



MEETING MINUTES

**Sustainable Lab Practices Working Group
NIH Environmental Management System (NEMS)
Wednesday, June 18, 2008
1:30 – 2:30 pm**

Meeting Objective(s):

- Provide update on the status of the NEMS
- Provide update on the status of NIH Target Chemicals Ranking
- Collect comments on new mercury manual issuance
- Discuss recycling initiatives for laboratory materials

Attendees:

Daniel Appella (NIDDK)
Stephen Fields (ORF)
Bill Ketner (ORF)
Andrew LaClair (ORS)
Terry Leland (ORF)
Mark Marshall (ORF)
David Mohammadi (ORF)

Kristen Peters (Booz Allen)
John Prom (ORF)
Wendy Rubin (ORS)
Linda Thompson (Booz Allen)
Roger Weidner (ORF)
Don Wilson (ORF)

Minutes:

NEMS Update

Terry Leland provided an update on the current activities of the NIH Environmental Management System (NEMS). We hope to have the NEMS audited by the end of the year, so each working group needs to work towards meeting their objectives.

Mark Marshall was also introduced as the new NIH recycling coordinator.

NIH Target Chemicals Ranking

Don Wilson and John Prom provided an update on what the DEP employees working subgroup has accomplished on targeting and prioritizing specific NIH laboratory chemical waste streams for reduction efforts. They decided to remove some chemicals, while adding some additional chemicals with high volume or toxicity. The chemicals from the cleanout of Building 8 have been deleted from the list. The abbreviated matrix now has two tiers of chemicals to focus efforts on, with the second tier rated as a second priority (See Attachment 1). The goal is to trim the list to a

significant number of chemicals and begin work on a communications strategy for those chemicals.

Dan Appella spoke with a Sigma-Aldrich sales representative about green chemistry and shared a brochure with the group. This type of pamphlet with actual data would be exactly what a chemist would be looking for when researching green chemistry alternatives. Aldrich said they would be willing to do a presentation as well.

Charlyn Lee is working on contacting the Safety Managers group. The Lab Managers group probably isn't the best group for input at this time, but will be an excellent resource for outreach later. Terry Leland said she will also brief the Presidential Fellowship Group.

NIH Mercury Policy Update

Lt Stephen Fields provided a report on the status of the NIH Manual Issuance on Mercury Procurement, Use, and Disposal (Attachment 2). Six offices are currently reviewing the draft manual, including:

- OD/Office of Logistics and Acquisition Operations
- ORS/Division of Veterinary Resources
- ORS/Division of Occupational Health and Safety
- ORS Science Resource Manager
- Clinical Center Environment of Patient Care Committee
- HHS Office of General Counsel

The ORS/Division of Occupational Health and Safety was a partner in the development of this manual. The four main purposes of the policy are to: (i) prohibit the procurement of mercury added products with NIH appropriated funds; (ii) prohibit use of mercury and its compounds on all facilities owned, operated, or leased by the NIH; (iii) require the elimination of existing mercury containing devices in use on NIH facilities; and (iv) provide for exceptions or procedures for obtaining variances for necessary scientific and medical uses of mercury.

The NIH mercury policy will be issued mid to late July and will prohibit use of mercury compounds on all of the NIH campus, including the Poolesville and Baltimore sites. The goal is to keep NIH's environment safe, while keeping with the NIH mission.

Lt Fields explained that they are currently working on a special exception process that would grant limited scientific and medical uses of mercury or mercury compounds. This process involves a written request from a lab or IC, and the Director of DEP will respond within 7 or 10 business days (the timeframe has yet to be finalized). The exception is only temporary. There is a standing exception for mercury added products and mercury contaminated products with a total concentration less than 100 ppb that may be procured or used on NIH facilities.

Dan Appella stated that scientists cannot afford to wait 10 days for research, if we want to keep our reputation as a premier research institution. In response, Lt Fields explained that development of the manual issuance involved the scientific community early in the process, and they are planning to work with them during outreach efforts. These efforts include listing mercury alternatives on the ORF and DEP websites, as well as using the nih.mercury.gov and Greenserve for sharing information.

The working group members were asked to send any additional comments to Linda Thompson, who will collect and provide them to Ed Rau and Stephen Fields for consideration.

Recycling Initiatives for Lab Materials

Bill Ketner and Mark Marshall said that NIH is just starting to scratch the surface of recycling lab materials. Glassware can be recycled, except Pyrex. Polypropylene pipette racks are recycled and crushed at a site on campus. A chemical contractor, located in Building 21, recycles chemical reagent bottles. Working group members were reminded to recycle cardboard in the corridors. An updated Waste Disposal Guide will be released later this year and will contain recycling information. Be sure to check with your supply companies to see if they will accept packaging materials to be returned. Sigma-Aldrich is willing to take back materials, and is opening a new facility in Gaithersburg, MD to meet NIH's needs.

The red metal commingled containers accept glass and plastic bottles, such as solvent bottles. Bottles made from #1 or #2 plastics containing non-hazardous waste (e.g., saline solutions, buffers) are recyclable in the commingled containers. Working group members were reminded not to recycle containers contaminated with radioactive or hazardous waste.

Action Items:

Action Item	Responsible Person(s)	Due Date
1. Provide comments on NIH Manual Issuance on Mercury Procurement, Use, and Disposal to Linda Thompson (thompson_linda@bah.com)	Working Group	July 11, 2008
2. Contact Mimi Freiman to solicit Safety Officers for additional feedback on abbreviated list of NIH Target Chemicals	Charlyn Lee	July 11, 2008
3. Continue to work on possible uses and alternatives of NIH Target Chemicals on abbreviated list	Linda Thompson	July 11, 2008

Next Meeting:

The next meeting is scheduled for Wednesday, July 16, from 1:30 to 2:30 PM in Building 50, Room 1328/1334.



MEETING MINUTES

**Sustainable Lab Practices Working Group
NIH Environmental Management System (NEMS)
Wednesday, May 21, 2008
1:30 – 2:30 pm**

ATTACHMENT 1

NIH Target Chemicals Ranking Matrix

Chemical	Quantity Waste Gen. CY07	Regulatory Mandate	Alternative Availability & Feasibility	Total Points	Use	Alternatives
TIER 1 – TOP PRIORITY LIST OF NIH TARGET CHEMICALS						
Ethidium Bromide	10 (201.1 Kg)	0	15	66	<ul style="list-style-type: none"> • DNA stain • <i>Not used by chemists</i> 	<ul style="list-style-type: none"> • SYBR Red, SYBR Safe • SYBR Red (Biotium Inc), EnVISION™ (Amresco) • Gel Green (Biotium, Inc) (instead of SYBR Green)
Picric acid	1 (7 Kg)	6	15	74	<ul style="list-style-type: none"> • Staining agent • Boudin fixative • Tissue fixative • <i>Not use by Chemists</i> 	<ul style="list-style-type: none"> • 2% aqueous ferric ammonium sulfate • Fluorescent based cells? • Modified Davidson's Fixative¹ • Davidson fixative (Ethanol, acetic acid, formalin)
Acetonitrile	15 (3532.7 Kg)	9		50	<ul style="list-style-type: none"> • HPLC 	<ul style="list-style-type: none"> • Reduce flow rates • Use capillary columns
					<ul style="list-style-type: none"> • Solvent 	<ul style="list-style-type: none"> • Polyethylene glycol
					<ul style="list-style-type: none"> • Organic synthesis • <i>Routinely used by chemists</i> 	<ul style="list-style-type: none"> • Water

Chemical	Quantity Waste Gen. CY07	Regulatory Mandate	Alternative Availability & Feasibility	Total Points	Use	Alternatives
					<ul style="list-style-type: none"> Oligo and peptide synthesis 	<ul style="list-style-type: none"> Purchase oligonucleotides and peptides from commercial vendors Synthesis also require the use of other organic chemicals
Xylene	15 (2634.5 Kg)	9		50	<ul style="list-style-type: none"> Radioactive tracer studies (liquid scintillation cocktails) <i>Minimally used by chemists</i> 	<ul style="list-style-type: none"> Non-hazardous proprietary liquid scintillation cocktails (National Diagnostics) Solvent recycling systems
					<ul style="list-style-type: none"> Clearing agents in histology In Situ 	<ul style="list-style-type: none"> Histo-Clear (National Diagnostics, RA Lamb) Clear-Rite 3™ Americlear™ Histosolv X™/ Shandon Xylene Substitute Mediclear II™ Pro-Par Clearant CitriSolv (Fisher) SpoT –light tissue pre-treatment kit (invitrogen) Sodium thiocyanate
Methanol	15 (5656.3 Kg)	9		57	<ul style="list-style-type: none"> Washing gels 	<ul style="list-style-type: none"> Ethanol Water

Chemical	Quantity Waste Gen. CY07	Regulatory Mandate	Alternative Availability & Feasibility	Total Points	Use	Alternatives
Chloroform	15 (986.5 Kg)	9		62	<ul style="list-style-type: none"> General, reaction solvent 	<ul style="list-style-type: none"> Dimethoxyethane polyethylene glycol
					<ul style="list-style-type: none"> Traditional DNA extraction <i>Routinely used by chemists</i> 	<ul style="list-style-type: none"> New DNA extraction kits using polycarbonate filters, PEG, and simple salts
Dichloromethane	15 (1095.5 Kg)	9		55	<ul style="list-style-type: none"> Cleaning agent 	<ul style="list-style-type: none"> d-Limonene
					<ul style="list-style-type: none"> General, reaction solvent <i>Routinely used by chemists</i> 	<ul style="list-style-type: none"> Benzotrifluoride (trifluorotoluene) Diethoxymethane Ionic liquids Water
					<ul style="list-style-type: none"> DNA extraction 	<ul style="list-style-type: none"> Commercial DNA extraction kits using non-organic chemicals (Quiagen, Sigma)
Chromic acid	15 (8.4 Kg)	9	15	58	<ul style="list-style-type: none"> Chromic acid baths <i>Minimally used by chemists</i> 	<ul style="list-style-type: none"> Alconox Base baths Disposable labware
Dimethyl formamide	15 (632.5 Kg)	9		45		
Methyl-2-pyrrolidone	10 (269.6 Kg)	6		40		
Hexane	10 (873.2 Kg)	10		43		
Phenol	10 (518.1 Kg)	9		53		
Phosphoric acid	10 (142.9 Kg)	3		34		

Chemical	Quantity Waste Gen. CY07	Regulatory Mandate	Alternative Availability & Feasibility	Total Points	Use	Alternatives
Trichloroacetic acid	10 (107.4 Kg)	3		35		
Perchloric acid	1 (4.2 Kg)	3		32		
Mercury	10 (216.5 Kg)	12	15	77		
Mercury Compounds	1 (11 Kg)	12	15	68		
TIER 2 - NIH TARGET CHEMICALS UNDER CONSIDERATION						
CFC-11 and 12	1 (0.4, 15.9 Kg)	12	15	66	• Refrigerant	• HFC-134a
Carbon tetrachloride	5 (49.2 Kg)	12		58		
1,1,1-Trichloroethane	5 (46.1 Kg)	12		58		
Ethylene oxide	5 (42.9 Kg)	9		48		
Silver nitrate	1 (9.03 Kg)	9		48		



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**Sustainable Lab Practices Working Group
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Wednesday, May 21, 2008
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ATTACHMENT 2



NIH Mercury Policy Update

Sustainable Lab Practices Working Group Meeting

LT Stephen T. Fields

Office of Research Facilities

Division of Environmental Protection

Waste Resource Recovery Branch

June 18, 2008

Summary of work accomplished since last meeting

The NIH Mercury Policy is currently being reviewed by the following organizations:

- OD/Office of Logistics and Acquisition Operations
- ORS/Division of Veterinary Resources
- ORS/Division of Occupational Health and Safety
- ORS Science Resource Manager
- Clinical Center Environment of Patient Care Committee
- HHS Office of General Counsel

This review process takes approximately two weeks.

Upcoming schedule after initial review

After final comments are incorporated, Mr. Daniel Wheeland, Director of ORF, and Dr. Michael Gottesman, Deputy Director for Intramural Research will review the policy prior to dissemination.

- This final review will take approximately three weeks.
- **The NIH Mercury policy will be issued mid to late July.**

NIH POLICY MANUAL

3033 - PROCUREMENT, USE AND DISPOSAL OF MERCURY AND ITS COMPOUNDS

Issuing Office: ORF/DEP 301-496-3537

Release Date: ##/##/08

1. Explanation of Material Transmitted: This chapter establishes NIH policy and management controls on procurement, use and disposal of items and materials containing elemental mercury and mercury compounds.

2. Filing Instructions:

Insert: NIH Manual Chapter 3033 dated: ##/##/2008

PLEASE NOTE: For information on:

- Content of this chapter, contact the issuing office listed above.
 - On-line information, enter this URL:
<http://www1.od.nih.gov/oma/manualchapters/>
 - To sign up for e-mail notification of future changes, please go to the [NIH Manual Chapters LISTSERV](#) Web page.
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A. PURPOSE:

This chapter establishes the policies and controls on procurement and use of items and materials containing elemental mercury and mercury compounds. The policy prohibits the procurement of mercury added products with NIH appropriated funds; prohibits use of mercury and its compounds on all facilities owned, operated or leased by the NIH; requires the elimination of existing mercury containing devices in use on NIH facilities; provides exceptions and procedures for obtaining variances for necessary scientific and medical uses of mercury.

B. BACKGROUND:

Mercury and its compounds are neurotoxic, bioaccumulative and persistent in the environment and subject to increasingly stringent regulations governing their use and disposal. Recent studies suggest that exposure to mercury contaminants may also alter the immune response to pathogens, contribute to the development of cardiovascular disease, and select and enrich for populations of multiply antibiotic resistant bacteria.

Mercury and its compounds are common contaminants in older biomedical facilities as a consequence of uses in building components, spills and biogenic accumulation of mercury, which is present in low concentrations in a wide variety of janitorial chemicals and other

commercial products that may be discharged in waste water. Disturbance of contaminated areas and plumbing during construction and demolition activities increases the potential for human exposure and releases to the environment in waste water and construction debris.

Since the early 1970's the NIH has had specific requirements governing disposal of mercury and its compounds. These were found in a previous version of this chapter updated on January 24, 1972 and subsequently rescinded on February 6, 1986 when mercury was included in policies for management of hazardous chemical waste. In 2001 the NIH initiated an agency wide campaign to encourage the voluntary elimination of unnecessary uses of mercury in its facilities. While this pollution prevention initiative has resulted in the elimination of most of the mercury in use at these facilities some use is continuing and spills of mercury, primarily from broken thermometers are still occurring. Spills increase the potential for exposure and environmental releases and may result in extremely high clean up costs and liability. Continuing unnecessary uses of mercury poses unacceptable and avoidable risks. Several federal and state regulations and Executive Order 13423 also require reductions in the use and disposal of toxic chemicals.

These circumstances and the wide availability of alternatives for mercury thermometers and almost all other uses of mercury and its compounds in the mission activities of the NIH dictated the need for mandatory restrictions on procurement and use of mercury established in the foregoing policy.

C. POLICY:

1. It is the policy of the NIH to prohibit all unnecessary acquisitions of mercury added products and uses of mercury and mercury compounds on its facilities and to ensure that all mercury containing equipment and waste is managed and disposed of in manner that is safe, protective of the environment and compliant with all applicable regulations.
2. This policy was developed in accordance with the following statutes, regulations, Executive Orders, policies and plans, and amendments thereto:
 - a. Resource Conservation and Recovery Act of 1976;
 - b. Comprehensive Environmental Response Compensation and Liability Act of 1980;
 - c. Clean Water Act of 1972;
 - d. Hazardous Materials Transportation Act of 1975;
 - e. Executive Order 13423, "Strengthening Federal Environmental, Energy, and Transportation Management";
 - f. Affirmative Procurement Plan for Purchasing Environmentally Preferable Products and Services at the U.S. Department of Health and Human Services;

- g. Annotated Code of Maryland, Environmental Article, Title 1, Subtitle 9 and other state and local laws and regulations restricting the sale and use of mercury devices; and
- h. Goals and targets for reduction of toxic chemical use and pollution prevention established by NIH Environmental Management System (NEMS) in compliance with Executive Order 13423 and the and the NIH Environmental Policy signed by the Director of the NIH on January 13, 2005.

D. REFERENCES:

1. NIH Manual 3033 Disposal or Reclamation of Waste Mercury and its Compounds. Updated January 24, 1972; rescinded February 6, 1986.
2. Executive Order 13423-Strengthening Federal Environmental, Energy, and Transportation Management. January 26, 2007.
3. NIH Mercury Abatement Program Web site <http://www.nomercury.nih.gov>
4. NIH Manual Chapter 3032 -Waste Minimization and Management at NIH. Available online at <http://www1.od.nih.gov/oma/manualchapters/intramural/3032/>
5. NIH Waste Disposal Guide. Printed copies of the Guide may be obtained from DEP at 301-496-7990 or DOHS Health and Safety Consultants at 301-496-2346. The Guide and updated information is available online at: <http://orf.od.nih.gov/waste/wasteguide.html>
6. NIH Environmental Policy. Available online at http://www.nems.nih.gov/records/NIH_Environmental_Policy.pdf
7. Affirmative Procurement Plan. Purchasing Environmentally Preferable Products and Services at the U.S. Department of Health and Human Services. Available online at <http://intranet.hhs.gov/environmental/documents/APPMay2007.doc>
8. NIH Manual 26101-25-2. Personal Property Management Guide. Available online at: <http://www1.od.nih.gov/oma/manualchapters/acquisitions/26101-25-2/>
9. Interstate Mercury Education & Reduction Clearinghouse (IMERC) Mercury-Added Products Database, Northeast Waste Management Officials' Association. Available online at: <http://www.newmoa.org/prevention/mercury/>

E. DEFINITIONS:

1. **Exception:** A mercury added product that may be procured and used on NIH facilities without prior authorization.

2. **Mercury Added Product:** A product, commodity, chemical, formulation, or product with one or more components, or a product that cannot function without the use of that component, that contains mercury or a mercury compound intentionally added to the product, commodity, chemical, or component in order to provide a specific characteristic, appearance, or quality, or to perform a specific function, or for any other reason.
3. **Mercury Contaminated Product:** A product that contains mercury at total concentration equal to or above 50 parts per billion as an unintended contaminant arising from the manufacturing process.
4. **NIH Facility:** A facility owned, operated or leased by the NIH.
5. **Special Exception:** Authorization to procure or use mercury added products, and mercury contaminated products with a total mercury concentration greater than 100 parts per billion as provided for in this issuance.
6. **Standing Exception:** Mercury added products and mercury contaminated products with a total mercury concentration greater than 100 parts per billion that may be procured or used on NIH facilities without prior approval (Special Exceptions).
7. **Thiomersal:** Ethyl(2-mercaptobenzoato-(2-)-O,S) mercurate (1-) sodium, a preservative and antimicrobial used in multi-dose vaccines and some biological reagents.

F. RESPONSIBILITIES:

1. The Office of Research Facilities Development and Operations (ORFDO) has overall responsibility for design, construction, operation, renovation and decommissioning of NIH facilities.
2. The Division of Technical Resources (DTS), ORFDO develops guidelines and requirements for the selection and use of equipment and materials used in facility design and construction.
3. The Division of Environmental Protection (DEP), ORFDO
 - a. Directs the NIH mercury abatement program and maintains a website to improve awareness of mercury hazards, mercury added products and non-mercury or reduced mercury alternatives.
 - b. Reviews and approves applications for special exceptions requested for procurement and use of mercury.
 - c. Conducts or assists in the assessment and remediation of mercury contamination in facilities.
 - d. Collects, stores, transports, treats, disposes and recycles mercury contaminated waste.

- e. Collaborates with the Environmental Protection Agency (EPA), other agencies and organizations in development and promotion of strategies, procedures and technologies for reducing mercury use, assessing and abating mercury contamination of facilities.
4. The Division of Occupational Health and Safety (DOHS), Office of Research Services (ORS), is responsible for providing technical assistance and support regarding health and safety risks, and appropriate precautions relating to waste management activities. DOHS also conducts safety surveys of laboratories and other work areas, identifies mercury containing devices and instructs owners on requirements for use and removal.
5. The Division of Fire and Rescue Services, ORS is responsible for providing first response to incidents involving spills and releases of mercury and its compounds on the main NIH campus in Bethesda, Maryland and at other NIH facilities as directed by the Associate Director for Research Services.
6. The IC Scientific Directors are responsible for reviewing applications for Special Exceptions submitted to them in accordance with this policy and making recommendations to the applicant and approving officials for action on the application.
7. Employees of the Institutes and Centers responsible for:
 - a. Avoiding the procurement of mercury added products except as allowed by this Chapter.
 - b. Minimizing the procurement and use of excepted mercury added products and mercury contaminated products, and procuring such products with the lowest available mercury content.
 - c. Identifying existing mercury added products in their work areas and ensuring that they are removed and disposed of following NIH requirements for surplus property and waste management.

G. PROCEDURES:

Special Exceptions: Exceptions to the prohibition on procurement and use may be granted for limited scientific and medical uses of mercury or mercury compounds for which there are no acceptable alternatives. Examples of such uses may include calibration of measurement instruments; fixatives used in histology; components of existing equipment that cannot be replaced; and research on mercury toxicology.

Application. Persons seeking to procure or use mercury added products or mercury contaminated products with a total mercury concentration equal to or greater than 100 parts per billion shall submit a written application for a Special Exception to the Division of Environmental Protection, ORF. The application shall contain the following information:

- Identification of the applicant;
- Name of Laboratory, Institute or Center
- Chemical form and quantity of mercury
- Location of use
- Intended use
- Justification
- Handling and containment precautions
- Spill response plan
- Acknowledgement of responsibility for clean up costs

Applicants are encouraged to review the need for the exception with the Scientific Director of their Institute or Center before submission of the application.

Review and Approval. The Director of DEP shall review the application and approve it or return it to the applicant in seven (7) business days with an explanation why it was not approved and a recommended course of action to secure approval.

Approval Notifications. The Director of DEP shall notify the applicant, IC Scientific Director and Division of Occupational Health and Safety in writing within seven (7) business days of approved requests for Special Exceptions.

Procurement Under Special Exception. The applicant for the Special Exception shall provide a copy of the special exception approval letter to their procurement official to authorize the procurement of the mercury added product.

Standing Exceptions: The items and materials listed below may be procured and used at NIH facilities without application for a Special Exception. Requirements for disposition of excepted equipment and waste containing excepted materials remain applicable.

- Biological products regulated by the federal Food and Drug Administration under the Public Health Service Act containing thiomersal and other mercury based additives.
- Mercury used in dental amalgams
- Fluorescent lamps
- Mercury contaminated products with a total mercury concentration less than 100 parts per billion
- Micromanipulation and microinjection apparatus

- Prescription drugs and other substances regulated by the federal Food, Drug, and Cosmetic Act
- Ultraviolet lamps

Termination of Exceptions: The Director, DEP may terminate Standing Exceptions and Special Exceptions when required by regulatory mandates or when suitable mercury free or lower mercury products become available for previously excepted uses. The Director will provide notice of terminations of Standing Exemptions in the NIH Record and by updating this chapter. The Director will notify holders of Special Exceptions of terminations in writing.

Disposition of Mercury Containing Equipment and Waste:

Unserviceable Property. Elemental mercury in unserviceable medical and scientific equipment shall be removed and disposed following NIH waste management requirements before transfer of the property to the PUB, DPPS. The DEP provides assistance in safe removal and disposal of the mercury upon request. After the mercury is removed, the Property Custodial Officer shall attach an [NIH Form 2683](#), Certification that Equipment is Free From Hazards, to each item medical/scientific equipment item. The form shall be completed with an indication that the mercury has been removed. The Property Utilization Branch (PUB), Division of Personal Property Services (DPPS), Office of the Associate Director, Office of Logistics and Acquisition Services (OLAO) will arrange for pick-up of the items by the Relocation Services Branch (RSB), Division of Logistic Services (DLS), OLAO. RSB personnel will not pick up items that are not tagged.

Mercury Containing Waste. All liquid and solid waste generated at NIH facilities that contain a total mercury concentration above 50 parts per billion shall be managed and disposed of as Chemical Waste following NIH Policy Manual Chapter 3032 - Waste Minimization and Management at NIH.

Additional Information:

Division of Environmental Protection, ORF 301-496-7775.

Online Information: <http://orf.od.nih.gov/>

H. Records Retention and Disposal:

For this chapter, records pertaining to NIH Waste Management are retained and disposed of under the authority of NIH Manual [1743](#) "Keeping and Destroying Records," Appendix 1, "NIH Records Control Schedule," Items 1300 B and 7000 C.

I: Management Controls:

- 1. Office Responsible for Reviewing Management Controls Relative to this Chapter (Issuing Office):**

Division of Environmental Protection, ORF

2. Frequency of Review (in years):

This policy will be reviewed every five years.

3. Method of Review:

Management Control Review (list title)

Alternative Review

4. Review Reports are sent to:

Director, Division of Environmental Protection, ORF

DRAFT