National Oceanic & Atmospheric Administration
U.S. Department of Commerce

Volume 2, Issue 1
November 14, 2016

Environmental, Safety and Sustainability Insights
NOAA Safety and Environmental Compliance Office, Office of the Chief Administrative Officer

Risk Management at NOAA

By Joe Duran, Safety and Occupational Health Specialist, NOAA SECO

Risk management is not new to NOAA. It's the way we do business every day. However, this systematic approach to risk management is new in that it allows for more consistency in our decision-making processes. Rather than relying solely on individual experience to achieve the best results, risk management teaches us that careful analysis and control of hazards will give us the optimum results in any situation.

Goals of Risk Management

The fundamental goal of risk management is to enhance mission effectiveness at all levels, while preserving assets and safeguarding health and welfare. Additionally, the risk management process can identify and exploit opportunities that provide the greatest return on our investment of personnel, time and dollars.

The Six Steps of Risk Management

1. Perform an operational analysis and identify the hazards.
2. Assess the risks.
3. Analyze risk control measures.
4. Accept the risks at the appropriate authority level.
5. Implement risk controls.
6. Supervise and seek feedback on the results.

One of the tenets of risk management is that risk acceptance decisions are made at an appropriate authority level. The higher the risk and longer duration it will go, the higher up the leadership chain the decision must be made.

The six-step risk management process works best when you remember each step is a building block for the next step. When conducting a risk management assessment, it is essential that you perform all steps. Allow yourself enough the time to do a thorough risk assessment. Proper time management while performing an assessment will ensure appropriate emphasis is put on each step and nothing is forgotten. This will prevent important risks and controls from being missed, as you might otherwise focus only on the most obvious ones.

The risk management process operates as a cycle, which continuously seeks improvements by identifying new hazards and reevaluating risks. Experience is the best teacher. Include all personnel who are regularly involved in the process during the assessment of the risks, it is an important factor in its success.

Coming soon: NOAA Handbook 209-30 on Risk Management

INSIDE THIS ISSUE

Hazardous Waste Generator Rules

Final Rule: Hazardous Waste Generator Improvements

Rule Summary

The EPA Administrator signed the final Hazardous Waste Generator Improvements Rule on October 28, 2016 and will be published in the Federal Register (FR) in the coming weeks.

This rule finalizes a much-needed update to the hazardous waste generator regulations to make the rules easier to understand, facilitate better compliance, provide greater flexibility in how hazardous waste is managed, and close important gaps in the regulations.

Two key provisions where EPA is finalizing flexibility are:

Allowing a hazardous waste generator to avoid increased burden of a higher generator status when generating episodic waste provided the episodic waste is properly managed and

Allowing a very small quantity generator (VSQG) to send its hazardous waste to a large quantity generator under control of the same person.

In addition to finalizing key flexibilities, the rule enhances the safety of facilities, employees, and the general public by improving hazardous waste risk communication and ensuring that emergency management requirements meet today's needs.

Further, the EPA is finalizing a number of clarifications without increasing burden including a reorganization of the hazardous waste generator regulations so that all of the generator regulations are in one place.

Rule History

The hazardous waste generator regulatory program was originally promulgated in 1980. Over the course of the last 35 years, the Agency, through experience with implementing the program, and in various meetings, correspondence, and discussions with the states and the regulated community, has become aware of the need for more clarity, consistency and flexibility.

Many of these issues were identified in a 2004 program evaluation of the hazardous waste generator program conducted by EPA. In 2013, a separate EPA program evaluation addressing hazardous waste determinations also identified a number of concerns related to generators being able to make a proper hazardous waste determination. Several of the proposed provisions were also responsive to the Notice of Data Availability (79 FR 8926, February 14, 2014) that EPA issued on the retail sector asking for comment on hazardous waste management practices in that sector and on challenges they face in complying with Resource Conservation and Recovery Act (RCRA).

The proposed rule was published in the Federal Register (FR) on September 25, 2015 (80 FR 57918).

Definitions of Hazardous Waste Generator Categories:

Conditionally Exempt Small Quantity Generators (CESQGs): Conditionally Exempt Small Quantity Generators (CESQG) generate 100 kilograms or less per month of hazardous waste or one kilogram or less per month of acutely hazardous waste. Requirements for CESQGs include:

- CESQGs must identify all the hazardous waste generated.
- CESQGs may not accumulate more than 1,000 kilograms of hazardous waste at any time.
- CESQGs must ensure that hazardous waste is delivered to a person or facility who is authorized to manage it.

Small Quantity Generators (SQGs): Small Quantity Generators (SQGs) generate more than 100 kilograms, but less than 1,000 kilograms, of hazardous waste per month.

Large Quantity Generators (LQGs): Large Quantity Generators (LQGs) generate 1,000 kilograms per month or more of hazardous waste or more than one kilogram per month

Alternative Fuel Vehicles

As car model years wind to a close, many of you may be thinking about purchasing a new or used vehicle. When purchasing a vehicle, consider fuel efficient and alternative fuel vehicles. More than a dozen alternative fuels are in production or under development for use in alternative fuel vehicles and advanced technology vehicles. Government and private-sector vehicle fleets are the primary users of these fuels and vehicles, but consumers are increasingly interested in them. Using alternative fuels and advanced vehicles instead of conventional fuels and vehicles helps the United States reduce petroleum use and vehicle emissions.

Biodiesel
Biodiesel is a renewable fuel that can be manufactured from vegetable oils, animal fats, or recycled cooking grease for use in diesel vehicles.

Electricity
Electricity can be used to power plug-in electric vehicles, which are increasingly available. Hybrids use electricity to boost efficiency.

Ethanol
Ethanol is a widely used renewable fuel made from corn and other plant materials. It is blended with gasoline for use in vehicles.

Hydrogen
Hydrogen is a potentially emissions- free alternative fuel that can be produced from domestic resources for use in fuel cell vehicles.

Natural Gas
Natural gas is a domestically abundant gaseous fuel that can have significant fuel cost advantages over gasoline and diesel fuel.

Electric Vehicles (EV)
Hybrid electric vehicles (HEVs), plug-in hybrid electric vehicles (PHEVs), and all-electric vehicles (EVs)—also called electric drive vehicles collectively—use electricity either as their primary fuel or to improve the efficiency of conventional vehicle designs.

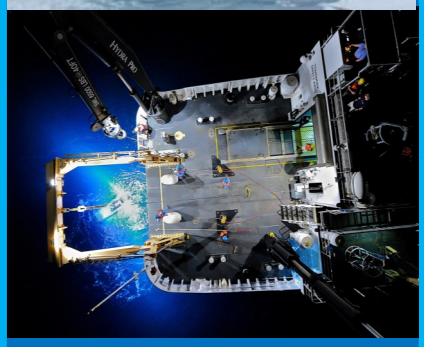
Hybrid Electric Vehicles : HEVs are primarily powered by an internal combustion engine that runs on conventional or alternative fuel and an electric motor that uses energy stored in a battery. The battery is charged through regenerative braking and by the internal combustion engine and is not plugged in to charge.

Plug-In Hybrid Electric Vehicles : PHEVs are powered by an internal combustion engine that can run on conventional or alternative fuel and an electric motor that uses energy stored in a battery. The vehicle can be plugged into an electric power source to charge the battery. Some can travel more than 70 miles on electricity alone, and all can operate solely on gasoline (similar to a conventional hybrid). Some types of PHEVs are also called extended range electric vehicles (EREVs).

All-Electric Vehicles : EVs use a battery to store the electric energy that powers the motor. EV batteries are charged by plugging the vehicle into an electric power source. EVs are sometimes referred to as battery electric vehicles (BEVs).

How to choose?

Choose your vehicle according to your need. For example, if you mostly drive in cities, a smaller hybrid might be right for you because it gets better mileage in city driving and is easier to park. If you need a vehicle for towing or heavy use, consider a clean diesel vehicle. Many vehicles produced by U.S. auto manufacturers are flexible fuel vehicles (FFVs), which can run on E85 (up to 85% ethanol, 15% gasoline) and other ethanol-gasoline blends.



ENVIRONMENTAL, SAFETY AND SUSTAINABILITY INTRANET SITE

The NOAA Environmental, Safety and Sustainability Intranet site provides a wide variety of resources to assist leaders and environmental, safety, and sustainability managers with accomplishing their jobs. Please visit the NOAA Environmental, Safety and Sustainability Intranet site to access these valuable resources: **https://secure.seco.noaa.gov/** .

As always, SECO encourages your input. Please send suggestions, ideas, requests, and any cool tools and resource that we can share on the site to assist in managing safety, environmental compliance, or sustainability programs to **SECO**.

Electric Vehicle Charging Stations

Providing plug-in electric vehicle (PEV) charging stations at the workplace is one strategy by which agencies can reduce greenhouse gas (GHG) emissions by encouraging the displacement of commuters' petroleum fuel with lower-emission electricity. Executive Order 13693 instructs Federal agencies to consider the development of policies to promote sustainable commuting and work-related travel practices including workplace vehicle charging for federal employees. Eighteen federal organizations have now committed to providing employee charging stations, including the Department of Commerce.

Until 2015, Federal agencies had no specific authority to allow employees to charge their PEVs at work. This changed with the enactment of the Fixing America's Surface Transportation Act (FAST Act) that authorizes agencies to allow employees and other authorized users to use existing or install new charging stations and requires the collection of fees to recover these costs. To support the implementation of workplace charging at federal facilities, the White House Council on Environmental Quality Office of Federal Sustainability released guidance for new and existing Level 1 charging receptacles (i.e. wall outlets) and Level 1, Level 2 and DC Fast Charger Electric Vehicle Supply Equipment. This guidance covers planning and reporting requirements for charging stations and principles for determining employee reimbursement for the use of workplace charging stations.

Meet Anne Delp, Environmental Engineer, NOAA SECO

My name is Anne ("Annie") Delp. I joined the Environmental Compliance Division of SECO in March. I am new to NOAA, but I am not new to the world of environmental compliance nor to the DC metropolitan area. I grew up in Frederick, Maryland and did my undergraduate and graduate studies at Penn State and Northwestern Universities, respectively. For the past 19 years, I have worked in all aspects of environmental compliance, primarily serving the federal government including the Department of Defense and Department of Energy. My expertise is developing and implementing environmental policies and programs for federal facilities at all levels - from the site/field to regional headquarters to secretariat level offices (such as the Office of the Secretary of Defense).

After serving as the BRAC Environmental Coordinator and helping close Walter Reed Army Medical Center, my family (husband & 2 daughters) and I left the DC area and spent the past 4 years in Germany with the Defense Logistics Agency (DLA). Being physically located in Western Europe with a regional oversight role was a perfect match for me – both personally and professionally. It was an exciting challenge for me to learn the legislative landscape for the US DOD overseas – which is a combination of host nation environmental requirements, US regulations, and international agreements. I loved meeting and working with people from all over the world, including those from NATO and partner countries. Daily life, professional and personal, meant overcoming cultural and language differences to achieve both small and large goals. I continually saw the need to be a humble learner and also a good ambassador for the U.S. and for federal employees. My job and our personal travel kept me "on the road" fairly constantly, experiencing hundreds of new places in Europe, Africa, and Asia minor. Fortunately, I have an incurable case of wanderlust. I am optimistic that I can apply the lessons learned during my time overseas in my new position.

I am excited to be back in the DC metro area. As is often the case, moving away allowed me to develop an increased appreciation for home. I am more convinced than ever of how special the DC area is due to the rich multiculturalism and access to the Arts, food, and endless outdoor activities. This is a truly unique city and microcosm of the world at large. I see a lot of that same diversity in the backgrounds, interests, and professional experiences within NOAA. I am really excited to be a part of the NOAA team and forward the mission of protecting the environment. When I am not at work, you can find me spending time with my husband, daughters, and friends – taking our girls to sports, exercising, traveling, or trying the newest restaurant in the District!

NOAA Environmental, Safety and Sustainability
Office of the Chief Administrative Officer
1305 East West Highway, Silver Spring, MD 20910
Phone: 301-628-1020 Email: SECO@noaa.gov Intranet Site: https://secure.seco.noaa.gov/
Public Website: http://seco.noaa.gov/