SOUTHWESTERN POWER ADMINISTRATION
2022 ANNUAL SITE ENVIORNMENTAL REPORT

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Contents

List of Abbreviations and Units

ABB	American Burying Beetle
AMS	Asbestos Maintenance Standard
APLIC	Avian Powerline Interaction Committee
ASER	Annual Site Environmental Report
BA	Biological Assessment
BMP	Best management practices
BO	Biological Opinion
CAA	Clean Air Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CWA	Clean Water Act
CX	Categorical Exclusion
CY	Calendar Year
DOE	Department of Energy
EA	Environmental Assessment
eGGRT	electronic Greenhouse Gas Reporting Tool
EHSS	Environmental, Health, Safety, and Security
EIS	Environmental Impact Statements
EMS	Environmental Management System
EO	Executive Order
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right to Know
ERV	Energy recovery ventilator
ESA	Endangered Species Act
ESA	Environmental Site Assessment
FEIS	Final Environmental Impact Statement

FFCA	Federal Facilities Compliance Act
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FONSI	Finding of No Significant Impact
FY	Fiscal Year
GCR	General Conformity Rule
GHG	Greenhouse Gas
MBTA	Migratory Bird Treaty Act
MCL	Maximum Contaminant Level
NAAQS	National Ambient Air Quality Standard
NAICS	North American Industry Classification System
NELAP	National Environmental Laboratory Accreditation Program
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NLEB	Northern Long-Eared Bat
NON-PRP	Non-potentially responsible party
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OSHA	Occupational Safety and Health Administration
PA	Programmatic Agreement
PBA	Programmatic Biological Assessment
PCB	Polychlorinated biphenyl
pCi/l	Picocuries per liter
PEA	Programmatic Environmental Assessment
PMA	Power Marketing Administration
RCRA	Resource Conservation and Recovery Act

ROD	Records of Decisions
ROW	Rights of Way
SARA	Superfund Amendments and Reauthorization Act
SDWA	Safe Drinking Water Act
SIP	State Implementation Plan
Southwestern	Southwestern Power Administration
SPCC	Spill Prevention, Control, and Countermeasure
SSA	Species Status Assessment
TRI	Toxic Release Inventory
TSCA	Toxic Substances Control Act
USACE	U.S. Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
VSQG	Very small quantity generator

1.0 Executive Summary

Southwestern Power Administration's (Southwestern) Annual Site Environmental Report (ASER) serves as the chief reporting mechanism for site environmental performance information within the Department of Energy (DOE) and as a valuable resource for shared and collaborative environmental protection and performance information to Southwestern stakeholders. The ASER meets the requirements of DOE Order 231.1B and was prepared in general accordance with the guidance titled *Guidance for Preparation of the 2022 Department of Energy Annual Site Environmental Reports*. Southwestern is committed to environmental protection, compliance, and sustainability and has made sincere efforts to ensure that the validity and accuracy of the reported data are correct. Southwestern's key environmental involvement includes an emphasis on the protection of ecological resources. Southwestern carries out the protection efforts through the environmental program elements such as protecting water resources, the transmission of clean hydropower energy, oil spill prevention practices, reduction of greenhouse gas emissions, and comprehensive project reviews to ensure the protection of living organisms, migratory birds, federally threatened or endangered species, and historic properties. Southwestern continues to strive to minimize effects to natural and cultural resources and continual improvement in environmental compliance and sustainability. Southwestern's mission is to reliably market and deliver federal hydroelectric power to the end-user preference customers and protect the environment while maintaining reliability in power transmission.

2.0 Introduction

Southwestern was established in 1943 by the Secretary of the Interior as a federal agency operating within the DOE as authorized by Section 5 of the Flood Control Act of 1944. As one of four Power Marketing Administrations in the United States, Southwestern markets hydroelectric power generated from 24 U.S. Army Corps of Engineers (USACE) multipurpose dams in Arkansas, Kansas, Louisiana, Missouri, Oklahoma, and Texas with a a generating capacity of approximately 2,181 megawatts.

Southwestern's mission is to market and reliably deliver federal hydroelectric power with preference to public bodies and cooperatives. The mission is conducted by maximizing the use of federal assets to repay the federal investment and participate with other water resource users in an effort to balance the diverse interests of power needs and to operate within the broad parameters set by the USACE and implement public policy. By law, Southwestern markets and delivers power to public bodies, rural electric cooperatives, and supplies services to over one hundred preference customers. The preference customers in turn serve over ten-million end-use customers throughout Kansas, Missouri, Oklahoma, Arkansas, Louisiana, and Texas (Figure 1).

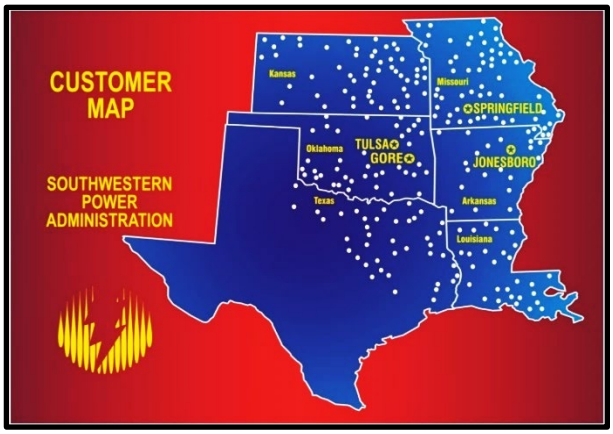

Figure 1. Southwestern Service Area

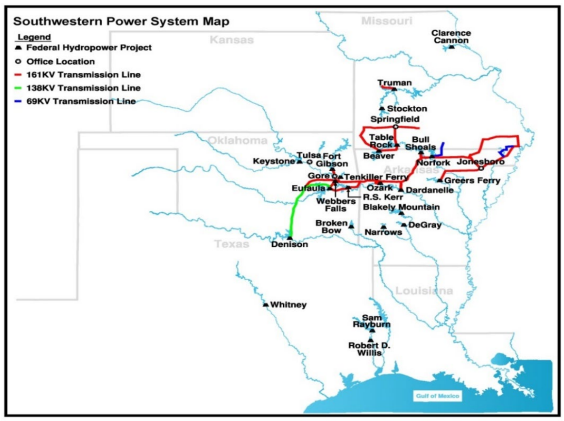

Figure 2. Southwestern Power System Map

Southwestern operates and maintains 1,380 miles of high-voltage transmission lines, substations and switchyards, and a communications system that includes microwave, VHF radio, and fiber optics. Offices are located in Jonesboro, Arkansas, Springfield, Missouri, Tulsa, and Gore, Oklahoma (Figure 2).

Continuous power scheduling and dispatching are conducted by staff in the Springfield and Nixa Operations Centers. The Agency headquarters office is located in Tulsa, Oklahoma. Southwestern employs a total of 204 full-time federal and contract employees.

In Calendar Year (CY) 2022, Southwestern marketed and delivered approximately 5.0 billion kilowatt hours of hydropower from federal hydroelectric projects in its marketing region. The agency's annual revenue of $222 million was used to pay the cost of operating and maintaining the generation and transmission facilities and repay the principal and interest on the federal investment.

In CY 2022, Southwestern hydropower generated enough renewable energy to save the Nation the fossil fuel equivalent of an estimated 2.7 million tons of coal, 38.0 billion cubic feet of natural gas, or 8.6 million barrels of fuel oil.

The agency’s environmental responsibilities reach beyond renewable energy. Southwestern works with federal, state, and local agencies to ensure concerns of water quality and quantity are adequately addressed. Coordination with public and private entities is an integral part of agency operations.

Southwestern’s facilities are considered very small quantity generators (VSQG) according to the EPA requirements for facilities that generate and store less than 2,200 lbs. of hazardous waste or 2.2 lbs. of acutely hazardous waste. The electric power system generates hazardous and non-hazardous industrial waste as a secondary effect to utilizing electrical equipment, maintaining maintenance facilities, and performing radio tower communication maintenance and system upgrades.

The quantities of universal waste, polychlorinated biphenyl (PCB) contaminated oil-filled electrical equipment, used petroleum oils, and greenhouse gas emissions are generated as byproducts of Southwestern’s operations are recorded and reported each year to the DOE Sustainability Dashboard. Within Southwestern’s facilities, the primary potential pollutants that could affect water, soil, and air resources include unplanned releases of dielectric insulating oil (non-PCB contaminated), sulfur-hexafluoride gas circuit breaker insulating gas emission, and herbicides used for vegetation

management control along rights of way. Standard operating procedures, training, controls, and diligent processes are in place and monitored regularly for the successful implementation of pollution prevention controls.

Southwestern uses the National Environmental Laboratory Accreditation Program (NELAP) certified laboratories to ensure strict quality assurance standards are met. The Environmental Protection Agency (EPA) standard test methods of quality control standards and policies are strictly followed. Adherence to these methods helps to ensure that the results of any laboratory tests are both accurate and legally defensible.

3.0 Compliance Summary

This section summarizes Southwestern's CY 2022 compliance results for the significant environmental statutes and regulations; DOE internal environmental and sustainability orders summarize any environmental violations or reportable environmental occurrences and provide a listing of active environmental-related permits.

3.1. Environmental Restoration and Waste Management

3.1.1. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

CERCLA (Superfund) is designed to develop an inventory of hazardous disposal sites, report accidental hazardous substance releases, establish liability and protocol for the cleanup of hazardous substance releases, promote planning by federal and state agencies to clean up hazardous disposal or spill sites, and cleanup of inactive hazardous waste sites. CERCLA imparted authorization to the EPA for the response and mitigation of polluted sites. During CY 2022, Southwestern did not implement CERCLA hazardous waste cleanups at their facilities.

Southwestern has no listed facilities on the Federal Agency Hazardous Waste Compliance Docket or Non-National Priorities List. Southwestern contracts with EPA and State permitted equipment disposal facilities for the disposal of; PCB contaminated equipment, used oil, electrical equipment carcasses, universal waste, hazardous waste, and environmentally sensitive materials. Southwestern established a plan to reduce and extricate the system of PCBs by 2023. All PCB equipment that was considered PCB contaminated by EPA limit standards has been eliminated from the system as of CY 2022.

Southwestern implements appropriate removal and discarding of hazardous materials and mitigation of site contaminants. The disposal facilities utilized by Southwestern are audited to ensure CERCLA and EPA compliance is maintained. Reportable quantities must be reported to the National Response Center within 24 hours of release. Southwestern facilities did not have an incidence of release equal to or above the reportable quantity of hazardous substances sited in the 40 CFR 302.4 within CY 2022.

Internal and external audits are conducted for facility disposal to comply with federal, state, and local hazardous material requirements. Southwestern annually conducts Phase I Environmental Site Assessments (ESA) for real estate interest acquisition in accordance with The All-Appropriate Inquiry rule (AAI). The AAI applies to any party who seeks to assert protection from CERCLA liability as an innocent landowner, prospective purchaser, or

contiguous property owner. Southwestern conducted one Phase I Site Assessment for easement acquisition during CY 2022 for easement purchase and transmission line modifications.

3.1.2. Emergency Planning and Community Right to Know (EPCRA) and Superfund Amendments and Reauthorization Act (SARA)

EPCRA encourages and supports emergency planning efforts at the state and local levels. The Act provides public and local governments with information concerning potential chemical hazards present in their communities.

Facilities must disclose hazardous substances stored in potentially harmful quantities. Southwestern's Environmental, Health, Safety and Security (EHSS) Division inventories and tracks chemicals that are stored at facilities and used throughout the system. A complete list of EPCRA contacts are listed in the SWPA 450.2 (Environmental Management System) EMS.

Southwestern did not meet or exceed the regulatory threshold quantities for each facility of Tier I and II reporting and the notification requirements during CY 2022.

EPCRA and SARA including SARA Title III amendments, and 40 CFR 355 Subpart C dictate reportable quantity releases of SARA extremely hazardous substances or CERCLA hazardous substances must be reported immediately to the local and state emergency response planning commissions. Southwestern did not have reportable quantity releases that required notice to the public during CY 2022.

EPCRA Subpart 313 requires facilities to complete and submit the Toxic Chemical Release Inventory form report (Form R). Form R should include the toxic chemicals manufactured, processed, or used in quantities exceeding the toxic chemical threshold for the fiscal year. Southwestern classification with the North American Industry Classification System (NAICS) is NAICS CODE 22112. The EPA regulation for utilities states: All 22112 codes for Electric Utilities, six-digit industry codes are covered, with the following caveat for all covered codes: Reporting is only required for facilities that combust coal, oil, or both to generate power for distribution in commerce.

Southwestern does not combust or use fossil fuels to generate power nor manufacture, process, or use toxic chemicals listed in 40 CFR 372.65 or 40 CFR 372.28 above their threshold quantity. Southwestern does not have mandatory reporting of the Toxic Release Inventory (TRI) to the EPA for CY 2022.

3.1.3. Resource Conservation and Recovery Act (RCRA)

RCRA governs and manages hazardous waste materials. Hazardous waste identification is a dynamic process. A stand-alone, updated comprehensive list of hazardous waste is not available. In compliance with 40 CFR Part 261.2A, hazardous waste material must be classified as solid waste initially and subsequently classified as a hazardous waste substance.

The EPA defines solid waste as garbage, refuse, sludge, or other discarded material (solids, semisolids, liquids, and contained gaseous materials). RCRA does not regulate non-solid waste. EPA defines hazardous waste by four characteristics: ignitability-flammable, corrosivity-rust or decompose, reactivity-explosive, toxicity-poisonous.

Southwestern's primary waste streams consist of used transformer oils, recyclable conductors or electrical equipment metals, construction debris, used wood poles, batteries, electronics equipment, light bulbs, and miscellaneous amounts of materials utilized to maintain equipment or office facilities. Electrical equipment and oils can be contaminated by PCBs, therefore Southwestern has implemented procedures to eliminate PCBs from facilities and transmission systems. The SWPA O 540.2 EMS is established and implemented to minimize the volume and toxicity of wastes, which monitors the collection, transport, processing, and disposal of solid wastes. In accordance with the EMS, waste procedures are followed for recycling, safety, health, and public welfare, and the protection of natural resources is maintained throughout the system. Southwestern continues to improve the identification, characterization, quantification, and reporting of RCRA waste streams.

The majority of Southwestern hazardous wastes are classified and managed as Universal Wastes. Southwestern facilities generate, store, and dispose of small quantities of waste and were not subject to RCRA reporting, or notice requirements for CY 2022. There were no RCRA related Notices of Violations issued for Southwestern facilities during CY 2022.

Federal Facilities Compliance Act (FFCA)

The FFCA is the primary mechanism EPA uses to address violations at federal facilities for statutes under which EPA does not have penalty or order authority. Violations determine the specific type, scope, and effect of the FFCA. If a violation occurs the EPA and the affected facility would jointly sign a Federal Facilities Compliance Agreement and provide documentation that the facility takes specified steps to achieve full compliance with the underlying statute.

The RCRA (Subtitle C Hazardous Waste, Subtitle D Solid Waste, and Subtitle I Underground Storage Tanks), the Safe Drinking Water Act, and the Clean Air Act impart penalty or order authority to the EPA at variance with federal facilities. The FFCA authorizes the EPA to assess penalties or issue orders. There were no FFCA agreements, penalties, fines, or violations issued against Southwestern or Southwestern federal employees during CY 2022.

3.1.4. National Environmental Policy Act (NEPA)

Congress enacted NEPA 1969 to establish a framework of environmental review for actions carried out by the federal government. NEPA imposes certain responsibilities on the federal government, including an obligation to assure a safe and healthy environment free from degradation and to achieve a wide range of beneficial uses without risk to health or safety. NEPA was enacted for two principal purposes; to ensure that federal agencies carefully consider significant environmental impacts arising from projects under agency jurisdiction and to establish a procedure by which members of the public are afforded an opportunity for meaningful participation in the agency's consideration of the proposed action. The 10 CFR

Part 1021 DOE NEPA Implementing Procedures are utilized to implement the procedural provisions of NEPA and are adapted to DOE and Power Marketing Administration activities. Southwestern fulfills NEPA regulations for actions, verifies the 10 CFR Part 1021 considerations and provides recommendations for federal actions that may significantly affect the environment.

NEPA documentation includes categorical exclusions (CX), Environmental Assessments (EA), Records of Decisions (ROD), Finding of No Significant Impact (FONSI), Environmental Impact Statements (EIS), and Final Environmental Impact Statements (FEIS). A summary of CY 2022 Southwestern NEPA classes of actions and projects are shown in Tables 1 and 2.

Table 1: 2022 Summary of Classes of NEPA Actions

NEPA Action		NEPA Action	
CXs Completed	6	FEISs Completed	0
EAs Completed	0	EISs in Process	0
EAs In Process	0	RODs Issued	0
FONSI Issued	0	**Total Number of NEPA Actions**	**6**

Table 2: NEPA Categorical Exclusions

Project Name (10 CFR Part 1021, Appendix B Reference)
Carthage Substation Transformer Addition (Part B 4.6)
Line 3005 Liberty to Van Buren Transmission Line Rebuild (Part B 4.13, 4.7, 4.11)
Line 3001 C Dardanelle to Structure 87T Transmission Line Rebuild (Part B 4.13, 4.7, 4.11)
Gore Facility Improvements and Fence Replacement (Part B 4.11, 1.11)
New Madrid Network Operating Agreement (Part B 4.8)
Weleetka Autotransformer #2 Addition (Part B 4.6)

3.1.6 Toxic Substances Control Act (TSCA)

The TSCA regulations prohibit the manufacturing, processing, and distribution of PCB in commerce, except as exempted by the EPA. The TSCA established chemical reporting requirements and standards that apply to manufacturers, importers, and processors. The EPA, through TSCA regulations, regulates the use, labeling, and disposal of PCBs. Some states, such as Arkansas, regulate PCB disposal and handling through their state RCRA Programs. The TSCA regulations also prescribe elements of requirements for Southwestern's radon, lead-based paint, and asbestos aspects. Southwestern has an ongoing reduction and elimination initiative for oil PCB concentrations in the testable electrical equipment. Reduction goals consist of < 50 parts per million (ppm) PCB measurable content.

Southwestern does not have equipment that contains 500 ppm or greater PCB concentration of oil or related substances. Southwestern disposes of PCB contaminated equipment within 30 days of removal from service. Oil-circuit breakers and their associated bushings have been replaced with gas-circuit breakers throughout the system and the remaining oil containing electrical breakers and transformers have been evaluated for PCB. The last remaining equipment with PCB content is located at Springfield and has a content of < 50 ppm PCB, through EPA considerations this equipment is considered non-contaminated.

PCB-contaminated equipment stored past 30 days from the initial out-of-service date is stored in one of Southwestern's two approved PCB Activity Database PCB Storage Facilities located in Gore, Oklahoma, and Springfield, Missouri. Southwestern's disposal facility audit criteria are used to evaluate and select an appropriate and qualified facility (or facilities) to accept Southwestern PCB-contaminated electrical equipment or mineral oil. These disposal requirements limit long-term risk, promote environmental stewardship, encourage the recycling or reuse of products when possible, and facilitate disposal requirements at reasonable costs.

Federal agencies are required by the Indoor Radon Abatement Section of TSCA to conduct studies of radon levels in federal buildings. Radon is an odorless, invisible radioactive gaseous element formed in the decay of radium. Radium occurs naturally in the air, water, and soil. The Springfield Maintenance Facility complex has levels above the mitigation action level of four picocuries per liter (pCi/l) concentrations. Ongoing testing for increased levels of radon gas emissions at the Springfield Facility has been implemented. The levels of radon are not above the EPA action levels in areas where employees are housed.

Engineering and administrative control measures have been implemented for Springfield, including periodic radon monitoring and sample testing. Mitigation equipment is in place, and Southwestern is in the process of updating the equipment, as well as installing an energy recovery ventilator (ERV) to the HVAC to reduce the radon levels. The Springfield Administrative Officer tracks and records radon levels on a monthly basis.

The area of the building containing radon levels above four picocuries per liter is not utilized for office space. Springfield Southwestern facility was found to have radon levels at or above the radon action levels for CY 2022.

3.1.7. Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

FIFRA directs the EPA to register pesticides to ensure usage according to label instructions, stating they will not present unreasonable risks to human health or the environment. Pesticides include insecticides, antifoulants, fungicides, rodenticides, disinfectants, and plant growth regulators. Depending on pesticide properties and use patterns, pesticides can leach through soils and contaminate groundwater. This is especially true where the water table is close to the surface or areas of highly permeable soil are present. State-licensed personnel and contracted firms accomplish all vegetation rights of way herbicide applications per regulations and approved herbicide list.

Southwestern's management of the use of pesticides provides a conservative methodology for safety and ecological protection. Southwestern contracts pest management vendors for the maintenance facilities. Guidance for the use of herbicides at substations/switchyards, pole yards, microwave/radio sites, and along the transmission line rights of way is managed according to Southwestern Vegetation Management EAs and subsequent FONSI stipulations. The EAs and FONSI are reviewed periodically for continued effectiveness and conformance. An updated Programmatic Environmental Assessment (PEA) and FONSI were implemented for the Vegetation Management for Southwestern in 2019. A review of the pesticide and herbicide list was upgraded with a more effective and less intrusive chemical list. The approved list is used for operation and maintenance activities and is updated and reviewed annually for EPA compliance. The PEA, FONSI, and Biological Assessment (BA) will be updated during CY 2024.

Herbicides approved through the EA and FONSI selection criteria are utilized for vegetation management. Southwestern facilities and rights of way areas did not have any pesticide or herbicide misuse claims initiated by the state or federal regulators during CY 2022.

3.2. Air Quality and Protection

3.2.7. Clean Air Act (CAA)

The CAA was promulgated "to protect and enhance the quality of the Nation's air resources to promote public health and welfare, and the productive capacity of its population." The EPA is required to set National Ambient Air Quality Standards that define clean air levels. The EPA set standards for six "criteria" pollutants: carbon monoxide, lead, ozone, nitrogen oxides, sulfur oxides, and particulate matter. The EPA also established New Source Performance Standards, National Emission Standards for Hazardous Air Pollutants (NESHAPs), and standards for mobile sources. Air quality standards are achieved by the states through State Implementation Plans (SIP). The SIPs establish emission limits and compliance schedules for pollution sources. The majority of Southwestern sites are located in rural areas that are attainment or non-maintenance areas for criteria air pollutants. Air pollution control regulations and pollution levels for Southwestern facilities within Oklahoma, Missouri, Arkansas, and Texas apply to the individual operating facilities. The facility's air pollutant levels are not combined.

The General Conformity Rule (GCR), established under the CAA (section 176(c)(4)), plays a vital role in helping states and tribes improve air quality in those areas that do not meet the National Ambient Air Quality Standards (NAAQS). The GCR applicability analysis must be performed for sites located within a non-attainment or a maintenance area for air pollutant criteria. General Conformity ensures that the actions taken by federal agencies do not interfere with a state's plans to attain and maintain national standards for air quality.

Southwestern maintenance and operations actions meet the EPA conformed action criteria and result in "de minimis and reasonably foreseeable emissions". Power Marketing transmission activities involve routine maintenance and repair activities and routine operation of facilities, mobile assets, and equipment. Construction activities are evaluated for air emissions release under the NEPA process and do not meet the EPA conformed action criteria.

Southwestern's Asbestos Maintenance Standard (AMS) governs its compliance with potential asbestos fiber release and follows both NESHAP and Occupational Safety and Health Administration (OSHA) asbestos regulations for employee worker protection. The AMS requires that exposure assessments, including personal and area air monitoring, be conducted for all OSHA Class III and IV work activities performed by trained maintenance personnel unless Southwestern can provide evidence that a work activity would have fiber releases below the permissible exposure limit of 0.1 fibers/cubic centimeter. Records of exposure assessments are retained by the applicable area maintenance office and corporate office. Applicable maintenance employees receive the appropriate level of annual Asbestos Awareness training. Those employees who participate in activities in which disturbance occurs receive Class II, III, and IV asbestos training. Southwestern hires contractors for Class I and II asbestos removal and remediation activities. Southwestern conducted a Site-Wide Asbestos Containing Materials and Lead Paint Inventory for twenty-four facilities in 2012. Since the inventory, Southwestern has mitigated the buildings located at communication sites and area offices of asbestos building materials. During CY 2022, Southwestern mitigated asbestos identified during the remodel of the Southwestern headquarters building located in Tulsa. The removal contained < 1% Asbestos of flooring and mirror adhesive. EPA and OSHA regulations were applied by the contractor for mitigation, removal, and disposal.

Southwestern is regulated under the Mandatory Greenhouse Gas (GHG) Reporting Rules per 40 CFR Part 98 Subpart DD. Southwestern utilizes SF_6 gas, a GHG agent, as an insulation gas within its gas-circuit breakers throughout its substations and switchyards. The rule requires that owners and operators of electric power system facilities, with a total system-wide nameplate capacity exceeding 17,820 pounds of SF_6, report emissions of SF_6annually on EPAs electronic Greenhouse Gas Reporting Tool (eGGRT). An Air Applicability Determination is performed to assess the applicability of the rule. For CY 2022, Southwestern had a total of 2,521.70 pounds, system-wide, nameplate capacity of SF_6-containing equipment. During CY 2022, Southwestern was not required to report SF_6 emissions through the eGGRT.

However, the emissions data was collected and reported through DOE reporting mechanisms to help track and achieve DOE-mandated GHG reduction targets in conjunction with the requirements of Executive Order (EO) 13693.

Southwestern began tracking SF_6 emissions in 2008 and implemented an aggressive repair and replacement program for leaking and aging SF_6-containing equipment. Millions of pounds of carbon dioxide emission equivalents have been reduced due to best practices. The SF_6 emissions are recorded each quarter for quality metering of emissions. Southwestern has effectively downsized SF_6 gas containment and replaced or repaired leaking equipment at each site. The emissions tracking indicates SF_6 gas emissions have been reduced throughout the system by 128.29 lbs. since the 2008 baseline.

3.3. Water Quality and Protection

3.3.7. Clean Water Act (CWA)

The CWA regulates the discharge of pollutants into Waters of the U.S. from any point source, including industrial facilities and sewage treatment facilities. The CWA also regulates stormwater runoff from certain industrial sources and requires reporting and cleanup of oil and hazardous substance spills in Waters of the U.S. The CWA requires permits for projects that have the potential to adversely affect wetlands and requires spill prevention plans for sites that store oil and other petroleum products. The EPA has established a requirement to have a National Pollutant Discharge Elimination System permit for the discharge of stormwater from facilities with point sources.

Southwestern has determined that a full-scale groundwater monitoring program is not warranted. However, Southwestern will continue to identify existing and potential sources of groundwater contamination. Should any information indicate that any Southwestern activities might adversely affect the groundwater, a site-specific groundwater monitoring program will be put in place.

Section 404 of the CWA establishes a program to regulate the discharge of dredged and fill material into Waters of the U.S., including wetlands. Proposed activities are regulated through a permit review process. An individual permit is required for compliance with working within a waterway of the Waters of the US. Individual permits are reviewed by the U.S. Army Corps of Engineers (USACE), which evaluates applications under a public interest review, as well as the environmental criteria set forth in the CWA Section 404(b)(1) guidelines and regulations promulgated by the EPA. States may assume this permitting authority and regulate 404 activities. For most discharges that will have only minimal adverse effects, a general permit may be suitable. General permits are issued on a nationwide, regional, or state basis for categories of activities. Southwestern did not apply for coverage under any of the 404 perming processes throughout CY 2022.

3.3.8. National Pollutant Discharge Elimination System (NPDES)

The NPDES is the primary mechanism used by EPA to manage point source discharges. NPDES permits are required for the discharge of pollutants from certain point sources, which are categorized by the North American Industry Classification System codes, into Waters of the U.S. Permitting of Southwestern substation facilities is required under 40 CFR Part 122 at facilities located in Missouri containing oil and water separator devices. Southwestern's Oklahoma and Arkansas substation facilities do not meet the definition of an "industrial activity" and are excluded as defined in 40 CFR Part 122.26(b) (14*).*

Southwestern substations are not located within facilities that have generation units. Southwestern complies with stormwater discharge regulations per the NPDES permitting rules, as modified and updated stormwater compliance mandates in each state.

The State of Missouri views oil/water separators as mechanical treatment devices and requires facilities to obtain a Missouri NPDES General Operating Permit MOG14 for Oil/Water Separators. Southwestern's oil water separators are considered secondary containment structures surrounding electrical power transformers. The permit authorizes the discharge from oil/water separators and similar wastewater treatment devices whose sole function is the treatment of stormwater, water without detergents or additives used to rinse or wash down pavements. This permit applies to establishments such as vehicle repair shops, transformer stations, and pipeline compressor stations. Southwestern has four such facilities in Missouri that require NPDES coverage. Annual Discharge Monitoring Reports are required for sites with NPDES permits. In CY 2022, Southwestern's HQ remodel initiated the compliance mandate for the contractor to provide a NPDES permit. Southwestern has implemented four stormwater compliance surveys and reported nonconformance; the contractor did initiate compliance and fixed the nonconformance issues.

3.3.9. Safe Drinking Water Act (SDWA)

The SDWA requires the EPA to establish primary drinking water standards for any contaminants that may have an adverse effect on public health. As a result, the EPA developed primary drinking water maximum contaminant levels (MCLs) and secondary MCLs. Southwestern utilizes city water for its staffed facilities and rural water at many of its unmanned electrical substation control building facilities. Southwestern has nine unoccupied electrical substation control buildings with non-potable wells to provide facility nondrinking water functions. Of the nine wells, three have been capped and plugged and are not currently in use. The wellheads are protected by locks that are routinely inspected to protect the integrity of the groundwater system. During CY 2022, Southwestern maintained compliance with the SDWA.

3.3.10. Oil Pollution Act

The Oil Pollution Act of 1990 amended the Clean Water Act and addressed the wide range of problems associated with preventing, responding to, and paying for oil pollution incidents in navigable Waters of the U.S. The act created a comprehensive prevention, response, liability, and compensation regime to deal with vessel and facility caused oil pollution to the United States navigable waters. The regulation requires these facilities to develop and

implement Spill Prevention, Control, and Countermeasure (SPCC) Plans and set up requirements for procedures, methods, and equipment requirements. Several of Southwestern substation facilities hold large volumes of transformer oil and are sited near navigable waters or Waters of the U.S. Southwestern has developed and implemented effective SPCCs at 11 of its applicable facilities. Annually, all SPCCs are reviewed, updated as needed, and signed by management. The SPCC plans are updated on a 5-year cycle or when substation modifications require updates (Table 3).

There were no reportable instances of spills at any of the Southwestern facilities during 2022. SPCC official plans are located onsite at the substation facility, and reference copies are located at the nearest lead maintenance office. Spill cleanup kits are located at all substation facilities to ensure quick control of a spill and minimize effects on the nearby environment. The Tulsa headquarters building spill plan and cleanup kits are supplied for emergency generators located on site. The emergency generators are equipped with a size-appropriate secondary containment for overspills and runoff potential.

Table 3: SPCC Facility Plans

SPCC Plan Expiration	Plan Review & Substation Facility	Annual Review/Maintenance Division Director Signature
December 8, 2023	5 Year Recertification/Review SPCC Plans-Professional Engineer (PE) Signature Required: (Table Rock, Springfield, MO)	November, Every 5 Years
April 22, 2026	5 Year Recertification/Review SPCC Plans-PE Signature Required: (Eufaula, OK)	November, Every 5 Years
October 10, 2025	5 Year Recertification/Review SPCC Plans-Professional Engineer (PE) Signature Required: (Carthage, MO, Paragould, AR, New Madrid, MO, Poplar Bluff, MO, Nixa, MO, Norfork, AR, Kennett, MO, Weleetka, OK)	November, Every 5 Years

3.4. Natural, Cultural Resources, and Sustainability

3.4.7. Endangered Species Act (ESA)

The ESA was established to protect aquatic and terrestrial animals and plant species that may become endangered or threatened (T&E). Federal agencies must ensure that their associated actions do not adversely impact T & E species. The agency is required to consult with the United States Fish and Wildlife Service (USFWS) or National Marine Fisheries Wildlife Service (NMFWS) for effects on species and habitats that may result from Southwestern operations. All maintenance and operations or engineering construction projects, as well as real property transfers, are evaluated for potential adverse impacts to known T&E species. Southwestern has cooperated with the USACE and the USFWS to manage releases from

Keystone, Eufaula, and Denison dams for the protection of the formerly listed endangered interior least tern, a migratory shorebird that nests on sand bars and islands in the rivers downstream from those projects. The interior least tern was listed as an endangered species by the USFWS in 1985. Since then, Southwestern has worked with the Tulsa and Little Rock Districts of the USACE, USFWS, and other entities to preserve and build habitat and support interior least tern reproduction while preserving hydropower benefits (Figure 5). The interior least-tern was removed from the USFWS List of T&E Wildlife with an effective date of February 12, 2021. The interior least tern will continue to be protected under the Migratory Bird Treaty Act. Southwestern is working with entities nationwide on a Conservation Plan and Monitoring Plan as part of the species delisting by the USFWS. We are committed to providing the resources necessary for T & E species habitat protection and continuing interior least tern habitat maintenance work for applicable projects and undertakings.

Southwestern's Programmatic Biological Assessment (PBA) and Biological Opinion (BO) maintain the implementation of habitat and species protection for operations and maintenance activities. This PBA and BO enable Southwestern to utilize the ability to expedite, minimize, or simplify the Section 7 ESA consultation protocol.

Before March 2019, Southwestern's Oklahoma project activities and undertakings were conducted under the previous PBA, in which the American Burying Beetle (ABB) was identified as a federally endangered species of concern for Southwestern's Oklahoma project activities. The USFWS reclassified and downlisted the ABB from endangered to threatened on the USFWS List of Endangered and Threatened Wildlife, effective November 16, 2021. The USFWS has analyzed the ABBs current known range and divided it into range analysis areas as outlined in the USFW Species Status Assessment Report (SSA) (Figure 3). The USFW named conservation lands where ABB populations will be protected within each analysis area. The Southern Plains analysis area protects conservation lands located in Arkansas, Fort Chaffee, Oklahoma's McAlester Army Ammunition plant, and Camp Gruber/Cherokee Wildlife Management area. The Cherokee Nation has appointed an area of land for the ABBs protection at the tribe's Sallisaw Creek Park in Sequoyah County, Oklahoma. The USFWS also considers the park as conservation land. Activities that result in the taking of the ABB in these protected areas are prohibited unless the activities are compliant with USFWS-approved conservation plans. The USFWS now has a streamlined consultation process for the ABB to ensure conservation and provide interagency team reviews to help aid in the effects determinations for the ABB. Southwestern will continue to work closely with the USFWS to provide protective mechanisms to facilitate the conservation of ABB habitat and minimize adverse effects to this species during affected project activities.

Southwestern uses the Stepwise Bat Field Guide derived from the USFWS bat and habitat manual to aid in making determinations of potential impacts for the four endangered bat species located along transmission lines and rights of way. The field guide supplies instruction to field crews, environmental staff, and managers to obtain a preliminary determination of potential impacts for Southwestern construction projects within bat range locations and probable habitats (Figure 4). Southwestern used the field guide for six construction projects in which T&E bats and habitats were identified during FY2022. The

USFWS has recently provided a streamlined consultation process for the Northern Long-Eared Bat (NLEB), one of the four bats that occur along transmission lines and rights of ways, to ensure conservation and provide interagency team reviews to help aid in the effects determinations for the NLEB.

Due to the downlisting, Southwestern provides the 4(d) streamlined consultation with the USFWS annually for the ABB and NLEB in the FWS IPAC. Southwestern reviewed or consulted six (6) construction projects, which were processed and managed through the procedures required in Section 7 of the ESA. There were no known adverse impacts or incidences regarding direct "take" to any known T&E species during CY 2022.

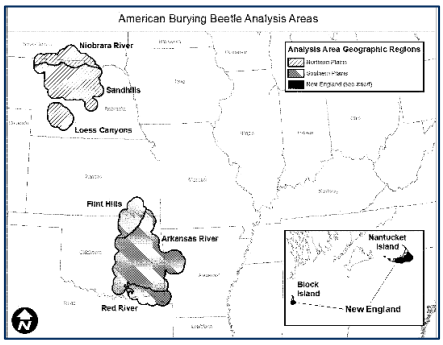

Figure 3. ABB Analysis Area

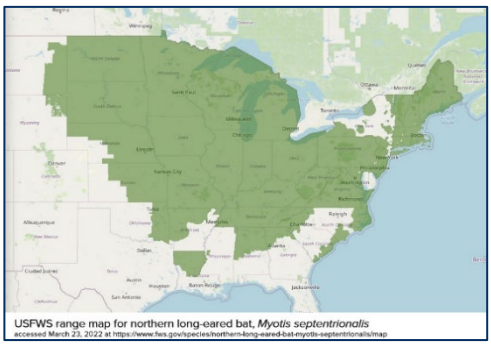

Figure 4. NLEB Range Map

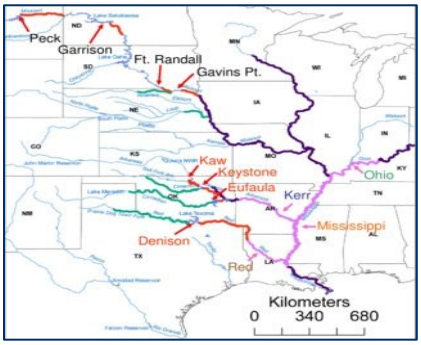

Figure 5. ILT Habitat

3.4.8. National Historic Preservation Act

Southwestern has responsibilities under the National Historic Preservation Act (NHPA) of 1966 and complies with Section 106. Implementing cultural resource protection is an integral part of the project planning process. The intent is to ensure that agency actions do not inadvertently disturb, destroy, or degrade cultural resources. Cultural resources can include but are not limited to prehistoric and historic archaeological materials, sites located on the surface or subsurface of the land, historic structures (buildings, sites, structures, or objects more than 50 years old), cultural and natural places, traditional cultural properties, and sacred objects important to a group or groups of Native Americans. For the protection of historic properties, a compliance process was established by the President's Advisory Council on the Historic Preservation (36 CFR 800). Southwestern ensures compliance with the provisions of the Act. The Act and the regulations do not mandate an outcome. The agency must consider the effects its actions may have on significant resources within the Area of Potential Effect (APE).

Agencies are required to develop and carry out a systematic program in compliance with Section 110 of the Act to inventory all cultural resources on lands which they own or manage and submit any properties that meet the eligibility requirements to the National Register of Historic Places. In 2006, Southwestern completed a Section 110 analysis, titled "National Register of Historic Places (NRHP) Evaluation for Electrical Stations and Maintenance

Facilities within Southwestern Power Administration," for existing facilities owned in-fee in the three primary states for which Southwestern conducts its activities. In this analysis, there were no properties identified for eligibility on the NRHP. During FY21, Southwestern surveyed 281 miles of rights of way for the Section 110 Systemwide Survey Project.

Southwestern conducts Section 110 analyses for newly acquired properties. In accordance with the Programmatic Agreements (PA), Section 110 reports were sent for review and consultation with the Arkansas, Oklahoma, and Missouri State Historic Preservation Offices, the Oklahoma Archeological Survey, and associated Native American Tribes. Southwestern buildings, adjacent lands, and associated structures were not considered eligible for listing in the NRHP. Additional cultural resource investigations are recommended for the Southwestern facilities located in the New Madrid Fault Line seismic region. This region requires deep disturbance archaeological monitoring and surveying for construction and soil disturbance activities.

The updated Programmatic Agreements process began in 2018 for Southwestern's operations and maintenance activities. The PA development is intended to provide relationship and agreement continuity between Southwestern, participating tribes, the State Historic Preservation Offices, and the ACHP. Continuous consultation and meetings have been in process for the PA during CY 2022. The Programmatic Agreements for Missouri, Oklahoma, and Arkansas. Ongoing consultation with the three State Historic Preservation Offices and participating Tribes has led to the development of a final draft PA for each of the three states. Southwestern will continue to work with the agencies involved in the process to derive a cooperative agreement for all parties.

Southwestern ArcGIS Cultural Resources Inventory Database provides a comprehensive repository of known cultural resources or artifacts on lands owned or administered by Southwestern (and within a one-half-mile radius), which serves as the foundation of a proactive cultural resource management program that will ensure compliance with local, state, tribal, and federal regulations. Southwestern updates the ArcGIS Cultural Resources Inventory database every three years, as stated in the Programmatic Agreement. In 2021, the ArcGIS Cultural Resources Inventory database was updated based on new Section 110 reviews of the transmission lines and shapefiles. Cultural resource sites are inventoried and provided to project managers within Southwestern. The FY 2021 inventory is listed in Table 4 of this report. To date, there are 1,423 archeological sites and historic properties within the given research corridor. Most of these cultural resources are not eligible; sixty-nine are eligible, and twenty-two are listed on the NRHP.

Southwestern does not qualify as a federal land management agency due to privately owned easements along the transmission line rights of way. Southwestern is obligated to protect cultural resources during operation and maintenance activities but would not be bound to manage or maintain cultural or historic properties found within these locations. If historic properties are identified during Section 110 or 106 analysis, normal protection, and avoidance practices will be implemented in modifying a project's design or the planned activity and follow the stipulation outlined in the PAs.

Table 4: Recorded Sites Near Southwestern Facilities

Inventory of Recorded Sites (within ½ mile radius of Rights of Way or Facilities)

Eligibility	Historic	Prehistoric	Multicomponent	Total
Not Eligible	685	438	209	1,332
Eligible	42	17	10	69
Listed	5	12	5	22
Total Number of Sites	732	467	224	1,423

3.4.9. Environmental Justice Act of 2021

The Act requires Federal agencies to address and eliminate the disproportionate environmental and human health impacts on populations of color, communities of color, Indigenous communities, and low-income communities.

Southwestern uses the EPA EJ Screen to assess the impacts that the construction, operations, and maintenance activities may have on areas that are populated with communities of color, tribal, and low-income communities. Impacts are assessed by the type and length of construction and maintenance and the EJ Screen data that assess the area for the population significance. The majority of Southwestern projects improve living standards by providing updates to transmission lines and substation efficiencies. Impacts on the environment are supplied with best management practices or mitigation measures to avoid negative consequences to the natural resources for the surrounding population. Cumulative effects are considered during the NEPA phase to reflect all areas that may be of concern.

Communities are made aware of the upcoming projects. NEPA reviews are listed on the external Southwestern web page for public viewing 30 days prior to construction or maintenance. https://www.energy.gov/swpa/southwestern-power-administration

3.4.10. Migratory Bird Treaty Act (MBTA)

The Migratory Bird Treaty Act prohibits the take, possession, or transport of any migratory bird, nest, egg, or part of a migratory bird without a permit. Southwestern considers the effects of migratory birds as part of the NEPA project analysis process for proposed activities and construction projects.

In 2018, Southwestern developed and implemented an Avian Protection Plan Maintenance Standard that is based upon Avian Powerline Interaction Committee (APLIC) Guidelines and other avian species regulatory laws. The Avian Protection Plan is reviewed and updated regularly. The Plan outlines general guidelines to reduce avian mortality risks that result from avian interactions with electrical transmission utility facilities to prove compliance with laws relating to the protection of avian species and set up a policy to minimize avian injury and

mortality. The Avian Protection Plan was updated in CY 2022 for current Migratory Bird laws and regulations. The newly remodeled Southwestern Tulsa Headquarters will be reviewed for bird collisions during May-June of CY 2023. Mitigation methods for building bird collisions will be implemented in the near future.

Southwestern field employees annually receive avian protection training, including cause and prevention of avian collisions and electrocutions, avian biology, avian-safe electrical equipment re-configuration, migratory bird laws, Bald and Golden Eagle Protection Act, the Endangered Species Act, and avian reporting procedures. Interagency meetings are held to inform the Director and Regional Managers of any MBTA or Threatened and Endangered Species Act modifications to requirements.

Due to the nature and configuration of high-voltage equipment (increased distance between current-carrying conductors and the conductors to a ground contact potential), Southwestern experiences very few avian collisions, perching, or nesting incidences for these structures. Southwestern has two documented raptor nests on known transmission structures located near dams or large bodies of water.

The documented nests are left undisturbed unless they cause an emergency safety concern. In this case, Southwestern would remove or relocate the nest, chicks, or eggs to an individual or firm using an appropriate USFWS-permitted contractor in accordance with the Southwestern Avian Protection Plan. Southwestern has supplied regional managers with a reference list of these permitted rehabilitators in their operating regions in case the removal or relocation of the nest, chicks, or eggs is necessary for safe operation.

3.4.11. Sustainability

In conjunction with the DOE Order 436.1, *Departmental Sustainability*, Southwestern has established several sustainable EMS Objectives and Targets, which are implemented, supported, and monitored through the EMS program. The sustainability Targets and Objectives are measured and recorded annually.

Southwestern developed the Southwestern Power Administration Vulnerability Assessment Resiliency Plan during CY 2022. The plan takes into account the vulnerable assets within the system and the processes of asset protection. The report demonstrates the mitigation that is implemented to keep the system performing at maximum levels.

Southwestern's EMS, the SWPA O 450.2, integrates the Environmental Protection Plan with the SWPA O 450.1. The EMS is provided to all employees to access the regulations and requirements for their particular job duties.

Southwestern, and other competing water user groups depend on water to meet their contractual obligations to its customers. Some of the competing uses include municipal water supply, hydroelectric power, fish and wildlife, tourism, navigation, flood control, irrigation, swimming, and boating. Although water is a renewable resource, water is dependent upon nature, and it varies in its amount and timing. Southwestern dedicates significant effort to coordinating operation activities with groups such as the USACE, state fish and wildlife agencies, USFWS, organized recreational groups, and other water user groups to find ways

to accommodate each user's needs and still meet electrical generation requirements. In the years and generations to come, Southwestern desires not only to continue to serve its customers with America's cleanest source of renewable energy but also to collaborate cooperatively with competing users to conserve natural resources.

Southwestern maintains tracking and metering of water, waste, recycling, electricity, emissions, fuels, and environmental compliance for construction, operations, and maintenance. From the baseline of 2008, Southwestern has tracked the usage of consumables and energy for five office buildings in Oklahoma, Missouri, and Arkansas. Southwestern remains on track to meet the goals that apply to DOE Power Marketing Administrations.

Sustainable reporting for CY22 includes; Carbon Free Energy tracking and reporting, Sustainability Site Plan, Vulnerability Assessment and Resiliency Plan, Green House Gas Report, EMS Objectives and Targets, and Internal Enviornmental Audit.

3.4.12. Floodplain Management and Wetland Management

Southwestern conforms to the DOE Floodplain and Wetland Regulations per the requirements outlined in 10 CFR Part 1021 and 1022 and EO 11988. As part of the NEPA project analysis protocol, any proposed action or project that may potentially affect floodplains or wetlands is carefully evaluated according to regulations.

During CY 2022, one floodplain assessment was performed for Structure 604 on Line 3101 Tupelo to Allen. The assessment was performed to evaluate the reliability of the anchor to be placed to strengthen structure 604. The BMU and Ameren interconnection project obtained a floodplain development permit following the Federal agreement for interconnection with Southwestern.

Six construction projects were assessed for wetlands determination. There were no wetlands jeopardized within the project limits or within the area of potential effect. No cumulative effects were considered to be negative impacts on the wetland areas.

3.4.13. Pollinator Initiatives

Pollinators are vital to continue supplying fruits, nuts, and vegetables to the overall population. Honeybee pollination alone adds more than $15 billion in value to crops yearly in the United States. Over the past few decades, there has been a significant loss of pollinators, including honeybees, native bees, birds, bats, and butterflies. The problem is serious and requires immediate attention to ensure the sustainability of our food production systems, ensure ecological well-being, and avoid added economic impact on the agricultural sector. As a result, in 2014, President Obama issued a *Presidential Memorandum* directing an interagency task force to create the *National Strategy to Promote the Health of Honey Bees and Other Pollinators.*

Since the issuance of the memorandum, Southwestern and other Power Marketing Administrations (PMA) have assessed activities and practices to evaluate contributions to the protection of pollinator species while still supporting the agency's mission effectively and reasonably. PMAs have developed best management practices (BMP) effective at promoting

pollinator activity and proliferation for pollinator species. The ecosystems throughout Southwestern's rights of way are varied and diverse; from the rugged hills of the Ozarks to the central plains of Oklahoma, pollinators thrive within many of these natural environments. A part of the rights of way managed by Southwestern traverses urban and suburban land that may not be suitable for pollinator BMPs. The BMPs that are managed throughout the ecoregions include removing invasive species, using native seeds and species, and managing vegetation to create low to mid-height sustainable native plant communities.

3.5. Summary of Environmental Permits

3.5.7. Gore, Oklahoma, Maintenance Unit Geographical Area

- Gore Substation and Maintenance Facility -RCRA Very Small Quantity Generator- EPA ID# OK2891632463
- Gore Substation and Maintenance Facility -Small Quantity Handler of Universal Waste- EPA ID# OK2891632463
- Gore Substation and Maintenance Facility PCB Activity Database (Generator/Storage) EPA ID# OK2891632463
- Oklahoma Department of Agriculture, Food, & Forestry- Pesticide Applicators License #6652-000

3.5.8. Springfield, Missouri, Maintenance Unit Geographical Area

- Springfield Maintenance Facility and Substation-RCRA Very Small Quantity Generator- EPA ID# MO8891632467
- Springfield Maintenance Facility and Substation-Small Quantity Handler of Universal Waste - EPA ID# MO8891632467
- Springfield Maintenance Facility and Substation PCB Activity Database (Generator/Storage)- EPA ID# MO8891632467
- Permit #MO-G140036, Missouri Dept. of Natural Resources

  NPDES Discharge Permit, Table Rock Substation Oil/Water Separator
- Permit #MO-G140037, Missouri Dept. of Natural Resources

  NPDES Discharge Permit, Nixa Substation Oil/Water Separator
- Permit #MORA07212, Missouri Dept. of Natural Resources

3.5.9. Jonesboro, Arkansas, Maintenance Unit Geographical Area

- Jonesboro Maintenance Facility and Substation-RCRA Very Small Quantity Generator- EPA ID# AR0143120681
- Jonesboro Maintenance Facility and Substation-Small Quantity Handler of Universal Waste- EPA ID# AR0143120681
- Jonesboro Maintenance Facility and Substation-PCB Activity Database (Generator)- EPA ID# AR0143120681
- Permit #MO-G140032, Missouri Dept. of Natural Resources NPDES Discharge Permit, New Madrid Substation Oil/Water Separator
- Permit #MO-G140033, Missouri Dept. of Natural Resources NPDES Discharge Permit, Kennett Substation Oil/Water Separator

4.0 Environmental Management System

Southwestern Environmental Management System (EMS) outlines a systematic process that guides Southwestern activities to ensure the implementation of environmental requirements and encourage continuous improvement. Southwestern's EMS Policy states:

> *"Southwestern will strive for excellence in the protection of the environment by conducting operations in a manner that meets DOE guidelines and applicable federal, state, and local environmental regulations, and other requirements to which the agency subscribes. Southwestern will strive for continual improvement and pollution prevention. The ISO Standard 14001:2015 will be used as a guide."*

The EMS Policy and Manual are approved by Southwestern senior staff. Aspects and Impacts of the EMS have been identified for all agency activities and are reviewed annually. Legal and other requirements are included in the attachments of the EMS.

Southwestern has identified the objectives and targets that support our commitment to the EMS. The objectives and targets are measured and reviewed annually by the senior staff. Federal employee responsibilities are depicted within the EMS to ensure operations are performed consistent with the guidelines. Annual EMS and job-specific environmental training have been included in the agency training plan. The communication from external parties or stakeholders is documented in an electronic journal, and yearly environmental audits and management reviews are scheduled to ensure continual improvement.

An internal audit was performed for the Springfield Area Office and Carthage Substation. All noncompliance issues were found and rectified. The scope of the Environmental audit includes employee interviews, an onsite review of the facilities, and environmental records.

The progress of Southwestern's implementation of the EMS is reported to the DOE Sustainability Dashboard from the process of metering and tracking of objectives and targets. Southwestern's EMS continued to remain in full conformance with the ISO 14001:2015 Standard and is an effective tool for the implementation and integration of environmental requirements throughout the agency.

The EMS and Environmental Pollution Prevention (EPP) plan has been integrated into the updates of the SWPA O 450.2 that replaces the EPP and the SWPA O 450.1 EMS.

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