

Functional Area WBS #: 16 – Environmental Protection & Compliance

Completed by: T.A. Miller (ANL-W) R.H. Guymon (INEEL)

FUNCTIONAL AREA SUMMARY FORM

(ANL-W & INEEL Laboratory Consolidation to INL)

Consider facilities, hardware, processes, procedures, personnel, training, database, etc. in your functional area.

1) **ACTIVITIES** needed to transition

What activities should be conducted to support to transition to a single contractor? When is the most opportune time to conduct each activity (pre-transition, transition, incoming contractor)?

Activities to transition functional area to one contractor	3/1 – 11/15 Pre-transition	11/15 – 1/30 Transition	1/31/05 Incoming Contractor
1. Review ANL-W and INEEL company policies/procedures; prepare a recommendation for new contractor (e.g. possible candidates for consolidation during transition, duplicate procedures).	X	X	
2. Consolidate policies/procedures that require immediate attention.		X	
3. Consolidate policies/procedures that do not require immediate attention during transition.			X
4. Review listing of ANL-W and BBWI environmental permits; determine which permits to be transferred to INL and ICP contractors.	X	X	
5. Transfer ANL-W and BBWI environmental permits to appropriate contractor(s).		X	
6. Transfer resources from ICP performing site-wide environmental permitting/reporting (other than RCRA/CERCLA) to INL contractor.			X
7. Determine which contractor (INL or ICP) will be responsible for site-wide environmental monitoring.	X		
8. Transfer site-wide environmental monitoring resources to appropriate contractor.			X
9. Integrate environmental staff from ANL-W, ICP and INEEL as determined by the new contractor.			X

2) GAP(S)

In your functional area, identify gap(s) that may inhibit a smooth transition. Please list below. Additionally, utilize the Gap/Risk Description form to define each gap/issue.

- RCRA Permits - It is unclear from the draft RFPs which contractor(s) (INL/ICP) will be responsible for ANL-W RCRA-permitted facilities. Ownership needs to be identified prior to transition so that the required 90-day notification (Permit Modification Request) to DEQ can be made.
- Site-wide Environmental Monitoring - It is unclear from the draft RFPs which contractor(s) will be responsible for site-wide environmental monitoring (including Safe Drinking Water Act compliance activities). Ownership needs to be identified prior to transition to allow sufficient time during transition for critical issues resolution (subcontracts, personnel, procedures, etc.).
- Chemical Management System (CMS) – ANL-W uses an ANL-E system for tracking of chemical use and inventory. INEEL uses a subcontractor (Northwind Environmental). The INEEL CMS is currently managed by ICP. Due to the complexities and sheer volume of chemicals currently managed by ANL-W and INEEL, it may be advantageous to integrate these systems prior to contract transition. It may prove too difficult of a task to merge these two systems during contract transition at the same time when the data need to be compiled into quarterly and annual reports.
- Underground Storage Tanks (USTs) – ANL-W and INEEL each have USTs regulated under 40 CFR 280; however, each contractor has different methods to achieve compliance (annual tank tightness testing, corrosion protection, monitoring, etc.). A consistent compliance strategy needs to be developed by the INL contractor.
- ISO14001 Registration – The INL contractor will need to decide whether it will maintain ISO 14001 registration of the INEEL EMS. In any event, it will be necessary to develop an INL EMS in accordance with DOE 450.1.

3) Other

Are there issues or concerns outside of your functional area that may inhibit the consolidation? If so, please list. Additionally, utilize the Gap/Risk Description form to define each gap/issue.

- Environmental non-compliance policy - DOE-ID and Argonne Site Office (ASO) personnel need to develop a consistent policy for identifying and reporting environmental non-compliances.

4) Have you initiated any actions outside of this review to facilitate the integration? If so, please describe.

- None

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GAP/RISK DESCRIPTION FORM

Please complete one form per gap.

- a) Describe the gap(s) that affects the integration of ANL-W and INEEL.
 It is unclear from the draft RFPs which contractor(s) (INL/ICP) will be responsible for ANL-W RCRA-permitted facilities. Ownership needs to be identified by DOE prior to transition so that the required 90-day notification (Permit Modification Request) to DEQ can be made.
- b) Rank the risk, on a scale of 1 to 5, associated with the above gap, and describe the impact(s)? (Risk 1 = minimal consequence on January 31, 2005; Risk 5 = operational barrier to laboratory on January 31, 2005)
 Risk: **4**
 Description: If permits are not in place by 1/31, the operation of affected permitted facilities will be impacted. Any affected units may be in non-compliance with the potential for regulatory enforcement action.
- c) What steps should be taken to address the gap(s) and when (pre-transition, transition, incoming contractor)? Please indicate the owner of the action (ANL-W, INEEL, or both where applicable).

	3/1 – 11/15 Pre-transition	11/15 – 1/30 Transition	1/31/05 Incoming Contractor
1. Ownership of ANL-W RCRA-permitted facilities needs to be identified by DOE prior to transition so that the required 90-day notification to DEQ can be made.	DOE-ID		
2. Submit PMR(s) to standardize reporting cycles.		INEEL and ANL-W	
3. Standardize facility policies and procedures			INL

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GAP/RISK DESCRIPTION FORM

Please complete one form per gap.

- a) Describe the gap(s) that affects the integration of ANL-W and INEEL.

Chemical Management Systems (CMS) are used to track/inventory chemicals for Hazard Communications (HAZCOM) compliance and to compile EPCRA 311, 312, and 313 reports. ANL-W uses an ANL-E system for tracking of chemical use and inventory. INEEL uses a subcontractor (Northwind Environmental). The INEEL CMS is currently managed by ICP. Due to the complexities and sheer volume of chemicals currently managed by ANL-W and INEEL, it may be advantageous to integrate these systems prior to contract transition. It may prove too difficult of a task to merge these two systems during contract transition at the same time when the data needs to be compiled into quarterly and annual reports.

- b) Rank the risk, on a scale of 1 to 5, associated with the above gap, and describe the impact(s)? (Risk 1 = minimal consequence on January 31, 2005; Risk 5 = operational barrier to laboratory on January 31, 2005)

Risk: **3**

Description:

All chemicals for both the INEEL and ANL-W are registered in respective Chemical Management Systems (CMS) databases. These databases must be merged. The INEEL Chemical Management System (ICMS) is particularly complicated and involves large amounts of data. The ICP currently manages the ICMS, which will be transferred to the INEEL as the future landlord.

During the transition period, reports must be submitted for the previous calendar year that will tax ICMS resources. These reports will need to be certified by the new contractor around March 2005. Early integration efforts will recommend to the new contractor a method to reduce the workload during transition and the reporting period. Accurate and timely reports must be provided to the regulators to remain in compliance.

- c) What steps should be taken to address the gap(s) and when (pre-transition, transition, incoming contractor)? Please indicate the owner of the action (ANL-W, INEEL, or both where applicable).

	3/1 – 11/15 Pre-transition	11/15 – 1/30 Transition	1/31/05 Incoming Contractor
1. INEEL and ANL-W representatives need to meet to determine how best to integrate CMS systems and to prepare a recommendation for the new contractor of those actions that must be completed prior to transition and/or contract award.	INEEL and ANL-W		
2. Complete essential CMS transition activities (e.g., procedures, training)		INEEL and ANL-W in Consultation w/ New Contractor	
3. Complete non-essential CMS transition activities			INL
4. Complete Quarterly and Annual Reports		INEEL and ANL-W	INL

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GAP/RISK DESCRIPTION FORM

Please complete one form per gap.

- a) Describe the gap(s) that affects the integration of ANL-W and INEEL.
 ANL-W and INEEL each have USTs regulated under 40 CFR 280; however, each contractor has different methods to achieve compliance (annual tank tightness testing, corrosion protection, monitoring, etc.). A consistent compliance strategy needs to be developed by the INL contractor.

- b) Rank the risk, on a scale of 1 to 5, associated with the above gap, and describe the impact(s)?
 (Risk 1 = minimal consequence on January 31, 2005; Risk 5 = operational barrier to laboratory on January 31, 2005)
 Risk: **2**
 Description:

- c) What steps should be taken to address the gap(s) and when (pre-transition, transition, incoming contractor)? Please indicate the owner of the action (ANL-W, INEEL, or both where applicable).

	3/1 – 11/15 Pre-transition	11/15 – 1/30 Transition	1/31/05 Incoming Contractor
1. Review compliance methodologies used by ANL-W and INEEL. Recommend appropriate methodology to be employed by INL.	INEEL and ANL-W		
2. INL Contractor to select appropriate compliance methodology.		New Contractor	
3. INL Contractor to implement appropriate compliance methodology.			INL

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GAP/RISK DESCRIPTION FORM

Please complete one form per gap.

- a) Describe the gap(s) that affects the integration of ANL-W and INEEL.
 It is unclear from the draft RFPs which contractor(s) will be responsible for site-wide environmental monitoring (including Safe Drinking Water Act compliance activities). Ownership needs to be identified by DOE prior to transition to allow sufficient time during transition for critical issues resolution (subcontracts, personnel, procedures, etc.).

- b) Rank the risk, on a scale of 1 to 5, associated with the above gap, and describe the impact(s)? (Risk 1 = minimal consequence on January 31, 2005; Risk 5 = operational barrier to laboratory on January 31, 2005)
 Risk: **3**
 Description: To avoid significant confusion during transition, DOE-ID should make a decision before the contract award regarding which future contractor (ICP or INL) will manage site wide monitoring. This is important to leave adequate time during transition for program integration and turnover. To avoid possible loss of data and potential regulatory issues, the program should be operational on 1/31/05.

- c) What steps should be taken to address the gap(s) and when (pre-transition, transition, incoming contractor)? Please indicate the owner of the action (ANL-W, INEEL, or both where applicable).

	3/1 – 11/15 Pre-transition	11/15 – 1/30 Transition	1/31/05 Incoming Contractor
1. Coordinate ownership of site wide monitoring with DOE-ID	INEEL		
2. If INL is given site wide monitoring responsibility, plan and integrate ANL-W and INEEL Environmental Monitoring Programs.		New Contractor	INL

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GAP/RISK DESCRIPTION FORM

Please complete one form per gap.

- a) Describe the gap(s) that affects the integration of ANL-W and INEEL.
DOE-ID and DOE-ASO have different approaches to the identification and reporting of environmental non-compliance. DOE-ID and ASO personnel should develop a consistent policy for identifying and reporting environmental non-compliances.

- b) Rank the risk, on a scale of 1 to 5, associated with the above gap, and describe the impact(s)?
(Risk 1 = minimal consequence on January 31, 2005; Risk 5 = operational barrier to laboratory on January 31, 2005)
Risk: **3**
Description:

- c) What steps should be taken to address the gap(s) and when (pre-transition, transition, incoming contractor)? Please indicate the owner of the action (ANL-W, INEEL, or both where applicable).

	3/1 – 11/15 Pre-transition	11/15 – 1/30 Transition	1/31/05 Incoming Contractor
1. Coordinate with DOE-ID and ASO personnel a consistent policy for identifying and reporting environmental non-compliances.	INEEL and ANL-W	New Contractor	
2. Develop policy, procedures and training to implement DOE noncompliance reporting policy.			INL

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GAP/RISK DESCRIPTION FORM

Please complete one form per gap.

- a) Describe the gap(s) that affects the integration of ANL-W and INEEL.
 The INL contractor will need to decide whether it will maintain ISO 14001 registration of the INEEL EMS. In any event, it will be necessary to develop an INL EMS in accordance with DOE 450.1.
- b) Rank the risk, on a scale of 1 to 5, associated with the above gap, and describe the impact(s)?
 (Risk 1 = minimal consequence on January 31, 2005; Risk 5 = operational barrier to laboratory on January 31, 2005)
 Risk: **2**
 Description: INEEL is currently ISO 14001 certified, the ANL-W site is not certified. The decision must be made if the integrated EMS will be certified as ISO 14001. The current RFP does not require the new contractor to maintain certification.
- c) What steps should be taken to address the gap(s) and when (pre-transition, transition, incoming contractor)? Please indicate the owner of the action (ANL-W, INEEL, or both where applicable).

	3/1 – 11/15 Pre-transition	11/15 – 1/30 Transition	1/31/05 Incoming Contractor
1. INL Contractor needs to decide whether to register INL EMS in accordance with ISO14001.		New Contractor	
2. Integrate ANL-W and INEEL EMSs into one EMS in accordance with DOE 450.1			INL