

2005 American Association of Port Authorities Environmental Improvement Awards

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**Port of Portland's
Checking and Corrective Action Program**

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Introduction – Paper Highlights

The Port of Portland (Port) recognizes that the activities associated with the broad and diverse services it provides impact the environment. In order to meet the Port policy of practicing responsible environmental stewardship, implementation of proactive environmental programs, and incorporating environmental considerations into all aspects of its strategic planning and business decision-making, the Port created a Checking and Corrective Action (CCA) Program to help ensure reduction of the environmental impacts of the Port's activities and improve the Port's environmental performance. The CCA Program is comprehensive in that it is Port-wide, is designed to integrate compliance with the Port's Environmental Management System (EMS), and it ensures continuous improvement of Port performance in a variety of areas such as waste management, water management, and environmental planning. The philosophy of the program is that compliance and management obligations should be met through proactive recognition and management of environmental issues and performance, and that the CCA Program provides opportunities for improvement and success, rather than a tool to identify failure. The program is ongoing and is integrated into the Port's annual budget cycle and work load planning. The program is a key element of the Port's overall Environmental Management System.

The Port of Portland established its current CCA program in 2001, with baseline audits of fifteen Port facilities, and establishment, implementation and tracking of corrective actions for issues identified in the baseline audits. As an element of the Port's Environmental Management System, Port facilities have been audited on a planned three year cycle, so that every Port facility is audited for environmental compliance on a rotating three year schedule, and related corrective actions are established, tracked, and completed.

Operational managers are responsible for developing, implementing, and reporting results. The Port has developed a centralized Checking and Corrective Action Tracking System

(CCATS) for ensuring completion of Corrective Actions. The current CCA program builds on previous comprehensive multi-media baseline audits and follow-ups in the 1990's.

Goals and Objectives

The Port of Portland recognizes that the activities associated with the broad and diverse services it provides impact the environment. In order to meet the Port policy of practicing responsible environmental stewardship, implementation of proactive environmental programs, incorporating environmental considerations into its strategic planning and business decision-making, the Port created a program for checking environmental performance to ensure that environmental compliance and management obligations are met through proactive recognition and management of issues, and improve the Port's environmental performance.

The primary environmental goals of this program are to:

- 1) improve environmental performance on a Port-wide basis by identifying areas of potential concern, developing, implementing and reporting corrective actions to ensure continued compliance and improved environmental performance, and
- 2) increase environmental stewardship and participation in environmental programs through achieving cross-Port ownership in developing, implementing, and reporting corrective actions.

The program is now in its fifth year of implementation, and has achieved these goals on a continuing basis.

Discussion

Background

As an element of the Port's Environmental Management System, the Port first established its CCA program in 2001, with a baseline audit of 15 Port facilities (six Marine Terminals and facilities, three General Aviation Airports, Portland International Airport, three business parks, the Port's Navigation base and dredging operations, and the Port administrative building). This was followed by an Environmental Systems audit in 2002. Since then, environmental audits have been conducted on a three year cycle so that each Port facility and/or operational area is audited every third year, with corrective actions for each audit established, implemented, and reported on an ongoing basis. The 2005/2006 audit cycle begins in July 2005, and will include audits of one Marine Terminal, three General Aviation Airports, Portland International Airport, and one business park.

Objectives and Methodology

The primary environmental goals of this program are to: 1) improve environmental performance on a Port-wide basis by ensuring continued compliance and seeking continuous improvement of environmental practices through early identification of issues and barriers to success at Port facilities, and 2) increase environmental awareness and participation in environmental programs through achieving operational ownership in developing, implementing, tracking and reporting corrective actions. In its fifth year, the CCA Program has met these goals on a continuing basis.

The program was initiated with baseline audits of 15 Port facilities (six Marine Terminals and facilities, three General Aviation Airports, Portland International Airport, three business parks, the Port's Navigation base and dredging operations, and the Port administrative building). This was followed by an Environmental Systems audit in 2002. Following establishment of the

baseline, individual facilities have been audited for environmental performance, focusing on the potential for compliance issues, but also including some systems, safety, and health aspects. Individual facility audits occur on a staggered three year cycle, so that each facility is audited every third year. The first cycle will be completed, and the second cycle will begin, in 2005/2006. On an annual basis, the program is a multi-phase process which begins with a Port-wide Audit Coordination Team identifying which facilities need be audited during the year, budgeting for the audits, and planning. Audits are scheduled based on magnitude of potential environmental impacts, importance of the activity, and the results of previous audits. Teams from operating areas are responsible for defining exact audit schedules, and ensuring management and worker participation in the audits. Typical of the process are initial planning meetings, daily review sessions of audit activities and potential findings, and closing meetings to identify findings as well as identify good performance. Following the audit, managers of the audited facilities or operating areas develop corrective actions for any recommendations made during the audit. Consistent with the Port's environmental policy of incorporating environmental considerations into all aspects of its business decision-making, responsibility for development, implementation, tracking, and reporting of corrective actions is carried out primarily by operational management or cross-functional teams within the Port. Progress toward completing corrective actions is measured throughout the year, reported to the EMS manager, and tracked through a central system.

Award Criteria

1. *The level and nature of benefits to environmental quality, beautification or community involvement.*

Conducting audits and implementation of corrective actions has benefited the Port's environmental quality and business practices, as well as that of the community within which the Port operates, through ensuring that the Port's regulatory obligations are being met, and that

measures for improvement of environmental performance are being implemented. Continuous improvement of the Port's performance, in areas such as waste, water, and natural resources management is assisted through identification of issues within audits.

2. The level of independent involvement and effort by the Port.

The process of audit planning, and developing, implementing, and reporting corrective actions is carried out within the Port. Assistance in auditing specific compliance areas is provided by external auditors. Success of the program has required active participation in audits by Port employees at all levels, from shop floor to the director level, and from all Port areas, from Marine Maintenance to Engineering to Aviation Operations to Legal. Each year more than 50 employees typically directly participate in audits. Carrying out specific projects to implement individual corrective actions is achieved through the efforts of Port employees as well as external contractors. Where external contractors are involved, corrective action achievement has still called upon significant direct participation, contribution and management by internal Port workers. Overall responsibility to track and ensure completion of corrective actions is the responsibility of Port personnel.

Development of the CCA Program has been independent of any regulatory action requirements.

3. The creativity of the solution or programs.

In developing this program, the challenge has been to develop a sustainable program in which each audit cycle builds on the previous one. This challenge has been met by using the EMS continuous improvement process, so that the program undergoes review and modification over time. This continuous improvement has resulted in more direct involvement in

environmental stewardship by staff at the Port, and a more positive view of the audit process and outcomes.

4. *Whether the project or program results are apparent (the project must be complete through some beneficial increment).*

Program results are apparent in that the Port has established a four-year record of checking environmental performance throughout the Port, and committing the necessary financial and personnel resources to implementing and documenting correcting actions. Awareness that a formal CCA Program exists has facilitated identification of potential environmental issues, and accelerated resolution of those issues. Identification of issues through the CCA Program, rather than on an ad-hoc basis has also improved allocation of financial and personnel resources to improve environmental performance on a timely basis.

5. *The cost effectiveness of the activity or the program.*

By aligning the CCA Program cycle with the Port's business planning cycle, the Port has increased efficiencies in developing and funding the Program. Efficiencies also have been gained by establishing comprehensive audits at multiple facilities, rather than fragmented efforts by individual divisions (e.g. Marine or Aviation) or other groups within the Port. Substantive involvement in the program each year by more than 50 workers within the Port on an annual basis has distributed the process workload, and enabled the Port to better utilize the knowledge base of the Port, resulting in more efficient and thorough audits.

6. *The transferability of the technology or idea to the Port industry.*

Although the Port of Portland has elected to establish a Port-wide CCA Program, the same process model could be scaled for use by larger or smaller ports, by specific areas within

Ports, and by Port tenants. The use of internal resources for establishing audit priorities, and developing, implementing, and reporting corrective actions is transferable to all ports, as is the concept of continuous improvement to make the program sustainable, and aligning it with other business and planning cycles and considerations.

Conclusion

The Port's CCA Program is entering its fifth year. As an element of the Port's Environmental Management System, during the past four years the program has been successful in delivering environmental benefits to the Port and to the environment within which the Port operates. A key measurement of the success of the program has been its evolution into a sustainable cyclical program, with participation at all levels within the Port.