

Los Alamos

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

8/28

memorandum

TO: Distribution *1 Dave* DATE: August 11, 1992

FROM: James F. Jackson, DD MAIL STOP/TELEPHONE: A101/7-4168

SYMBOL: DD *Jim*

SUBJECT: ENVIRONMENTAL COMPLIANCE PROGRAM TASK FORCE

As we are all aware, environmental compliance issues have increasingly dominated the day-to-day operations of the Laboratory. Through numerous conversations with you and other managers, I have felt a growing need to ensure that we have an effective and comprehensive program to address all aspects of environmental compliance. Therefore, I have endorsed the formation of an Environmental Compliance Program Task Force (Task Force) by Al Tiedman to review the disparate issues and program needs and recommend changes that may be necessary.

The Task Force was formed on July 29, 1992 and has ten "core" members, primarily derived from different support organizations (ADO, Legal, and ADQPP), with some representation from user organizations as well (see attachment 1 for list of participants). The Task Force is meeting daily in the Green Room of the Administration Building from 8:30 a.m. to C.O.B. and further information can be obtained from Charlie Nylander, Chairperson, or Bennie Gonzales, Deputy Chairperson, by calling 665-8505.

The motivation for establishing this Task Force is simply that the Laboratory must ensure that it has an effective environmental compliance program. No matter how our program is organized, it must be comprehensive, efficient, user friendly, and successful. This effort is also a pilot program for the larger issue of how we do all regulatory compliance.

Over the past week the Task Force has concentrated their efforts on fact-finding and have determined that user participation is needed to ensure input into the final product. Although there has been participation by several of the ES&H Coordinators, I am asking that each directorate nominate an individual to serve on the Task Force for its duration --- approximately 45 days. It is important to have active user/generator input to ensure a balanced approach to this difficult problem.



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Both DOE-AL and DOE-LAAO have been apprised of the Task Force's objectives, and they strongly applaud the Laboratory's initiative toward comprehensive environmental compliance. The results of the Task Force's examination of our present approach to compliance and recommendations for improvement will serve us all, and therefore, I will look for your positive support.

Attachment a/s

Distribution:

John C. Browne, ADCIS, MS A110
John D. Immele, ADNWT, MS A105
Eugene M. Wewerka, ADCM, MS A102
Frederick A. Morse, ADPLS, MS A114
Michael Stevenson, ADEE, MS A107
Terry R. Gibbs, CONT, MS A119
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Karl R. Braithwaite, DIR-ESD, MS A103
Jerry L. Bellows, DOE/LAAO, MS A316

ENVIRONMENTAL COMPLIANCE PROGRAM TASK FORCE

CHARTER

- **DEVELOP AND RECOMMEND A COMPREHENSIVE LABORATORY - WIDE ENVIRONMENTAL ASSURANCE PROGRAM THAT MINIMIZES PROGRAMMATIC IMPACT OF ENVIRONMENTAL REQUIREMENTS, WHILE ACHIEVING FULL ENVIRONMENTAL COMPLIANCE.**

ENVIRONMENTAL COMPLIANCE PROGRAM TASK FORCE

- **MINIMIZE PROGRAMMATIC IMPACTS**
 - **STREAMLINE EXISTING PROGRAMS**
 - **SIMPLIFY PROCESSES (USER - FRIENDLY)**
 - **COST EFFECTIVE**
 - **INTEGRATE EXISTING RESOURCES**
 - **COORDINATE EXISTING RESOURCES**
 - **COMMUNICATE ROLES AND RESPONSIBILITY**
 - **COMMUNICATE BUDGET IMPACTS**

ENVIRONMENTAL COMPLIANCE PROGRAM TASK FORCE

- **ASSURANCE**
 - **TECHNICAL SUPPORT**
 - **TRAINING**
 - **INSPECTION**
 - **DOCUMENTATION**
 - **TRACKING**
 - **ENFORCEMENT MECHANISMS**
 - **REWARDS**
 - **FUNDING**

ENVIRONMENTAL COMPLIANCE PROGRAM TASK FORCE CORE MEMBERSHIP

- ENVIRONMENTAL MANAGEMENT (EM)
- HEALTH AND SAFETY (HS)
- MATERIALS MANAGEMENT (MAT)
- FACILITIES ENGINEERING (ENG)
- ASSOCIATE DIRECTOR FOR PHYSICS & LIFE SCIENCES (ADPLS)
- ASSOCIATE DIRECTOR FOR OPERATIONS (ADO)
- LABORATORY COUNSEL (LC)
- LABORATORY QUALITY & POLICY OFFICE (LQPO)
- LABORATORY ASSESSMENT OFFICE (LAO)
- JOHNSON CONTROLS (JCI)

- OTHERS

- RECENT LETTER TO ADS

ENVIRONMENTAL COMPLIANCE INVOLVES MULTIPLE ORGANIZATIONS AT THE LABORATORY

- ENVIRONMENTAL MANAGEMENT (EM)
- HEALTH AND SAFETY (HS)
- LABORATORY ASSESSMENT OFFICE (LAO)
- LABORATORY QUALITY AND POLICY OFFICE (LQPO)
- MATERIALS MANAGEMENT (MAT)
- LABORATORY COUNSEL (LC)
- FACILITIES ENGINEERING (ENG)
- ALL OTHERS

ENVIRONMENTAL COMPLIANCE TASK FORCE

- **METHODOLOGY**
- **ISSUE CAPTURE**
- **MULTIPLE PERSPECTIVES**
- **POOR DEFINITION OF ROLES AND RESPONSIBILITIES**

SO FAR

- **OVER-LAPPING ACTIVITIES**
- **INEFFICIENCIES**
- **INADEQUATE COMMUNICATION**
- **INADEQUATE TRAINING**
- **INADEQUATE TRACKING**
- **INADEQUATE ENFORCEMENT**
- **NO PENALTIES OR REWARDS**