



MEETING MINUTES

**Implementation Team
NIH Environmental Management System (NEMS)
Tuesday, September 9, 2008
10:00 am – 11:30 am**

Meeting Objective(s):

- Determine Team and Program Status
- Review status of remaining implementation actions
- Review of Environmental Management Program (EMP) structure

Attendees:

Danita Broadnax (ORF)	Terry Leland (ORF)
Jim Carscadden (ORF)	Mark Miller (ORF)
Louise Davis (ORS)	Walt Mitton (NIDDK)
Ray Dillon (OD)	Kristen Peters (Booz Allen)
Robin Hirschhorn (Booz Allen)	Nicole Rohloff (NEI)
Brian Kim (ORF)	

Minutes:

NEMS Greening Update

Terry Leland updated the Implementation Team on the greening activities. Updates include:

- **Redesign of NEMS Website:** Ms. Leland informed the Implementation Team of the updates to the NEMS website (www.nems.nih.gov). The website was redesigned to enhance its navigability. Specifically, a navigation bar for the program areas was added and appears on the left side of the page. The teams page was reviewed, and Ms. Leland informed the Green Team leads that there is space for Green Team specific pages. If Green Teams are interested in posting content, please contact Kristen Peters (peters_kristen@bah.com).
- **NEMS Awareness Training:** The NEMS Awareness training is now available through the HHS Learning Portal. This training is mandatory for all employees and contractors. An email from Executive Officers will announce the training and require the training be completed by October 31. Since the NEMS training is the first mandatory training available to NIH through the HHS Learning Portal, NIH staff tested accessibility of the training and experienced problems in logging on to the HHS system. The problems with the HHS Learning Portal is of concern since this is the first broad exposure of the NEMS to the broader NIH community.

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- **NEMS Newsletter:** Ms. Leland informed the Implementation Team that a newsletter will be developed to highlight greening activities (see Attachment 1). Danita Broadnax is heading this effort. The newsletter will be distributed every other month to anyone who is involved in the NEMS.

Working Group Updates

Representatives of the functional working groups briefed the Implementation Team members on their activities.

- **Sustainable Lab Practices:** Don Wilson informed the Implementation Team that this working group is currently identifying target chemicals for priority reduction and investigating greener alternatives to these chemicals. The next step is to develop an outreach strategy to inform the NIH research community about the chemicals that are targeted for priority reduction. The next initiative will to reduce unused chemicals.
- **Sustainable Office Practices:** Ray Dillon informed the Implementation Team that this working group is focused on greening the purchases made by those with purchase card authority. The group continues to coordinate with Staples to provide a web-based, user-friendly green purchasing source. This source will function as a one-stop-shop for employees to buy green supplies, including office products and furniture. Mr. Dillon is working with the purchase card program to gain approval and buy-in of the program officers for the Staples catalog. The Staples green catalog will be ready in upcoming weeks. Robin Hirschhorn informed the Implementation Team that the working group has asked Lonnie Winley of the NIH Logistics Services Division to discuss the initiative to create a centralized purchase source via the GDC warehouse and self-service stores; this meeting will occur on September 10. Mr. Wilson added that the working group will be addressing the bio-based purchasing requirements; an USDA representative will present information during the October meeting. Mr. Wilson also stated that the working group is addressing the requirements of the Federal Electronics Challenge (FEC). NIH joined the FEC but has limited success in meeting its goals. A major obstacle is that computers and peripherals purchases are not being tracked. Mr. Wilson is trying to work with OLAO to address the tracking issue. The OD CIO has expressed interest and support for the FEC and is working with Mr. Wilson to green electronics by requiring computers and monitors purchased through ORS meet the EPEAT standards.

Green Teams Updates

Green Team leads updated the Implementation Team on their activities:

- **NEI:** Nicole Rohloff provided an overview of the NEI Green Team activities. The team conducted a recycling survey to gauge staff opinions and identify opportunities for improvements. NEI is working with Mark Marshall, NIH's recycling coordinator, to address issues identified through the recycling survey. Additionally, the team is attempting to increase participation from lab staff.

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- **NIDDK:** Walt Mitton briefed the Implementation Team on the NIDDK Green Team activities. The team is continuing its brownbag series and will host Tom Hayden of Division of Transportation and Travel Services to discuss green transportation options. The team is also planning for an awards picnic that is intended to be a green, zero waste event. Similarly to NEI, the NIDDK Green Team is working to increase the participation of intramural staff.
 - **NIDCD:** Since Catherine Langston could not attend the meeting, Ms. Hirschhorn provided an update on NIDCD Green Team activities. This team has established objectives and conducted a baseline of its activities and office spaces. The NIDCD Green Team was trained to conduct the pilot version of the Go Greener Office Challenge and conducted the surveys of all NIDCD sites in late August. As a result of the survey, the NIDCD Green Team is developing a greening policy that will be reviewed and approved by NIDCD leadership. The team will re-survey again in six months to determine if greening activities are making a difference.

Additional Updates

Additional updates discussed include:

- **Construction Debris Recycling Program:** Mr. Wilson informed the Implementation Team of the successes of the construction debris recycling program. DEP is providing dumpsters and paying the hauling fees for construction debris. This is at no cost to the project.
- **Energy Stewardship Group:** Ms. Leland stated that the Energy Stewardship Group has been meeting to address energy issues at every level – from facility improvements to end user behavior. This group is collecting energy usage data by building. Data from all buildings will be collected by December. Once all the data is available, outreach on a building-by-building basis will occur; one option is to develop posters similar to the NEMS PEPCO poster to raise awareness of energy usage and to promote conservation in a building.
- **Children's Inn Upgrades:** Ms. Leland informed the team that building upgrades will occur at the Children's Inn to make it greener and healthier. Solar panels are being considered. If solar panels are added, educational outreach will be developed and posted in the Children's Inn to inform occupants about solar energy and its benefits.

Remaining Implementation Actions

A number of implementation actions must be completed before the end of the calendar year. The Implementation Team reviewed the NEMS implementation schedule (Attachment 2). The internal auditor training will occur in early November to create a pool of qualified auditors that can conduct internal NEMS audits. Ms Leland encouraged representatives from Institutes and Green Teams to participate in the auditor training. The self-declaration audit, which will be conducted by external parties, is scheduled for late December.

Executive Order 13423 Review

Ms. Hirschhorn presented information on the requirements of Executive Order 13423 (see Attachment 3). The Implementation Team needs to consider the goals of EO 13423 when setting priorities and program objectives.

Discussion of EMP Structure

In preparation of the NEMS audits, EMPs should be reviewed and updated. The EMP intends to record what NIH is working on and make management of the activities easier. However, if the EMPs are not used to manage and record activities, NIH could fail the audit and program management will not be improved. Ms. Hirschhorn guided the Implementation Team through the components of an EMP (see example in Attachment 4). To make the EMPs more user-friendly and useful, Ms. Hirschhorn present a revised version of the RML EMP format (see Attachment 5) to the Implementation Team for consideration. The Implementation Team was asked to review the current NEMS EMP format and the RML EMP format and provide comments on usefulness to Kristen Peters.

Action Items:

Action Item	Responsible Person(s)	Due Date
1. Provide content for Green Team pages if necessary	Green Team Leads	September 23
2. Review NIDCD greening policy to identify procedures (operational controls) to be included; provide comments to Maura Barr (barr_maura@bah.com)	All	September 26
3. Review RML EMP format and current NEMS EMP format and provide comments and suggestions to Kristen Peters (peters_kristen@bah.com)	EMP Leads	September 26

Next Meeting:

The next NEMS Implementation Team will occur in mid-October. A detailed meeting request is forthcoming.



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ATTACHMENT 1

EMS news

Green Tips

- Don't forget that you must recycle, recycle, recycle
- Don't forget to recycle, recycle, recycle.
- Print double sided copies.
- Don't print that email or document unless it's necessary
-

NEMS TEAMS AND GROUPS

NEMS Communications Advisory Group

Sustainable Facilities Working Group

Sustainable Lab Practices Group

Sustainable Office Practices Working Group

NEI

CIT

NIDCD

The Children's Inn

The NIH Environment in the News

This is the story of the NIH Environmental Management System (NEMS).

Once upon a time there was an NIH that was not very sustainable. Which is very bad way to be. We used throw paper in the trash along with our cans and other items that could be recycled. We left the lights on (to the tune of a gazillion dollar a year power bill).

And boy oh boy did we ever waste paper.



Caption describing picture or graphic.

Green Team Stories

This story can fit 75-125 words.

Your headline is an important part of the newsletter and should be considered carefully.

In a few words, it should accurately represent the contents of the story and draw readers

into the story. Develop the headline before you write the story. This way, the headline will help you keep the story focused.

Examples of possible headlines include Product Wins Industry Award, New Product Can Save You Time!, Mem-

bership Drive Exceeds Goals, and New Office Opens Near You.

Inside Story Headline

This story can fit 150-200 words.

One benefit of using your newsletter as a promotional tool is that you can reuse content from other marketing materials, such as press releases, market studies, and reports.

While your main goal of distributing a newsletter might be to sell your product or service, the key to a successful newsletter is making it useful to your readers.

A great way to add useful content to your newsletter is to develop and write your own articles, or include a calendar of upcoming events or a special offer that promotes a new product.

You can also research articles or find "filler" articles by accessing the World Wide Web. You can write about a variety of topics but try to keep your articles short.

Much of the content you put in your newsletter can also

be used for your Web site.

Microsoft Publisher offers a simple way to convert your newsletter to a Web publication. So, when you're finished writing your newsletter, convert it to a Web site and post it.



Caption describing picture or graphic.

"To catch the reader's attention, place an interesting sentence or quote from the story here."

Inside Story Headline

This story can fit 100-150 words.

The subject matter that appears in newsletters is virtually endless. You can include stories that focus on current technologies or innovations in your field.

You may also want to note business or economic trends, or make predictions for your customers or clients.

If the newsletter is distributed internally, you might comment upon new procedures or improvements to the business. Sales figures or earnings will show how your business is growing.

Some newsletters include a column that is updated every issue, for instance, an advice column, a book review, a letter from the president, or an editorial. You can also

profile new employees or top customers or vendors.

Inside Story Headline

This story can fit 75-125 words.

Selecting pictures or graphics is an important part of adding content to your newsletter.

Think about your article and ask yourself if the picture supports or enhances the message you're trying to

convey. Avoid selecting images that appear to be out of context.

Microsoft Publisher includes thousands of clip art images from which you can choose and import into your newsletter. There are also several tools you can use to draw shapes and symbols.

Once you have chosen an image, place it close to the article. Be sure to place the caption of the image near the image.



Caption describing picture or graphic.

Inside Story Headline



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Caption describing picture or graphic.

WE'RE ON THE WEB!

EXAMPLE.MICROSOFT.COM



Organization

Primary Business Address
National Institutes of Health
Division of Environmental Protection
Building 13/Suite 2S11

Phone: 301-496-77775
Fax: 301-
E-mail: broadnaxd@mail.nih.gov

Your business tag line here.

This would be a good place to insert a short paragraph about your organization. It might include the purpose of the organization, its mission, founding date, and a brief history. You could also include a brief list of the types of products, services, or programs your organization offers, the geographic area covered (for example, western U.S. or European markets), and a profile of the types of customers or members served.

It would also be useful to include a contact name for readers who want more information about the organization.

Back Page Story Headline

This story can fit 175-225 words.

If your newsletter is folded and mailed, this story will appear on the back. So, it's a good idea to make it easy to read at a glance.

A question and answer session is a good way to quickly capture the attention of readers. You can either compile questions that you've received since the last edition or you can summarize some generic questions that are frequently asked about your organization.

A listing of names and titles of managers in your organization is a good way to give your newsletter a personal touch. If your organization is small, you may want to list the names of all employees.

If you have any prices of standard products or services, you can include a listing of those here. You may want to refer your readers to any other forms of communication that you've created for your organization.

You can also use this space to remind readers to mark their calendars for a regular event, such as a breakfast meeting for vendors every third Tuesday of the month, or a biannual charity auction.

If space is available, this is a good place to insert a clip art image or some other graphic.



Caption describing picture or graphic.



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ATTACHMENT 2

**National Institutes of Health
Environmental Management System (NEMS)
Implementation Tracking Checklist**

Status of NEMS Implementation at Bethesda (including Poolesville)			
Step	Activity	Milestone Date	Status
1.	Implementation Training/Kick-Off (if needed)	2/29/08	Complete
2.	Review Environmental Policy and Self-declaration Protocol	2/29/08	Complete
3.	Review NEMS Implementation Team Membership	2/29/08	Complete
4.	Update Activities, Products and Services	2/29/08	Complete
5.	Update Legal and Other Requirements	2/29/08	Complete
6.	Update Significant Environmental Aspects and Impacts	2/29/08	In progress
7.	Review and Update Objectives and Targets	2/29/08	Finalizing
8.	Update Environmental Management Programs	2/29/08	In progress
9.	Develop Operational Controls	7/31/08	In progress
10.	Revise NEMS Procedures	7/31/08	In progress
11.	Conduct Awareness Training	10/31/08	Email to go out 1 st half sept.
12.	Conduct Competence Training	10/1/08	In progress
13.	Conduct Internal EMS Audit	11/3/08	--
14.	Prepare Audit Report and Corrective Action Requests	11/24/08	--
15.	Conduct Management Review	12/15/08	--
16.	Receive Self-Declaration Audit	1/1/08	--
17.	Self-Declare Conformance to E.O. 13423	1/15/08	--



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ATTACHMENT 3



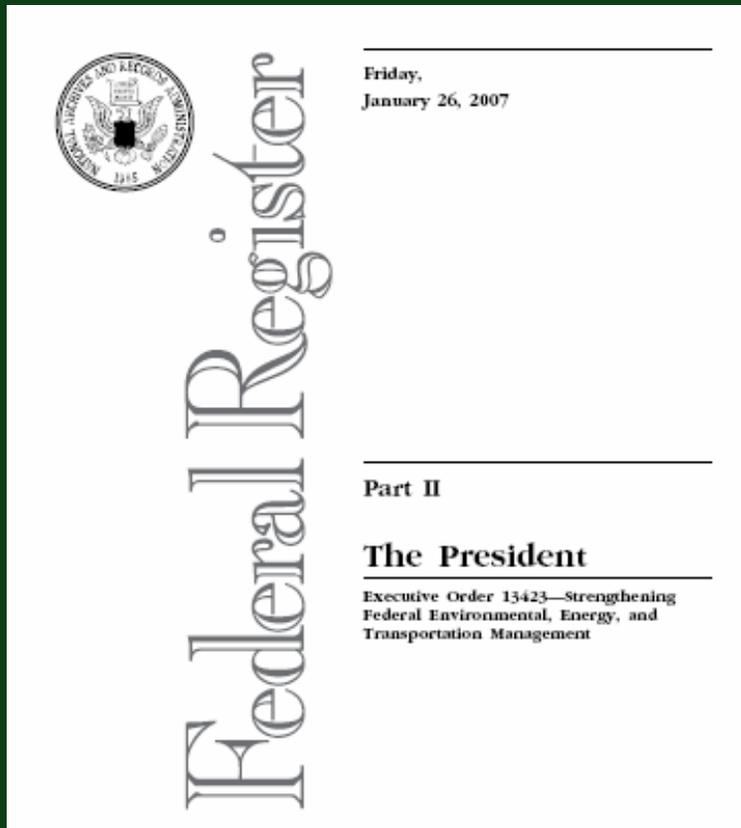
The “Sustainable Practices EO” – *EO 13423, Strengthening Federal Environmental, Energy, and Transportation Management*



Take Action to Protect the Future



Intent of the New “Sustainable Practices” Executive Order 13423



- ▶ Promote Federal Agency leadership in advancing the nation’s energy security and environmental performance
- ▶ Improve Federal Government performance in environmental, energy, and transportation management
- ▶ Consolidate and strengthen numerous, disparate Executive Orders into a cohesive set of goals to promote sustainable practices across the public sector

The new EO embeds sustainability goals into the US Government's planning

- ▶ **EO 13423 integrates the provisions of five previous “greening of government” EOs, including 13101, 13123, 13134, 13148, and 13149**
- ▶ **The order focuses on several Federal agency “sustainable practices” areas**
 - Energy efficiency
 - Renewable energy
 - Water conservation
 - Sustainable acquisition
 - P2 and recycling (with emphasis on toxic/hazardous material management)
 - Sustainable design/high performance building construction, leasing, maintenance
 - Efficient and alternative fleet management
 - Electronics stewardship
- ▶ **Environmental Management Systems are identified by the EO as the primary management approach for addressing the environmental aspects of internal agency operations**

A closer look at some aggressive goals...

▶ **Energy Efficiency and Greenhouse Gas Emissions**

“...improve energy efficiency and reduce greenhouse gas emissions through reduction of energy intensity by 3 percent annually, or 30 percent by 2015, compared with a 2003 baseline.”

▶ **Renewable Energy** “...at least 50 percent of the statutorily required renewable energy must come from “new” renewable sources and to the extent feasible, the agency implements renewable energy generation projects on agency property for agency use.”

▶ **Water Conservation** “through life-cycle cost effective measures...reduce water consumption by 2 percent annually through 2015 or 16 percent total by 2015, relative to FY 2007 levels.”

A closer look at some aggressive goals...

- ▶ **Sustainable Acquisition** Agency acquisitions of goods and services shall use sustainable environmental practices, including acquisitions of biobased, environmentally preferable, energy-efficient, water efficient, and recycled-content products, and use paper with minimum 30% recycled material content.
- ▶ **P2 and Management of Toxic and Hazardous Materials**
“...conduct its activities, including acquisitions, to reduce the quantity of toxic and hazardous chemicals purchased, used, and/or disposed of and increases diversion of solid waste as appropriate, and maintain cost-effective waste prevention and recycling programs...”

A closer look at some aggressive goals... (cont.)

- ▶ **Fleet Management** “Reduce fleet total consumption of petroleum products by 2 percent annually through 2015, increase consumption of fuels that are non-petroleum-based by at least 10 percent annually relative to FY 2005 baseline consumption levels, and use plug in hybrid (PIH) vehicles when commercially available at a cost reasonably comparable to non-PIH vehicles.
- ▶ **Electronics Stewardship** “...ensure that 95 percent of computer products acquired meet Electronic Product Environmental Assessment Tool (EPEAT) standards; ensure that Energy Star® features are enabled on 100 percent of computer monitors; have policies and programs to extend the lifetime of electronic equipment; and ensure that non-usable computers are recycled using environmentally sound management practices.”

A closer look at some aggressive goals... (cont.)

- ▶ **Sustainable Buildings** “Ensure new construction and major renovation of agency buildings comply with the *Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings* set forth in the *Federal Leadership in High Performance and Sustainable Buildings MOU*, and ensure that, by 2015, at least **15 percent** of its existing building inventory incorporates the sustainable design practices found in the *Guiding Principles*.”



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ATTACHMENT 4



NEMS ENVIRONMENTAL MANAGEMENT PROGRAM

PROGRAM NAME:	Green Purchasing		
SIGNIFICANT ENVIRONMENTAL ASPECT(S): Natural resource and raw material consumption–Paper Natural resource and raw material consumption-Fossil Fuels Natural resource and raw material consumption–Water Energy consumption (electricity) General Waste	DOCUMENT NUMBER:	TBD	
	DATE REVISED:	03/01/08	
	REVISION NUMBER:	1	
	SUNSET DATE:	03/01/09	
	PROGRAM LEAD:	Ray Dillon, OD	

SECTION 1 – PROGRAM DESCRIPTION

The NIH Green Purchasing Program involves the selection and acquisition of products and services that most effectively minimize negative environmental impacts over their life cycle of manufacturing, transportation, use and recycling or disposal. Green purchasing involves procuring the following: Recycled content products; ENERGY STAR and energy-efficient products; Standby power devices; Alternative fuel vehicles/alternative fuels; Biobased products; and Non-ozone depleting substances. Green purchasing requirements apply to all Federal agencies and their contractors. The requirements pertain to simplified acquisitions and large purchases, as well as to both direct purchases of products and to support services contracts. These requirements also apply to Federal purchase cardholders and to micro-purchases.

The Green Purchasing Program helps NIH to: (1) Improve safety and health of our patients, workers and the public; (2) Reduce pollution and conserve natural resources and energy; (3) Develop new, more environmentally friendly products; (4) Stimulate new markets for recycled materials and create jobs and improve awareness of environmental stewardship; (5) Protect the research mission; (6) Provide potential cost savings; (7) Reduce liabilities; and (8) Comply with environmental laws and regulations.

SECTION 2 – GOALS AND OBJECTIVES

FIVE-YEAR GOAL: Implement NIH Green Procurement Program <i>Justification:</i>	Performance Indicator(s): Program implemented		Resource requirements: No additional resources required
A. Objective: Identify a green purchasing source that could be promoted for use at NIH.	Performance Indicator(s): Green purchasing source identified	Responsibility: Ray Dillon, Carl Henn	Timeframe: December 2008
B. Objective: Produce a Best Practices listing providing proven green products being used at NIH.	Performance Indicator(s): Best practices listing produced	Responsibility: Ray Dillon, Carl Henn	Timeframe: December 2008
C. Objective: Develop an outreach program to deploy the Green Purchasing Program throughout NIH.	Performance Indicator(s): Outreach program developed	Responsibility: Ray Dillon, Carl Henn	Timeframe: December 2008

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D. Objective: Explore the appropriate means for tracking green purchasing and the resulting benefits through development of a database program or modifying current systems.	Performance Indicator(s): Tracking system identified	Responsibility: Ray Dillon, Carl Henn	Timeframe: December 2008
E. Objective: Increase sale of 13423 compliant products in NIH self-service stores and through NIH Stock Catalog	Performance Indicator(s): Percent increase in green products	Responsibility: Lonnie Winley, Aleta Allmond	Timeframe: December 2008
F. Objective: Green NIH Commercial leases to require full recycling services and to be 13423 compliant	Performance Indicator(s): Number of leases that are greened	Responsibility: Melissa Richardson, Pat Rice	Timeframe: December 2008
G. Objective: Green NIH construction contracts and achieve maximum construction debris recycling	Performance Indicator(s): Number of construction contracts that are greened and tons of recycled debris	Responsibility: Melissa Richardson	Timeframe: December 2008
H. Objective: Green NIH cafeteria contracts to include maximum recycling, composting, 13423 compliance and biobased products use	Performance Indicator(s): Draft SOW criteria for greening future contract, support pilot composting program	Responsibility: John Crawford	Timeframe: December 2008
I. Objective: Green NIH custodial contracts to support maximum NIH recycling and use of environmentally preferable products	Performance Indicator(s): Draft SOW criteria for greening future contracts	Responsibility: Ed Bain, Henry Primas	Timeframe: December 2008
J. Objective: Create and Launch NIH Green Purchasing Portal	Performance Indicator(s): Implement Green Purchasing Portal	Responsibility: Don Wilson	Timeframe: December 2008

Section 3 – SIGNIFICANCE, IMPACTS AND REQUIREMENTS

REASON(S) FOR SIGNIFICANCE:	<ul style="list-style-type: none"> a. These aspects are governed by legal and other requirements. b. Potential impact to environment and public health – These aspects have the potential to significantly impact the environment through using and/or deplete natural resources (including forest/paper, water, and fossil fuels) in their production and consuming of electricity in their use at NIH. c. Potential impact to NIH mission – Represents a significant cost to NIH
POTENTIAL ENVIRONMENTAL/ ORGANIZATIONAL IMPACTS:	<ul style="list-style-type: none"> a. Loss of landfill space b. Resource depletion
LEGAL AND OTHER	<ul style="list-style-type: none"> a. Executive Order (EO) 13423, Strengthening Federal Environmental, Energy, and Transportation Management

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REQUIREMENTS:	b. EO 13221, Energy Efficient Standby Power Devices
	c. Federal Acquisition Regulations (FAR), Parts 7, 11, 23
	d. Resource Conservation and Recovery Act (RCRA) (Section 6002)
	e. 2002 Farm Security and Rural Investment Act (Section 9002)
	f. Energy Policy Act of 1992, Section 303 (EPAct)
	g. National Energy Conservation Policy Act (42 U.S.C. 8262g)
	h. NIH Manual Issuance 3032, Waste Management.
	i. NIH Pollution Prevention Plan (P2 Plan)

SECTION 4 – OPERATIONAL CONTROLS

ACTIVITY(IES) THAT GIVES RISE TO ASPECT	CONTROL(S)	RESPONSIBLE PERSON	MONITORING	RECORDS	ACTION TAKEN IF CONTROL FAILS
Use of office equipment	▪	▪	▪	▪	▪
Procurement of office supplies	▪	▪	▪	▪	▪

SECTION 5 – RELEVANT DOCUMENT(S)

DOCUMENT NAME	LOCATION	RESPONSIBLE PERSON
HHS Affirmative Procurement Plan		

SECTION 6 – COMPETENCY OF RESPONSIBLE PERSONS

NAME/TITLE	BASIS FOR COMPETENCE

SECTION 7 – AUTHORIZATION

NAME:	
SIGNATURE:	
DATE:	

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ATTACHMENT 5



REMS ENVIRONMENTAL MANAGEMENT PROGRAM

PROGRAM NAME:

Accidental Releases and Spills

Program Lead:

Barri Twardoski

Significant Environmental Aspect(s):

Releases and Spills (other than fuel, which is covered in Tank Management EMP)

Section 1 – Program Description

This program covers the requirements for responding when there is an unexpected release of a hazardous substance.

Section 2 – Goals & Objectives

Goals & Objectives		Resource Requirements	Person Responsible	Objective Deadline
GOAL 1 – Minimize contamination in the event of a release				
Objectives:	A – Follow Emergency Plan requirements	Existing	Paul Carlson	Immediately following a release
	B – Maintain a trained HazMat Team for responding to release/spills.	Funding, Management approval	Mike Parnell	40 hrs/year
	C – Maintain inventory spill containment equipment available in designated storage areas.	Existing	Rod Parker	quarterly
	D – Prepare annual chemical inventory	Existing	Charmell Owens	March 2009

Section 3 – Operational Controls

Activity to be controlled	Control	Person Responsible for Control	Monitoring of Control	Records of Monitoring	Action taken if control fails
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Rocky Mountain Laboratories Environmental Management System (REMS)

Document Number: ReleasesandSpills-08.v1

Date Revised: 7/1/08

Revision Number: 1

Sunset Date: 9/30/08

Chemical Use, Storage, Transportation	RML Chemical Hygiene Plan Lab SOPs	Paul Carlson, ORS DOHS	Annual laboratory surveys by DOHS	Lab safety inspection records	Training to staff by DOHS; correction of practices and conditions
Management of hazardous waste	RML Waste Management Plan; Employee training; NIH Waste Disposal Guide, RML HazWaste Tag system	Rod Parker	Internal - Upon waste collection, review of container and HazWaste Tag is conducted. External - Biannual Hazardous Waste Report Reviewed by MT Department of Environmental Quality.	Internal - HazWaste Tags, Record of WMP updates. External - Biannual Hazardous Waste Report Approved by MT Department of Environmental Quality.	Document revision and distribution / additional training
Laboratory Waste Collection	RML Waste Management Plan; Employee training; NIH Waste Disposal Guide	Rod Parker	Periodic review of the guide	Record of WMP changes	Document revision and distribution / additional training
Hazmat response and cleanup	Mitigate release	Barri Twardoski	Cleanup oversight	Spill report	Retrain
	Hazmat SOP	Mike Parnell	Training	Training records	Retrain/Revise SOP

Section 4 – Relevant Documents

Document Name	Location	Responsible Person
RML Waste Management Plan	Bldg A, Room 310	Barri Twardoski
Laboratory Safety Inspection Reports	Bldg 5, Room 204	Paul Carlson
RML Spill Prevention, Control and Countermeasure Plan	Bldg A Room 310	Barri Twardoski
Refueling Procedures	Bldg A Room 310	Barri Twardoski
RML Emergency Response Manual	RML Intranet and Internet sites	Paul Carlson
IRF Emergency Response Plan	RML Intranet and Internet sites	Paul Carlson/ Nancy Hoe
HazMat Team Training Certifications	Building 13	Mike Parnell

Section 5 – Legal & Other Requirements

- a. Resource Conservation and Recovery Act (RCRA); 42 USC, s/s 321 et. Seq. (1976).
- b. State of Montana Solid Waste Management Act & Hazardous Waste Act; ARM 17.5.505, 508, 509, 511.

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Rocky Mountain Laboratories Environmental Management System (REMS)

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- c. TSCA 40 CFR Parts 260-299
- d. FIFRA – EPA List of Registered Pesticides
- e. Oil Pollution Act (40 CFR Parts 355, 370, 372).
- f. Montana Comprehensive Environmental Cleanup and Responsibility Act (CECRA)
- f. U.S. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
- g. Oil Pollution Act (40 CFR Parts 355,370,372)

Section 6 – Competency of Responsible Person

Name/Title	Basis for Competence
Barri Twardoski / RML RSO & Environmental Compliance Officer	Environmental Engineer, on the job experience and knowledge of SPCC requirements
Kelly Hudson / NIH/ORF Chief Engineer	Chief Engineer, knowledge of design and construction standards
Clyde Trueax NIH/ORF Campus Maintenance Supervisor	On the job experience and knowledge of RML's maintenance activities
Mike Parnell Hazmat team leader	Chief Veterinarian, Toxicology background, 40 Hour training per year, hazmat certified, experience and knowledge of RML's activities and Emergency Response procedures

Section 7 – Authorization by REMS EMR/Coordinator

Name:	
Signature:	
Date:	

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