



INDIANA ENVIRONMENTAL STEWARDSHIP PROGRAM ANNUAL PERFORMANCE REPORT

State Form 53475 (R5 / 2-17)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
ENVIRONMENTAL STEWARDSHIP PROGRAM

Indiana Department of Environmental Management
Office of Program Support
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Indianapolis, IN 46204-2251
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Please use this form if you are a member of the Indiana Environmental Stewardship Program (ESP) to report on progress toward objectives and targets AND certify ESP requirements continue to be achieved. Indiana ESP facilities must submit an Annual Performance Report (APR) by April 1st of every year, for each calendar year in which the entity has been a member for at least three (3) full months. Membership terms are renewed every four (4) years through submitting your APR. Your APR should be reviewed and signed by a senior manager at your facility prior to submittal. Once signed, e-mail the APR to IDEM at esp@idem.IN.gov. Please do not include any confidential business information in your annual performance report. **Public access laws require IDEM to make the APR publicly available**, which may include posting all portions of your report on the Indiana ESP Web site. If you have any questions, please contact IDEM at esp@idem.IN.gov or (800) 988-7901.

| SECTION A | | FACILITY INFORMATION | |
|--|-------------------------------------|---|--|
| Name of facility Elanco Clinton Laboratories | | | |
| Name of parent company (if applicable) Elanco US Inc. | | | |
| Street address (number and street) 10500 South State Road 63, P.O. Box 99 | | | |
| City / State / ZIP code Clinton, Indiana 47842-0099 | | | |
| Website of facility / company http://www.elanco.com | | | |
| CONTACT INFORMATION | | | |
| Name of Contact (Mr. / Mrs. / Ms. / Dr.) Mr. John M Batronis | | Title Advisor - Environmental | |
| Telephone number (765) 832-4163 | FAX number (765) 832-4549 | E-mail address batronism@elanco.com | |
| Mailing address (if different from facility address) | | | |
| City / State / ZIP Code | | | |
| REPORTING PERIOD | | | |
| Reporting period dates (mm/dd/yyyy – mm/dd/yyyy) 01/01/2019 - 12/31/2019 | | | |
| 1a. Is this the fourth Annual Performance Report of your membership term? <input type="checkbox"/> Yes—If yes, answer question 1b. <input checked="" type="checkbox"/> No—If no, skip to the "Change in Information" section of this report. | | | |
| 1b. Do you wish to renew your Indiana Environmental Stewardship Program membership? <input type="checkbox"/> Yes—If yes, please complete all sections of this annual report. <input type="checkbox"/> No—If no, please complete all sections of this annual report except for Section F. | | | |
| CHANGE IN INFORMATION | | | |
| In your ESP application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any changes or additions to your facility's list of products or activities? <input checked="" type="checkbox"/> Yes—If yes, please describe them: <u>Clinton Laboratories started packaging Elanco's Capstar®, Capaction®, QuickTabs®, and FleaCaps® products in 2019.</u> <input type="checkbox"/> No | | | |

| SECTION B | | PUBLIC OUTREACH AND PERFORMANCE REPORTING | |
|---|--|---|--|
| Why do we need this information? IDEM needs to know how environmental information was shared with the public. | | What do you need to do? Describe how the facility has shared and plans to share environmental information. | |
| Please briefly describe the activities that your facility conducted during this reporting period to interact with the community on environmental issues and to report publicly on its environmental performance. Annual community outreach meetings; Vermillion County Soil & Water Conservation District | | | |
| Please indicate which of the following methods your facility plans to use to make its ESP Annual Performance Report available to the public. Please check as many as appropriate. <input checked="" type="checkbox"/> Web site (http://www.elanco.com) <input type="checkbox"/> Open house <input checked="" type="checkbox"/> Meetings <input type="checkbox"/> Press releases <input checked="" type="checkbox"/> Other <u>neighbor meetings & tours</u> | | | |

SECTION C

ENVIRONMENTAL MANAGEMENT SYSTEM ASSESSMENT

Why do we need this information?

Facilities need to have implemented an EMS that meets certain criteria and use an ISO 14001 EMS Lead Auditor at least every thirty-six (36) months to assess the EMS.

What do you need to do?
Answer the following questions
about your EMS.

1. What is the most recent date that an ISO 14001 EMS Lead Auditor performed an EMS assessment at your facility? October 9, 2017

2. Name, title, and organization of ISO 14001 EMS Lead Auditor who conducted the most recent EMS assessment: _____
Bradley J. Verrico, CPEA; Lead Auditor; Midland Engineering Limited, Midland, MI

3. Is the date of the most recent EMS assessment performed by an ISO 14001 EMS Lead Auditor within the past thirty-six (36) months?

☒ Yes—If yes, skip to Question 4.

☐ No—If no, please have your ISO 14001 EMS Lead Auditor complete and sign the following checklist, indicating whether or not your EMS meets the listed criteria for ESP membership:

☐ Yes ☐ No Evidence of senior management support, commitment, and approval.

☐ Yes ☐ No A written environmental policy directed toward compliance, pollution prevention, and continuous improvement.

☐ Yes ☐ No Identification of the environmental aspects at the entity.

☐ Yes ☐ No Prioritization of the environmental aspects and a determination of those aspects deemed significant considering, at the minimum, environmental impacts and applicable laws and regulations.

☐ Yes ☐ No Established priorities, and environmental objectives and targets for continuous improvement in environmental performance and for ensuring compliance with applicable environmental laws, regulations, and permit conditions. Objectives and targets must go beyond current legal requirements and specify the environmental media, types of pollution to be prevented or reduced, implementation activities, and projected time frames.

☐ Yes ☐ No An established community outreach mechanism that includes identifying and responding to community concerns; informing the community of important matters that affect the community; and reporting on the EMS, including reporting to the public on the environmental policy and significant aspects.

☐ Yes ☐ No Incorporation of environmental and pollution prevention planning in the development of new products, processes, and services and modifications of existing processes.

☐ Yes ☐ No Evidence of clear responsibility for implementation, training, monitoring, EMS maintenance, taking corrective action, and ensuring compliance with applicable environmental laws, regulations, and permit conditions.

☐ Yes ☐ No Documentation of the implementation procedures and the results of implementation.

☐ Yes ☐ No Appropriate written EMS procedures.

☐ Yes ☐ No An annual evaluation of the EMS with written results provided to senior management and affected employees.

Signature of ISO 14001 EMS Lead Auditor _____
Date (month, day, year)

4. Were any deficiencies found during the most recent EMS assessment?

☒ Yes—If yes, describe any deficiencies found and the corrective action taken to address each deficiency: _____
See Attachment 1 for details of three minor deficiencies that were identified, and corrective action taken.

☐ No

5. What type of protocol was used to perform the independent EMS assessment?

☐ ISO 14001:2015 Certified audit

☐ ISO 14001:2004 Certified audit

☐ ESP Independent Assessment Protocol

☒ Other (please specify): Responsible Care Management System (RCMS) (See Attachment 1)

6. Is the EMS certified to a recognized standard?

☒ Yes—If yes, what standard does the EMS follow (please provide a copy of the most recent certificate)?

☐ ISO 14001:2015

☐ ISO 14001:2004

☒ Responsible Care EMS

☐ Responsible Care 14001

☐ No

SECTION C

ENVIRONMENTAL MANAGEMENT SYSTEM ASSESSMENT
CONTINUED

7. When was the last Senior Management review of your EMS completed?
 Month / Year: 03/2019
 Who headed the review (name and title)? Mark Dancheck, Senior Director - Engineering and Maintenance

8. When did your facility last conduct an internal or corporate environmental compliance audit? Do not include inspections or site visits by regulatory organizations.
 Scope of the compliance audit: Assess the level of compliance with Environmental Requirements
 Month(s) / Year(s): 04/2017
 Who conducted the audit(s) (e.g., facility staff, corporate, third party)? Lilly Corporate HSE group and external HSE EMS auditor ; Corporate (North American Env. Services)

9. Explain the emergencies experienced within the facility during the past year. Were the applicable emergency and contingency plans detailed in the EMS effective? What changes, if any, have been made to your facility's emergency or contingency plans?
 No actual emergencies; conducted mock disaster drill with local community, following EMS.

10. Has your facility corrected all instances of potential environmental non-compliance and EMS non-conformance identified during your audits and other assessments?
☒ Yes—If yes, briefly summarize corrective actions taken and other improvements made as a result of your EMS assessment(s) or compliance audit(s).
All improvement opportunities from the April 2017 HSE and October 2017 RCMS audits have been implemented.
☐ No—If no, please explain your plans to correct these instances. ☐ No such instances identified.

SECTION D

ADDITIONAL INFORMATION

Why do we need this information?

This information will help IDEM to effectively manage the Environmental Stewardship Program.

What do you need to do?

Answer the questions as completely as possible.

- In addition to ESP, please list environmental awards received or voluntary programs participated in during the past twelve (12) months. Collaboration with the DNR, pertaining to the Healthy River Initiative. Global Day of Service. Elanco's Food Resource Bank program. Partnership with Project HATCH to fight hunger and undernourishment in Central Indiana (HATCHforHunger.com).
- Has your facility taken advantage of any ESP incentives? If so, please describe the implementation process and list additional benefits IDEM should consider.
 Yes, we received an expedited Title V air permit with "flexible" language, and renewal of NPDES permit. Coordination on inspections.
- If your facility was not registered to the ISO 14001 standard prior to becoming an ESP member, has ESP helped you to pursue registration? If so, how has ESP been instrumental in achieving registration?
 Currently, the site is not pursuing ISO 14001 certification.

SECTION E

ENVIRONMENTAL IMPROVEMENT INITIATIVE RESULTS

Why do we need this information?

Facilities need to share the results of the environmental improvement initiative that was pursued during the reporting period. IDEM needs to report cumulative program reduction results.

What do you need to do?

Reference Section F for "Category" and "Indicator" options to complete this section. Summarize your facility's progress on achieving the initiative you identified in the application or last year's APR. For assistance, please call (800) 988-7901 or email esp@idem.IN.gov.

Initiative #1

| | | | |
|---|---|--|--------------|
| Category 1: <u>Discharges to Water</u> | Baseline (indicate measurement unit) | Current (indicate measurement unit) | Cost Savings |
| Indicator 1: <u>Nutrients</u> | | | |
| Calendar year | <u>2014</u> | <u>2019</u> | <u>NA</u> |
| Actual quantity (per year) | <u>10,886 lbs. P</u> | <u>5,220 lbs. P</u> | |
| Production unit (select one) | Earned Labor Hours Production units <input checked="" type="checkbox"/> Production lbs. Other -- specify (e.g. Gallons, length, etc.) | | |
| Production Quantity | <u>8,631,713 BKGs</u> | <u>8,672,897 BKGs</u> | <u>NA</u> |
| Normalization factor (Current year production ÷ Baseline year production) <u>1.00477</u> | | | |
| Normalized quantity (Actual current year quantity - Actual baseline quantity) x Normalization factor <u>5,245 lbs. Phosphorus</u> | | | |
| Briefly describe <i>how</i> you achieved improvements for this environmental initiative or, if relevant, any circumstances that delayed progress. | | | |
| 1. Optimizing phosphoric acid feed (as a microbial nutrient source) to the site's C101 membrane-bioreactor wastewater treatment plant, and 2. Improving cooling tower chemistry control and reducing system losses (from excessive blowdown, system leakage and tower basin overflow) in cooling towers and chilled water systems. | | | |

SECTION E

ENVIRONMENTAL IMPROVEMENT INITIATIVE RESULTS
CONTINUED

Initiative #2

| | | | |
|---|---|--|-----------------|
| Category 2: _____ Indicator 2: _____ | Baseline (indicate measurement unit) | Current (indicate measurement unit) | Cost Savings |
| Calendar year | | | |
| Actual quantity (per year) | | | |
| Production unit (select one) | Earned Labor Hours Other -- specify (e.g. Gallons, length, etc.) | Production units | Production lbs. |
| Production Quantity | | | NA |

Normalization factor (Current year production ÷ Baseline year production)

Normalized quantity (Actual current year quantity - Actual baseline quantity) x Normalization factor

Briefly describe *how* you achieved improvements for this environmental initiative or, if relevant, any circumstances that delayed progress.

Initiative #3

| | | | |
|---|---|--|-----------------|
| Category 3: _____ Indicator 3: _____ | Baseline (indicate measurement unit) | Current (indicate measurement unit) | Cost Savings |
| Calendar year | | | |
| Actual quantity (per year) | | | |
| Production unit (select one) | Earned Labor Hours Other -- specify (e.g. Gallons, length, etc.) | Production units | Production lbs. |
| Production Quantity | | | NA |

Normalization factor (Current year production ÷ Baseline year production)

Normalized quantity (Actual current year quantity - Actual baseline quantity) x Normalization factor

Briefly describe *how* you achieved improvements for this environmental initiative or, if relevant, any circumstances that delayed progress.

1. Briefly describe the *impacts or wastes* eliminated resulting from the environmental initiative(s). If multiple initiatives, please indicate which specifically.
In 2013, the Lilly Environmental Board of Directors introduced a challenging goal to reduce absolute phosphorus emissions in the corporation's wastewater discharge by 15 percent by 2020, as compared to 2014 levels. This goal was to address an issue that was becoming increasingly important to communities, regulators, and investors. Clinton Laboratories has made steady improvements in the past 5 years to reduce phosphorus emissions by 52%.

2. Are there other best management practices (BMPs) you can share correlating to your initiative(s)?
Side benefits of the initiative were a reduction in water use (due to tighter control of cooling towers and chiller water systems), a reduction in chemical costs (for treating cooling towers, chilled water systems and wastewater treatment), lower energy costs (due to reduced well pumping and reduced chilled-water losses), an improved focus on tower chemistry, and less water-treatment chemicals (other than P) being discharged in the site wastewater effluent.

3. If the objectives and targets associated with the environmental improvement initiative(s) were not attained, please verify continued progress toward the environmental initiative(s). If multiple initiatives, please indicate which specifically.
The objectives and targets of the environmental improvement initiative were attained.

4. Please provide a narrative summary of progress made toward *qualitative, significant* EMS objectives and targets, if any.
This project is part of a comprehensive strategy to reduce water and energy consumption and emissions at Clinton Laboratories.

5. Please list any state, U.S. EPA, or other partnership programs to which you are reporting this data (e.g., Energy Star, Project XL).
None.

6. Is your entity willing to share the environmental improvement initiative(s) and its best management practices (BMPs) at the ESP Annual Meeting and/or a Partners for Pollution Prevention quarterly meeting or conference? ☒ Yes ☐ No

SECTION F

ENVIRONMENTAL IMPROVEMENT INITIATIVE

Why do we need this information?

Facilities need to show they are committed to improving their environmental performance.

What do you need to do?

Refer to the Environmental Performance Table and answer the following questions.

1. Select the appropriate boxes in the following table to indicate the **category** and **indicator(s)** that represents the environmental improvement initiative selected by your facility. For the category and indicator selected, list the **baseline year** (e.g., 2015) and the **future year** (e.g., 2016). Next, list the **baseline annual quantity** (e.g., 5 tons) and **future annual quantity** (e.g., 2 tons) you are committing to achieve by the end of the future year.

| Category | Indicator | Baseline Year 20 <u>12</u> | Future Year 20 <u>20</u> | Unit |
|---|---|----------------------------|--------------------------|---|
| <input type="checkbox"/> Material Procurement | <input type="checkbox"/> Recycled content | | | Pounds, tons |
| | <input type="checkbox"/> Hazardous/toxic components | | | Pounds, tons |
| <input type="checkbox"/> Suppliers' Environmental Performance | <input type="checkbox"/> Specify indicator: _____ | | | As specified for the particular indicator |
| <input type="checkbox"/> Material Use | <input type="checkbox"/> Materials used | | | Pounds, tons |
| | <input type="checkbox"/> Hazardous materials used | | | Pounds, tons |
| | <input type="checkbox"/> Ozone depleting substances used | | | CFC-11 equivalent pounds |
| | <input type="checkbox"/> Total packaging materials used | | | Pounds, tons |
| <input checked="" type="checkbox"/> Water Use | <input checked="" type="checkbox"/> Total water used | 1,305 MM Gallons | 1,100 MM Gallons | Gallons |
| <input checked="" type="checkbox"/> Energy Use | <input type="checkbox"/> Electricity | | | kWh / MWh, Btu / MMBtu |
| | <input type="checkbox"/> Steam | | | kWh / MWh, gallons, ft ³ |
| | <input type="checkbox"/> Natural gas | | | Btu / MMBtu |
| | <input type="checkbox"/> Diesel | | | Gallons |
| | <input type="checkbox"/> Propane / LPG | | | Btu / MMBtu, gallons |
| | <input type="checkbox"/> Gasoline | | | Gallons |
| | <input type="checkbox"/> Solar | | | kWh / MWh |
| | <input type="checkbox"/> Wind | | | kWh / MWh |
| | <input type="checkbox"/> Landfill gas | | | Btu / MMBtu |
| | <input type="checkbox"/> Combined heat and power | | | kWh / MWh, Btu / MMBtu |
| | <input checked="" type="checkbox"/> Other: <u>Energy Efficiency</u> | 3233 kBTU/sq ft | 3101 kBTU/sq ft | kBTU/square feet |
| <input type="checkbox"/> Land and Habitat | <input type="checkbox"/> Land and habitat conservation | | | Square feet, acres |
| | <input type="checkbox"/> Community land revitalization | | | Square feet, acres |
| <input type="checkbox"/> Air Emissions | <input type="checkbox"/> Total GHGs | | | MTCO ₂ E |
| | <input type="checkbox"/> VOCs | | | Pounds, tons |
| | <input type="checkbox"/> NO _x , SO _x , PM _{2.5} , PM ₁₀ , or CO | | | Pounds, tons |
| | <input type="checkbox"/> Air toxics | | | Pounds, tons |
| | <input type="checkbox"/> Odor | | | European Odour Units |
| | <input type="checkbox"/> Radiation | | | Curies, Becquerels |
| | <input type="checkbox"/> Dust | | | Pounds, tons |
| <input checked="" type="checkbox"/> Discharges to Water | <input type="checkbox"/> COD or BOD | | | Pounds, tons |
| | <input type="checkbox"/> Toxics | | | Pounds, tons |
| | <input type="checkbox"/> Total suspended solids | | | Pounds, tons |
| | <input checked="" type="checkbox"/> Nutrients | 10,886 lbs. P | 6,614 lbs. P | Pounds, tons of N or P |
| | <input type="checkbox"/> Sediment from runoff | | | Pounds, tons |
| | <input type="checkbox"/> Pathogens | | | MPN/ml, CFU/ml |
| <input checked="" type="checkbox"/> Non-hazardous Waste | <input type="checkbox"/> Landfill | | | Pounds, tons |
| <input type="checkbox"/> Hazardous Waste | <input type="checkbox"/> Incineration | | | Pounds, tons |
| | <input checked="" type="checkbox"/> Reused/recycled off-site | 11% | >12% | Pounds, tons, gallons |
| | <input checked="" type="checkbox"/> Other: <u>Waste Efficiency</u> | 0.623 kg/BKG prod. | 0.592 kg/BKG prod. | Pounds, tons, gallons |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Noise | | | dBA |
| <input type="checkbox"/> Vibration | <input type="checkbox"/> Vibration | | | Inches per second |
| <input type="checkbox"/> Products | <input type="checkbox"/> Expected lifetime energy use | | | kWh / MWh, Btu / MMBtu |
| | <input type="checkbox"/> Expected lifetime water use | | | Gallons |
| | <input type="checkbox"/> Expected lifetime waste to air, water, or land from product use | | | Pounds, tons |
| | <input type="checkbox"/> Waste to air, water, or land from disposal or recovery | | | Pounds, tons |

If you need assistance filling out the form, please contact the ESP program manager at either esp@idem.in.gov or 1-(800) 988-7901.

SECTION F

FUTURE YEAR ENVIRONMENTAL IMPROVEMENT INITIATIVE

CONTINUED

2. If the environmental improvement initiative(s) will be *qualitative* in nature, please describe. _____
Standard work practices will be defined and implemented to reduce rework/waste, and video bulletin boards will be used to promote recycling and waste-reduction initiatives.
3. What activities or process changes do you plan to undertake at your facility to accomplish your initiative (e.g., technology changes in a particular process line, employee training)? _____
The site continues to expand the use of LED-lighting to replace mercury-vapor and florescent bulbs. Ongoing efforts to maintain steam traps, identify malfunctioning traps, and reduce compressed air usage and leaks will aid in reaching the Energy Efficiency goal.
4. Does this initiative address a significant aspect in your EMS?
☒ Yes
☐ No—If no, please explain why you believe this indicator should be included as an environmental improvement initiative: _____

CERTIFICATION AND PLEDGE

On behalf of (name of facility) Elanco Clinton Laboratories

I certify that the information contained in this Annual Performance Report and attachments is accurate to the best of my knowledge and that this facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with all applicable federal, state, and local environmental requirements, or has a corrective action program in place to attain compliance.

We, Elanco U.S., Inc., Elanco Clinton Labs, commit to maintaining the principles and goals outlined in our Environmental Management System for our facility's Indiana Environmental Stewardship Program status. We agree to strive for full compliance with all regulations promulgated by the U.S. EPA, state, or local jurisdictions. We agree to promote the Indiana Environmental Stewardship Program and to share our success stories with other facilities. We understand that we must meet the requirement of implementing one (1) new, independent environmental improvement initiative each year of membership (for a total of four (4) initiatives), that the Annual Performance Report must be submitted to IDEM by April 1st of each year, and that we must reapply to the Indiana Environmental Stewardship Program every four (4) years.

I understand that the information provided in this Annual Performance Report will be public record. I am the senior facility manager or authorized facility signatory, and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is submitting this Annual Performance Report.

Signature Mark Dancheck

Date (month, day, year)
04-16-2020

Printed signature
Mark Dancheck

Title
Senior Director - Engineering and Maintenance

Attachment 1
Elanco Clinton Laboratories
Environmental Stewardship Program

Description of Elanco Environmental Management System Audits

Eli Lilly & Company began implementing Environmental Management Systems [EMS] more than 20 years ago, with Global EMS standards that required all sites to develop Health, Safety, and Environmental [HSE] management systems patterned after ISO 14001 standards. Following Lilly's divestiture of Elanco in March 2019, Clinton Laboratories continues to be Responsible Care Management System (RCMS) certified.

An important element of Elanco's Global HSE program is periodic audits of the EMS. All manufacturing sites are audited at least once every four years, and the audit includes a comprehensive review of the HSE management system.

Site audits are conducted by Elanco's Global HSE auditing group. The audit team typically consists of a lead auditor and several team members who focus on specific programs and topics. The lead auditor is an Elanco corporate employee and the team members are a mix of external auditors and Elanco subject matter experts from the Global HSE organization and various Elanco plant sites.

The EMS portion of the audit is conducted using the company's HSE management system RCMS-certified protocol, which includes over 120 questions to assure that each element of an ISO 14001 EMS is addressed and implemented.

The HSE management system audit protocol includes questions on the following topics:

1. Management commitment and accountability
2. Site specific policy
3. Aspects, permits, and regulatory requirements
4. Performance objectives and targets
5. Management plans and programs
6. Management system documentation
7. Organizational structure and responsibilities
8. Training
9. Communication
10. Document control
11. Operational control
12. Emergency preparedness and response

A comparison of each element of the IDEM Independent Assessment Protocol to Elanco's HSE management system audit protocol demonstrates that Elanco's protocol addresses all the elements of the IDEM protocol and in many respects exceeds the IDEM requirements.

The most recent EMS audit conducted at Clinton Laboratories in October 2017 was led by Mr. Bradley Verrico; Lead Auditor; Midland Engineering, Ltd., an external consultant who is a Certified Professional Environmental Auditor (CPEA) and is certified and approved by BEAC to perform EMS audits. There were three minor audit findings from this audit:

1. Audit nonconformance review

The requirement to define a root cause and to review the efficacy of actions taken (based on that cause) has not been established related to audit findings.

-This issue was identified in a previous internal audit and has been corrected.

2. Communication - community complaint records

There was insufficient evidence of current complaint forms being kept in the security office at the time of the audit, because the records were not available.

-The site established a system for data entry and for records retention of the completed documents.

3. Contractor training

A required record of "orientation within 5 years" could not be found for 1 of 9 sampled contractor employees.

-All overdue contractors were put back through orientation, and the site contractor safety coordinator has instituted a monthly review of the contractor orientation of long-term contractor employees with contract firms.