United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

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Memorandum

To: Heads of Bureaus and Offices

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

Subject: Departmental Summary of the Fiscal Year 2003 Annual Report on Bureau Environmental Auditing Programs and Activities

As you are aware, environmental auditing of all Department of the Interior (DOI) facilities is required by 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.

This report entitled, "DOI Summary of the Fiscal Year 2003 Annual Report on Bureau Environmental Auditing Programs and Activities," prepared by the Office of Environmental Policy and Compliance is provided for your information. The purpose of this report is to provide the Department with feedback as to the progress that bureaus are making in the area of environmental auditing. The report covers Fiscal Year 2003 (FY 03) beginning October 1, 2002 through September 30, 2003.

The attachment summarizes auditing data by bureau. For FY 03, a total of 336 facilities were audited resulting in a cumulative total of 2,541 facilities audited to date. Bureaus reported an estimated 426 facility audits are scheduled for FY 04. The attachment also summarizes major audit issues identified and the costs associated with respective bureau environmental auditing programs in FY 03.

The Secretary has emphasized that compliance with environmental laws and regulations remains a high priority for the Department. Therefore, Heads of DOI Bureaus and Offices must ensure that this is communicated to all bureau managers and reflected in their programs. Furthermore, it is the responsibility of DOI facility managers (e.g., area/field office managers, district managers, refuge managers, park superintendents, etc.) to ensure that corrective actions are completed within their respective facilities as a result of audit findings and to request the necessary funding through their respective budget process. Bureaus are also reminded that bureau level directives or orders on Environmental Management Systems must be in place by December 31, 2003.

While the annual reporting of bureau environmental auditing activities has been successful over the years, it is still rooted in the use of a paper reporting mechanism. As a Department, we need to develop one standard reporting system for all bureau environmental audit data to provide

uniform methodologies, consolidate reporting, and improve quality assurance/quality control management. Management improvement requires that the Department's environmental auditing reporting system must now move to another level. Reporting must be standardized, available in real time, and have the capability of being shared with other reporting systems. During FY 2004, OEPC will coordinate with bureaus through a facilitated environmental audit working group that will evaluate environmental audit program requirements, use of existing bureau database management systems, incorporate best (bureau) practices, and present an implementation schedule for revised reporting of environmental audits in FY 2005.

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

Attachment

cc: Deputy Solicitor
Assistant Secretaries
Associate Solicitor - Land & Water Resources Division/Facility
Compliance Branch
REO's
Haz-Mat Contacts

Ref: ER 03/663

ATTACHMENT

DOI Summary of Annual Bureau Reports on Environmental Auditing Programs and Activities for FY 2003

Bureau	# Owned/Operated Facilities	# of Facilities Audited in FY 03	Cumulative Total # of Facilities Audited to Date (all years)	# of Facility Audits Scheduled in FY 04
BIA*	444	16	303	15
BLM*	150	42	225	28
BOR*	489	50	289	77
FWS	854	133	868	140
GS*	690	26	440	98
NPS	388	46	356	67
NPS Concessions	(130 of 388 above)	23	58	31
OAS	2	0	2	1
DOI Total	3,017	336	2,541	426

* Includes concessioners, permittees, and other land users.

Major Audit Issues Identified and Total Cost of Administering Bureau Environmental Auditing Programs in FY 2003

Bureau	Major Audit Issues Identified in FY 03	Total Cost of Audit Program
BIA	a. Incompatible storage of hazardous waste. b. Improper management of and disposal of used oil. c. Incomplete or no emergency response training.	$112,720.00
BLM	a. Employees lack hazard specific training. b. Inadequate guidance procedures for employees.	$500,000.00
BOR	a. Lack of funding. b. SPCC planning needed. c. Training needed in several areas (e.g., hazard communication, hazardous materials management, etc.). d. Inadequate guidance procedures for employees.	$76,000.00
FWS	a. Incompatible materials storage. b. Improper management of hazardous waste.	$500,000.00
GS	a. Uncharacterized or unknown waste streams. b. Inappropriate storage of flammable materials. c. Improper flammable storage room design.	$128,500.00

Bureau	Major Audit Issues Identified in FY 03	Total Cost of Audit Program
NPS	a. Employees lack of hazard communication training. b. Improper storage of hazardous materials.	$104,500.00
NPS Concessions	a. Improved fuel storage needed. b. Emergency planning and reporting procedures needed.	$392,269.00
OAS	(Funding of maintenance hangar construction expected in FY 2004).	$3,500.00
DOI Total	N/A	$1,817,489.00