

CITY OF SAN DIEGO  
M E M O R A N D U M

DATE: January 26, 2011

TO: Natural Resources and Culture Committee – Agenda of February 2, 2011

FROM: Chris Gonaver, Environmental Services Director

SUBJECT: Environmental Services Department Environmental Management Program:  
Transition from ISO 14001 to ESD's Environmental Management Program

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In 2002, the Environmental Services Department (ESD) obtained ISO 14001 Environmental Management System certification for the department's Miramar Landfill, a first for a municipal landfill. The purpose of the ISO 14001 certification was to help ESD's Miramar Landfill,

- minimize how its operations negatively affect the environment (i.e., cause adverse changes to air, water, and land),
- comply with applicable laws and regulations, and
- continually improve in the above.

The ISO 14001 program works through a management system framework that recognizes and manages environmental issues through awareness of legal requirements, objectives for improvement, competent personnel, controls and monitoring, and self correction. This management system does not specify levels of environmental performance but provides a framework for a holistic, strategic approach to environmental policy, plans and actions.

In the first four years of implementation, changes were made to daily operations to meet the goals of the ISO program which resulted in significant environmental protection and cost savings. Two of the largest savings during this period were \$3M saved by reducing idling time on the heavy equipment and \$2M saved by using re-usable tarpaulins instead of dirt for daily cover. These changes also resulted in significant reductions to vehicle emissions and preservation of landfill capacity. Other innovations included switching from potable water to reclaimed water to control dust on the roads and to moisten the compost, reducing paper usage and reusing collected storm water also for dust control. These operational changes, along with their associated cost savings, have continued year after year. Since 2005, however, no new major initiatives have been introduced as a result of the ISO 14001 program.

The environmental protection approach to operations fostered by this initiative was already embedded in the work ethic of our landfill staff. One example is the methodology used by staff at the Miramar Greenery composting operation which resulted in several initiatives that were implemented outside the ISO 14001 program. These included taking the necessary steps to increase the amount of food waste added to the composting operation helping business to reduce the amount of waste they disposed, as well as conducting pilot studies evaluating future mixed organic diversion initiatives. Staff also suggested colorizing wood chips to dramatically boost revenues for the sale of these commodities.

In 2009, as part of our continuous effort to improve efficiencies and effectiveness, ESD looked at the cost/benefit associated with continuing the ISO 14001 certification versus transferring of the "essence" of the ISO 14001 program to an internal Environmental Management System. In January 2010, the evaluation of the overall costs and benefits associated with the external ISO 14001 program was completed. The costs associated with maintaining external certification and paying for annual and tri-annual inspections were approximately \$80,000/year with little or no direct economic benefit directly attributed to the ISO 14001 certification since 2005. ESD staff continued to evaluate these findings and presented them to our departmental management team in March 2010 along with a proposal to internalize the fundamental nature of the ISO 14001 program while discontinuing the need to pay for external certification costs.

On May 21, 2010, ESD notified the auditing firm (Attachment 1) that we were officially ending the ISO 14001 certification and we removed specific references to the ISO 14001 program from our website. ESD supervisors were briefed on these developments throughout April and May 2010.

At the May 25, 2010 meeting of the City Council, the decision to discontinue outside ISO certification was brought up during public comment. The speaker questioned whether there was a connection between the potential divestiture of Miramar Landfill and the decision to end outside certification. I responded to Council questions about this issue at that time, explaining that there was no connection as the two decisions were made independently of each other.

At the July 13, 2010 City Council meeting, the decision to end the ISO 14001 certification was again raised by public testimony. I was asked again by Council to explain why we had decided to end the ISO 14001 program and questioned about the perceived connection between the ending of the ISO 14001 program and the landfill RFQ. I explained that the ISO 14001 program had been undergoing a long term review and that was the basis of the decision to internalize it. When questioned further, I stated that we expected to have the documents related to the new internal Environmental Management Program on the City's website by the end of 2010.

Our new Environmental Management Program is actively being implemented internally by ESD staff. We have maintained all of the Standard Operation Procedures (SOPs) that were fundamental to the ISO 14001 program, while introducing several new SOPs since launching our internal program. They include, developing complete SOPs for all of the operations at the Miramar Greenery, developing a brush clearing SOP that protects native species, enhances fire prevention, and removes fire hazards, and revising existing SOPs to ensure operational efficiencies are incorporated.

ESD has always had a strong commitment to the environment. Some highlights include:

- Receipt of the first U.S. EPA Energy Star issued for a Green Building in 1999
- Implemented innovative ordinances which have dramatically increase recycling – the City now has a 66% recycling rate
- Committed to tracking and measuring progress in many aspects of environmental quality e.g., through the City's General Plan and the Climate Mitigation and Adaptation Plan, the City reviews sustainability initiatives and tracks greenhouse gas emissions from City operations in 1990, 2004 and 2007-2009.

In the spirit of this environmental commitment, ESD staff continue to investigate new initiatives for the Miramar Landfill that will enhance the overall impact to the environment, extend the life of the landfill, and further the progress of the initiative that began when we first achieved ISO 14001 certification.

We are committed to,

- improving overall environmental performance and compliance
- increasing efficiency while realizing cost savings
- promoting predictability and consistence in managing environmental obligations
- effectively targeting our scarce environmental management resources

Our website has been updated (<http://www.sandiego.gov/environmental-services/miramar/index.shtml>) and new logo created to enhance recognition of our Environmental Management Program. Ongoing training has begun, and new banners are being created. Our commitment to the environment has not changed, it's just been re-engineered.



Chris Gonaver  
Environmental Services Director

Attachment: May 21, 2010 Letter to ISO Auditor



THE CITY OF SAN DIEGO

May 21, 2010

NSF-International Strategic Registrations Ltd.  
Mr. Christian Lupo, General Manager  
789 N. Dixboro Road  
Ann Arbor, MI 48105

Dear Mr. Lupo:

Subject: Agreement for Consulting Services, Lump Sum Agreement for ISO 14001 Registration Services, City of San Diego and NSF International Strategic Registration Services Ltd.

After careful consideration of operations at the Miramar Landfill in respect to our environmental management system, the City of San Diego, Environmental Services Department (ESD) has determined that it will no longer seek to maintain ISO 14001 certification of its Environmental Management System (EMS). Through this program, we have been able to achieve great success in identifying additional environmental impacts within our operations, and have capitalized on improving our processes to not only minimize our impact on the environment, but to gain significant operational cost savings.

We are currently consolidating our resources in both time and manpower, and will therefore incorporate our EMS in such a way as to capture and maintain all of our previous gains, while allowing us greater flexibility in how we address our future operational challenges. In accordance with Article II, Section 2.6 of the above referenced agreement, you are hereby notified that this agreement is cancelled effective upon receipt of this letter.

In conclusion, I wish to express ESD's gratitude for the many years of outstanding support, commitment, and professionalism displayed by NSF in managing our registration, especially though our interactions with our Lead Auditor, Mr. Willem Lamers.

Sincerely,

Stephen Grealy,  
Deputy Environmental Service Director

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