



# NEMS ENVIRONMENTAL MANAGEMENT PROGRAM

<b>PROGRAM NAME:</b>	Stormwater and Forest Conservation		
<b>SIGNIFICANT ENVIRONMENTAL ASPECT(S):</b> Liquid Discharges to Ground and/or Stormwater Soil Erosion	<b>DOCUMENT NUMBER:</b>	TBD	
	<b>DATE REVISED:</b>	09/27/07	
	<b>REVISION NUMBER:</b>	1	
	<b>SUNSET DATE:</b>	11/20/07	
	<b>PROGRAM LEAD:</b>	Mr. Ed Pfister	

## SECTION 1 – PROGRAM DESCRIPTION

In December 1999, the EPA promulgated NPDES Phase II stormwater requirements, and as of April 2003, these requirements have been implemented in Maryland through the Maryland Department of the Environment, Water Management Administration (MDE/WMA) by adoption of General Discharge Permit (#03-IM-5500)/General NPDES Permit (#MDR055500).

In Maryland, the Phase II requirements affect approximately 60 State and Federal facilities including the National Institutes of Health (NIH). These affected facilities are now required to obtain NPDES permit coverage under the Federal Clean Water Act (CWA) by January 2005. Coverage under the NPDES permit includes the requirement to implement the following six Best Management Practices (BMPs): BMP 1 - public education and outreach; BMP 2 - public participation and involvement; BMP 3 - illicit discharge detection and elimination; BMP 4 - construction site runoff control; BMP 5 - post-construction runoff control; and BMP6 - pollution prevention/good housekeeping. As an integrated part of the NIH Environmental Management System (NEMS), this Stormwater and Forest Conservation EMP addresses the aspect of "liquid discharges to ground and/or stormwater and soil erosion" and sets forth goals, performance indicators, objectives, and action plans consistent with addressing the comprehensive compliance requirements of the State NPDES Phase II program.

## SECTION 2 – GOALS AND OBJECTIVES

<b>FIVE-YEAR GOAL:</b> Provide Awareness for Voluntary Stormwater Pollution Prevention Activities  <i>Justification: TBD</i>	<b>Performance Indicator(s):</b> Awareness provided		<b>Resource requirements:</b> No additional resources required
<b>A. Objective:</b> Conduct Four (4) Strategic Community Outreach Activities in 2007.	<b>Performance Indicator(s):</b> Number of awareness activities conducted	<b>Responsibility:</b> Ed Pfister	<b>Timeframe:</b> December 2007
<b>FIVE-YEAR GOAL:</b> Improve Water Quality of Stormwater Discharges from NIH  <i>Justification: Compliance with legal requirement</i>	<b>Performance Indicator(s):</b> Quality of Stormwater Discharges		<b>Resource requirements:</b> No additional resources required

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<b>A. Objective:</b> Identify Prioritized List of illicit discharges from ongoing monitoring activities to be rectified.	<b>Performance Indicator(s):</b> prioritized list identified	<b>Responsibility:</b> Ed Pfister	<b>Timeframe:</b> December 2007
<b>B. Objective:</b> Integrate GIS tool with stormwater mapping program.	<b>Performance Indicator(s):</b> GIS tool integrated	<b>Responsibility:</b> Ed Pfister	<b>Timeframe:</b> December 2007
<b>C. Objective:</b> Enhance the UST/AST inspection and monitoring program.	<b>Performance Indicator(s):</b> UST/AST program enhanced	<b>Responsibility:</b> Ed Pfister	<b>Timeframe:</b> December 2007
<b>FIVE-YEAR GOAL:</b> Decrease quantity of stormwater discharge <i>Justification: Compliance with legal requirement</i>	<b>Performance Indicator(s):</b> Quantity of stormwater discharge		<b>Resource requirements:</b> No additional resources required
<b>A. Objective:</b> Implement NIH Urban Forest Conservation Plan.	<b>Performance Indicator(s):</b> Plan Implemented	<b>Responsibility:</b> Ed Pfister	<b>Timeframe:</b> December 2007
<b>B. Objective:</b> Improve NIH Storm Water System through Capital Improvements.	<b>Performance Indicator(s):</b> Number of Stormwater related capital improvements	<b>Responsibility:</b> Ed Pfister	<b>Timeframe:</b> December 2007
<b>C. Objective:</b> Develop & Implement New Storm Water Pollution Prevention Plan (SWP3).	<b>Performance Indicator(s):</b> SWP3 completed	<b>Responsibility:</b> Ed Pfister	<b>Timeframe:</b> December 2007
<b>D. Objective:</b> Update Storm Water System Mapping/Monitoring with Structured BMPs.	<b>Performance Indicator(s):</b> Stormwater System updated	<b>Responsibility:</b> Ed Pfister	<b>Timeframe:</b> December 2007

### SECTION 3 – PROGRAM DESCRIPTION, SIGNIFICANCE, IMPACTS AND REQUIREMENTS

<b>REASON(S) FOR SIGNIFICANCE:</b>	<ul style="list-style-type: none"> <li>a. Soil contamination</li> <li>b. Groundwater contamination</li> <li>c. Surface water contamination</li> <li>d. Ecological damage</li> <li>e. Sedimentation of water courses</li> <li>f. Increased runoff / stream flow</li> <li>g. Watershed alterations</li> <li>h. Water erosion</li> </ul>
<b>POTENTIAL ENVIRONMENTAL/ ORGANIZATIONAL IMPACTS:</b>	<ul style="list-style-type: none"> <li>a. Legal or other requirement</li> <li>b. Potential organization/financial impact that NIH considers to be high</li> <li>c. Potential community relations/public perception impact that NIH considers to be high</li> </ul>

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	d. Potential environmental impact that NIH considers to be high
	e. Potential health impact that NIH considers to be high
<b>LEGAL AND OTHER REQUIREMENTS:</b>	a. Refer to NIH Bethesda Environmental Permit Matrix (Environmental Compliance Section, DEP, ORF, Shared Drive)

**SECTION 4 – OPERATIONAL CONTROLS**

ACTIVITY(IES) THAT GIVES RISE TO ASPECT	CONTROL(S)	RESPONSIBLE PERSON	MONITORING	RECORDS	ACTION TAKEN IF CONTROL FAILS
New Building Construction; Excavation/Site Disturbance; Utilities Work; Site Work (Digging, Paving & Grading, etc.)	<ul style="list-style-type: none"> <li>Stormwater Erosion &amp; Sediment Control Permit</li> <li>Environmental Checklist for Projects</li> <li>NIH Forest Conservation Plan (FCP)</li> </ul>	<ul style="list-style-type: none"> <li>DEP Compliance Team</li> <li>DEP Compliance Officer</li> <li>Project Officer</li> </ul>	Weekly and/or Periodic Inspections	<ul style="list-style-type: none"> <li>Inspection Log</li> <li>Inspection Reports</li> <li>MDE Approved Drawings</li> <li>DNR Approved Drawings</li> </ul>	<ul style="list-style-type: none"> <li>Notification of Corrective Action to Project Officer</li> <li>MDE Enforcement Action</li> </ul>
Decommissioning	<ul style="list-style-type: none"> <li>Environmental Checklist for Projects</li> <li>Quality System Manual (Facility SOPs) C-2050</li> </ul>	DEP & Project Officer	DEP reviews and updates periodically	<ul style="list-style-type: none"> <li>ISO 9000 Audit Records</li> </ul>	<ul style="list-style-type: none"> <li>Project Suspension</li> </ul>
Master Planning; New Building Design; Renovation	<ul style="list-style-type: none"> <li>NEPA Review Process</li> <li>Other NIH Internal Review Processes</li> <li>EMS Sustainability Group Input to Design Policy Guidelines</li> <li>Pre-Project Planning (PDRI)</li> </ul>	<ul style="list-style-type: none"> <li>Director of Master Planning [[Ron Wilson]]</li> <li>Environmental Quality Branch</li> <li>Terry Leland [[Title?]]</li> <li>DPPA [[Jim Lewis]]</li> <li>Discrete Project Officer</li> <li>DCPM/Construction Manager</li> </ul>	<ul style="list-style-type: none"> <li>NEPA Audits (of Completed Projects)</li> <li>PDRI Process</li> <li>Periodic Review of DPG</li> <li>PIN/Constru ctware</li> </ul>	<ul style="list-style-type: none"> <li>NEPA Review Documents (Records of Decisions)</li> <li>PDRI Documents</li> <li>DPG Manual Updates Resulting from Periodic Reviews</li> </ul>	<ul style="list-style-type: none"> <li>Project Suspension</li> <li>No Funding</li> </ul>
Demolition ( <i>To be</i>	TBD	TBD	TBD	TBD	TBD

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<i>evaluated in 2007)</i>					
Hazardous Material Response and Clean-Up	DEP Spill Plan (Emergency Spill Containment Devices, response, and Removal)	<ul style="list-style-type: none"> <li>▪ Environmental Quality Branch</li> <li>▪ Fire Department</li> </ul>	Plan Review & Updates	Spill Reports & Spill Database	<ul style="list-style-type: none"> <li>▪ Clean up regulatory Action &amp; Notification</li> <li>▪ Contact National Spill Response Center</li> </ul>
Fire Fighting ( <i>To be evaluated in 2007)</i>	TBD	TBD	TBD	TBD	TBD
Maintenance of Fire Equipment & Systems ( <i>To be evaluated in 2006)</i>	TBD	TBD	TBD	TBD	TBD
Fire Training	TBD	TBD	TBD	TBD	TBD
Storm Water Management (structures)	<ul style="list-style-type: none"> <li>▪ Structural, physical SW BMPs, including:               <ul style="list-style-type: none"> <li>-Gutters</li> <li>-Conveyances</li> <li>-Catch basins</li> <li>-Vortex storm “sceptors”</li> <li>-Sand filters</li> <li>-Wet/dry ponds</li> <li>-Infiltration basins</li> <li>-Flow spreaders</li> <li>-Reforestation</li> <li>-Stream Bank stabilization (<i>Soft; dirt, etc.</i>)</li> <li>-Stormwater Mgt. Structures (<i>Hard; basins, etc.</i>)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ DPM</li> <li>▪ MEO, Grounds</li> <li>▪ DEP</li> <li>▪ Contractors</li> </ul>	<ul style="list-style-type: none"> <li>▪ Periodic Inspections</li> <li>▪ Fix and/or Maintain on failure</li> <li>▪ Annual storm drain cleaning (vacuum)</li> <li>▪ Maintenance and repair of structures as necessary</li> </ul>	<ul style="list-style-type: none"> <li>▪ 2006 Stormwater BMP Catalog O&amp;M Plan</li> <li>▪ Stormwater system drawings and maps</li> <li>▪ Work orders/requests</li> </ul>	<ul style="list-style-type: none"> <li>▪ Fix/Maintain/Replace on failure</li> <li>▪ Regulatory Citation</li> </ul>

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Stormwater Outfall(s)	<ul style="list-style-type: none"> <li>▪ Outfall 001</li> </ul>	<ul style="list-style-type: none"> <li>▪ DPM</li> <li>▪ MEO, Grounds</li> <li>▪ DEP</li> <li>▪ Powerplant Staff (monitor and sample)</li> </ul>	Quarterly maintenance (or as needed)	Sampling and monitoring records	<ul style="list-style-type: none"> <li>▪ NIH Fire Dept and Maryland Department of the Environment (MDE) is notified</li> <li>▪ NIH spill response equipment deployed (oil absorbent pads/booms etc.)</li> </ul>
Turf Maintenance	<ul style="list-style-type: none"> <li>▪ Sediment and erosion control permits for construction activities</li> <li>▪ NIH Nutrient Application Plan (State Guidance)</li> <li>▪ Mowing</li> <li>▪ Cultural Practices               <ul style="list-style-type: none"> <li>-Soil pH testing</li> <li>-Aeration</li> <li>-Over-seeding</li> <li>-Leaf collection and disposal</li> <li>-Mowing height</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Project Officer</li> <li>▪ DPM</li> <li>▪ MEO, Grounds</li> </ul>	<ul style="list-style-type: none"> <li>▪ Annual Soil Analysis</li> <li>▪ Project Officers monitor contract</li> </ul>	<ul style="list-style-type: none"> <li>▪ Annual Soil Analysis results and records</li> <li>▪ Visual inspection by Project officer</li> <li>▪ Monthly maintenance schedule</li> </ul>	<ul style="list-style-type: none"> <li>▪ Corrective Actions</li> <li>▪ Revise Plan</li> <li>▪ Cure notice sent to contractor by CO</li> <li>▪ Adjust practices as necessary (e.g., adjust pH levels by adding lime, minimum mowing height of 3.5 inches, fall core aeration, etc.)</li> </ul>

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Landscape Construction; Planting New Trees and Shrubs	<ul style="list-style-type: none"> <li>NIH Forest Conservation Plan (FCP)</li> <li>Landscape Specification Guidelines for Baltimore-Washington Metropolitan Areas</li> </ul>	<ul style="list-style-type: none"> <li>MEO-Grounds</li> <li>Division of Master Planning &amp; Cap. Projects</li> </ul>	<ul style="list-style-type: none"> <li>Periodic field inspections</li> <li>NIH Tree Policy</li> </ul>	<ul style="list-style-type: none"> <li>MEO-Grounds</li> <li>GIS Tree Program</li> </ul>	Replace upon discovery
Parking Lot & Garage Maintenance (Contractor “sweeps” twice a year, & facilities get power-washed annually in spring)	<ul style="list-style-type: none"> <li>Use of water-based paints in garages</li> <li>DEP approved cleaning solutions</li> <li>COMAR 26.08.06</li> </ul>	<ul style="list-style-type: none"> <li>MEO Project Officer</li> </ul>	MEO-Grounds Project Officer Pre and Post work site inspections	Project Officer post-inspection documents	<ul style="list-style-type: none"> <li>Cure Notice sent to Contractor by CO</li> <li>Independent contractor brought in</li> </ul>
	<ul style="list-style-type: none"> <li>Wet sweeping of parking garages</li> </ul>	<ul style="list-style-type: none"> <li>DPM</li> <li>MEO, Grounds</li> </ul>	<ul style="list-style-type: none"> <li>Project Officers monitor contracts</li> </ul>	Project Officer post inspection documents	Cure Notice
	<ul style="list-style-type: none"> <li>Dry sweeping of parking lots and streets</li> </ul>	<ul style="list-style-type: none"> <li>DPM</li> <li>MEO, Grounds</li> </ul>	<ul style="list-style-type: none"> <li>Project Officers monitor contracts</li> </ul>	Project Officer post inspection documents	Cure Notice sent
	<ul style="list-style-type: none"> <li>Controlled effluent discharge to sanitary</li> </ul>	<ul style="list-style-type: none"> <li>DEP</li> </ul>	<ul style="list-style-type: none"> <li>Project Officers monitor contracts</li> </ul>	Project Officer post inspection documents	Cure Notice sent
	<ul style="list-style-type: none"> <li>MSDS Review for cleaning products used</li> </ul>	<ul style="list-style-type: none"> <li>DEP</li> <li>Washington Suburban Sanitary Commission (WSSC)</li> </ul>	<ul style="list-style-type: none"> <li>Project Officers monitor contracts</li> </ul>	Project Officer post inspection documents	<ul style="list-style-type: none"> <li>Stop Notice given/issued</li> <li>Cure Notice sent</li> </ul>
	<ul style="list-style-type: none"> <li>Disposal of solids collected (weekly collection and disposal)</li> </ul>	<ul style="list-style-type: none"> <li>NIH Waste and Resource Recovery Branch</li> </ul>	<ul style="list-style-type: none"> <li>Project Officer and Contractor</li> </ul>	<ul style="list-style-type: none"> <li>Quarterly Records submitted by Contractor</li> </ul>	Cure Notice sent

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Pest Management (Exterior: Industrial Weed Management)	<ul style="list-style-type: none"> <li>Use of MEO Grounds Staff and Grounds Maintenance Contractor Certified &amp; Registered Applicators</li> </ul>	<ul style="list-style-type: none"> <li>DPM</li> <li>MEO, Grounds Maintenance</li> <li>Grounds Maintenance Contractor Supervisor</li> </ul>	<ul style="list-style-type: none"> <li>Annual applicator training</li> <li>State oversight of program (Annual State inspection of program by MD Department of Agriculture)</li> </ul>	Training records and certificates	<ul style="list-style-type: none"> <li>Cure Notice Sent</li> <li>Independent Pest Management Company brought in</li> </ul>
	<ul style="list-style-type: none"> <li>NIH Pesticide Management Policy (not official)</li> </ul>	<ul style="list-style-type: none"> <li>DPM</li> <li>MEO, Grounds Maintenance</li> </ul>	Project Officer and Contractor	State Mandated Records	<ul style="list-style-type: none"> <li>Cure Notice Sent</li> <li>Independent Pest Management Company</li> </ul>
	<ul style="list-style-type: none"> <li>Secure and proper storage facility for chemicals</li> </ul>	<ul style="list-style-type: none"> <li>DPM</li> <li>MEO, Grounds Maintenance</li> </ul>	Spot monitoring of storage facilities by regular users	State inspection records	NIH Spill Response Protocol (Internal and external Pest Mgt.)
Interior Pest Management	<ul style="list-style-type: none"> <li>NIH Integrated Pest Management Plan</li> </ul>	<ul style="list-style-type: none"> <li>NIH Division of Occupational Safety and Health (DOSH) Entomologists</li> </ul>	TBD	TBD	TBD

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Bulk Product Storage (i.e., salt/sand, and topsoil/mulch)	<ul style="list-style-type: none"> <li>NIH Storm Water Pollution Prevention Plan (SWPPP)</li> <li>Salt/Sand are covered by solid/permanent structures</li> <li>Soil/mulch covered by tarps</li> </ul>	<ul style="list-style-type: none"> <li>DPM</li> <li>MEO, Grounds</li> </ul>	Daily spot checks by regular users	TBD	Fix/maintain on failure
Ice/Snow Control	NIH Ice and Snow Control Policy	<ul style="list-style-type: none"> <li>MEO-Grounds Project Officer</li> <li>Contractor</li> </ul>	<ul style="list-style-type: none"> <li>PO Monitoring Contractor</li> <li>Progress during storm events</li> </ul>	Individual Storm Records	MEO-Standby employees to take over if contractor falters
Washing of Animal Transport Vehicles (Dedicated truck wash facility is not always used, runoff can be introduced into NIH SW system)	<ul style="list-style-type: none"> <li>SOP not enforced, truck wash facility not always used, SOP should be re-issued</li> </ul>	<ul style="list-style-type: none"> <li>VRB (Div. of Vet. Resources) Animal Transportation Services</li> </ul>	TBD	TBD	TBD
Animal Bedding Storage and Disposal ( <i>To be evaluated in 2007</i> )	TBD	TBD	TBD	TBD	TBD
Cooling Towers Discharge (Bleed-Off)	<ul style="list-style-type: none"> <li>Industrial NPDES Discharge Authorization Permit (DAP)</li> </ul>	MEO, Power Plant	<ul style="list-style-type: none"> <li>Monthly Monitoring</li> <li>Annual MDE NPDES Inspection</li> </ul>	Discharge Monitoring Report (DMR)	Regulatory & Corrective Action
HVAC Condensate	<ul style="list-style-type: none"> <li>NIH Design Policy Guidelines (DPG)</li> </ul>	TBD	TBD	TBD	TBD

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Hydrant Line Flushing	<ul style="list-style-type: none"> <li>NPDES BMP</li> </ul>	<ul style="list-style-type: none"> <li>NIH Fire Dept.</li> <li>DEP</li> <li>Division of Property Mgt. (DPM)/(Utilities)</li> </ul>	<ul style="list-style-type: none"> <li>Physical Monitoring &amp; Chlorine Monitoring During Flush Events</li> </ul>	Internal NIH Correspondence (email, etc.)	Corrective Actions
Electrical Substation/Open Air Transformers Operation (Stormwater divergence/removal)	<ul style="list-style-type: none"> <li>SW Interceptor Tank</li> </ul>	<ul style="list-style-type: none"> <li>DEP</li> <li>DPM (Utilities)</li> </ul>	TBD	TBD	TBD
Fuel Storage & Transfer for: Gas Station; Emergency Generators; Power plant; Auto Garage	<ul style="list-style-type: none"> <li>NIH SPCC Plan</li> <li>Secondary Containment (spill kits on trucks, buckets for USTs/ASTs, berms, etc.)</li> <li>AST/UST Requirements/Specifications</li> </ul>	<ul style="list-style-type: none"> <li>DEP responsible for regulatory compliance</li> <li>Div. of Property Mgt. (DPM) responsible for tank management</li> <li>ORS (NIH Garage)</li> <li>MEO, Power Plant</li> </ul>	<ul style="list-style-type: none"> <li>Regulatory Inspections</li> <li>Automatic monitoring systems</li> <li>Regular tank integrity testing</li> <li>Maintenance</li> <li>Contract</li> <li>Fuel Logs</li> </ul>	<ul style="list-style-type: none"> <li>Monitoring and maintenance records</li> <li>Compliance Inspection Reports</li> <li>SPCC Plan</li> <li>“Victor Roots” print outs</li> <li>Fuel Use records</li> <li>Hours Operated Records</li> <li>Visual Inspection records</li> </ul>	Replace, repair on failure State reporting requirements SPCC Plan revisions (as needed) Corrective Actions NIH Emergency Response protocol activated
Minor Fluid Spills from Vehicles (e.g., hydraulic fluid, fuel tank overflow, etc.)	<ul style="list-style-type: none"> <li>Emergency Response Plan (Emergency containment, response, removal)</li> </ul>	Fire Department	Equipment Monitoring & Maintenance	Spill Database	<ul style="list-style-type: none"> <li>Clean up regulatory Action &amp; Notification</li> <li>Contact National Spill Response Ctr.</li> </ul>

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Refueling & Maintenance of Construction Vehicles & Equipment at Construction Sites	<ul style="list-style-type: none"> <li>SPCC</li> <li>DPG</li> <li>Physical Engineering Control (e.g., containment mechanisms)</li> </ul>	TBD	TBD	TBD	TBD
Truck Washing/Sanitizing (e.g., Animal transport Vehicles)	<ul style="list-style-type: none"> <li>Dedicated Wash./Sanitize. Facility</li> <li>VRB has policy in place</li> </ul>	<ul style="list-style-type: none"> <li>VRB</li> </ul>	TBD	<ul style="list-style-type: none"> <li>Design Records</li> <li>Maintenance</li> </ul>	TBD
Store & Process Furniture & Equipment <ul style="list-style-type: none"> <li>NIH Scrap Yards @ Bldg. 25 &amp; 14G Storm Drains (surplus furniture and equipment)</li> </ul>	Covered structures with walls on 3 sides	TBD	TBD	TBD	TBD
Receiving to Loading Docks (Stormwater Interceptor Tanks feed into Stormwater system)	Spill Response Plan	TBD	TBD	TBD	TBD
Grease Storage and Traps ( <i>To be evaluated in 2007</i> )	TBD	TBD	TBD	TBD	TBD

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Management of Non-Hazardous Waste (General) (e.g., Abandoned Chemicals & Unknown Wastes)	<ul style="list-style-type: none"> <li>▪ NIH Hazardous Waste Management Program</li> <li>▪ Waste management facility (Building #21) is bermed and has trenches to direct any spills/releases to underground tanks (tanks are pumped if they reach capacity)</li> </ul>	TBD	TBD	TBD	TBD
Janitorial Services ( <i>To be evaluated in 2007</i> )	TBD	TBD	TBD	TBD	TBD
Dog Care ( <i>To be evaluated in 2007</i> )	TBD	TBD	TBD	TBD	TBD
Vehicle Inspection ( <i>To be evaluated in 2007</i> )	TBD	TBD	TBD	TBD	TBD

**SECTION 5 – RELEVANT DOCUMENT(S)**

DOCUMENT NAME	LOCATION	RESPONSIBLE PERSON
None.	N/A	N/A

**SECTION 6 – COMPETENCY OF RESPONSIBLE PERSONS**

NAME/TITLE	BASIS FOR COMPETENCE
Environmental Compliance Officer, Environmental Compliance Branch, DEP	TBD
Master Planner, Division of Facility Planning	TBD
Landscape Architect, Facility Operations Branch	TBD
Program Manager, Federal Programs ORF/DPPA	TBD
Acting Program Manager, Construction Management Branch (CMB)	TBD
PhD, Chief Utilities Section, Division of Property Management	TBD

**SECTION 7 – AUTHORIZATION**

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