the Fiscal Years 1999 and 2000 report summaries, the bureaus are making progress in their environmental auditing programs.

The OEPC also provides the bureaus with the quarterly updated Federal TEAM Guide through Internet access.

#### Progress in Environmental Leadership and Agency Awards Programs:

The Department of the Interior Environmental Achievement Award. This annual award recognizes DOI bureaus, offices, employees, and contractors for their exceptional achievements or contributions that have benefitted the Department/Bureau/Office. The following illustrates some of the subject areas for award recognition: waste prevention and recycling, energy conservation, environmentally preferable purchasing and affirmative procurement, facility environmental excellence, environmental management systems, environmental stewardship, outreach, and toxics reduction. However, other environmental and conservation improvement initiatives will also be considered. 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-four recipients have 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 level 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 its accompanying FY00-01 Action Plan. The Partnership includes bureau designated representatives from environmental management, facilities management, property management and procurement.

Progress in Greening the Cafeteria, Composting, and Reducing Energy and Emissions:

For over a year, the DOI has been testing EarthShell Corporation's environmentally-preferable plates and bowls in Main Interior Building cafeteria. Originally, the pilot project, which began on Earth Day 1999, was to run for six months. Due to its success and overwhelming response from DOI employees, the project is continuing and more than 120,000 plates and bowls have been used. The bowls and plates are made from limestone and starch which allow them to biodegrade in marine or composting environments. Results from three different composting methods by the U.S. Department of Agriculture (USDA) have been very positive and the USDA is conducting plant growth tests with the compost mixture. Furthermore, the entire manufacturing process has less impact on the environment compared to traditional packaging. These products require less energy to manufacture than paper or polystyrene containers. The process also uses less fossil fuel, produces lower greenhouse gas emissions, and produces lower amounts of a wide variety of air and water emissions.

## **PROGRESS OF DEPARTMENTAL BUREAUS**

### **Bureau of Indian Affairs**

Section 305 - Progress to Update and/or Amend Agency Policy Documents and Strategies:

The Bureau of Indian Affairs (BIA) is currently developing a bureau-wide Environmental Management Audit Program (EMAP) that will improve environmental performance and compliance with environmental regulations at all BIA facilities and operations. An environmental auditing section to the Indian Affairs Manual (IAM) has been developed that describes the scope, requirements, guidance, and responsibilities for the implementation of the audit program. An EMAP Program guide that is an interpretative guide for the IAM section has been prepared. There is a strategy for developing additional policies and procedures to be implemented at bureau facilities (e.g. hazardous waste management, solid waste management, etc.).

Section 401 - Progress in Agency and Facility Level Environmental Management System Self-Assessments and Pilot Projects:

The Bureau has not conducted a self-assessment for the implementation of an environmental management system at a bureau-operated facility. However, the Environmental Management Audit Program will include environmental management system at the facility level. The Office of Facility Management and Construction is updating the Facility Management Information System (FMIS) that will accommodate the Bureau's environmental criteria into the system. As a pilot project, the BIA conducted audits as Compliance Assistance Review through a Memorandum of Understanding (MOU) with the EPA. At least five (5) audits have been conducted under the MOU.

The BIA has advertised to hire an additional compliance person to assist in meeting our Greening responsibilities.

#### Section 505 - Progress in Reducing Ozone Depleting Substances:

Although it is not known if bureau facilities have begun the progress of replacing ozone depleting substances, the EMAP will address Air Pollution Control under the audit.

#### Information Relating to Prior Reporting Requirements under E.O. 12856:

An Integrated Pesticide Management program at a BIA school is planned to promote the reduction of toxic pesticide use in school as part of a pilot project by the United States Environmental Protection Agency. Two (2) BIA schools have purchased Alternative Fuel Vehicles.

#### Any Other Information Highlighting Bureau/Office on Implementing E.O. 13148:

The BIA's audit program will address sustainable practices that will include green procurement, water conservation, energy conservation, and solid waste management through the audit process.

### **Bureau of Land Management**

#### Sections 202 and Section 402 - Progress in Environmental Compliance and Facility Compliance Audits:

The Bureau of Land Management (BLM) established its Compliance Assessment - Safety, Health and the Environment (CASHE) program in 1993 and recently completed baseline audits of all facilities. The baseline audits identified a number of systemic -- as opposed to isolated -- problems at BLM facilities.

#### Section 505 - Progress in Reducing Ozone Depleting Substances:

One widespread problem was the accumulation of old or excess solvents, paints, and other volatile organic compounds (VOCs). Following each baseline audit, BLM made a "clean sweep" of the facility. In many cases the facility became a Small Quantity Generator (SQG) for one month and incurred a one-time cost of \$4,000-8,000 to dispose of excess chemicals and other hazardous waste.

The baseline audits helped BLM turn the tide and make great strides in improving its business practices and the management of its facilities. One major effort has been the acquisition of environmentally preferable products and services, which include low VOC chemicals and water-based cleaners. Field office personnel receive training in chemical management procedures and waste minimization strategies (such as substituting less toxic products). They now incorporate simple and common sense measures into everyday work habits, such as purchasing only the amounts absolutely needed, and planning and sequencing work to prevent leftover materials.

When refrigerators and air conditioners are taken out of service, BLM has trained and certified technicians remove the coolants. This is not a frequent occurrence, however. Almost all BLM field offices are in commercial and/or industrial spaces leased by the General Services Administration.

Electrical and computer spaces no longer have halon fire suppression systems.

Section 305 - Progress to Update and/or Amend Agency Policy Documents and Strategies:

The BLM is developing a handbook for the “office of the future.” This guidance will go beyond typical “greening” initiatives. The handbook will address business practices such as how field office personnel do their jobs. Currently, BLM employees drive from home to the office before heading out to the field. If employees are allowed to take their government vehicles home at night and go directly to the field in the morning, there will be an overall reduction in fuel usage (employees’ private vehicles and government vehicles combined).

The Holister (California) Field Office will pilot the “office of the future” before the draft handbook is finalized.

Section 401 - Progress in Agency and Facility Level Environmental Management System Self-Assessments and Pilot Projects:

Environmental management system assessments will probably be a part of future CASHE follow-ups. However, BLM has not completed the protocol.

### **Bureau of Reclamation**

Sections 202 and 402 - Progress in Environmental Compliance and Facility Compliance Audits:

The Bureau of Reclamation (BOR) instituted an environmental auditing program to comply with DOI’s Departmental Manual (515 DM 2) and to implement BOR policy for the hazardous materials and hazardous waste auditing program at BOR owned facilities in the seventeen western states (BOR Manual/Directives & Standards ENV 02-08). ENV 02-08 requires each of the five BOR Regions to develop, implement, and document a comprehensive audit program to ensure compliance with applicable federal, state, and local environmental requirements that affect BOR lands, facilities, operations, and uses.

Any Other Information Highlighting Bureau/Office on Implementing E.O. 13148:

The BOR's Environmental Education Program offers environmental activities for teachers and students. For example, the Pollution Prevention Curb Stenciling activity is designed to teach grades 4-12 about the connection that storm drains have with water quality. BOR provides supplies to teachers and instructions for students to stencil storm drains in their neighborhoods and around their schools. The stencils used instruct students and the general public to "Dump No Waste - Feeds Fresh Water" or similar slogans. From this, both students and the general public learn that pouring materials, littering, or even wash-off from fertilizer can contaminate our waters.

### **Fish and Wildlife Service**

#### Section 505 - Progress in Reducing Ozone Depleting Substances:

EPA's Significant New Alternatives Policy (SNAP) Program is being used by Fish and Wildlife Service (FWS) facilities to maximize the use of safe alternatives to Ozone Depleting Substances (ODSs). The FWS's policies, as well as the environmental auditing program, stresses the phase-out of Class I ODSs such as Freon (R-12) and Carbon Tetrachloride. Currently, few FWS facilities use Class I ODSs. FWS facilities do not anticipate any disposal of ODSs.

#### Section 305 - Progress to Update and/or Amend Agency Policy Documents and Strategies:

The FWS manual chapter, Pollution Prevention (560 FW 2), has been updated to incorporate the goals of E.O. 13148 and is awaiting release. The Service is in the process of including other greening requirements into other existing policies. We will make the 12 month goal.

#### Section 401 - Progress in Agency and Facility Level Environmental Management System Self-Assessments and Pilot Projects:

The FWS is in the process of obtaining the services of a contractor to perform an EMR based on CEMP. Even though every effort will be made to complete the EMR by October 26, 2001, it is likely that the date of completion could be delayed by several weeks.

#### Sections 202 and Section 402 - Progress in Environmental Compliance and Facility Compliance Audits:

The FWS has had a very effective environmental auditing program in place since 1995 that emphasizes pollution prevention as a means to both achieve and maintain environmental compliance. A total of 227 facilities were audited in FY 2000, with a cumulative total of 761 facilities audited since 1994.

#### Section 403 - Progress in Environmental Leadership and Agency Awards Programs:

One of our employees, Lee Fulton, since retired, was nominated and won the DOI Environmental Achievement Award for all of DOI in the year 2000. Among other things, he was recognized for implementing environmentally-beneficial landscaping practices at the D'Arbonne National Wildlife Refuge in Monroe, Louisiana.

The Oregon State Office of the Service in Portland, Oregon, was also selected as a recipient of the DOI 2000 Environmental Achievement Award for an extensive office recycling program.

Also, the Service has drafted an awards program with assistance from the Regions at the Regional Coordinators' Workshop during the week of February 13-15, 2001.

Section 503 - Progress in Reduction Goals for Designated "Priority Chemicals":

The FWS has developed a list of priority chemicals at the Regional Environmental Coordinators' Workshop, conducted February 13-15, 2001: Formalin, 2,4-D, Weedon, Chlorine, Pentachlorophenol (PCP), Carbon Tetrachloride, Methyl Bromide, Toluene, Glyphosate, Methyl Ethyl Ketone (MEK), Picric Acid, Potassium Permanganate, Lead-based Paint, Acetone and Hydrochloric Acid.

Any Other Information Highlighting Bureau/Office on Implementing E.O. 13148:

The FWS recently published a booklet as a result of E.O. 13101 and 13148 entitled "Environmental Stewardship and Greening the Government" and sent it to all Regions.

The FWS has appointed Recycling and Pollution Prevention Coordinators in all Regional Offices and field stations.

The FWS has drafted a plan that sets forth its contribution to the goals established in the Executive Order by assigning personnel various tasks and associated deadlines as required.

### **Geological Survey**

Section 305 - Progress to Update and/or Amend Agency Policy Documents and Strategies:

Over the last two years, the U. S. Geological Survey's (USGS) environmental compliance focus has been primarily on hazardous waste management to encompassing all environmental media. Examples of this evolution are the development of 1) a USGS 44-1-H, Environmental Management and Compliance Program Requirements Handbook, to mirror Federal TEAM Guide requirements; 2) web-based auditing tools for Bureau wide implementation; and 3) expansion of the role of field Collateral Duty Hazardous Waste Coordinators to Environmental Coordinators.

Existing management plans will be reviewed, updated, and incorporated into an Environmental Management Plan. Additionally, information acquired from the Environmental Management System (EMS) assessments required by Section 401 will be incorporated into the overall plan.

Section 401 - Progress in Agency and Facility Level Environmental Management System Self-Assessments and Pilot Projects:

The USGS has informally implemented several elements of an Environmental Management System (EMS) and will be completing a formal plan for implementation in FY 2001. Efforts to pull different system components together into on Bureau wide management system will be a goal of our EMS assessment.

Assessment of the USGS environmental management program will be the foundation of the EMS. Based on the findings of this assessment, other EMS assessments will be completed appropriately and the results will be incorporated into a USGS- wide Environmental Management Plan. Beta-test run of the web-based auditing and information portal will begin within the 3<sup>rd</sup> quarter of this FY and full implementation at the beginning of FY 2002. Other pilot projects will be implemented at selected facilities as a result of the EMS assessment process.

#### Section 505 - Progress in Reducing Ozone Depleting Substances:

The National Center in Reston, Virginia removed 2 each 1500 ton chillers with an additional 2 chillers scheduled for removal this Fiscal Year. Each of these units contains 3, 250 pounds of R-11 refrigerant, and are being replaced with units that contain HFC-134. This replacement coincides with a chiller plant upgrade that will include a refrigerant monitoring system.

#### Any Other Information Highlighting Bureau/Office on Implementing E.O. 13148:

Management is committed to the environmental management and compliance program as evidenced by the approval, funding, hiring of the first full-time Environmental Protection Specialist to serve as the Environmental Program Manager. In addition, the USGS is planning to hire 1 full-time Environmental Protection Specialist in each of the 3 regions. This increased staff will provide management oversight and direction from the USGS-level down through the Region-level.

In an effort to standardize and simplify the auditing process at all organizational levels, the USGS has entered into a joint effort with the U.S. Army Corps of Engineer Construction Engineer Research Laboratory (CERL) to develop a web based tracking and auditing assistance program. 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 auditing requirements, inclusive of the following applications:

4. Environmental Auditing
5. Safety Auditing/Inspections,
6. Incorporation of USGS, EPA and OSHA regulations, guides, checklists
7. Portal to ensure data and information access rights at field levels
8. Hazard Abatement Tracking
9. Trend Analysis and Report Generation
10. Program Planning/Reporting externally
11. Information Dissemination, Newsletter distributions, notifications
9. Initial Teleconference/Web based orientation/training

Recycling is encouraged at every USGS location. For example the National Center in Reston

recycles glass, aluminum cans, paper, toner cartridges, styrofoam, cardboard, plastic, aluminum press plates, telephone books, fluorescent light tubes, and cafeteria grease. Revenues generated through these efforts are used to offset the cost of solid waste removal services.

### **National Park Service**

#### Section 305 - Progress to Update and/or Amend Agency Policy Documents and Strategies:

NPS Management Policies 2001 were recently updated to reflect current regulatory requirements. The NPS Director Order for Solid and Hazardous Waste Management is also in the process of being updated.

#### Section 401 - Progress in Agency and Facility Level Environmental Management System Self-Assessments and Pilot Projects:

The NPS was selected as the first bureau within DOI to participate in an analysis of its environmental management systems. The analysis was performed by comparing existing management systems within the NPS against the Code of Environmental Management Principles (CEMP) for federal agencies. The final report was issued August 2000 by EPA. In addition to this national study, the following region-specific projects are noteworthy of mention:

Since its initiation in 1995, the NPS/EPA Partnership Project has been instrumental in changing the environmental culture of the 81 national parks in the Intermountain Region. This Partnership has tapped into the technical expertise of the EPA to develop the tools, training and technical assistance needed by parks to understand and comply with environmental laws. The Partnership has successfully focused on pollution prevention techniques encouraging parks to go beyond compliance. The latest pilot project of this Partnership is the development of an Integrated Environmental Management System for the Intermountain Regional Office. Once finalized, this EMS will be expanded to NPS wide to assure that environmental risks are considered in all management decisions.

#### Any Other Information Highlighting Bureau/Office on Implementing E.O. 13148:

The NPS and EPA Partnership (Partnership) has been instrumental in changing the environmental culture of NPS. The work of the Partnership proved to be forward thinking. It has allowed parks to comply with EO 13148 through the development of park-based environmental audits and continuous improvements. The NPS believes that it can develop and implement an NPS-wide Environmental Management Program with effective participation by dependent parks.

