

Integrating an Environmental Management System with an Integrated Safety Management System

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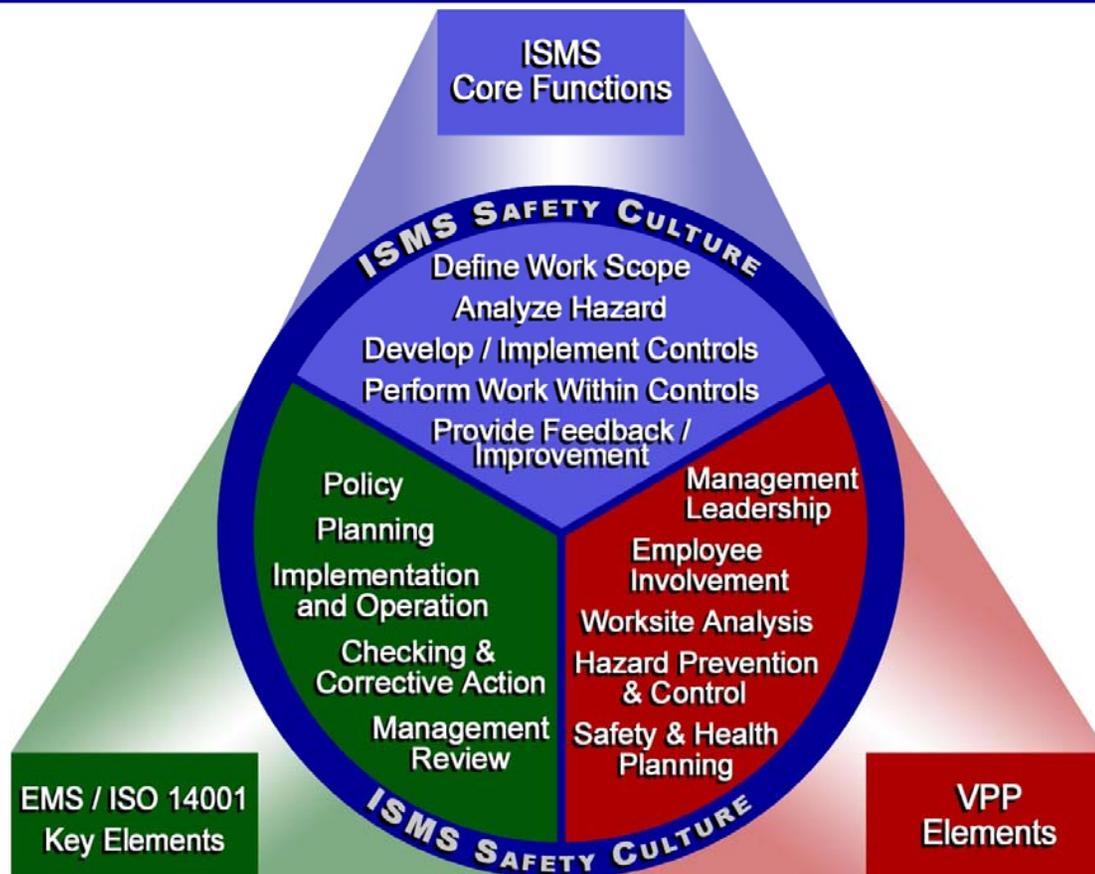


CWI Environmental Management System

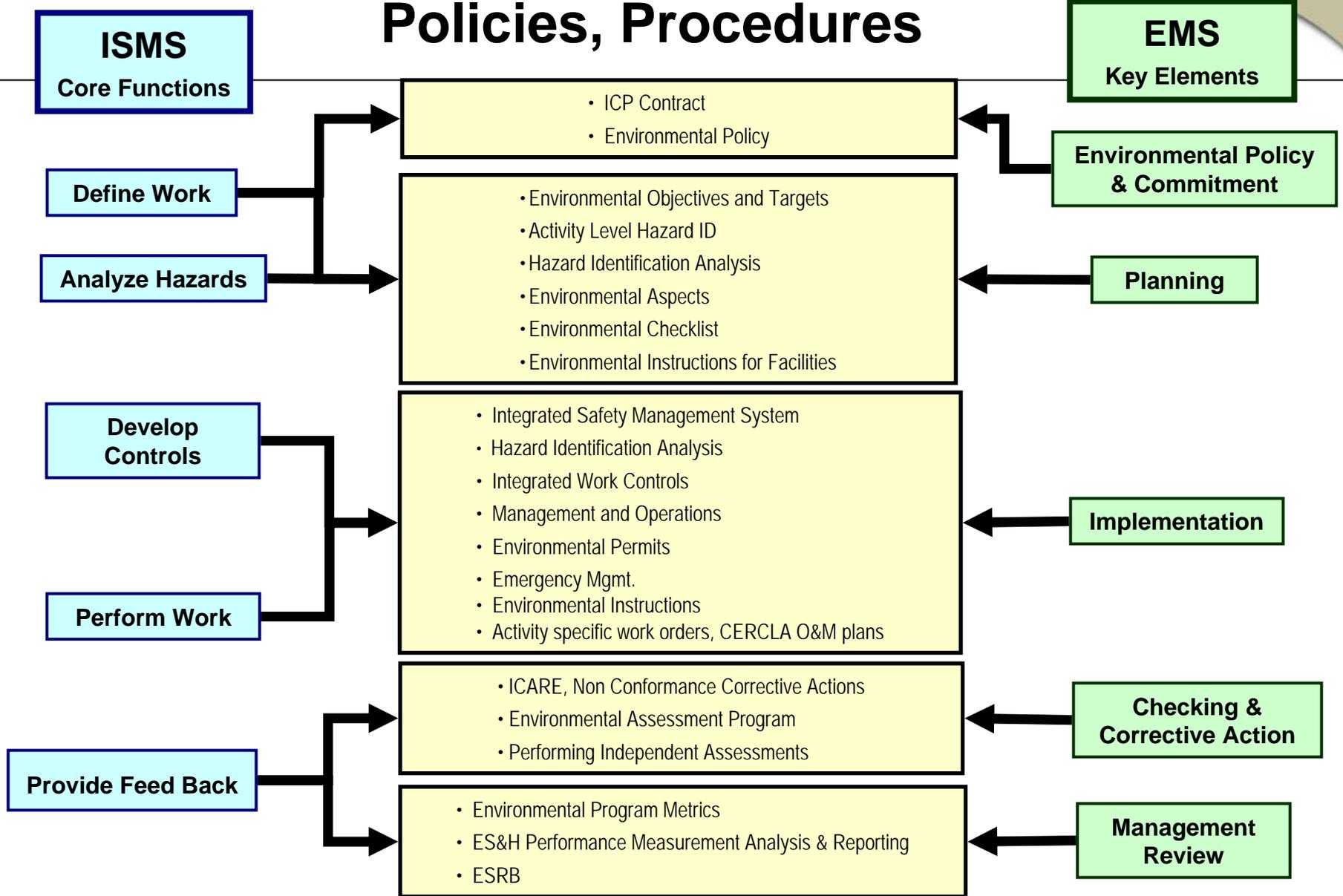
- ◆ CWI Environmental Management System (EMS) is ISO-14001 Registered via an Independent Registrar
- ◆ EMS integrates environmental principles into company work planning and execution as a part of the Integrated Safety Management System (ISMS)
 - The CWI EMS is based on the five key elements of ISO 14001 integrated into the five core functions of ISMS.

ISMS/EMS Integration

ICP Integrated Safety Management System



ISMS / EMS Integration of Policies, Procedures



Environmental Requirements (Define the Work)

- ◆ **Company EMS Objectives & Targets are derived from the CWI Contract with DOE**
- ◆ **Environmental Requirements for the CWI Objectives & Targets are derived from**
 - Federal, state, and local regulations
 - DOE Orders
 - Federal Facility Agreement and Consent Order (FFA/CO) (DOE-ID 1991)
 - Notice of Non-Compliance Consent Order (and subsequent revisions) (IDHW 1992)
 - *Idaho Settlement Agreement* (1995)
 - INEL Site Treatment Plan (DOE-ID 1995)
 - Voluntary Consent Order (DEQ 2000)
- ◆ **ISMS/ EMS Integration**
 - Environmental and Regulatory Services (E&RS) completed a vertical and horizontal roll down of 182 environmental requirements to the operating level and across the CWI Functional Support Areas and Projects

Environmental Aspects Review

(Analyze Hazards)

- ◆ CWI Projects and E&RS review work activity planned in upcoming quarter for environmental aspects
- ◆ Work scope reviewed is documented in a NEPA Environmental Checklist :
 - Environmental aspects are identified for all work
 - Environmental features for each of the aspects (hazardous materials, emissions, asbestos, chemicals, radioactivity etc.) are identified.
 - Aspects are then evaluated to determine if they could be classed as a “significant impact” if the features or barriers failed, these are then identified as ICP “Significant Environmental Aspects”.
 - These Environmental Aspects are tracked by the EMS
- ◆ The aspects are reviewed by CWI Project Management for concurrence.

Requirements to Procedures (Develop Controls)

- ◆ **Identified Requirements are Rolled Down to the Shop Floor**
 - Work scope identified in the EC process will have engineered features, training, procedures monitoring or sampling implemented to mitigate each environmental aspect that could have negative environmental consequences.
 - Requirements for mitigation are identified and placed in company directives and procedures
 - Requirements then flow from company level directives and procedures to localized work instruction and shift orders
 - Environmental requirements and associated controls identified may also be implemented in work packages that are not covered by procedure.

Process Requirements and Implementation

(Perform the Work)

- ◆ Environmental field personnel support line organization Project Execution Plans: Provide key day-to-day environmental interface with project management for scope/budget, resource support, oversight of ongoing work
 - Personnel selection process maintains and enhances resource proficiency.
 - Resources selection based on meeting job criteria in employee Position Description (PD).
 - Perspective candidates' minimum qualifications are verified against PD.
- ◆ CWI resources are qualified to perform tasks and duties based upon Competence Commensurate with Responsibilities (CCR): education/experience and completion of function job code training
- ◆ CCR assessed on a regular basis

Process Requirements and Implementation

(Feedback and Improvement)

- ◆ **Environmental Assessment Program**
- ◆ **Executive Safety Review Board approves EMS Targets and Objectives and annual progress and completion status**
 - Identified on an annual basis in compliance with ISO-14001
- ◆ **DOE Safety Performance Objectives, Measures, and Commitments**
 - Enforceable Milestones
 - Regulatory Inspection
 - Environmental Release Severity
 - Environmental Document Quality
- **External Regulatory Inspections and independent ISO-14001 audits**
 - Monthly Meetings with DEQ management

EM FSA Strengths

- ◆ Received ISO 14001:2004 EMS Registration in Dec. 2005 and successfully passed five subsequent surveillance audits
- ◆ Received recent awards for Pollution Prevention program voluntary activities
 - Electronic Reuse and Recycling Campaign
 - Federal Electronics Challenge 2 bronze awards
- ◆ Numerous Regulatory Inspections during the last three years
 - One warning letter was issued concerning missed RCRA inspections
- ◆ Critical elements are embedded in CWI processes
 - Internal and external communication
 - Training
 - Objectives and Targets developed directly from the CWI contract
 - “Top Management” engagement
 - Management Review

Summary – Effective EMS/ISMS Integration

- ◆ Combined ISMS/EMS/VPP training by developing the ICP Safety Toolbox
- ◆ Self-assessments and direct employee feedback support continual improvement
 - Completed DOE-HQ ISMS review
 - Conduct approximately 50 focused self-assessments per year
 - Support two ISO-14001 Audits per year by an independent Registrar
 - Hosted recent DOE-HQ Office of Energy, Environmental Safety & Health (O&A Audit)

