ENVIRONMENTAL, SAFETY, AND OCCUPATIONAL HEALTH INTERNAL CONFORMANCE AUDIT PROTOCOL

Defense Logistics Agency Strategic Materials

This audit covers depot specific elements as well as elements of the organizational Environmental, Safety, and Occupational Health Management System.

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Environmental, Safety and Occupational Health Internal Conformance Audit Protocol Summary
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ESOHMS PROTOCOL	Nonconformances		Recommendation	
	Minor	Major	Yes	No
General Requirements				
Environmental, Safety, and Occupational Health Policy				
Environmental, Safety, and Occupational Health Aspects				
Legal and Other Requirements				
Objectives, Targets, and Programmes				
Resources, Roles, Responsibility, and Authority				
Competence, Training, and Awareness				
Communication				
Documentation				
Control of Documents				
Operational Control				
Emergency Preparedness and Response				
Monitoring and Measurement				
Evaluation of Compliance				
Nonconformity, Corrective Action, and Preventive Action				
Control of Records				
Internal Audit				
Management Review				
Executive Order 13514				

4.1 General Requirements (REFERENCE IGD 1005, 2.1)

The organization will establish, document, implement, maintain, and continually improve an Environmental, Safety, and Occupational Health (ESOH) Management System (ESOHMS) in accordance with the requirements of International Standards and determine how it will fulfill these requirements.

The organization will define and document the scope of its ESOHMS.

PROBE QUESTIONS

1. Does the depot Distribution Facilities Manager or ESOH representative understand the scope of the ESOHMS for the Defense Logistics Agency (DLA) Strategic Materials?

2. Can the depot Distribution Facilities Manager or ESOH representative indicate where the scope of the ESOHMS is defined and documented?

3. Can the depot Distribution Facilities Manager or ESOH representative articulate how DLA Strategic Materials ensures continual improvement?

Additional Comments:

4.2 Environmental, Safety, and Occupational Health Policy (REFERENCE IGD 1005, 2.1)

Top management will define the organization's ESOH policy and ensure that, within the defined scope of its ESOHMS, it

a. is appropriate to the nature, scale, and ESOH impacts of its activities, products, and services;

b. includes a commitment to continual improvement and prevention of pollution;

c. includes a commitment to comply with applicable legal requirements and with other requirements to which the organization subscribes that relate to its ESOH aspects;

d. provides the framework for setting and reviewing ESOH objectives and targets;

e. is documented, implemented, and maintained;

f. is communicated to all persons working for or on behalf of the organization; and

g. is available to the public.

PROBE QUESTIONS

1. Is the policy documented?

2. Is the policy reviewed periodically to ensure that it remains relevant and appropriate?

3. Is a current copy of this policy posted in the workplace?

4. How do you know this posted policy is the most up-to-date version?

5. Are all employees aware of the policy? If there is a new policy, how it is being communicated to the employees?

6. How was the policy communicated to individuals working on your site in behalf of the government (for example, contractors, contracted personnel, etc.)?

7. How is the policy made available to public and interested parties?

8. Has the policy been endorsed by upper management?

9. Does the depot Distribution Facilities Manager or ESOH representative understand how top management ensures the policy is appropriate to the nature, scale, and environmental impacts of its activities, products, or services?

Additional Comments:

4.3.1 Environmental, Safety, and Occupational Health Aspects (REFERENCE IGD 1002)

The organization will establish, implement, and maintain risk assessment procedures

a. to identify the ESOH aspects and risks of its activities, products, and services within the defined scope of the ESOHMS that it can control and those that it can influence taking into account planned or new developments, or new or modified activities, products, and services;

b. to determine those aspects that have or can have significant impacts on the environment (i.e., significant ESOH aspects); and

c. to identify hazards, assess risks, and implement necessary control measures for routine and nonroutine activities, activities of all personnel with access to the workplace, and all facilities at the workplace.

The organization will document this information and keep it up to date.

The organization will ensure that the significant ESOH aspects are taken into account in establishing, implementing, and maintaining its ESOHMS.

PROBE QUESTIONS

1. What are the significant ESOH aspects and risks that apply to this depot? How are the impacts or hazards controlled?

2. Has the depot Distribution Facilities Manager or ESOH representative explained the risk assessment process from the aspect procedure (Interpretive Guidance Document [IGD] 1002) and how it is maintained to identify significant ESOH aspects and risks? They should also indicate how significant ESOH aspects and risks are documented and kept up to date.

   a. In developing the significant aspects, were the risks analyzed using the ESOH Risk Analysis Worksheet?

3. Can the depot Distribution Facilities Manager or ESOH representative articulate how new or modified activities and products are incorporated into the determination of significant ESOH aspects and risks?

4. What commodities are stored onsite? Have there been any changes in the last year to either what is stored or how the stored materials are regulated? Have these changes been taken into consideration while determining significant aspects?

5. Are employees aware of the depot's significant ESOH aspects and risks?

6. Are risks assessed and appropriate controls implemented for both routine and nonroutine tasks?

Additional Comments:

4.3.2 Legal and Other Requirements (REFERENCE IGD 1003)

The organization will establish, implement, and maintain procedures

a. to identify and have access to the applicable legal requirements and other requirements to which the organization subscribes related to its ESOH aspects and

b. to determine how these requirements apply to its ESOH aspects.

The organization will ensure that these applicable legal requirements and other requirements to which the organization subscribes are taken into account in establishing, implementing, and maintaining its ESOHMS.

PROBE QUESTIONS

1. Were there any changes in the way you handle commodities due to changes in the law? How were you made aware of these changes?

2. Is there a procedure to identify legal and other requirements? How can you access this information?

3. Does the depot maintain or have access to an inventory of applicable legal and other requirements?

4. How does the depot keep track of changes to legal requirements?

5. How is applicable information communicated to employees or other interested parties?

Additional Comments:

4.3.3 Objectives, Targets, and Programmes (REFERENCE IGD 1004)

The organization will establish, implement, and maintain documented ESOH objectives and targets, at relevant functions and levels within the organization. The objectives and targets will be measurable, where practicable, and consistent with the ESOH policy, including the commitments to prevention of pollution, to compliance with applicable legal requirements and with other requirements to which the organization subscribes, and to continual improvement.

When establishing and reviewing its objectives and targets, an organization will take into account the legal requirements and other requirements to which the organization subscribes and its significant ESOH aspects. It will also consider its technological options; its financial, operational, and business requirements; and the views of interested parties.

The organization will establish, implement, and maintain a programme for achieving its objectives and targets. The programme will include

a. designation of responsibility for achieving objectives and targets at relevant functions and levels of the organization and

b. the means and timeframe by which they are to be achieved.

PROBE QUESTIONS

1. Is the depot working toward DLA Strategic Material's objectives and targets? Are all employees aware of the objectives and targets?

2. Are responsibility and timeframes assigned for the objectives and targets? Are the plans for implementation reviewed regularly for appropriateness?

3. Do you have any of the ESOH risks in the Significant ESOH Aspects Table (Table 2, IGD 1002)? Which ones? How are they controlled throughout your operations? Are there objectives and targets associated with these risks?

4. Please provide the status of your progress toward the objectives and targets in listed in Table 5 (Environmental, Safety, and Occupational Health Objectives, Targets, and Implementation Plans), from IGD 1004.

Additional Comments:

4.4.1 Resources, Roles, Responsibility, and Authority (REFERENCE IGD 1006)

Management will ensure the availability of resources essential to establish, implement, maintain, and improve the ESOHMS. Resources include human resources and specialized skills, organizational infrastructure, technology, and financial resources.

Roles, responsibilities, and authorities will be defined, documented, and communicated in order to facilitate effective environmental management.

The organization's top management will appoint a specific management representative or representatives who, irrespective of other responsibilities, will have defined roles, responsibilities, and authority for

a. ensuring that an ESOHMS is established, implemented, and maintained in accordance with the requirements of this International Standard and

b. reporting to top management on the performance of the ESOHMS for review, including recommendations for improvement.

PROBE QUESTIONS

1. Does the Distribution Facilities Manager have an understanding of his or her role and responsibilities for the ESOH program? Are the roles and responsibilities included in the Facilities Distribution Manager's position description? If yes, where? And does the position description match the Facility Distribution Manager's understanding of his or her role?

2. Is an ESOH Management Representative assigned by top management? Is the depot aware of and coordinating with the ESOH Management Representative?

3. Are the roles and responsibilities for implementing the ESOHMS at this depot defined and documented?

4. Where are the roles and responsibilities for outloading personnel defined? Are these personnel aware of their roles?

5. What are your roles in meeting the facilities' objectives and targets?

6. How does the depot communicate ESOH performance to top management?

Additional Comments:

4.4.2 Competence, Training, and Awareness (REFERENCE IGD 1007)

The organization will identify tasks that have the potential to cause a significant ESOH impact. The organization will ensure that any person performing these tasks, for it or on its behalf, is competent, based on appropriate education, training, or experience. The organization will retain associated records.

The organization will identify training needs associated with its ESOH aspects and its ESOHMS. It will provide training or take other action to meet these needs and will retain associated records.

The organization will establish, implement, and maintain procedures to make persons working for it or on its behalf aware of the following:

a. The importance of conformity with the ESOH policy and procedures and with the requirements of the ESOHMS

b. The significant ESOH aspects and related actual or potential impacts associated with their work and the environmental benefits of improved personal performance

c. Their roles and responsibilities in achieving conformity with the requirements of the ESOHMS

d. The potential consequences of departure from specified procedures

PROBE QUESTIONS

1. How are training requirements identified (that is, how are legal and other requirements cross referenced with job duties to determine who needs what training)?

2. Does the training program take into consideration the differing levels of responsibility, ability, and risk for different positions?

3. What training have personnel received on spill prevention and stormwater runoff?

4. What safety or commodity-specific training have personnel received?

5. Please provide the training matrix for depot employees. Provide evidence that two employees have received the specified training.

6. Specifically for environmental compliance, environmental conformance, and emergency response, what training do the security guards receive? Provide training records.

7. Have you had any new employees in the last year? If yes, provide their new employee orientation training records.

8. How have people working "on behalf of the government" been trained at this depot?

Additional Comments:

4.4.3 Communication (REFERENCE IGD 1008)

With regard to its ESOH aspects and ESOHMS, the organization will establish, implement, and maintain procedures for

a. internal communication among the various levels and functions of the organization and

b. receiving, documenting, and responding to relevant communication from external interested parties.

The organization ensures employees are involved in the development and review of ESOH policies and procedures to manage risks; consulted where there are any changes impacting workplace health and safety; represented on health and safety matters; and informed as to who is their ESOH representative and specified management appointee.

The organization will decide whether to communicate externally about its significant ESOH aspects and will document its decision. If the decision is to communicate, the organization will establish and implement methods for this external communication.

PROBE QUESTIONS

1. Have you established a community advisory board? Please provide evidence that this board has met and the topics that were discussed. If you have not, do you have other ways of communicating with the public?

2. Are employees involved in the development and review of ESOH policies and procedures to manage risks and consulted where there are any changes impacting workplace health and safety?

3. Please provide the material safety data sheets (MSDSs) for your commodities and chemicals stored at this depot. How are they communicated to your employees?

4. Are people working “on behalf of the government” at or for your depot aware of our ESOHMS? This would include suppliers and contractors.

5. If you have an ESOH-related question, how would you get it answered?

6. How do you receive ESOH information relevant to your job duties?

7. What is the procedure for handling information requests from an external party?

8. When are Public Affairs and Legal Services part of the communication strategy?

9. What is the protocol if the news media were to call? Have they? Please provide your media contact log.

Additional Comments:

4.4.4 Documentation (REFERENCE IGD 1009)

The ESOHMS documentation will include the following:

a. The ESOH policy, objectives, and targets

b. Description of the scope of the ESOHMS

c. Description of the main elements of the ESOHMS and their interaction and reference to related documents

d. Documents, including records, required by this International Standard

e. Documents, including records, determined by the organization to be necessary to ensure the effective planning, operation, and control of processes that relate to its significant ESOH aspects

PROBE QUESTIONS

1. As appropriate to operations, are the documents listed below maintained or accessible by the depot ESOH staff?

   a. Stormwater permits, exclusions, and Stormwater Pollution Prevention Plans (SWPPPs)

   b. Interpretive Guidance Document

   c. Spill Prevention, Control, and Countermeasure (SPCC) Plans

   d. Safety and occupational health policies

   e. Pesticide Management Plan

   f. Cleanup and remediation documents

   g. ESOHMS training

   h. ESOH audit documentation

   i. Storage tank registration and management documents

   j. Emergency Planning and Community Right-To-Know Act (EPCRA) reporting documentation

   k. Emergency plans and procedures

   l. Stockpile Operations and Logistics Storage Manual

2. Verify that other staff members have access to the ESOH documents as needed.

Additional Comments:

4.4.5 Control of Documents (REFERENCE IGD 1010)

Documents required by the ESOHMS and by this International Standard will be controlled. Records are a special type of document and will be controlled in accordance with the requirements given in 4.5.4.

The organization will establish, implement, and maintain procedures to

a. approve documents for adequacy prior to issue,

b. review and update as necessary and reapprove documents,

c. ensure that changes and the current revision status of documents are identified,

d. ensure that relevant versions of applicable documents are available at points of use,

e. ensure that documents remain legible and readily identifiable,

f. ensure that documents of external origin determined by the organization to be necessary for the planning and operation of the ESOHMS are identified and their distribution controlled, and

g. prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose.

PROBE QUESTIONS

1. What is the depot's procedure for controlling documents?

2. How do you know if the document you are using is the most up-to-date revision?

3. Please provide your Stockpile Operations and Logistics Storage Manual. When was it updated?

4. The depot ESOH representative should be aware of and be able to explain the role Review/Revision matrix.

5. What commodities are being shipped today? Recently? Where are they defined in the latest edition of the Stockpile Operations and Logistics Manual?

6. Are documents stamped/ maintained in accordance with the ESOHMS document control procedure (IGD 1010) to prevent the use of obsolete documents?

7. Do employees have access to pertinent ESOH documents at the points of use?

Additional Comments:

4.4.6 Operational Control (REFERENCE IGD 1011)

The organization will identify and plan those operations that are associated with the identified significant ESOH aspects consistent with its ESOH policy, objectives, and targets, in order to ensure that they are carried out under specified conditions, by

a. establishing, implementing, and maintaining documented procedures to control situations where their absence could lead to deviation from the ESOH policy, objectives, and targets;

b. stipulating the operating criteria in the procedures; and

c. establishing, implementing, and maintaining procedures related to the identified significant ESOH aspects of goods and services used by the organization and communicating applicable procedures and requirements to suppliers, including contractors.

PROBE QUESTIONS

1. How does paragraph 2.3 of IGD 1011 apply to your contractors supplying goods and services to DLA Strategic Materials and this depot?

2. Are the procedures included in the Operations and Logistics Storage Manual being followed?

3. Please review the operational controls associated with the significant aspects. Are these controls documented in an operation control matrix? Find evidence to support whether the controls are properly implemented.

4. What is one way we can communicate relevant procedures and requirements to our suppliers and contractors?

5. Please provide the operational control matrix. How do you implement these controls in your depot?

Additional Comments:

4.4.7 Emergency Preparedness and Response (REFERENCE IGD 1012)

The organization will establish, implement, and maintain procedures to identify potential emergency situations and potential accidents that can impact the environment and how it will respond to them.

The organization will respond to actual emergency situations and accidents and prevent or mitigate associated adverse ESOH impacts. The organization will periodically review and, where necessary, revise its emergency preparedness and response procedures, in particular, after the occurrence of accidents or emergency situations.

The organization will also periodically test such procedures where practicable.

PROBE QUESTIONS

1. How do you keep the fire department and local emergency response departments aware of the depot activities and commodities/chemicals stored?

2. What is considered a “spill”? Have you had any spills?

3. Have you had to use an emergency response plan? Please provide the review of the plan following its use.

4. Please provide any reports you have documenting unsafe conditions or mishaps. Have you had any mishaps? If yes, describe how they were tracked, corrected, and confirmed for effectiveness.

5. What do you do in case of an emergency? Are all employees aware of the procedures?

6. How are emergency response procedures reviewed for adequacy?

7. What are the procedures for preventing environmental impacts, injury, or illness as a result of an emergency?

8. Please provide your emergency response plan.

9. If the depot had an emergency, was the emergency response plan reviewed for effectiveness?

Additional Comments:

4.5.1 Monitoring and Measurement (REFERENCE IGD 1013)

The organization will establish, implement, and maintain procedures to monitor and measure, on a regular basis, the key characteristics of its operations that can have a significant environmental impact. The procedures will include documenting information to monitor performance, applicable operational controls, and conformity with the organization's environmental objectives and targets.

The organization will ensure that calibrated or verified monitoring and measurement equipment is used and maintained and will retain associated records.

PROBE QUESTIONS

1. Do you have records to demonstrate that your monitoring equipment is calibrated and maintained on an approved schedule by headquarters or the manufacturer's recommendations?

2. Is this depot on private well water? If yes, please show the requirements for water testing and evidence that these tests have been completed.

3. Please provide the records for monitoring operational controls, the waste tracking system, and National Pollutant Discharge Elimination System (NPDES) monitoring and reporting per IGD 1013.

4. Does this depot have and maintain a Calibration Chart/Schedule for Alpha/Beta/Gamma meters, scales, other meters/equipment, and so forth?

5. What monitoring is done and what records are maintained to assess the safety of workers in high-risk areas (such as mercury storage)?

Additional Comments:

4.5.2 Evaluation of Compliance (REFERENCE IGD 1014)

4.5.2.1 Consistent with its commitment to compliance, the organization will establish, implement, and maintain procedures for periodically evaluating compliance with applicable legal requirements. The organization will keep records of the results of the periodic evaluations.

4.5.2.2 The organization will evaluate compliance with other requirements to which it subscribes. The organization may wish to combine this evaluation with the evaluation of legal compliance referred to in 4.5.2.1 or to establish separate procedures.

The organization will keep records of the results of the periodic evaluations.

PROBE QUESTIONS

1. Do you have a copy of the latest external compliance audit for your site?

2. How often do internal audits occur? What is the process for these audits?

3. Have you addressed all of the findings for your site?

Additional Comments:

4.5.3 Nonconformity, Corrective Action, and Preventive Action (REFERENCE IGD 1015)

The organization will establish, implement, and maintain procedures for dealing with actual and potential nonconformities and for taking corrective action and preventive action. The procedures will define requirements for the following:

a. Identifying and correcting nonconformities and taking action to mitigate their ESOH impacts

b. Investigating nonconformities, determining their causes, and taking action in order to avoid their recurrence

c. Evaluating the need for action to prevent nonconformities and implementing appropriate actions designed to avoid their occurrence

d. Recording the results of corrective actions and preventive actions taken

e. Reviewing the effectiveness of corrective and preventive actions taken

Actions taken will be appropriate to the magnitude of the problems and the ESOH impacts encountered. The organization will ensure that any necessary changes are made to ESOHMS documentation.

PROBE QUESTIONS

1. Have any nonconforming conditions that would require corrective and preventive action occurred at your depot? How are mishaps handled?

2. Do you know the causes of these nonconformances?

3. What are the steps taken to address these nonconformances?

4. Are the results of corrective and preventive actions taken documented and EMS procedures updated if necessary?

5. The depot ESOH representative should be able to explain how corrective and preventative actions are vetted for risk prior to implementation.

6. Is the process outlined in IGD 1015 being followed? Explain how verification occurs.

Additional Comments:

4.5.4 Control of Records (REFERENCE IGD 1016)

The organization will establish and maintain records as necessary to demonstrate conformity to the requirements of its ESOHMS and of this International Standard, and the results achieved.

The organization will establish, implement, and maintain procedures for the identification, storage, protection, retrieval, retention, and disposal of records.

Records will be and remain legible, identifiable, and traceable.

PROBE QUESTIONS

1. What ESOHMS records do you maintain (for example, training, results of audits, reviews, and calibration of equipment)? What are the established retention times for the records?

2. Are these records legible, identifiable, and traceable to the activity, product, or service?

Additional Comments:

4.5.5 Internal Audit (REFERENCE IGD 1017)

The organization will ensure that internal audits of the ESOHMS are conducted at planned intervals for the following reasons:

a. To determine whether the ESOHMS

   1. conforms to planned arrangements for environmental management including the requirements of this International Standard and

   2. Has been properly implemented and is maintained

b. To provide information on the results of audits to management

Audit programmes will be planned, established, implemented, and maintained by the organization, taking into consideration the environmental importance of the operations concerned and the results of previous audits.

Audit procedures will be established, implemented, and maintained that address

- the responsibilities and requirements for planning and conducting audits, reporting results, and retaining associated records and

- the determination of audit criteria, scope, frequency, and methods.

Selection of auditors and conduct of audits will ensure objectivity and the impartiality of the audit process.

PROBE QUESTIONS

1. When was the last internal audit conducted? Did the auditors find any nonconformances? If yes, provide a list of these nonconformances with the corrective actions taken.

2. Did the audit team include objective members with experience in conducting ESOH audits?

3. How are audit results communicated to management?

Additional Comments:

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4.6 Management Review (REFERENCE IGD 1018)

Top management will review the organization's ESOHMS, at planned intervals, to ensure its continuing suitability, adequacy, and effectiveness. Reviews will include assessing opportunities for improvement and the need for changes to the ESOHMS, including the ESOH policy and ESOH objectives and targets. Records of the management reviews will be retained.

Input to management reviews will include the following:

a. Results of internal audits and evaluations of compliance with legal requirements and with other requirements to which the organization subscribes

b. Communication from external interested parties, including complaints

c. The environmental performance of the organization

d. The extent to which objectives and targets have been met

e. Status of corrective and preventive actions

f. Follow-up actions from previous management reviews

g. Changing circumstances, including developments in legal and other requirements related to its ESOH aspects

h. Recommendations for improvement

The outputs from management reviews will include any decisions and actions related to possible changes to ESOH policy, objectives, targets, and other elements of the ESOHMS, consistent with the commitment to continual improvement.

PROBE QUESTIONS

1. When was the last management review held? Is there an agenda and/or meeting minutes from the meeting? How did the depot participate (provide data, attend, see meeting minutes, etc.)? What topics were discussed?

2. Who is included in the management review?

3. What were the outputs from the last management review meeting?

Additional Comments:

Executive Order 13514 (REFERENCE ESOH Awareness Training Manual, Table 1)

Executive Order (EO) 13514 was signed by President Obama on October 5, 2009, and published in the *Federal Register* on October 8. Included in the EO are new goals for managing greenhouse gases, participating in local and regional planning, and leveraging Environmental Management Systems to implement all the goals in the EO. The EO also updates goals that were included in the last major environmental executive order that was issued (EO 13423). The new EO 13514 does not supersede EO 13423. The requirements of EO 13423 must still be implemented in addition to the new requirements in EO 13514.

PROBE QUESTIONS

1. Are EO 13514 goals incorporated into the organization's EMS? Specifically, are EO13514 aspects considered when setting objectives and targets, is progressed monitored, and is Top Management briefed regularly?

2. Is the appropriate monitoring occurring for EO13514 implementation?

    a. What were your greenhouse gas emissions for the most recent fiscal year (FY)?

    b. What was your energy use for the most recent FY?

    c. Have any renewable energy projects been implemented at the installation?

    d. Do you have any fleet vehicles? If yes, do they use any alternative fuel vehicles? What was your fuel consumption in fleet vehicles for the most recent FY?

    e. How many gallons of alternative fuel were purchased in the most recent FY?

    f. What was your potable water usage for the most recent FY?

g. How much water was used for landscaping, industrial, and agricultural uses in the most recent FY?

h. Have there been any water reuse projects installed?

i. Have low-impact development or other environmental friendly stormwater management practices been used?

j. How much toxic and hazardous chemicals were used in the most recent FY?

k. What quantity of solid waste was diverted from the landfill in the most recent FY?

l. Are there any programs at the depot promoting recycling?

m. Does the depot have a documented recycling program?

n. What quantity of printing paper was used in the FY?

3. Does the depot maintain a cost-effective recycling and waste prevention program?

4. Has the depot implemented any pest management and sustainable landscape management practices?

5. Have energy considerations been incorporated into National Environmental Policy Act (NEPA) documents for new or expanded facilities?

6. Has the depot participated in any local or regional transportation, energy, ecosystems, and watershed planning?

7. Have there been any recent construction or major renovation projects? If yes, were the "Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings" followed?

8. Have the Energy Star® features been enabled on all computers and monitors?

9. How does the depot manage the disposal of electronic products?

Additional Comments: