

16977 – ODUSD(I&E) Environment, Safety, and Occupational Health (ESOH) in Acquisition Initiatives 2014

2014 NDIA Systems Engineering Conference

Thursday, October 30, 2014

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Outline

Acquisition Environment, Safety, and Occupational Health (ESOH)

Mission

Policy, Guidance, and Oversight

- DoDI 5000.02, Operation of the Defense Acquisition System
- Defense Acquisition Guidebook
- ESOH in the SEP, PESHE, and NEPA/EO 12114 Compliance Schedule
- Program Support Assessments
- Program Oversight

Initiatives

- Life Cycle Analysis in Acquisition
- Implementing Better Buying Power
- Hazardous Materials Management Update to NAS-411-1
- HFC Minimization





Acquisition ESOH Mission

Prevent Loss of life of injury to personnel Avoid damage to equipment or facilities

Support the warfighter and DoD's mission

Prevent harm to the environment and surrounding community Avoid system failures that negatively impact mission capability and operability





Acquisition ESOH Policy, Guidance, and Oversight





Acquisition ESOH Policy

Interim DoD Instruction 5000.02, Operation of the Defense Acquisition System, issued in November 2013

- Incorporates Facts-of-Life changes & Significantly Streamlines content
- Identifies new Acquisition system types
 - All types of systems require system safety analyses
 - Software system safety cannot be overlooked
- References MIL-STD-882E, Standard Practice System Safety
- Clarifies ESOH Rick Acceptance for Joint Programs
- Better Addresses ESOH for early Testing and Development Activities





Acquisition ESOH Policy

Interim DoD Instruction 5000.02, Operation of the Defense Acquisition System

- ESOH Section incorporates Better Buying Power policy and minimizes duplication of information in acquisition documents
 - Program managers (PM) will document the ESOH planning in the Systems Engineering Plan (SEP)
 - For example, how ESOH is integrated into systems engineering planning, includes, which Integrated Product Team(s) have ESOH responsibilities
 - PM will document results of results of their planning and implementation in the Programmatic ESOH Evaluation (PESHE)
 - Hazards and ESOH risk data provided
 - ESOH risk management information
 - Hazardous materials management data, including minimization efforts
 - PM will develop a National Environmental Policy Act (NEPA) and Executive Order (EO) 12114 Compliance Schedule



Defense Acquisition Guidebook (DAG) Chapter 4 Changes:

- ESOH Section in Chapter 4 elaborates on ESOH content for the SEP, PESHE, and NEPA/EO 12114 Compliance Schedule
- Updated Sustainable Procurement guidance
- Added Sustainability Analysis (Section 4.3.19.2.) with Life Cycle Assessment as a Systems Engineering process tool
- Added Operational Energy as a Design Consideration
- Demilitarization & Disposal section rewritten







Acquisition Community Connection (ACC) Update

Updated the ACC ESOH Community of Practice (CoP)

- Removed outdated content to reflect current policy/guidance
- Added links on front page to specific key ESOH areas
 - Synchronized new look to match Systems Engineering CoP
- Front page of ESOH CoP:
 - Overview
 - Topics
 - Documents
 - Resources
 - Compliance
 - ESOH Policy

ACC Website: https://acc.dau.mil/esoh





ACC Update (continued)

> ACC Topics

- Air Quality Considerations
- Noise Far Field
- Noise Occupational
- ESOH Risk Management
- Hazardous Materials Management
- Electromagnetic Radiation (EMR)
- Sustainable Procurement Program
- Sustainability and Systems Acquisition
- Demilitarization and Disposal Considerations
- Key Mandatory Definitions from MIL-STD-882E
- System Safety Methodology MIL-STD-882E
- Chemical and Material Risk Management Program
- National Environmental Policy Act and Executive Order 12114





Acquisition ESOH Oversight - Program Support Assessments (PSAs)

Office of Deputy Assistant Secretary of Defense for Systems Engineering (ODASD(SE)) leads PSAs

- DoDI 5000.02 mandated Defense Acquisition Board decision support
- Provides a Systems Engineering Focused Review
- Examines multiple aspects of Program

> ODUSD(I&E) provides ESOH Subject Matter Experts to:

- Validate program compliance
- Assess effectiveness of Acquisition ESOH policy
- Work closely with program teams
- Fiscal Year (FY) 2014 supported Small Diameter Bomb II PSA
- FY 2015 plan to support various PSAs (Joint Air-to-Ground Missile (JAGM), etc.)



Program Oversight

Some programs lacked a PESHE or requesting to tailor / waive the PESHE requirement

- Impact: Programmatic risks from lack of ESOH analyses (e.g., software system safety analyses)
- One program proposed use of Halon 1301, ozone depleting substance (ODS) as fire suppression agent
 - Impact: Future supply risks for meeting mission requirements (legacy systems and future systems requiring Halon 1301)
- > One program was not working to minimize hexavalent chromium
 - Impact: Potential exposure risks to maintainers, increased end-oflife costs to Demilitarization/Disposal.

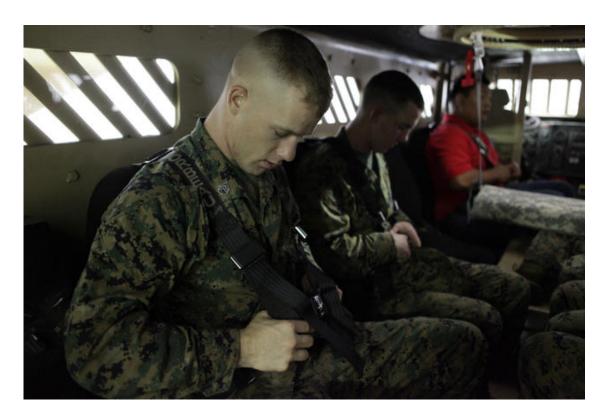
In some instances, National Environmental Policy Act (NEPA) analyses were missing

Impact: Schedule Risks to programs

ODUSD(I&E) Working to Minimize Impacts



Acquisition ESOH Initiatives

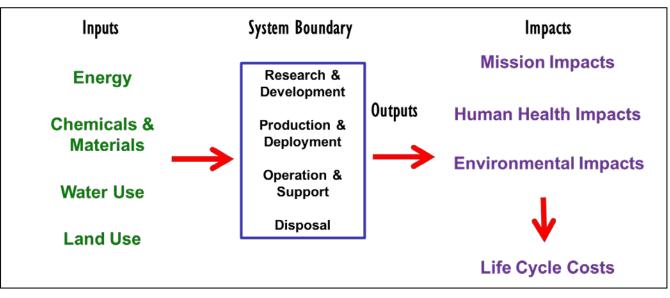




Life Cycle Sustainability Analysis

Develop a sustainability analysis Program Offices can use to help understand life cycle impacts during the design process and influence decision making

- Human health and environmental impacts
- Life cycle costs of impacts
- Approach: Develop a Sustainability Analysis Using Life Cycle Assessment Methods
 - Tailored analysis for DoD Streamlined Life Cycle Analysis (SLCA)





Sustainability Analysis Pilot Project Collaboration with Boeing & Sikorsky

 Pilot project to calculate impacts & life cycle costs of two design alternatives for two current acquisitions manufactured and sustained over 30 years:





117 Boeing P-8A

573 Sikorsky MH-60R

• Example life cycle costs for chemical and materials:

Personal protective equipment Workplace IH monitoring Air handling/waste treatment systems HAZMAT training Hazardous waste management and disposal Emissions/discharge permits



Implementing Better Buying Power Memos

Streamlining and Integrating ESOH in Acquisition Documents

- Approach: Developed Guide to ESOH in the Systems Engineering Plan (SEP), Programmatic ESOH Evaluation (PESHE), and NEPA/EO 12114 Compliance Schedule:
 - Built on lessons learned & best practices from Acquisition ESOH professionals
 - Eliminates redundancy in acquisition documents
 - Delineates expectations for ESOH content in documents, which if followed, should optimize document development and approval
 - Describes technical planning for ESOH considerations in SE
 - Documents data generated from implementing the technical plan
 - Improves ESOH risk management
 - Resource for developing system documentation and fielding activities



Guide to Environment, Safety, and Occupational Health (ESOH)

In the Systems Engineering Plan (SEP) Programmatic ESOH Evaluation (PESHE) and National Environmental Policy Act (NEPA)/ Executive Order (EO) 12114 Compliance Schedule





Next Phase: Promote Better Buying Power 3.0

Potential Focus Areas:

- Streamline documentation requirements and staff reviews
- Strengthen organic engineering capabilities & Improve requirements definition
- Improve our leaders' ability to understand and mitigate technical risk
- Department of Defense Instruction on Acquisition of Services





- Promote Hazardous Materials Minimization
- Current Challenges:
 - Multiple management approaches
 - Multiple hazardous material lists
 - DoD's priorities were not clear to industry



- Approach: Align National Aerospace Standard (NAS) 411 (Hazardous Materials Management Program Standard Practice) & MIL-STD-882E Task 108 (Hazardous Materials Management Plan)
 - MIL-STD-882E, Task 108, Hazardous Materials Management Plan
 - Prioritizes efforts to eliminate or reduce hazardous material usage by categorizing targeted materials as Prohibited, Restricted, and Tracked
 - Includes HAZMAT list by category as contractual requirements
 - NAS 411 provides:
 - Detailed guidance for implementing MIL-STD-882E, Task 108
 - Lists of baseline hazardous materials in the three categories



Hazardous Materials Management, Cont.

- <u>Phase 1:</u> Updated National Aerospace Standard (NAS) 411, Hazardous Materials Management Program (HMMP), and developed complementary NAS 411-1, Hazardous Materials Target List (HMTL)
 - NAS 411 Provides
 - Contractors with Task 108 implementation guidance
 - Intent: Program Office puts Task 108 in Request for Proposal (RFP) and Contractor Proposal includes NAS 411
 - Alternative: Program Office puts NAS 411 in RFP
 - Guidance on establishing a HAZMAT list by category
 - Procedures to obtain Government waiver to use Prohibited HAZMAT in a specific application
 - NAS 411-1
 - Provides a "starting point" for program offices and contractors with baseline lists of Prohibited and Restricted HAZMAT
 - Includes a definition for a "Tracked HAZMAT"
 - Does not include a baseline "Tracked HAZMAT" list (Phase 2 effort)



Hazardous Materials Management, Cont.

<u>Phase 2</u>: Update to National Aerospace Standard 411-1 and Create a baseline Tracked list for NAS 411-1

- DoD Acquisition ESOH IPT Working Group screened 1007 materials for the proposed Tracked list using:
 - HAZMAT use(s) and carcinogen information
 - Hazardous Materials Information Resource System
- Final product is a proposed "tracked list" containing 379 materials

Way Ahead on Tracked List Development

- AIA will
 - Conduct further analysis of the DoD proposed "tracked list"
 - Coordinate with DoD on any proposed changes to DoD Tracked list before publishing the list in a NAS 411-1 update





- Promote alternatives to replace HFC's that contribute significantly to Global Warming
- > Background:
 - Replacements for Ozone Depleting Substances (ODSs)
 - Chlorofluorocarbons (CFCs), Hydro-Chlorofluorocarbons (HCFCs), & Halons
 - Widespread & Important Uses
 - Refrigerants
 - Fire Suppressants
 - Foam Blowing Agents
 - Aerosols & Solvents
 - Contribute to Climate Change
 - Global Warming Potential (GWP) Thousands of Times More Potent Than CO2
 - Already Regulated by UN Framework Convention on Climate Change & U.S. Clean Air Act (USCAA)
 - DoD Emissions Reported to CEQ and OMB in the Annual Energy Management Report/Greenhouse Gas Inventory per EO 13514
 - Emerging Proposals to Phase-Down Production and/or Ban Use
 - EU Fluorinated-Gas Regulation
 - Montreal Protocol Amendment Proposals
 - U.S. Climate Action Plan



HFC Minimization, Cont.

- > HFCs Used In Virtually <u>All</u> Existing & New Weapon Systems
 HFC-134a and various blends consisting of HFC-32, -125, -134a, and -143a
 New Design Shipboard Air-Conditioning & Refrigeration
 New Design Aviation & Ground/Tactical Environmental Control

 - HFC-227ea and HFC-125
 - New Design Ground Combat Vehicle Fire/Explosion Suppression
 - New Design Shipboard and Aviation Fire Suppression
 - HFC-236fa and HFC-134a
 - Retrofit for Legacy Shipboard AC&R
 - HFC-43-10mee, HFC-245fa, and HFC-365mfc
 - Solvents for Weapons System Production & Maintenance
 - HFC-134a and HFC-152a
 - Aerosol Propellants for Weapons System Maintenance
 - HFC-245fa
 - Insulating Foam on Shelters
 - Others
 - Insulating Foams
 - Structural Foams
 - Ordnance Applications
 - Wind Tunnels



HFC Minimization, Cont.

Minimization Effort Strives to Protect DoD Equities

- Clean Air Act ,Services Steering Committee, Ozone Depleting Substances Subcommittee Interagency Coordination
 - Meet regularly with Environmental Protection Agency and the Department of State
 - Review & Comment on Proposed Rules and US Government Positions
- Ensure a Phase-Down not a Phase-Out
 - Critical Uses With No Suitable Alternatives
 - Lessons-Learned from Managing Montreal Protocol ODS Essential / Critical Use Exemptions
 - Seek Military Exemptions Should Phase-Down Plateau Drop Too Low
- External Engagement
 - Other Militaries
 - Industry
 - Other Fora (International Organizations, Non-Government Organizations, etc.)



Path Forward – Minimization of HFC's

Acquisition Community and Program Managers should evaluate risks

- Implement Mandatory HFC Conservation Measures
 - Review & Revise Maintenance Procedures As Necessary
 - Require Recovery, Recycling, and Reclamation
- Use HFCs Only Where Necessary
 - Begin Shifting To Existing Lower-GWP Alternatives
 - Example: Shift From R-404A to R-407A = 46% Reduction in GWP
 - Start Looking At New Low-GWP Alternatives
- Look At The Big Picture
 - Safety
 - Energy Efficiency (Don't trade direct emissions for indirect emissions)
- Talk With Your Suppliers
- Seek Out DoD/Service Expertise



Acquisition Environment, Safety, and Occupational Health

Mission

✓ Support the War Fighter

Policy, Guidance, and Oversight

- ✓ Policy and Guidance to Support Mission
- ✓ Oversight to ensure Compliance

Inițiatives

- ✓ Updates to DoDI 5000.02 and the Defense Acquisition Guidebook
- ✓ Streamlining for ESOH in Documentation
- Better Buying Power 3.0
- Sustainability in Acquisition
- HAZMAT Minimization
 - NAS 411-1
 - HFC





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BACKUP





LED Lighting on Navy Ships

ESOH, Energy, Cost Savings, Logistics, and Safety Benefits > LED lights do not contain hazardous materials

- Persons won't be exposed to chemicals if LED bulbs break
- Improved working conditions for Sailors due to better lighting
 - Workers can more easily see the details of our work, identify hazards, and potentially avoid mishaps

LED lights are more expensive up front, but last up to five times longer

- Shipmates spend up 80 percent less time on ladders and lifts changing out bulbs
- LED lights use approximately 50 percent less energy than conventional florescent bulbs
- Since lights last longer, the Navy will be able to stock fewer bulbs in their supply rooms



SLCA in Acquisition Programs

Refining "Sustainability in Acquisition" Methodology

- Communicating with stakeholders to identify improvements and gain support
- Eventually SLCA could be placed on contracts
- Programs would identify sustainability factors to be considered at the appropriate decision point
 - Use physical, chemical, and toxicity data to make smart choices
 - Possible weighting or scoring system for alternatives
 - Estimates potential life cycle costs that need to be considered

Could be used to support Life Cycle cost estimating