

## **FY04 Management System Assessment Planning and Integration Template**

**Management System:** Environmental Management System

### **Status/Maturity of the System:**

The Environmental Management System was evaluated for maturity in May 2001 (FY01). At that time, the System was determined to be well along in the maturation process. The evaluation identified several opportunities for improvement, all which have been acted upon. Since the maturity evaluation, annual assessments of the EMS have been conducted in support of the ISO 14001 registration and programmatic assessments have been conducted on key aspects of the system.

In late FY03, an independent third-party review of the BNL Management System Self Assessment Program was conducted. During this review, the Environmental Management System was described as 'fully deployed and quite mature' (see quote from Executive Summary, BNL Management System Self Assessment Program, K. Christopher to P. Chaudhari, October 2, 2003).

*The quality and detail of management system self-assessment programs vary leading to a lack of rigor and consistency in deployment of the management system self-assessment program. For example, the self-assessment program associated with the Environmental Management System is fully deployed, quite mature, and has benefited from senior management commitment to this management system, its external registration and the rigors that mechanism entails, and its early exposure to the Management System Maturity Evaluation process.*

### **General Work Scope:**

The scope of work for FY04 is consistent with the purpose of the EMS. The EMS develops and delivers high quality, expert environmental products and services for all Brookhaven National Laboratory BNL stakeholders. The EMS ensures that these products and services protect the environment, add value, and are timely, effective, and efficient. These services are designed to eliminate, reduce, or control environmental risks and impacts, ensure compliance, and achieve and demonstrate environmental excellence.

The scope of work planned for the FY04 year includes a continued focus on Compliance related assessments, improvement initiatives, and program maintenance. Compliance related assessments are discussed below. Improvement initiatives include streamlining the EMS, continued focus on integrating pollution prevention across the lab and continuing waste reduction efforts, improving stakeholder relationships, evaluating and improving customer service, and improving the efficiency of EMS operations. Program maintenance activities include maintaining the ISO 14001 registration, continued development of environmental professional staff, updating of subject areas for changes in external drivers, updating of process assessments to capture compliance and pollution prevention opportunities and continuing to improve and reassess the Site Environmental Report. Specific work scope for FY04 includes:

- Timely submittal of all regulatory reports;

- Continual improvement of the ISO 14001 EMS, with the goal of streamlining the EMS by moving organizational EMS's up to the directorate level, integrating EMS management review with the annual self evaluation, identifying opportunities to reduce the level of documentation, and cooperating on EMS assessments to lower the auditing burden;
- Continued from FY03, the focus on efficiency of waste management will be a priority for the new division. A strategic plan will be finalized and will include evaluation of several possible opportunities for cost improvement and benchmarking of other DOE and non-DOE waste management programs.
- Maintenance and improvement of environmental protection programs, including the programs to comply with RCRA, CAA, CWA, SDWA, EPCRA, TSCA, NEPA, NESHAP, Pollution Prevention Act, CERCLA, Chemical Bulk Storage, Article 12, Natural Resource Management, Cultural Resource Management, and DOE Orders (5400.1, 5400.5, 231.1, and 435.1);

### **Integrated Assessment Planning:**

FY'04 assessments include:

Assessment Activities by or on behalf of the MS Steward:

- ARARs (Applicable, Relevant, and Appropriate Requirements) assessment of the Environmental Restoration Project is scheduled for 1<sup>st</sup> quarter. This is an assessment that will mainly impact Environmental Restoration and environmental subject matter experts in EWMSD. This assessment is being conducted at the request of BAO, with BAO observation.
- Internal assessment of the EMS for ISO 14001 is scheduled for 2<sup>nd</sup> quarter (January 2004). This lab wide assessment will continue to attempt to integrate all the department level EMS assessments. A lab wide review will be done for selected elements of the ISO system. Although many departments are impacted, this should actually reduce assessment activity as many line organizations may rely upon this assessment to fulfill their EMS assessment requirements.
- The Liquid Effluents subject area and compliance with EPA/NYSDEC SPDES regulations is scheduled for 2<sup>nd</sup> quarter. This assessment is lab wide and may involve many departments, especially those that discharge process wastewaters to the sanitary or stormwater disposal systems. This assessment will include BAO observation.
- RCRA (Resource Conservation and Recovery Act) assessment will be conducted in the 4<sup>th</sup> quarter. This assessment will impact many line organizations, especially those that generate hazardous or mixed waste. This assessment will include BAO observation.
- Review and evaluation of SOPs and Subject Areas, as scheduled by EWMSD.

Required Line Assessments:

- Departments are required to conduct compliance and EMS assessments. Environmental assessments should be conducted annually; however, frequency may vary for specific operations, regulations, or ISO 14001 program elements due to the importance of the activity, regulatory requirements, or past performance.

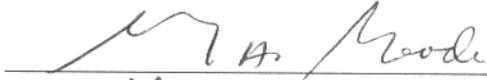
Independent Assessments:

- BAO will conduct a collaborative assessment with BNL of Facility Review Disposition Project transferred actions. This assessment will impact many lab organizations, as the FRDP was a labwide project. This assessment is scheduled for the 3<sup>rd</sup> quarter of FY04.

- EMS ISO 14001 Independent Assessment. This assessment will be a full re-registration audit by NSF to maintain the ISO 14001 registration, and as such will impact all organizations (as opposed to Surveillance Audits which are a sampling). This assessment is scheduled for the 4<sup>th</sup> quarter (June 2004).
- Various regulatory inspections where the schedule is unknown and unannounced. Examples include RCRA, Air (radioactive and nonradioactive), hazardous material bulk storage, SPDES, and DOE assessments.

Signatures:

MS Point of Contact:



Date: 10/6/03

MS Steward:



Date: 10/7/03