

2008 Closing the Circle Award
Environmental Performance Track Initiative in the USPS FY 2007
U.S. Postal Service, Northeast and Western Areas, Headquarters

During the last 12 months the U.S. Postal Service (USPS) has updated and completed full implementation of its environmental management systems (EMS) for twenty five (25) plants, twenty three (23) vehicle maintenance facilities (VMF) and five (5) large Post Offices in the eight districts of the Northeast Area and two districts within the Western Area. The processing and distribution facilities (P&DC) in these ten districts process mail for 27.5 million Americans (20.3 million live in the Northeast Area of the United States and 7.2 million live in Washington and Idaho). Our 78,195 employees in the ten affected districts provide mail delivery service to 27.5 million Americans through a fleet of 21,196 vehicles. Our impacts to the environment primarily relate to the automotive and mail processing and maintenance equipment we operate in these 63 facilities (53 in the Northeast Area and 10 in the Western Area). To ensure our EMS provides standardized procedures that match our high standards for delivery performance expected by our customers, we have developed environmental compliance programs that are consistently applied and implemented across all our risk facilities in these ten districts.

While our EMS program began twelve years ago, the latest revisions were implemented over a three-year period to support the USPS national leadership goal of increased participation in the EPA Performance Track Program (PT Program). Another valuable output from this “plan, do, check, act” revision process undertaken over the last three years is the development of a model corporate EMS known as Environmental Program Evaluation Guide (EPG). Our continuously improving EMS is not a “Johnny-come-lately” development. It has been in existence since 1994, making it one of the earliest EMS’s in the Federal government.

As the concepts of EMS evolved, the USPS revised its protocols to reflect industry best practices and guidance contained in Presidential Executive Orders. After fourteen years of experience with EMS’s, the USPS has made substantial improvements to EMS review and data tracking procedures with leadership coming from our Northeast and Western Areas. For example, in the Northeast Area our EMS integrates the environmental activities of 53 high risk facilities with 3,143 retail Postal Service facilities throughout the New England states (CT, ME, MA, NH, RI and VT) and upstate NY (zip code areas 120 to 149). In the Western Area the participating states are WA and ID, comprising 20 high risk facilities, 746 retail facilities, and a service area in the two states of 155,000 square miles. With a service area covering nearly 263,000 square miles, the challenges faced by our Northeast Area (104,000 square miles) and Western Area (155,000 square miles) environmental staffs are daunting: providing consistent, reliable and compliant environmental programs in every community within these Areas in which the USPS operates.

The process of achieving a sound EMS has been a three step process: 1) the initial step involved bringing each facility into compliance with environmental laws and regulations. This was accomplished with the help of the facility manager and Facility Environmental Coordinator (FEC); 2) the second step was the completion of an EMS that ensured compliance requirements were met and a business-based EMS was implemented. This step has been performed by the six Environmental Specialists (ES) serving the USPS Northeast Area and two ES’s serving the Western Area. The third and final step was an outside, independent EMS review to ensure that the EMS complied with USPS and EPA EMS protocols. The challenge for the USPS has been the development of a corporate EMS that also meets the site-specific compliance and business needs of each facility. This higher level EMS has taken longer to achieve but has offered far greater benefits than stand-alone EMS

strategies. Our process required stakeholder involvement at all levels of the organization (i.e., at the facility, District, Area and Headquarters levels). Once finalized, a seamless communication of environmental procedures, protocols and requirements was realized throughout the Northeast and Western Areas.

Background:

As of January 11, 2008, a total of twenty four (24) Northeast and Western Area facilities are members of the EPA Environmental Performance Track (PT) Program. Two of these facilities (Hartford, CT VMF and Hartford, CT P&DC) are actual Charter members that joined the program when it first began in 2000 and have subsequently renewed their membership this year for the third time (i.e., a third commitment was made for the 3 year PT Program). The Northeast Area has twenty five (25) facilities that are ISO 14001 compliant that will be applying for the PT Program in the near future. Just as important, the USPS has seven (7) Post Offices, Plants and VMFs in the Northeast Area and seven (7) plants and VMFs in the Western Area with pending PT applications. The overall status of USPS participation in the PT Program is summarized in Table 1:

Table 1: USPS Participation in EPA Performance Track Program

Area	Number in PT Track	Number with Pending Applications	Additional facilities with EMS 14001 Compliant programs
Northeast	21	7	25
Western	3	7	0
Total	24	14	25

Pollution Prevention and Economic Benefits of a Facility-Level EMS:

The EMS adopted by plants and VMFs in the USPS has resulted in significant pollution prevention, recycling and economic benefits. For example, in FY 2006, the USPS Northeast Area leveraged its network of plants and VMFs to backhaul nearly 77 million pounds of mixed paper, cardboard, plastic and other recyclables to its 87 designated Hub sites that serve as collection points for these materials before pickup by paper mills and commodity brokers. More importantly, this same network of plants and VMFs: 1) prevented over 91 million pounds of waste from being generated through programs to reuse cardboard containers up to five times and plastic pallets up to 50 times; and 2) prevented nearly 7 million pounds of undeliverable mailings from ever happening as a result of our customer oriented electronic change of address program.

As a further illustration of progress, over the last five years, one of the Western Area’s enrolled facilities reduced the generation of hazardous waste by approximately 110%. During this same period, the facility increased the recycling of paper, cardboard and other materials from 73 tons to 87 tons. Although respective totals for hazardous waste reduction and recycling at the other facilities will vary, this one facility illustrates the success of EMS implementation in the Western Area.

The combined recycling and pollution prevention programs at our EMS sites in the Northeast and Western Areas have resulted in over \$2.7 million in savings from avoided landfill disposal costs and over \$1.1 million in savings from recycling of Undeliverable Standard Mail (USM), cardboard, plastic and metals. These achievements are based on the development and adoption of standardized metrics that are consistently and uniformly measured across all USPS operations over time.

Similarly dramatic waste prevention achievements have been documented for all Northeast Area plants and VMFs in the hazardous waste management arena. In 2006 (our latest reporting year for RCRA data), the Area’s 25 plants reduced hazardous waste by 90% over

1992 hazardous waste generation levels. In 1992 these facilities generated 10,284 gallons of hazardous waste. By 2006, they reduced this waste stream to 990 gallons, saving over \$43,974 in hazardous waste disposal costs. Perhaps more impressively the Area's 23 VMFs reduced hazardous waste by 97% over 1992 generation levels. In 1992, these facilities generated 40,880 gallons of hazardous waste but by 2006 they had reduced these waste streams to 1,115 gallons. More significantly, these VMF actions saved over \$171,307 without adjusting for inflation.

The USPS EMS Accounting and Data Management Strategy

One of the critical elements of our EMS is the commitment to standardized tracking of all waste streams at all our high risk facilities. All of our EMS sites use standard data collection tools that enable the USPS to determine trends in waste generation, financial costs for disposal and recycling and revenue generation from recycling initiatives. In addition, the USPS tracks the status of other program considerations including compliance with training responsibilities through annual training action plan updates; compliance with environmental equipment needs through annual environmental budget calls for compliance and pollution prevention equipment; and compliance with facility-specific environmental targets and objectives through annual updates of environmental program performance. Our approach builds on, but goes beyond, an individual facility-based strategy. Our high risk facilities that have joined the EPA PT Program have established a corporate EMS approach that is consistently applied at all 63 facilities. Our corporate approach is based on the principle of "customized compliance" using standardized EMS protocols. These 63 facilities are not only leaders in the deployment and maintenance of a sound corporate EMS, they have established the quality control procedures that will enable the remaining 600+ USPS plants and VMFs to adopt the same high standards of EMS performance.

National Environmental Performance Track: A Tool for Leadership and Compliance

The EPA National Environmental Performance Track Program is a voluntary compliance-based program that recognizes environmental leadership at the facility level. With over 400 members, the PT Program has become a status symbol for leading edge companies that wish to gain market advantage with American and international customers. PT Program members must meet three major criteria to be eligible for participation: 1) the facility must be in full compliance with all applicable laws and regulations as determined by an outside auditor; 2) it must demonstrate two significant environmental accomplishments during the previous two years; and 3) it must have a validated EMS comparable to ISO 14001 meeting PT EMS protocols. Once these criteria are met, each facility must make new commitments (2 to 4 new commitments) to continuously improve above and beyond any former achievements. All 63 of our high risk facilities have met these standards even though only 24 of our facilities have become PT Program members. The Northeast and Western Areas have an additional 14 facilities with pending PT Program applications and 25 USPS facilities that have fully implemented EMS 14001 protocols and are expected to join the PT Program over the next twelve months.

The USPS EMS has proven to be entirely compatible with the PT Program, allowing for a seamless transition to the EPA EMS protocols. Perhaps more importantly, the USPS has integrated its EMS procedures with those of EPA and dovetailed them with the EPA WasteWise program. The PT Program requires compliance as a condition of admission into the program, whereas WasteWise simply requires a commitment to the development of facility-specific or organization-specific goals for waste prevention, recycling and the purchase of recycled content products. The USPS has integrated these two EPA programs into its routine procedures for environmental compliance and pollution prevention. The result has been an effective system for measuring and evaluating the benefits of an EMS.

The result of this effort is that the USPS has more facilities in the EPA National Performance Track Program than any other Federal agency in the United States.

EMS Team Strategy

One critical element of the USPS EMS approach is the application of consistent and standardized protocols for managing every significant environmental aspect associated with our high risk facilities. This means that the USPS has been able to make dramatic reductions in training costs since maintenance staff, facility managers and employees know exactly what to expect even when they take another position within the USPS. This approach also reduces the challenges associated with having totally unique EMS protocols at each facility. In contrast to many EMS initiatives that merely focus on success at the facility level, the USPS has established standards of excellence that are consistent nationwide. We call our standardized EMS, Environmental Program Evaluation Guide. EPEG, as it is known internally, has been built on the successes of our model EMS programs in the Northeast and Western Areas. The organizational and EMS advantages of a standardized system are enormous and are reflected in the significant cost reductions associated with solid, universal and hazardous waste generation.

The development of a corporate-level EMS within the entire USPS would not have been possible without the support of every facility manager, facility environmental coordinator and the Environmental Specialist for each of the ten affected districts. The key staff that made this initiative possible are; James Gaffney, James Hennessey, Julie Theroux, Ronald Robbins, Nick Varoutsos, Bob Fox, Angelo Dispensa, Charles Vidich, James Hanna, Sydney Randell, Jerry Jensen, Melinda Edwards, William Hayen, Cathey Sinai, Terry Grover, with Leadership support from Michael Fanning, Manager, Environmental Policy and Programs and Sam Pulcrano, Director Safety and Environmental Performance Management. Their combined efforts allowed the USPS to successfully complete 63 EMS reviews at all of the P&DC and VMF facilities in the Northeast and Western Areas. These reviews, along with ten years of previous preparatory work, have enabled these facilities to meet the minimum requirements for entry into EPA's PT Program. Currently, nearly 40% of all of the Northeast Area facilities that require EMS belong to Performance Track. This achievement is unique in the Federal sector. In 2000, the USPS was the first Federal agency accepted into the PT Program. It is now the Federal agency with the largest membership in the Performance Track program.
