

Invasive Plant Research Laboratory



June 2022 until June 2023

Invasive Plant Research Laboratory
Environmental Management System



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SUBJECT: Research Leader's Support
IPRL Environmental Management System (EMS) Policy Statement
Revised May 26, 2023

TO: Archie Tucker
Area Director, SEA

FROM: Dr. Melissa Smith
Acting Research
Leader

The policy of the Invasive Plant Research Lab (IPRL) is to fully support and comply with Executive Order (EO) 14057, "Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability" which was signed by President Biden August 2022. EO 14057 outlines a coordinated, whole-of-government approach, along with individual agency goals and actions, to transform Federal procurement and operations to reduce greenhouse gas (GHG) emissions and environmental impacts and secure a transition to clean energy and sustainable technologies. It establishes that the Federal Government will lead by example to achieve a carbon pollution-free electricity sector by 2035 and net-zero emissions economy-wide by 2050, using its scale and procurement power to achieve: requires Federal agencies to promote and protect our public health and environment to ensure access to clean air and water and limit exposures to dangerous chemicals and pesticides and to hold polluters accountable. It is the policy of the United States that agencies shall meet these requirements in a manner that increases efficiency, optimizes performance, eliminates unnecessary use of resources, and protects the environment. In implementing this policy, each agency shall prioritize actions that reduce waste, cut costs, enhance the resilience of Federal infrastructure and operations, and enable more effective accomplishment of its mission. This EO does not rescind/eliminate the requirements of EO 13990; instead it expands on the energy reduction and environmental performance requirements for Federal agencies.

The foundation of a successful EMS at the IPRL includes the development and maintenance of an effective policy statement followed by the education of our employees. IPRL conforms to a nationally accepted standard (ISO) requiring 2nd party audits every 3 years (outside auditor), and 1st party reviews/audits annually using an Agency audit checklist. Non-conformance with the standard requires an action plan to correct deficiency(s).

The attached policy statement establishes the foundation of a successful EMS at the IPRL. Eileen Pokorny will coordinate the IPRL efforts towards the implementation of our Environmental Management System and maintain all documentation regards to the IPRL's EMS until June 30, 2023.

I challenge each of you to be better stewards of our environment and to make pollution prevention and the concept of Sustainability an essential part of your daily operational decision practices.

Acting Research Leader Signature: _____

Research Leader's Office
Invasive Plant Research Lab

Environmental Management System “Policy Statement”

It is the policy of the United States that Federal agencies follow the law in the implementation of the environmental, transportation, and energy-related activities by supporting their respective missions in an environmentally, economically and fiscally sound, integrated, continuously improving, efficient, and **sustainable** manner.

The Invasive Plant Research Lab, (IPRL) conducts research to develop solutions to control invasive species of high national priority. In conjunction with this mission, the Environmental Management System is committed in protecting human health and the environment; meeting or exceeding Federal, State, and local laws, regulations, codes, and guidelines; and employing sustainable pollution prevention practices. Whenever feasible, the IPRL will utilize pollution prevention and sustainable concepts/initiatives as the means for achieving compliance.

The Invasive Plant Research Lab continues to minimize our impacts and continually improve our environmental by implementing Executive Order 14057 “Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability” following Executive Order 13990 “Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis” following Executive order 13834 "Efficient Federal Operations" following Executive Order 13693, “Planning For Federal Sustainability in the New Decade”, the Energy Policy Act of 2005, and the Energy Independence and Security Act. IPRL will utilize our EMS as the means to monitor/document progress towards meeting environmental compliance and pursue progress on these goals.

In conclusion, the Invasive Plan Research Lab is committed to environmental compliance, pollution prevention, conservation practices, and continual improvement towards the current Executive Order and EMS goals.

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✦ Executives Orders and Energy Laws that the Federal Government must follow:

**Executive Order 14057—“Catalyzing Clean Energy Industries and Jobs
Through Federal Sustainability”**

EO Section	EO 14057 Goals and Requirements	Goals and Requirements in Earlier Authorities
GHG emissions – Scopes 1 and 2	A 65 percent reduction in scope 1 and 2 GHG emissions from Federal operations by 2030 from 2008 levels;	FY24 goal set by agencies relative to FY22 baseline [EO 14057]
GHG emissions–Scope 3	Agencies propose new FY25 goal within 90 days of EO (by 23 June 2025), to include leased space [§2]	FY24 goal set by agencies relative to FY22 baseline [EO 14057]
GHG emissions – mandatory Scope 3 GHG reporting for leases	The annual GHG inventory will include Scope 3 GHG for all leases over 10,000 GSF starting with FY24 reporting year.	None
GHG emissions – supply chain	E.O. 14057 builds upon E.O. 14008, and emphasizes the importance of the Federal Government’s strategic planning, governance, financial management, and procurement to ensuring climate resilient operations. Section 503(b) of E.O. 14057 establishes a continuing requirement to develop CAPs, and section 211(c) of E.O. 14008 requires annual CAP progress reports. Both the CAPs and the annual CAP progress reports communicate agency action to bolster climate adaptation and resilience and make the Federal Government more climate-ready.	Consider reductions associated with vendors and contractors [EO 14057]
Energy – intensity (Btu/GSF)	100 percent carbon pollution-free electricity on a net annual basis by 2030, including 50 percent 24/7 carbon pollution-free electricity;	the Federal Government will lead by example to achieve a carbon pollution-free electricity sector by 2035
Energy – data center efficiency	Install and monitor advanced energy meters in all data centers by FY18 [§3(a)(ii)(B)] Establish PUE target of ≤1.2–1.4 for new data centers and ≤1.5 for existing [§3(a)(ii)(C)]	Implement best management practices for energy-efficient management of servers and Federal data centers [EO 13514]
Energy – “clean energy” targets (renewable energy, including non-electric, and alternative energy)	E.O. 14057 directs the Federal Government, as the largest consumer of electricity in the Nation, to lead by example in transitioning to 100 percent CFE and to use its purchasing power to accelerate a full transition of the electricity sector to CFE by 2035. The E.O. emphasizes the need for a coordinated, whole-of-government approach to achieve these goals. This will require significant cross-agency collaboration, changes to how agencies plan and execute energy procurement, and enhancements to agency capabilities to measure and track CFE consumption, as well as 24/7 CFE, while technologies, market rules, and procurement mechanisms for CFE continue to develop.	Take action in FY 2024, as a foundational year, to increase CFE purchasing through both existing mechanisms and innovative procurement strategies.
Buildings – net zero building design	Starting FY24 all new construction of Federal buildings >5,000 GSF that enters the planning process will be designed to achieve energy net-zero and, where feasible, water or waste net-zero by FY30.	All new buildings entering planning in 2024 or later designed to achieve zero-net-energy use by 2030 [EO 14057]

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Buildings – net zero building inventory	Identify in the SSPP a new 2025 goal (no minimum goal stated) for % of buildings >5,000 GSF (number versus area not stated) that will be net-zero energy, water, or waste [§3(h)(iii)]	None
Buildings – Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings (GPs)	To reduce emissions and improve efficiency of existing facilities, E.O. 14057 establishes three outcome-focused performance targets and three strategy-based performance targets.	1. Reduce Building Portfolio Emissions 2. Increasing Energy Efficiency 3. Increasing Water Efficiency
EO Section	EO 14057 Goals and Requirements	Goals and Requirements in Earlier Authorities

Buildings – mandatory lease clauses	All lease solicitations are to include energy efficiency criteria as a source selection factor or minimum performance standard, and a requirement for lessors to disclose carbon emissions or energy consumption for that portion of the building occupied by the agency [§3(h)(iv)]	Energy Star label required [EISA]
Buildings – climate resilient design	Include climate resilient design in operations, existing building projects and new buildings [§3(h)(viii)]	Agency climate change adaptation plans are to consider resilience in real property investments [EO 14057]
Transportation planning	In planning for new buildings or leases, include cost-effective strategies to optimize sustainable space usage and consider existing community transportation planning and infrastructure, including access to public transit [§3(h)(vi)]	Regional and local integrated planning [EO 14057]
Agency-specific targets for reductions in building emissions	A Federal net-zero emissions portfolio under E.O. 14057 is one where, at an agency level, the targeted scope 1 and scope 2 GHG emissions from all facilities are reduced by the maximum extent feasible, and then the remaining emissions are balanced so the annual emissions equal zero.	Consistent with section 201 of E.O. 14057, agencies must propose agency-specific targets for reductions in building emissions and identify annual progress targets. In coordination with OMB, CEQ will provide instructions for proposing and submitting targets for review and approval. DOE must provide tools, data analysis, and technical support to assist agencies in setting targets, taking into account each agency’s existing portfolio.
Setting Agency Targets	Consistent with section 201 of E.O. 14057, agencies must propose agency-specific targets for reductions in building emissions and identify annual progress targets. Prioritize efficiency and electrification, in conjunction with strategies to use CFE consistent with section 4.2 of these Instructions. As CEQ and OMB have not yet provided guidance on the appropriate use of emissions removal technologies, agencies should not employ emissions removal strategies or offsets at this time.	Agencies will have unique opportunities and challenges in reducing scope 1 and 2 emissions. Agencies that make significant progress and meet their 2030 targets at an accelerated pace must revise targets to promote continued progress toward the net-zero goal.
Sustainable acquisition – environmentally preferable purchasing	Purchase to the maximum extent practicable products or services that meet EO 14057 specifications, standards, or labels, or criteria developed or adopted by certain voluntary consensus standards bodies.	

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Sustainable acquisition – Bio-Preferred and bio-based	USDA’s Bio-Preferred 90 website provides information on minimum biobased content requirements and related reporting and acquisition tools, ⁹¹ including recommended methodologies for agencies to set biobased purchasing targets.	Procurement preference for highest bio-based content.
Solid waste diversion	Under section I.F.2 of M-22-06, and consistent with section 207 of E.O. 14057, agencies must track municipal solid waste (MSW) generated from operations in leased spaces and construction and demolition (C&D) debris generated during tenant improvement.	Divert 50% of non-hazardous solid waste by 2025 and 75 percent by 2030.
Toxic and hazardous chemicals and materials	Substantively the same (“Reduce or minimize the quantity of toxic and hazardous chemicals and materials acquired, used, or disposed of, particularly where such reduction will assist the agency in pursuing agency GHG emission reduction targets”) [§3(j)(iv)]	Reduce quantity of toxic & hazardous chemicals and materials acquired, used, or disposed. Increase agency use of acceptable alternative chemicals and processes in keeping with the agency's procurement policies; and decrease agency use of chemicals.
Performance contracting	Fulfill existing commitments through FY23 then, beginning for 2024, set and report annual agency targets in the SSPP [§3(k)]	2011 President’s Performance Contracting Challenge
EO Section	EO 14057 Goals and Requirements	Goals and Requirements in Earlier Authorities
Electronics Stewardship – features on equipment	Same	Acquire ENERGY STAR certified ¹⁰² and FEMP Low Standby Power Products ¹⁰³ electronic products; Acquire IT products and services that meet EPA’s Recommended Standards, Specifications, and Ecolabels for Federal purchasing.
Electronics Stewardship – sustainable procurement	Environmentally sustainable procurement.	Sustainable life-cycle management of electronics is driven by a range of statutory requirements, including, most recently, the Energy Act of 2020
Electronics Stewardship – disposition	Same	Employ environmentally sound practices with respect to the agency’s disposition of all agency excess or surplus electronic products [EO 14057]
Agency Chief Sustainability Officer – designation	Designate a Chief Sustainability Officer; must be a senior civilian officer of the USG compensated at ES-IV or above [§7(a)]	Senior Sustainability Officer is chosen from among the agency’s “senior management officials” [EO 14057]
Agency Chief Sustainability Officer – internal meetings	Meet quarterly with those within the agency responsible for implementing the EO [§9(e)]	None
Lessor or contractor operation of agency buildings or vehicles	Ensure that leases and contracts for lessor or contractor operation of Government-owned buildings or vehicles facilitate the agency’s compliance with this order [§7(d)]	None
Sustainable employee commuting and travel	Consider developing policies to promote sustainable commuting and work-related travel practices for Federal employees (including workplace vehicle charging and telecommuting) [§7(f)]	Consider implementing strategies and accommodations for transit, travel, training, and conferencing that actively support lower-carbon commuting and travel by agency staff [EO 14057]

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Awards to recognize excellence	Foster outstanding performance and excellence in agency efforts to implement this order through opportunities such as agency leadership award programs [§7(h)]	Administer the Presidential leadership awards program to recognize exceptional and outstanding agency performance [EO 13514]
Climate Change Resilience – Cost Considerations	Calculate the potential cost of not taking into account agency vulnerabilities to climate change, and consider that cost in agency decision-making [§13]	Cost considerations not explicitly addressed this way in EO 14057
Strategic Sustainability Performance Plan (SSPP)	Submit an annual SSPP.	N/A
Notification of Exemptions	Notify CEQ of exemptions to this EO by 30 days.	N/A
Revocations	EO revokes two prior sustainability E.O.s and part or all of four Presidential Memoranda. Except as noted elsewhere in this document, revocations would generally have little effect as their requirements are consolidated and restated in this draft. [§16]	N/A

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✦ The Invasive Plant Research Laboratory's Plan to Implementing Executives Orders and Energy Laws

Maintaining a policy of commitment to environmental excellence

Commitment: It continues to be the policy of the IPRL to demonstrate its commitment to environmental protection and management through the following:

- Adherence to applicable regulations of Federal, State, and local Governments, Policies and Procedures of the U.S. Department of Agriculture and Agricultural Research Service, and Executive Orders, and
- Advancement of stewardship of natural resources by using sound management systems and conducting research to reduce impacts of agricultural production in the SEA, integral with the Pollution Prevention Program Executive Order 13693 is the foundation of this policy

Develop Annual Goals, Objectives, and Targets to advance the Invasive Plant Research Laboratory's Program performance in terms of both regulated and unregulated impacts

The Invasive Plant Research Laboratory has developed our "Annual Goals and Objectives that were based on one or more of the following criteria:

- Significant environmental impacts associated with facility and research-related operations;
- Deficiencies noted by employees discovered during day-to-day monitoring activities;
- Regulatory issues and trends discovered during internal and external inspections, reviews, or audits;
- Pollution prevention and conservation initiatives; and/or,
- Agency-wide emphasis programs, including the new practice goals of Executive Order 13990.
- Additional Elements and Continued Programs in the IPRL's EMS.

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2022/2023 Goals USDA, ARS, IPRL

3225 College Avenue

Ft. Lauderdale Florida 33314

EMS Coordinator Eileen Pokorny

Listed in Order of Priority

Based on money savings and external inspection.

1. **Remove all used tires golf cart, or any other tires and recycle/dispose at proper responsible facility. The EMS Coordinator is responsible to achieve this goal; the EMS Coordinator will monitor this Goal; progress will be documented with pictures of tires and name of company; written documentation will be maintained in the general file room by the Location Administrative Office. (Date of Completion May 5, 2023)**

2. **Replace fluorescent lamps with LED lamps in the Specimen Room #115. This will prepare the plan to replace the remaining lamps within in facility with LED lamps. The Location Administrative Office is responsible to accomplish this goal; the EMS Coordinator will monitor this goal; progress will be documented through emails/receipts by Danyelle Fitzgerald/Lexa Greenley , written documentation will be maintained in the general file room. (Date of completion September 7, 2023)**

3. **Current EMS Coordinator will assist a staff member to collect all the disposable gloves and process them to be recycled. The current EMS Coordinator is responsible to accomplish this goal; the EMS Coordinator and staff member will monitor and update this goal as needed; progress will be maintained with "Right Cycle" documented on the website regularly and mentioned at staff meetings and committee meetings; written documentation will be maintained in the EMS file. (Date of completion May 22, 2023)**

Research Related Goal

Design a rain-water collection cistern for distributing water to test plants in place of using city water. Use the design for future possible "End-of-Year" funding. The EMS Coordinator, Dr. Smith, Faculties Supervisor, and Area Engineer will be coordinating information to complete this goal; the EMS Coordinator will monitor this goal; progress will be maintained by the EMS Coordinator; written documentation will be maintained by the Administrative Office. (Date of Completion May 10, 2023)

The goals and objectives have been **prioritized by the EMS Committee as numbered** and assigned by the EMS Coordinator.

I approve the above recommendations from the EMS committees and **when feasible** they will have my full support for continual improvement.

Acting Research Leader: _____

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Consider Environmental Impacts when making Policy, Planning, Purchasing, and Operating Decisions

- **Affirmative Procurement:** An Affirmative Procurement Program has been established at the IPRL. This program requires all credit card holders to be trained in their responsibilities. RCRA 6002 insures compliance with the requirements established by the EPA for procurement of environmentally preferable products.
- **EMS Committee:** This committee will annually re-evaluate the Location's environmental aspects and impacts based on current and new operations. The goal will be to concentrate on incorporating systems and procedures to eliminate or minimize any negative impacts to the environment. Necessary revisions will be incorporated into the SOP of the operation, and written report will be compiled and filed in the Location's Safety Office.
- **NEPA Compliance:** All elements of the National Environmental Policy Act are considered to insure full compliance. Any construction projects at the IPRL undergo an environmental analysis before construction begins. Repair and Maintenance (R&M) Projects are analyzed on an individual basis by the Location Coordinator, and if appropriate, a Categorical Exclusion (CATEX) decision is made by the Area Director. All R&M Projects and other construction projects not qualifying for the CATEX will undergo either an Environmental Assessment or Environmental Impact statement, whichever is pertinent

Identify and Comply with Pertinent Requirements in Federal, State, and Local Laws and Regulations; Permits; Department of Agriculture, Agricultural Research Service, and SAA Policies and Procedures; and Industry Codes that IPRL must adhere to

- **Environmental Compliance:** Failure to comply with legal requirements and Executive Orders can have serious consequences for the IPRL, the SEA and the Agency. Line management accountability for environmental performance is an integral component of this Policy. All IPRL personnel must act within the scope of their duties to be eligible for the legal protection of the Agency. Violation of any Federal, State, or local law or regulation is not within the scope of any employee's duties. Violations can result in civil or criminal actions and disciplinary action up to and including removal from the Federal Service
- **Policy:** It is the policy of the United States that Federal agencies conduct their environmental, transportation, and energy-related activities under the law in support of their respective missions in an environmentally, economically and fiscally sound, integrated, continuously improving, efficient, and sustainable manner
- **Goals for Agencies:** The head of each agency shall:
 - Improve energy efficiency and reduce greenhouse gas emissions of the agency, through reduction of energy intensity;
 - Ensure that (i) at least half of the statutorily required renewable energy consumed by the agency in a fiscal year comes from new renewable sources, and (ii) to the extent feasible, the agency implements renewable energy generation projects on agency property for agency use;
 - Beginning in FY 2008, reduce water consumption intensity, relative to the baseline of the agency's water consumption in fiscal year 2007, through life-cycle cost-effective measures by 2 percent annually through the end of fiscal year 2015 or 16 percent by the end of fiscal year 2015;
 - Require in agency acquisitions of goods and services (i) use of sustainable environmental practices, including acquisition of bio-based, environmentally preferable, energy-efficient, water-efficient, and recycled-content products, and (ii) use of paper of at least 30 percent post-consumer fiber content;
 - Ensure that the agency (i) reduces the quantity of toxic and hazardous chemicals and materials acquired, used, or disposed of by the agency, (ii) increases diversion of solid waste as appropriate, and (iii) maintains cost effective waste prevention and recycling programs in its facilities;
 - Ensure that (i) new construction and major renovation of agency buildings comply with the *Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings set forth in the Federal Leadership in High Performance and*

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Sustainable Buildings Memorandum of Understanding (2006), and (ii) 15 percent of the existing Federal capital asset building inventory of the agency as of the end of fiscal year 2015 incorporates the sustainable practices in the Guiding Principles;

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Ensure that, if the agency operates a fleet of at least 20 motor vehicles, the agency, relative to agency baselines for fiscal year 2005, (i) reduces the fleet's total consumption of petroleum products by 2 percent annually through the end of fiscal year 2015, (ii) increases the total fuel consumption that is non-petroleum-based by 10 percent annually, and (iii) uses plug-in hybrid (PIH) vehicles when PIH vehicles are commercially available at **3920 Federal Register** / Vol. 72, No. 17 / Friday, January 26, 2007 / Presidential Documents a cost reasonably comparable, on the basis of life-cycle cost, to non-PIH vehicles; and

Ensure that the agency (i) when acquiring an electronic product to meet its requirements, meets at least 95 percent of those requirements with an Electronic Product Environmental Assessment Tool (EPEAT)-registered electronic product, unless there is no EPEAT standard for such product, (ii) enables the Energy Star feature on agency computers and monitors, (iii) establishes and implements policies to extend the useful life of agency electronic equipment, and (iv) uses environmentally sound practices with respect to disposition of agency electronic equipment that has reached the end of its useful life.

Request the Necessary Resources to successfully carry out our Goals, Objectives and Targets

- **Resources:** In order to successfully carry out our goals, objectives, and targets of our EMS, the IPRL must request the necessary resources. One way this is accomplished is through the Annual ARMP process. During the ARMP process, the IPRL engages in an extensive review at the Location level followed by a review at the Area level. Requests are made for the following pertinent Programs:
 - Hazardous Waste Disposal/Removal
 - Employee Assistance Program
 - Occupational Medical Surveillance Program
 - Safety and Health Training
 - Personal Protective Equipment
 - Safety and Health Equipment

Making personnel aware of their environmental roles and responsibilities, providing appropriate training, and holding employees accountable for their performance and actions, including recognizing them for outstanding performance

- A copy of the IPRL EMS plan will be posted in the Break room and electronic copy will be posted on the IPRL shared drive.
- Informational emails which provide EMS awareness information will be developed and distributed to Location personnel.
- The EMS Coordinator shall direct personnel to various types of EMS training, but specifically it is a requirement for all employees to complete the awareness training Online at Ag-Learn or attend "Earth Day" celebration each year as EMS Awareness Training.
- All new employees receive new employee orientation which contains a segment on environmental management and the Location's Environmental Management System.
- The SEA has in place procedures for recognizing employees for outstanding performance through a variety of awards. Also, the IPRL plans to issue an annual EMS award which includes procedures for nominating employees for outstanding performance in environmental management.

Effectively communicating with employees, partners, stakeholders, customers, and the general public, our commitment to the environment and soliciting their input in developing and achieving our goals and objectives.

- **Right-To-Know and Pollution Prevention:** The IPRL informs the public and its employees of possible sources of pollution resulting from facility operations through timely planning and reporting under the Emergency Planning and Community Right-to-Know Act (EPCRA) and through collection of chemical inventories and Material Safety Data Sheets (MSDSs)
- **Pollution Prevention:** This program is all-encompassing and includes nutrient management, chemical management, sustainable agriculture, energy conservation, research related to reducing the impacts of agricultural production on the environment within the Southeast Area, and education/outreach activities
- **Location Safety Meetings** – EMS is a topic at all Safety Committee meetings.
- **All communications** (e.g., local community concerns, FOIA requests, regulatory agency requests, etc.) from external parties shall be handled by the Administrative Officer.

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Routinely monitoring our environmental operations and conducting periodic inspections, audits, and reviews to ascertain that we meet applicable standards and to evaluate our program effectiveness

- **EMS Review and Revision:** It is the policy of the SEA that the Area and Location EMS's be reviewed annually on or before June 30. Necessary revisions should be incorporated and a written report should be compiled. At the IPRL, committee members of the EMS will conduct a first party audit annually
- **Environmental Audit** – The Location has conducted a precursory environmental audit and used that information to enhance the Location EMS. Also, during the “Annual Safety Inspection” by Area Office, a second party audit is completed annually.
- **Annual Safety Inspections** – Each Location is inspected at least once annually by Area Safety, Health and Environmental personnel. Within each written report of annual Area “Safety” inspections, EMS is listed as a heading with observations, comments, and/or discrepancies
- **Additionally**, during Location self-inspections, environmental elements receive focus and consideration (ARS Form 404). The Invasive Plant Research Laboratory maintains procedures for monitoring and measuring operations of significant environmental impacts (e.g., energy usage, water usage, toxic and hazardous materials usage, etc.). This monitoring is through annual data call reports, building automation system, hazardous waste logs, etc.
- **CARE/BiSHOP Team Reviews** – Periodic reviews are conducted by CARE Teams.

Correcting identified deficiencies in a timely manner and taking appropriate steps to prevent their recurrence.

- **Environmental Audit Response** – After completing the latest environmental audit, IPRL began to immediately address issues. Sound environmental management principals are employed to engage in corrective action and to initiate new programs if needed. Recommendations and or directives are issued to prevent recurrence. If the deficiencies cannot be corrected in a timely manner, a “Corrective Action Plan” will be developed for long term improvement.
- **Safety Inspection response** – When environmental issues are noted during annual inspections, timetables are established for corrective action. Recommendations and or directives are issued to prevent recurrence. If the deficiencies cannot be corrected in a timely manner, a “Corrective Action Plan” will be developed for long term improvement.

Clearly documenting and reporting the progress and achievements related to this policy.

- **Written Report after Annual Review** – After the review of the EMS, conducted annually on or before June 30 (beginning June 30, 2023) a written report is prepared which clearly documents the progress and achievements related to the respective EMS.
 - All reports are provided to the Senior Management Official to help carry out an annual EMS review.
 - Senior Management Official will acknowledge the progress of the location EMS by signing the “Goals and Objectives” and also the “Research Leader Support” letter in the IPRL's EMS.
 - The EMS Coordinator will maintain, update, and store all of the facility written EMS record and documents.
 - All EMS communications, including complaints will be passed onto the Senior Management, thereby allowing the Senior Management Official at the IPRL to respond to recommendations thereby creating continual improvement on the IPRL EMS.

Evaluation of this Policy Statement will be conducted annually and revised **if necessary.**

- **Policy Statement** will be evaluated annually and revised *if necessary*.

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The Policy Statement will be posted in the lobby of the IPRL's main building #17 for the viewing purposes of employees and contractors.

ADDITIONAL ELEMENTS AND PROGRAMS IN THE IPRL EMS

- **Environmentally and Economically Beneficial Landscaping:** Cost-effective and environmentally sound landscaping practices are employed to reduce adverse impacts to the environment. The policy of the SEA is to use native vegetation in landscaping projects. Because native trees, plants, grasses, etc. are endemic to the environment, a more natural impact results from their use. Naturally occurring vegetation is situated and located within IPRL facilities to need less watering, maintenance, and other activities that have negative connotations regarding environmental impact
- **Recycling Program:** IPRL strives to establish and maintain recycling programs for any recyclable material. Special focuses are placed on catalogs/magazines, newspaper, paper, batteries, metals, oils, printer cartridges, aluminum cans and plastics
- **Reduction in Ozone-Depleting Substances:** An inventory of R11, R12, R22 and R123 equipment was taken and sent to Area Office. IPRL's plan is to phase out this remaining equipment, considering life-cycle length and available funds, with equipment using ozone-friendly HCFC refrigerants. Source of information can be found at: <http://www.epa.gov/ozone/title6/phaseout/22phaseout.html>. The overall goal is to eliminate this equipment and implement this guidance throughout the Southeast Area.
- **Toxic Chemical Release Reduction:** The IPRL reduces its releases and transfers of toxic chemicals through innovative pollution prevention and effective facility management and acquisition and procurement practices.
- **Toxic Chemical and Hazardous Substance Use Reduction:** The IPRL reduces the use of specifically selected toxic chemicals, hazardous substances, and pollutants through identification of proven substitutes and established or advanced facility management practices. The IPRL has specifically targeted the following five chemicals:
 - Mercury
 - Cadmium
 - Lead
 - PCBs
 - Naphthalene
- **Utilization of Bio-based Products:** Whenever possible and feasible, the IPRL utilizes bio-based products including the following:
 - Lubricants, oils, and other petroleum products.
 - Carpet and other building materials.
 - Cleaning supplies.
 - Recycled paper products.
- **Pesticide Program:** It is the policy of the IPRL to comply with all Federal, State and local laws governing the use and application of pesticides. Employees engaged in pesticide application are required to be trained and certified according to the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). Pesticide use and storage is strictly monitored and IPRL has written policies and/or standard operating procedures within specific pesticide programs.
- **Chemical Hygiene Program:** The IPRL has initiated laboratory chemical hygiene programs. The utilization of written chemical hygiene plans and Location Chemical Hygiene Officers supports chemical management, hazardous waste management and contributes to waste minimization.