

**ENVIRONMENTAL PROTECTION & WASTE
SERVICES
SELF ASSESSMENT SUMMARY**

FY 2001

(Signatures on file)

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SELF-EVALUATION REPORT

ENVIRONMENTAL & WASTE SERVICES DIVISION FY 2001

Per ORNL-QA-P03, "ORNL Self Assessment Program", the Environmental & Waste Services Division (EP&WS) has compiled a self-evaluation report for the FY 2001. The report describes the organization's activities and how these activities were conducted, and is consistent with the activities outlined in the division's Self Assessment Plan.

Since this is the first year the self assessment process has been administrated in the current fashion, a learning curve was encountered early in the process. After a year of the assessment process, it was determined that the assessed activities accurately reflect what is being performed within the division.

Any findings or concerns resulting from assessment activities (inspections, walk-arounds, reviews, etc.) are documented and corrective actions are tracked and root causes evaluated. EP&WS staff realize there is always room for improvement and when the assessment plan is reevaluated for the next fiscal year, some changes or additions are anticipated.

EP&WS grouped their assessment activities around 5 categories: Customer Focus, Financial Performance, Staff Results, Organizational Effectiveness, and Compliance.

Customer Focus:

Performance Objective: Ensure Customer Satisfaction

Results: A planned ESH&Q survey was not developed this year because ORNL performed a lab-wide workplace survey.

Analysis: EP has a customer survey available online for tasks we perform for other organizations. No feedback has been received. Survey results could be useful for continuous improvement purposes, therefore, the survey will remain available and could be promoted more aggressively. Customers have the opportunity to evaluate EP&WS services in PADS and with feedback meetings.

Performance Objective: Annual Site Environmental Report (ASER)

Results: Satisfactory – Preparation for the 2000 ASER began with a kick-off meeting in January 2001. A proposed schedule detailing four review cycles and the final publication date of October 1 was distributed and discussed. Having received and incorporated updated materials from all three sites, the proposed schedule was closely adhered to and no unforeseen or unexpected problems or delays were encountered. ORNL environmental performance is prepared for the DOE customer and provided to the major stakeholder—the public.

Analysis: Two new ASER team members were added (Project Director and Technical Reviewer). Their expertise and input was invaluable in coordinating and preparing a clearly written and technically correct document. The report is in its final review stage as scheduled and it is anticipated that the due date will be met and preparation costs are within budget. This year's report was accomplished in a timely fashion and with improved use of resources (less staff and money).

Performance Objective: Enhance/maintain web sites for EP&WS

Results: It is the desire of EP&WS to provide accurate and useful web sites that describe their personnel, services, and activities. Generally, the web sites are up-to-date, with some exceptions. Some progress has been made during the year, but some work still needs to be completed and the responsible parties are aware of the needed updates.

Analysis: EP&WS web sites are examined quarterly for accuracy and completeness. Due to layoffs and shifting of job responsibilities, some organizational charts need updating and some web sites are under construction. There are opportunities for improvement in some areas and efforts are underway.

Performance Objective: Continue effective liaison between TDEC/DOE-O and ORNL/DOE

Results: Positive verbal and written feedback from the DOE Oversight office (DOE-O) and Tennessee Department of Environment and Conservation (TDEC) has been received regarding the services provided by the staff managing the State Oversight Program (the Tennessee Oversight Agreement, TOA).

Analysis: This activity was assigned to the DOE Compliance Group in February 2001. Many changes have been implemented, resulting in increased interaction and quality service (specifically, in providing requested documents, information, and data). Written feedback was requested

semiannually from TDEC and DOE-O (even though the Self Assessment Plan called for an annual assessment), to enable the TOA staff to respond, if needed, to concerns or problems in a timely manner. Shorter turnaround time and increased communications have been strengths exhibited by the new TOA staff. Two Senior Management Roundtable sessions were facilitated by TOA to further communications and provide a forum for discussion of topics requested by TDEC.

Financial Performance

Performance Objectives: 1) **Spending is consistent with projected budget;** 2) **Maintain constant rate;** 3) **Direct charge % of total budget increases**

Analysis - During FY 01, EP&WS struggled with multiple funding issues. There was an involuntary reduction in force due to funding reductions in overhead. Even with the reduced employee count, there was still insufficient funding to cover personnel and added work load, forcing management to actively pursue other funding options for the unfunded FTEs and work. Additional funding came in three forms: ESH&Q management reserves, OIP funding, and direct charge. It is anticipated that EP&WS will cost within 1% of budget and will end the year with less than a \$2.00/hr. variance overall.

There was a 3.6% increase in chargeable hours. Both WS and EP worked to increase direct charge hours and were successful where appropriate. EP intends to continue to increase the number of direct chargers and has positioned themselves accordingly during the last half of the FY. WS will continue to direct charge for waste characterization, certification, packaging and handling services.

Staff Results

Performance Objectives: 1) **Increase Leadership Skills;** 2) **Staff Development;** 3) **Staff Satisfaction**

Results: - Completed PADS and results plans were approved (the goal was to establish and retain critical skills). There was Leadership Training, mentoring in WS, and multiple interactions with other Battelle operated Lab personnel..

Analysis: The results of the ORNL Quality of Work Life Survey were an indicator of staff satisfaction. EP&WS staff were encouraged to participate and bring their concerns to management's attention.. A number of WS staff participated in ORNL-sponsored leadership development programs, including Leadership ORNL, during FY 2001.

Organizational Effectiveness - First 5 Performance Objectives are Critical Outcomes

Minimize # of reportable releases to the environment

Performance Level Scale: 0 releases = outstanding

1 release = excellent

2 releases = good

3+ releases = marginal

Results: There was one reportable release in the first FY quarter (oil sheen in Melton Branch near HFIR - most likely a frozen water line that broke and the leaking water ran across oil on the ground/pavement and ended up in the creek). Performance level = excellent.

Minimize # of significant findings from inspections by regulators

Performance Level Scale: 0 findings = outstanding

1 finding = excellent

2 findings = good

3+ findings = marginal

Results: No findings in the first 3 quarters (compliance with required sampling, timely reports, and technical reviews contributed to the “outstanding” success).

Minimize # of reportable noncompliances

Performance Level Scale: 0 NC = outstanding

1-4 NC = excellent

5-8 = good

9+ = marginal

Results: NPDES Permit Nonconformances - 4 NPDES nonconformances occurred during FY 2001. In March, one chlorinated water exceedance at HFIR (responsible division, Engr.), and 3 in April (Total Suspended Solids exceedances) at STP (responsible division, P&E). Although still considered “excellent”, it is an increase over FY 2000, which had only 2 exceedances (in temperature measurements). There were 7 NPDES nonconformances in FY 1999 and 11 nonconformances in FY 1998. Performance Level = excellent.

Notices of Violation - In January of 2001, the TDEC issued DOE and ORNL a Notice of Violation concerning the improper management and disposal of hazardous waste filters. The filters are now being

properly managed and disposed of. A meeting between ORNL and the State took place and the results are that a warning would be issued. The NOV was a result of aggressive self assessment and self reporting to the State. This contributed to the State's issuance of a warning as opposed to stronger enforcement action.

Fully characterized and certified wastes are delivered to BJC and its contractor

Performance Level Scale: <1% = outstanding

<2% = excellent

<3% = good

<4% = marginal

Results: The waste package rejection rate is minimized to the extent practicable. Rejections are tracked monthly and WS has an overall performance level of “outstanding” for the number of certified WIDS to Weskem.

Analysis: In the second quarter, WS had a slightly higher increase in return due to clarification issues, rather than correction of errors.

Implement Effective Pollution Prevention Program at ORNL

Performance Level Scale: >300K = outstanding

\$250-\$300 = excellent

\$200-249K = good

<\$200K = marginal

Results: The goal for this activity was to invest a minimum of \$250K of ORNL funds into pollution prevention projects that have a cumulative return on investment of >30%. ORNL funded a significant project, the Chemical Management Center, which collects unused chemicals for redistribution. ORNL has also partnered with DOE HQ to fund a Spectrophotometer for 75K (EM HQ is funding 250K of the project). The return on investment is pending until the 4th quarter is completed.

Analysis: The CMC is funded at 310K with ICP Spec funded at 75K.

Performance Objective - Provide an Effective EPO/ECR Program

Results: The EPO Program Coordinator developed a draft plan to facilitate collection and resolution of feedback from customer divisions. The survey was developed later in the year and two feedback sessions were conducted as planned. Fairly positive feedback was received with some issues being reviewed.

Analysis: The goal of the facilitated feedback sessions was to determine the effectiveness of the EPO Program and seek opportunities for improving EPWS support to the Program. The results of the survey questionnaires were reviewed and presented at the September EPO meeting. The program will be revised in

the new fiscal year.

Performance Objective - Development of Environmental Management Systems (SBMS)

Results: A project plan with milestones was reviewed quarterly. An Environmental Management System description was completed and procedure revisions have been ongoing this past year.

Analysis: The deadline for the subject areas was extended until the end of 2001. Four have been completed by mid- 4th quarter, and 3 more are projected to be completed by the end of the quarter. The remainder will be completed by the end of the calendar year.

Performance Objective - Establish and Implement Chemical Management Center (CMC)

Results: Receipt of items in the first quarter was completed on schedule. The program has been working towards transferring 6000 items to the CMC or other users by 9/30/01.

Analysis: The goal for FY2001 was to transfer 6,000 items from control areas where they are no longer needed to custodians who can use the chemicals. Complications with the upgrades to the facility and errors in the hazardous materials tracking system (HMIS) have hampered progress toward the goal. It is estimated that 80% of the items will be transferred by the end of the FY.

Compliance

Performance Objective: Computer Security/Training & Qualifications

Results: EP&WS worked towards a goal of having 100% of its staff in compliance with required training. The training was tracked by the DTOs quarterly and the division has had 0 deficiencies. Required training is also tracked quarterly and EP&WS currently remains in the “satisfactory” category. However, during one quarter, 3 EP staff members became deficient in required training areas. Once discovered, variances were put in place and training was immediately scheduled and completed.

Analysis: Tracking this required training on a more frequent basis (quarterly), has decreased the likelihood that any staff members become deficient in computer security training. WS appointed a new DTO during the year, with no lag in tracking.

Performance Objective: Radiation Control/Dose

Results: The RCO reviews the bioassay and external dose reports on a quarterly basis. The results are received 4-6 weeks after the end of each quarter. No limits have been exceeded this past year. The bioassay monitoring program is now linked directly to the RWP. Under this program, employees and subcontractors are placed on a routine bioassay program pursuant to the internal exposure hazards identified on the RWP(s) on which they perform work. The individuals are placed on the program for a minimum of one year

following their last RWP entry. The RCO also reviews this program and makes suggestions to either remove an individual or retain them in the program depending on the nature of their job duties.

Performance Objective: Provide a Safe Work Environment

Results: Office self-inspections were conducted semi-annually in EP&WS in FY 2001, with an overall outstanding participation. All concerns/issues are followed up on or corrected immediately. Regular division-wide quarterly safety meetings were provided and attendance encouraged and documented. Individual managers administered various safety meetings (WS had Plan-of-the-Day meetings, as well as monthly safety meetings, which regularly discussed safety issues, while EP sampling personnel had weekly safety meetings to promote safety awareness). Via email, the DSO routinely distributes lessons-learned information from internal/external reports and also relays relevant safety topics in quarterly meetings.

Analysis: Division-wide quarterly safety meetings were reevaluated several times due to low attendance by Waste Services staff. It was discovered that WS was having regular safety meetings separately on a more frequent basis, resulting in a higher overall attendance record for the quarterly attendance.

The routine EP sampling meetings were reevaluated and determined that they no longer served their original purpose. The sampling group has implemented more structured group meetings designed to encourage feedback of concerns and/or safety issues. Environmental sampling procedures, which include safety issues and guidance, are currently up-to-date with over 30 SOPs being reviewed (technicians performing the activity are required to review) and updated during FY 2001. Job Hazard Evaluation forms go hand-in-hand with sampling procedures. JHEs are generated for each activity, reviewed by those performing the activity, and are updated as the activities change. Increased field inspections are planned, as well as document/paperwork reviews. Adhering to the principles of ISMS is routinely promoted.

The DSO conducted quarterly safety inspections as scheduled, at times accompanied by Safety representatives, as well as representatives from Operational Awareness. Several inspections revealed minor problems which were immediately corrected. There are no outstanding safety issues to date.

Safety incidences were tracked quarterly (rather than on the annual schedule) and overall 6 incidences (one thumb, 2 back injuries, 2 bicycles injuries, and one knee injury) were reported. The quarterly evaluations were performed in order to provide safety awareness consultations, as necessary.

Performance Objective: Emergency Preparedness

Results: Several EP&WS staff members participate in Lab-wide drills. For the drill In the first quarter, full participation was received. The second quarter offered no drills, but two Field Monitoring 2 drills in the second quarter required and received EP coverage. There were no drills in the 3rd quarter, and a 4th quarter drill is planned and participation from EPWS is expected to be provided, as usual.

Analysis: EP&WS has an outstanding record for participation in the drills. Operationally, WS performs hazardous materials spill response for ORNL, responding on average to about 7-10 spills per month (about 90 to 100 spills per year). This performance objective was to be evaluated annually, but instead, is evaluated quarterly in an effort to continuously promote the importance of the team's role in the emergency drills.

Performance Objective: Environmental Requirements

Results: Most all documents were submitted to DOE/regulators in advance of deadlines. Only one report was late this past year, due to a belated request for amendment causing the report to start out later than appropriate. All monitoring requirements, including, sampling, monitoring, data analysis, and reporting were met. EP has an outstanding record of producing timely and accurate regulatory reports. Numerous reports are sent out and tracked quarterly. In Waste Services, the status of the 90-D areas and 120-D clock for LLW accumulation areas is tracked weekly and no violations have occurred this year.

Analysis: Technical reviews, as well as peer reviews, ensure deliverables are technically and accurately correct and internal /external schedules are followed to ensure documents are delivered in a timely manner.

Performance Level Scale: 0 = outstanding, **1 = excellent**, 2 = good, >3 = marginal.