

Corporate
Environmental, Health, and Safety
Policy Study

March 2002

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Executive Summary

ICF Consulting (formerly ADL Global Environment and Risk), with the encouragement of the U.S. Chemical and Hazard Investigation Board, reviewed corporate Environmental, Health, and Safety (EHS) policies and analyzed how these policies have changed over the past decade relative to today's business climate. The information gathered included EHS information from EHS policies, EHS principles, EHS vision statements, and selected EHS annual reports.

In all, EHS information was gathered from 87 corporations in seven industry sectors; we surveyed the EHS policies of 62 companies as well as companion EHS materials and annual reports of 25 additional companies. The information came from corporate websites on the Internet.

The industries surveyed in the study include:

Chemicals	Oil
Utilities	Technology/Telecommunications
Resources/Mining	Consumer Products/Pharmaceuticals
Manufacturing	

Our study revealed that now more than ever, EHS policies set forth commitments to communicate with external parties and to manage and improve EHS performance as a demonstration of industry's growing awareness that EHS activities can have a powerful impact on a company's public profile. Moreover, the common themes captured in the policies reflect the complex mixture of influences on EHS performance, including corporate management's commitment to EHS stewardship, alignment with business strategies, and advances in science and technology. These common themes include:

- Engaging in continuous improvement to enhance EHS performance.
- Communicating EHS matters and performance data to external stakeholders.
- Integrating EHS matters with the same consideration as other business questions within the decision-making processes of a company.
- Measuring and reporting performance based on auditing activities, implementation of formal management systems, and other tracking and evaluating processes.
- Committing to EHS stewardship as a function of conserving natural resources, providing a safe work environment for employees, and focusing on pollution prevention and waste minimization.

From the policy study data, we also made other observations. These include the following:

Executive Summary (continued)

- The role of compliance in today's EHS policy goal has changed. Today compliance is positioned as an auxiliary goal instead of a primary goal.
- There are clear and distinct differences in the EHS policy goals across some of the industry sectors analyzed namely the manufacturing and the consumer products/pharmaceuticals sectors.
- Only a handful of companies use their EHS policies to declare a leadership position in EHS affairs.
- The policy goals captured in EHS policy statements are similar to the goals outlined in other EHS companion materials, such as EHS principles, EHS vision statements, or EHS values.
- The broad application of corporate EHS policies to global operations is implied rather than explicitly stated.
- Lastly, the data suggest that EHS policies act as living documents that provide a basis to unify company EHS efforts and demonstrate accountability, and will evolve according to future influences.

1.0 Introduction

1.1 Purpose

Today, industry operates in a business climate that has seen considerable changes. Businesses have experienced an ever-expanding global market place; a surge in mergers and acquisitions (M&A) followed by a more recent lull in M&A activities; the rise and fall of dot coms; the quest for value creation; and recently, a global economic slow-down. All the while, corporations interact with an increasingly sophisticated public that demands more from industry in the areas of environmental stewardship, resource conservation, and health and safety.

ICF Consulting (formerly ADL Global Environment and Risk), with encouragement from the U.S. Chemical and Hazard Investigation Board, analyzed EHS policies across a broad spectrum of industries. The purpose of our study was to evaluate how policies have changed over the past decade relative to today's business climate and to observe today's major policy thrusts.

1.2 Approach

EHS information was gathered from 87 corporations in seven industry sectors; we surveyed the EHS policies of 62 companies as well as companion EHS materials and annual reports of 25 additional companies. The companies included in this study cover the following industries:

- Chemicals
- Utilities
- Resources/Mining
- Manufacturing
- Oil
- Technology/Telecommunications
- Consumer Products/Pharmaceuticals

This study was based on information publicly available on the Internet including EHS policy statements, as well as EHS principles, vision statements, or value statements that provide detail to a company's approach to EHS affairs.

Our study identified 18 distinct EHS goals that appear in the EHS policies analyzed. These are summarized in Table 1.

1.0. Introduction (continued)

Table 1: EHS Policy Goals

EHS Goals Identified in Policy Statements	
Audit EHS activities	Integrate EHS concerns into business decisions
Communicate with external stakeholders	Measure and report progress against targets
Maintain compliance with regulatory requirements	Participate in external organizations
Attain compliance-plus performance	Focus on pollution prevention and waste minimization
Conserve natural resources	Engage in product stewardship activities
Engage in continuous improvement	Provide a safe work environment for employees
Follow design for environment concepts	Provide training for employees
Ensure products/operations are free from significant risks	Reduce accidents/incidents
Implement management systems or other industry standards (e.g., Responsible Care)	Focus on sustainable development

1.3 Organization of Report

Our policy study report is organized as follows:

- Section 2.0 summarizes our review and analysis of the content of EHS policies from 62 companies.
- Appendix A includes the policy goals per industry sector.
- Appendix B lists the company policy statements and companion materials reviewed to complete our analysis.

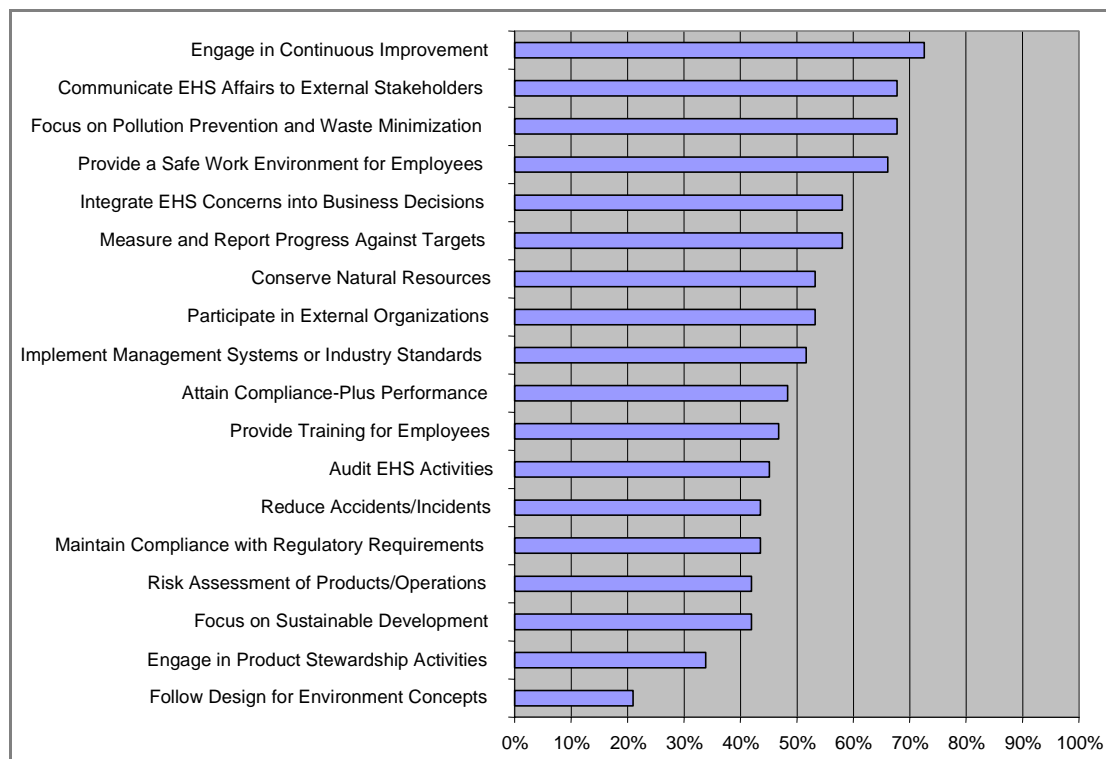
2.0 Survey Results

2.1 Major Policy Themes

Figure 1 lists the percentage of EHS policies that incorporate the policy goals reviewed in the study. Based on the data, we identified five major policy themes:

- Engage in continuous improvement
- Communicate with external stakeholders
- Integrate EHS into business decisions
- Measure and report EHS performance
- Commit to EHS stewardship

Figure 1: Percentage of Policies Incorporating a Particular Policy Thrust



We identified these policy themes by comparing prominent EHS policy goals and interpreting the general emphasis of EHS policies. Some policy themes, such as continuous improvement, are individual policy goals; other policy themes, such as commitment to EHS stewardship, reflect a combination of several related goals. Each of the five themes is described below.

2.0 Survey Results (continued)

2.1.1 Engage in Continuous Improvement

Overall, companies mention the goal of continuous improvement more than any other single policy goal (72.6% of policies mention the goal). We interpret this to mean several possible roles for continuous improvement:

- Wide adoption of this goal represents greater industry focus toward performance-related efforts in EHS management and act to assuage pressure for more prescriptive governmental regulations.
- EHS policies that list continuous improvement indicate a company's awareness that change is a way of life for modern corporations.
- Companies use goals for continuous improvement to spur positive changes and strive for ever-increasing gains in EHS performance by measuring EHS achievement against past performance, rather than measuring against regulatory standards.

2.1.2 Communicate with External Stakeholders

Of the policies reviewed, 67.7% include a commitment to communicate EHS affairs to organizations outside the corporation. We interpret this policy goal as a major theme, in part because at least 60% of the surveyed companies in each of the seven industry sectors mention this goal in their EHS policies. (See Appendix 1.)

In addition to the goal to communicate EHS activities to outsiders, some companies also discuss their efforts to become more open and accountable to the public. Wide use of the Internet and other advances in communication have allowed the public to easily access information, and we believe that today's corporations increasingly consider the link between communicating company information and the effects of that information on corporate reputations. By communicating consistent, relevant information to the public, companies more actively engage the actions and behaviors of external stakeholders.

2.1.3 Integrate EHS into Business Decisions

The goal to integrate EHS into business decisions was also very prominent in the policies reviewed (58.1%). At times in the past, companies dealt with EHS concerns when action was required. Today, many companies consider EHS concerns from the conception of a new project or activity, and how EHS issues can directly affect other aspects of business and financial performance. We interpret the prominence of this policy goal as an acknowledgement among the management of many companies that EHS issues must be considered at every stage of business decision-making. Moreover, we view the prominence of this goal among EHS policies as evidence that many companies believe that EHS issues must be considered to the same extent as other prominent business issues, meriting a company's full attention from the planning stages forward to new activities, projects, and products.

2.0 Survey Results (continued)

2.1.4 Measure and Report EHS Performance

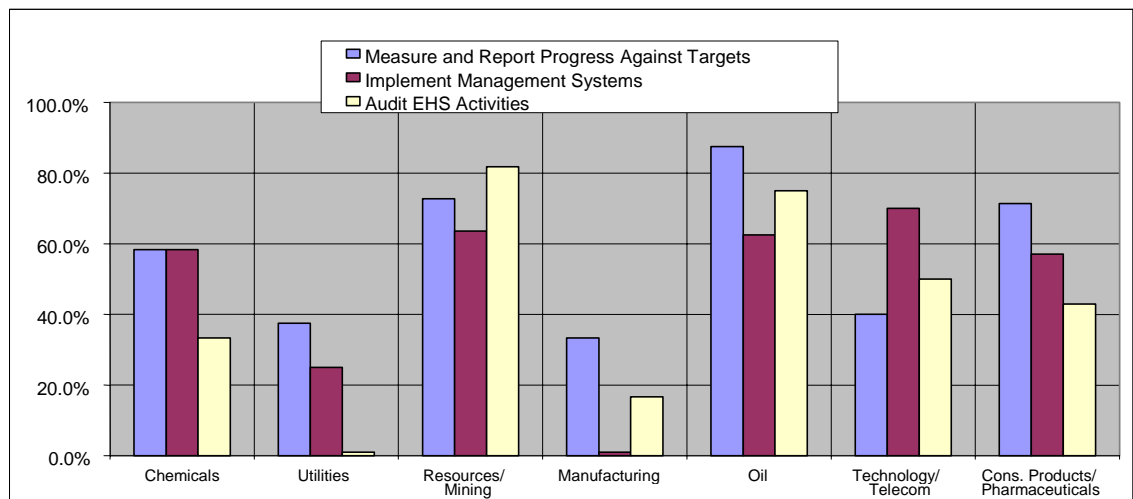
Many EHS policy statements reflect industry's desire to measure and report EHS performance. This theme incorporates several related goals. For example, some corporate EHS policies directly state a commitment to measure and report progress against targets (58.1% of policies); and other policies include goals that implicitly relate to measuring and reporting EHS performance, such as implement management systems (51.6% of policies) and audit EHS activities (45.2% of policies).

We believe that these goals are closely related because:

- Measuring and reporting EHS performance allows companies to track performance, identify and prioritize opportunities for improvement, and identify cost savings and other benefits related to EHS improvement.
- An effective EHS management system improves performance by integrating responsibilities and practices into an organized system, it is concerned with both the immediate outcome and long-term impact of EHS activities, and it acts as a mechanism to implement efforts to measure and report EHS activities.
- EHS auditing programs are designed to verify a company's EHS performance.

Goals related to the policy theme of measuring and reporting are especially prominent within the EHS policies of resources/mining and oil industry sectors (see Figure 2). In the case of EHS policies in the chemical industry sector, 58.3% mention implementing some management system, and 50% mention implementing the Responsible Care Program.

Figure 2: Goals Forming the Policy Theme of Measuring and Reporting EHS Activities



2.0 Survey Results (continued)

2.1.5 Commit to EHS Stewardship

Commitment to EHS stewardship is another major policy theme noted in corporate policies today. This theme is expressed as efforts to conserve natural resources (53.2%), provide a safe work environment for employees (66.1%), and engage in pollution prevention and waste minimization (67.7%).

So, what does this mean?

- First, companies are focusing attention on efforts to reduce the quantities of natural resources used in the production processes.
- Second, companies place a high priority on providing a safe workplace for employees. Many companies report a reduction in work-related injuries, deaths, and illness as they implement policy goals for a safe work environment. Some corporations encourage customer companies to take up the goal. In its “Sustainable Growth 2000 Progress Report,” DuPont reports that, through this commitment, “our customers have seen dramatic reductions in worker injuries in relatively short periods of time, lower costs, and in many cases, improved productivity and morale.”¹
- Third, companies often recognize that pollution prevention and waste minimization can lead to large cost savings. The manufacturing company 3M has made efforts to reduce waste for many years through a program called “Pollution Prevention Pays.” Since the program’s inception in 1975, the company claims to have prevented 807,000 tons of pollution and realized a cost savings of more than \$827 million.² (Most companies in nearly every industry sector surveyed include pollution prevention and waste minimization [between 62% and 90%] except consumer products/pharmaceuticals, where only 42.9% mention this policy thrust.)
- Lastly, the policy theme of EHS stewardship and its related policy goals is prominent within the EHS policies of chemicals, manufacturing, and technology/telecommunications industry sectors (see Figure 3).

¹ DuPont and Company, “Sustainable Growth 2000 Progress Report,”

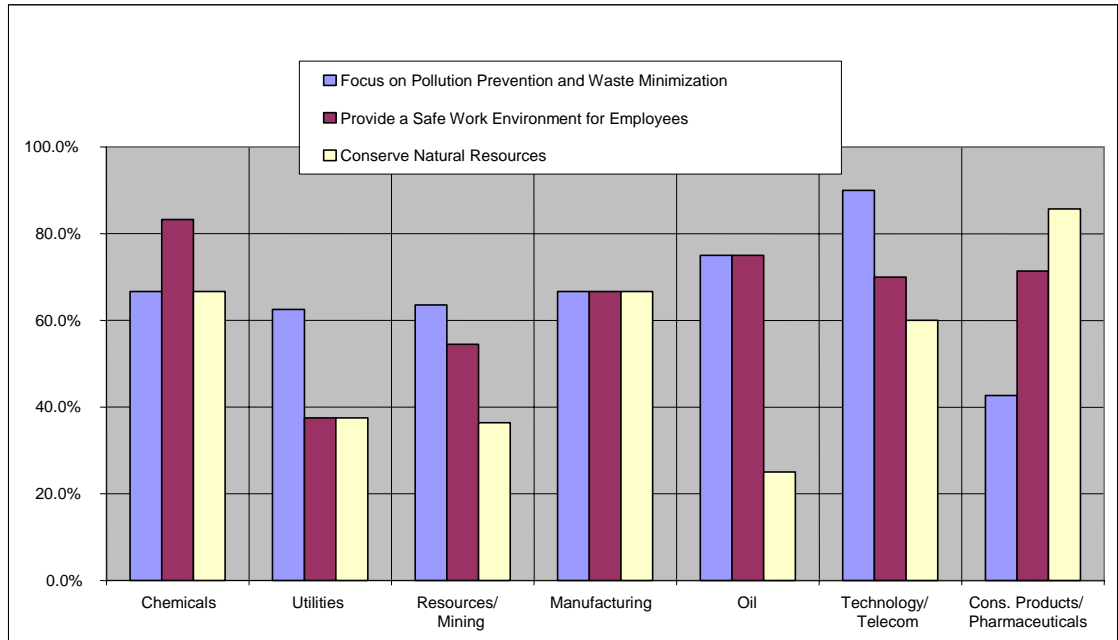
<http://www.DuPont.com/corp/news/publications/dupprogress/2000USprogrept.pdf>

² 3M Company, Environment: “More About Pollution Prevention Pays,”

http://www.3m.com/about3m/environment/policies_about3P.jhtml

2.0 Survey Results (continued)

Figure 3: Goals Forming the Policy Theme of Commitment to EHS Stewardship



2.2 Other Observations

In addition to the major policy themes found in current EHS policies, our study notes other important observations concerning EHS policy statements.

2.2.1 *The Changing Role of Compliance in EHS Policy Statements*

The role of compliance in EHS policy statements has evolved over the years. Proliferation of regulations during the late 1970s and 1980s forced compliance to the forefront of the corporate EHS psyche, evidenced by ICF Consulting (formerly ADL Global Environment and Risk)'s earlier policy study (1988) that found compliance a major driver of EHS policies during the 1980s. For many companies today, however, the role of compliance in corporate EHS efforts seems to have changed. In the past, compliance goals appeared to dominate the priorities of corporate EHS activities and policies. Today compliance appears to be an auxiliary goal to other policy themes such as engaging in continuous improvement and communicating with external stakeholders.

A comparison between the text of today's EHS policy statements and that from the 1988 study illustrates the changing role of compliance in EHS policy statements. Many older policies begin by stating, "[Company] is committed to operating our plants and facilities in complete compliance with all applicable environmental regulations and to operate in a manner that protects the quality of our environment and the health and safety of our associates and the public." The policies would then list other goals and conclude with another allusion to compliance and regulation: "We reaffirm our

2.0 Survey Results (continued)

commitment to work with local, state and federal authorities to develop effective environmental solutions that meet tests of practicality and feasibility.”

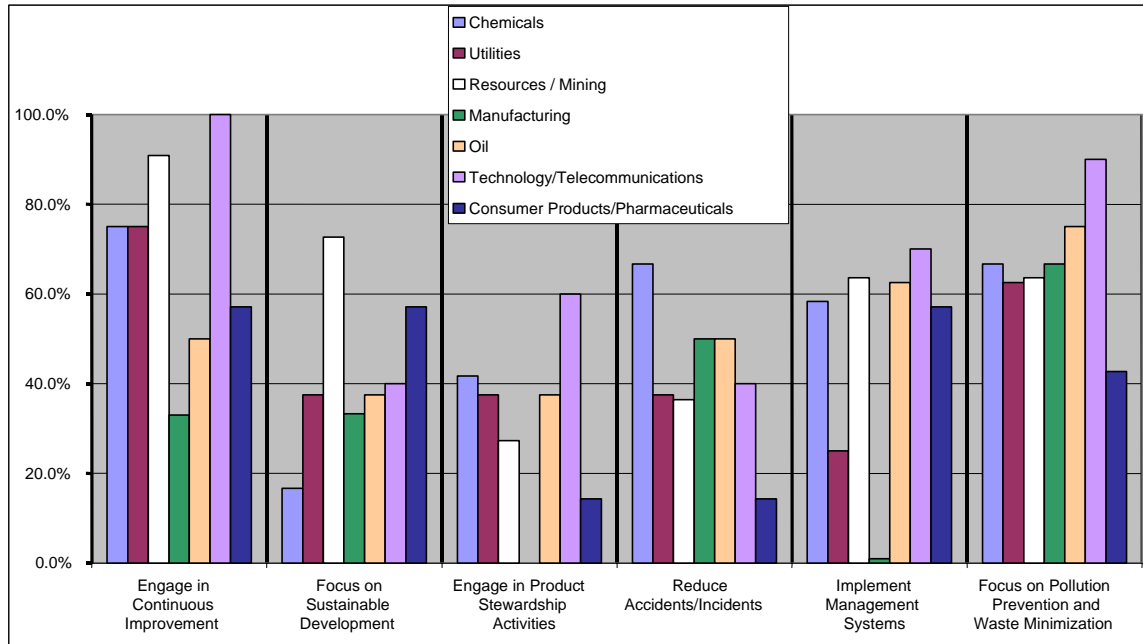
Many more recent policies, however, do not focus on the issue of compliance; instead, compliance might figure in the policy as a demonstration of general EHS commitment. One company, for example, lists its EHS policy goals and follows them up with several implementation objectives, including a simple statement to “comply with all applicable laws, rules, regulations and standards.” Another policy offers a further example of the changing role of compliance: “In addition [to other EHS accomplishments], we pride ourselves on meeting the standards set forth by relevant legislation and international agreements. Our efforts to comply with both self-imposed and government standards has resulted in significant environmental improvements.” Although some companies still organize EHS efforts around compliance objectives, we believe the growing role for compliance-related goals reflects a trend to incorporate compliance into larger EHS themes.

2.2.2 Policy Goals Differ Among Some Industry Sectors

Another finding in the study highlights the differences in policy goals between some industries (see Figure 4). For example, the policy goal for “continuous improvement” demonstrates the disparities among industries: 100% of the companies surveyed in the technology/telecommunications sector list the goal, while only 33.3% of the companies in the manufacturing industry mention the same goal (72.6% across all industries). For many policy objectives, one or two industry sectors – usually consumer products/pharmaceuticals and/or manufacturing – are outliers, yielding policy data far from the grouping of the other industries.

2.0 Survey Results (continued)

Figure 4: Policy Goals by Industry Sector



The discrepancy in the policy goals among the industry sectors might be influenced by factors such as regulatory requirements and external stakeholders. For example, because of the public’s awareness of resources/mining companies’ potential to disturb massive amounts of the land through development and extraction processes, declaring a goal for “sustainable development” might be more relevant to resources/mining companies (and their stakeholders) than companies in the chemicals sector.

2.2.3 Stating Leadership in EHS as a Policy Goal

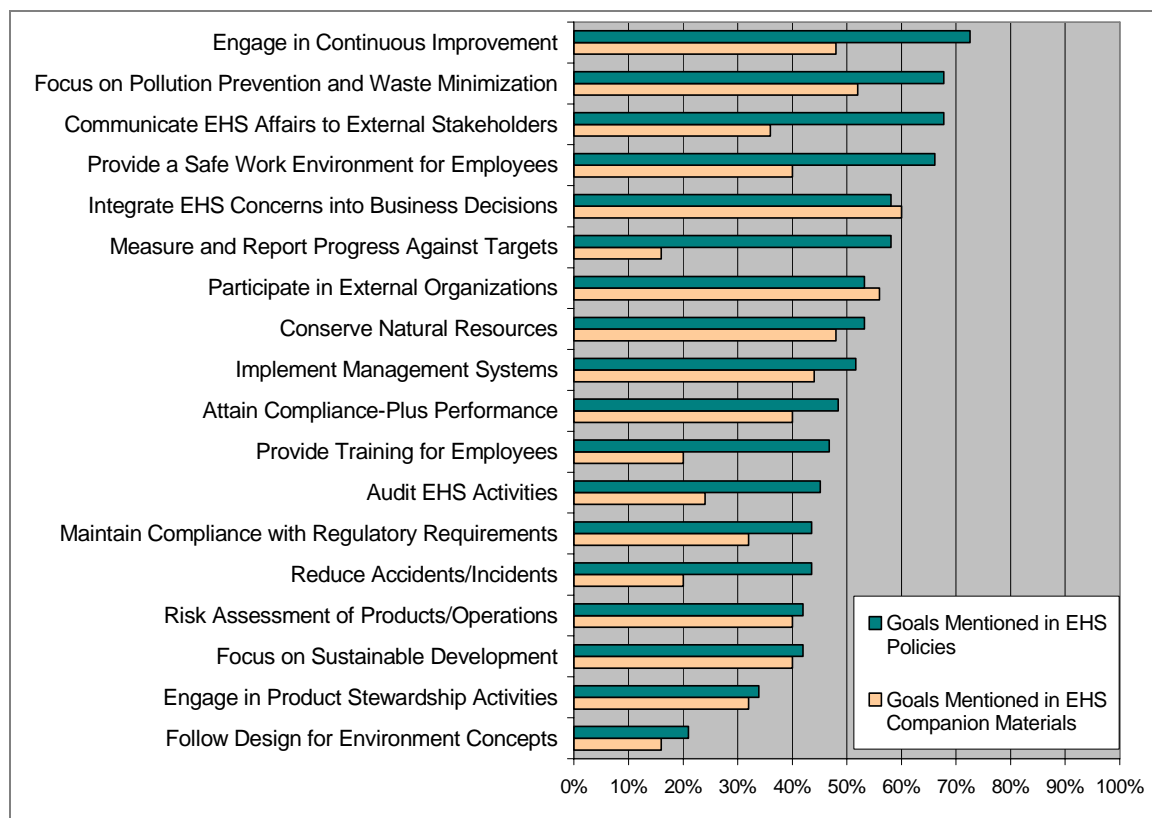
Despite the fact that most companies in this survey have well-developed and well-organized EHS programs, at least one likely EHS goal is absent from most EHS policies, namely, the goal to be an industry leader in EHS affairs. The EHS policies reviewed in this study indicate that companies generally do not use their policy statements to declare a goal for a leadership position in EHS matters. Only 8.3% of the companies surveyed use their EHS policy statements to formally declare efforts to be industry leaders in EHS matters. Instead of stating the goal to be recognized as an industry leader in EHS matters, many companies simply state that EHS management is important. For the few companies that declare a leadership position in EHS matters, this goal serves to reinforce their overall commitment to EHS affairs.

2.0 Survey Results (continued)

2.2.4 Similarities Exist Among EHS Policy Statements and Companion EHS Materials

Companies commonly produce brief policy statements that are accompanied by longer, more detailed documents that define policy or outline implementation goals. Companies often refer to the more detailed documents as EHS principles, EHS values, an EHS vision statement, and EHS annual reports. In reviewing these companion materials, we found that – with some exceptions – the goals included in formal EHS policies were also referenced or described in EHS companion materials. See Figure 5.

Figure 5: Comparison of EHS Goals in Policies and Companion Materials



2.2.5 Application of a Policy to Global Operations

Today's global economy underscores the importance of corporate policies that achieve consistent performance throughout a company's worldwide operations. Activities and components that make up a single product might include manufactured items from several factories, companies, and contracted/sub-contracted operations throughout the world.

Of the companies surveyed, only 45% clearly state in their EHS policies that corporate EHS goals apply to global operations. Nearly 53% of the companies do not mention whether EHS policies and goals are implemented worldwide. A small portion of the

2.0 Survey Results (continued)

policy statements (about 2%) indicate that EHS policies are limited in their application within the company.

2.2.6 Summary of Results

This study identifies current policy goals and significant changes in the content of EHS policies in comparison to ICF Consulting's (formerly ADL Global Environment and Risk) 1988 Policy Study. The data suggest several major policy themes in today's corporate EHS policies, including:

- *Engage in continuous improvement* or focusing on increasing gains in EHS performance.
- *Integrate EHS in business decision-making* reflecting a need to consider EHS impacts from the conception of a project or activity through its lifecycle.
- *Communicate with external stakeholders* regarding EHS performance.
- *Measure and report against EHS targets* to demonstrate improvement and an ability to communicate externally.
- *Commit to EHS stewardship* with regard to conserving natural resources, maintaining a safe work environment, and promoting waste minimization.

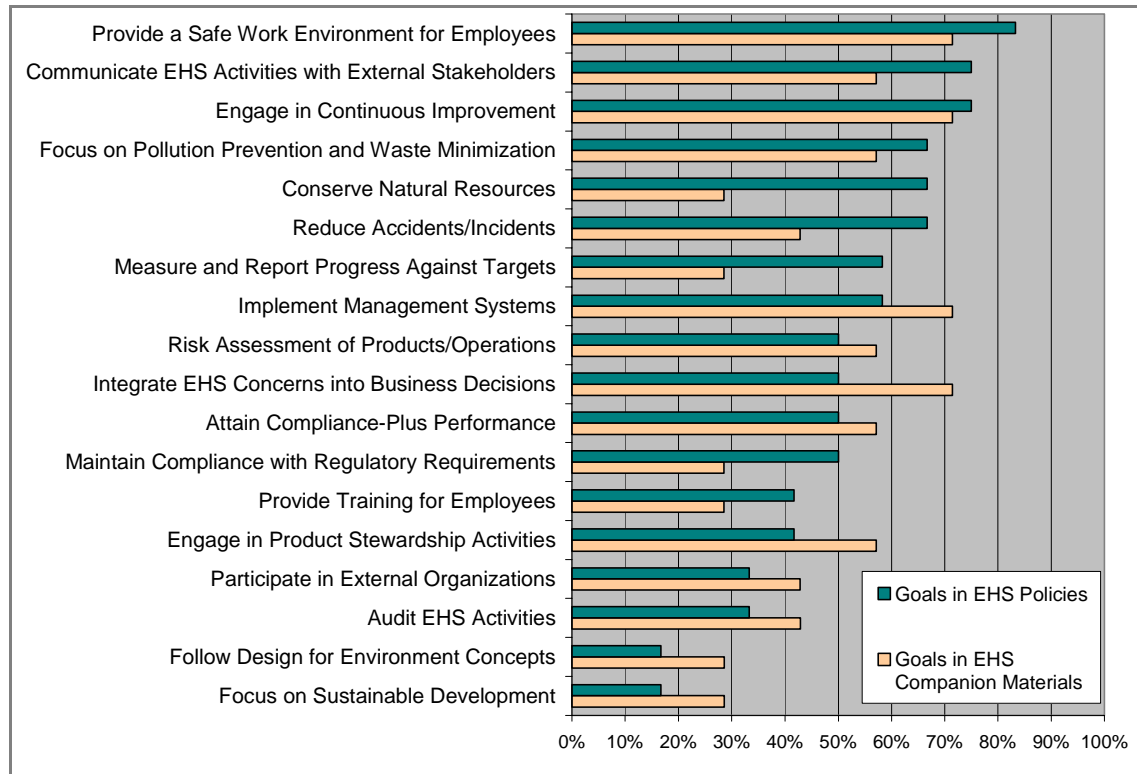
From the EHS policies and companion EHS materials reviewed, we also made other observations. For example, we noted that:

- The goal of compliance in policies has changed over the past several years from a dominating role to a more auxiliary or supporting role.
- Variations exist in the policy goals of some industries reviewed (and in particular among consumer products and oil and chemicals).
- Only a handful of policies indicate a company's stated commitment to be a leader in EHS matters.
- The application of a policy to global operations is implied.

Appendix A: Policy Goals by Industry Category

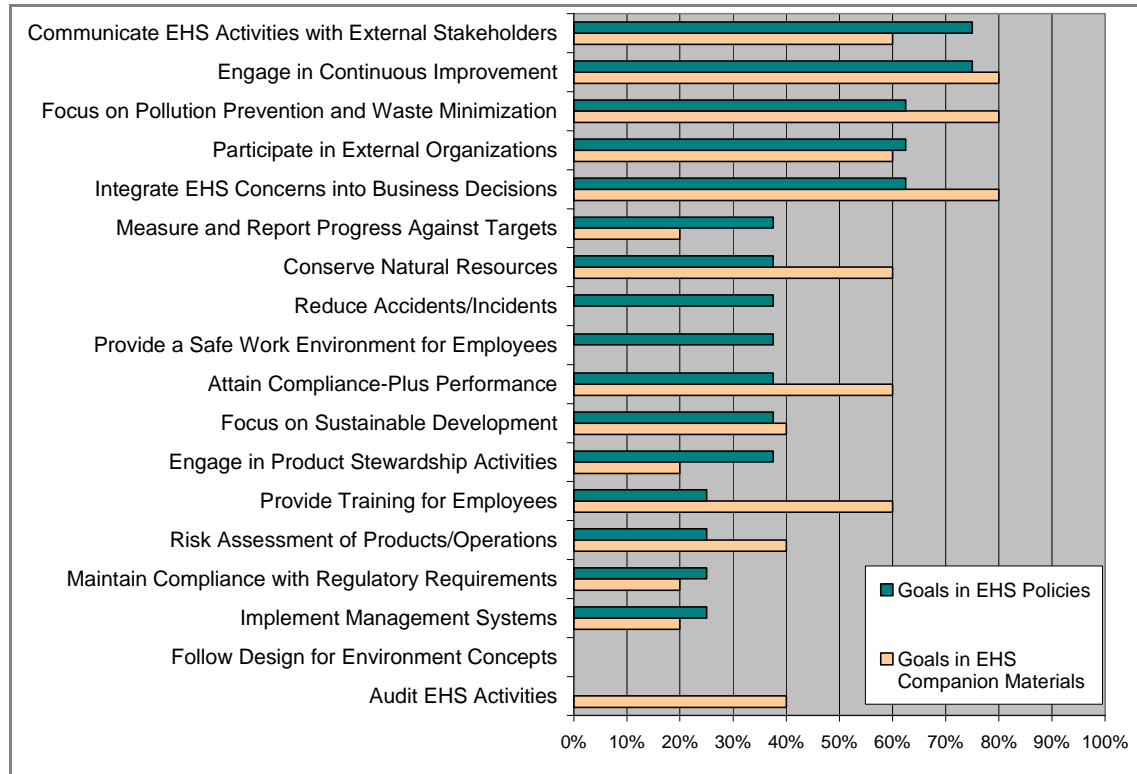
Appendix A features graphs by industry sector of the policy goals mentioned in the survey of company EHS policy statements and companion materials.

Figure 1A. Policy Goals – Chemicals Sector



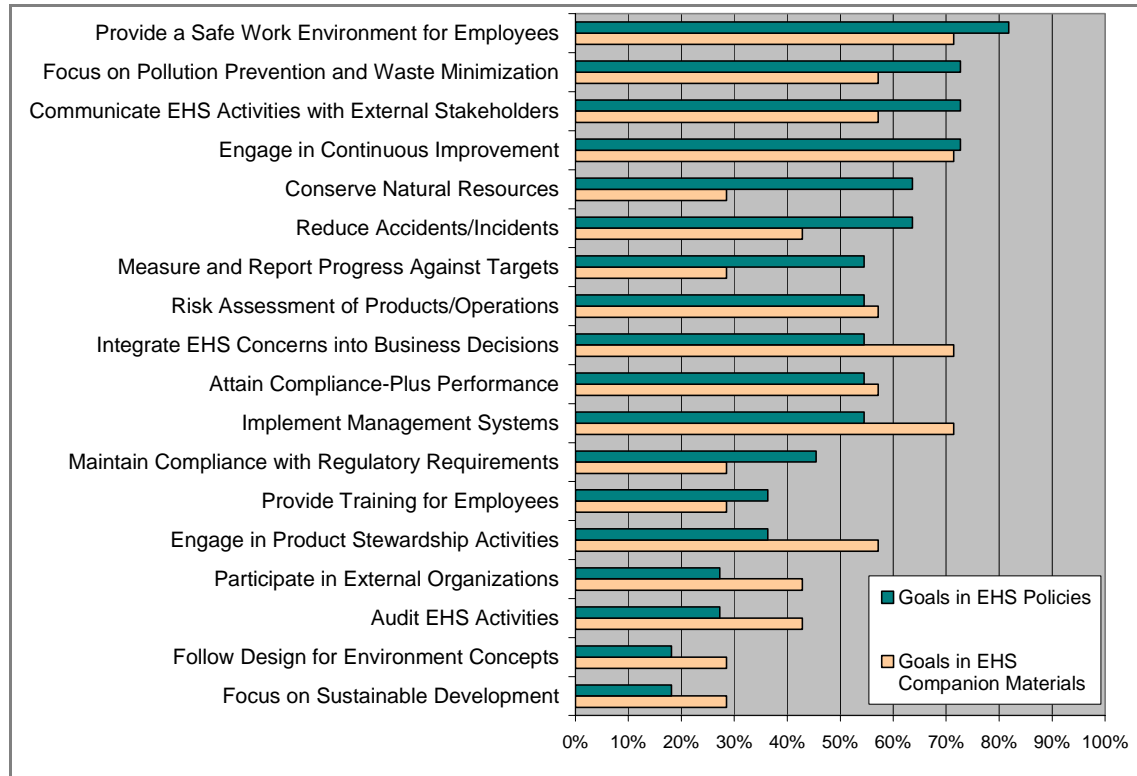
Appendix A: Policy Goals by Industry Category (continued)

Figure 2A. Policy Goals – Utilities Sector



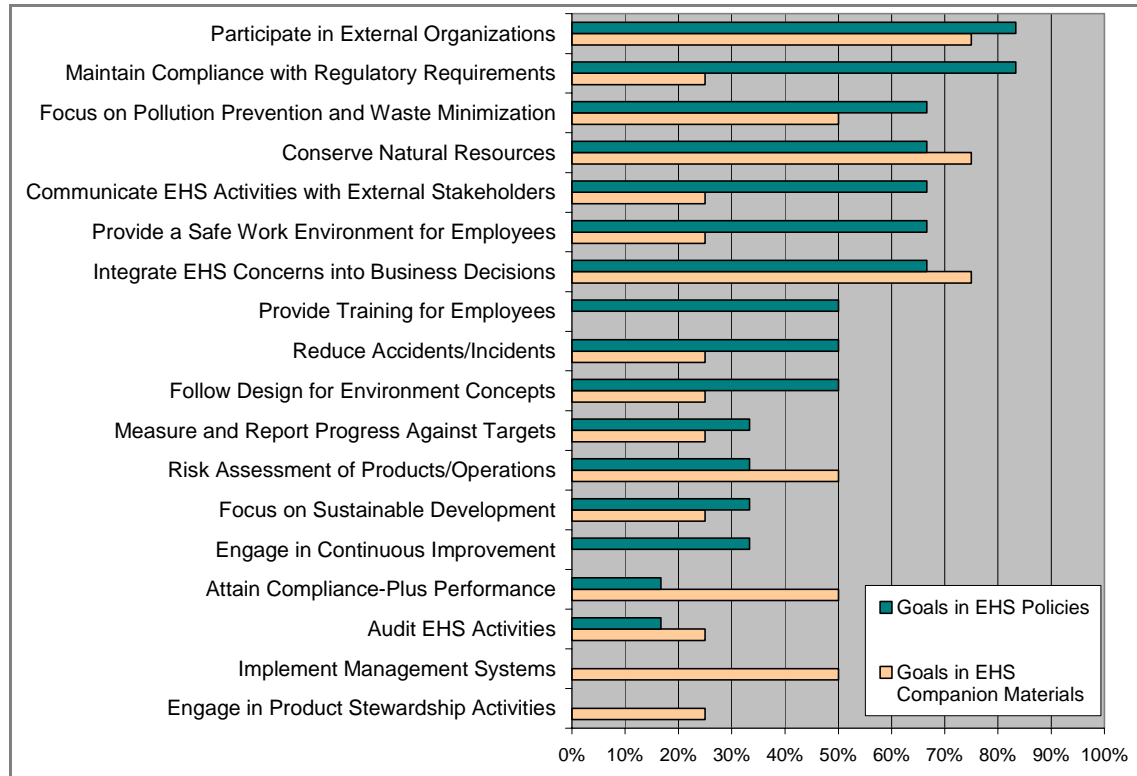
Appendix A: Policy Goals by Industry Category (continued)

Figure 3A. Policy Goals – Resources/Mining Sector



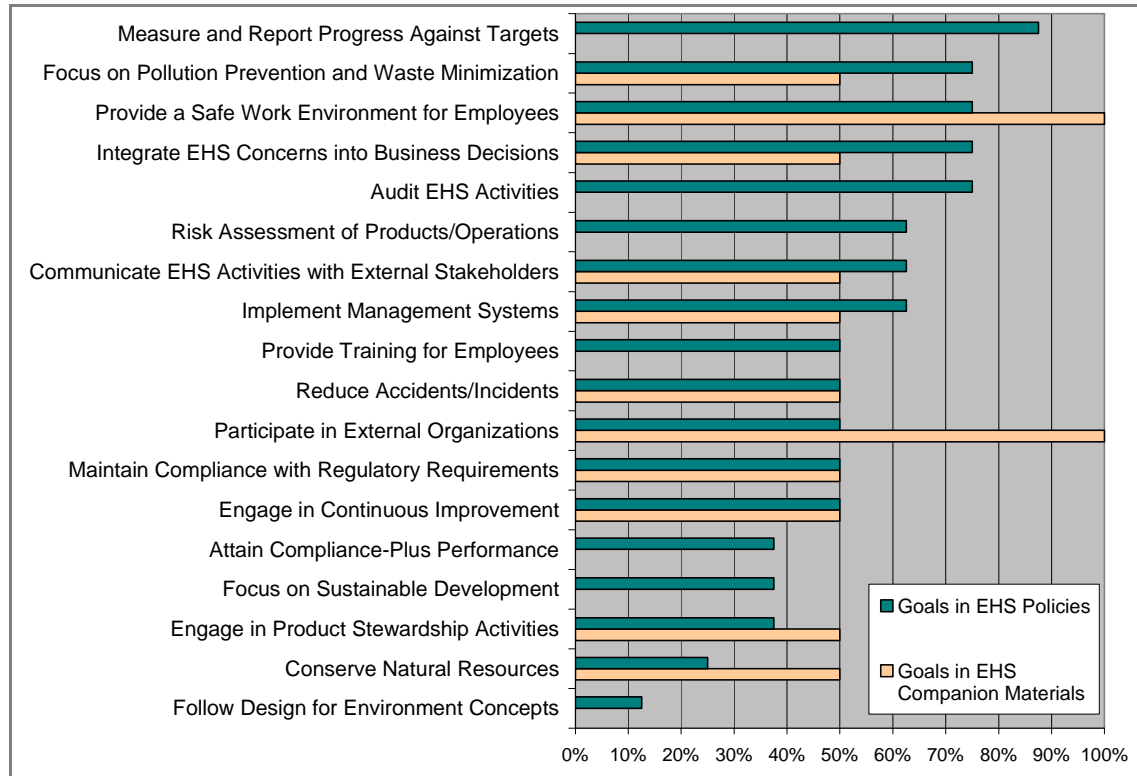
Appendix A: Policy Goals by Industry Category (continued)

Figure 4A. Policy Goals – Manufacturing Sector



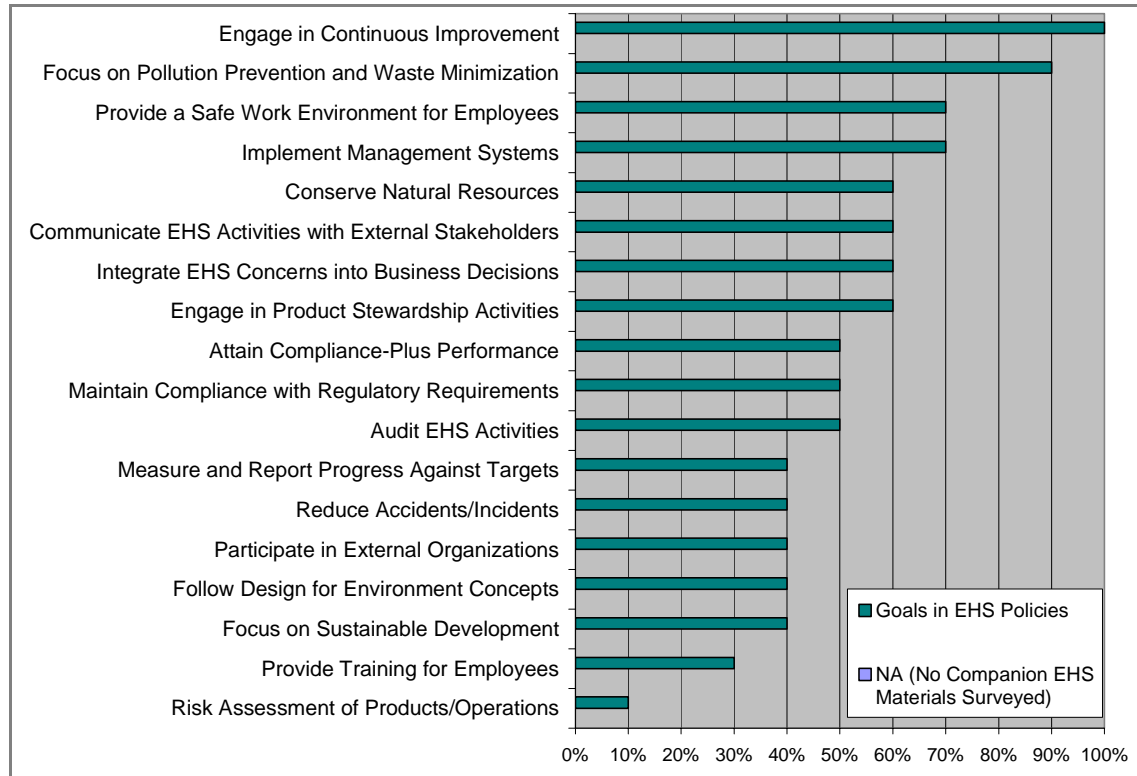
Appendix A: Policy Goals by Industry Category (continued)

Figure 5A. Policy Goals – Oil Sector



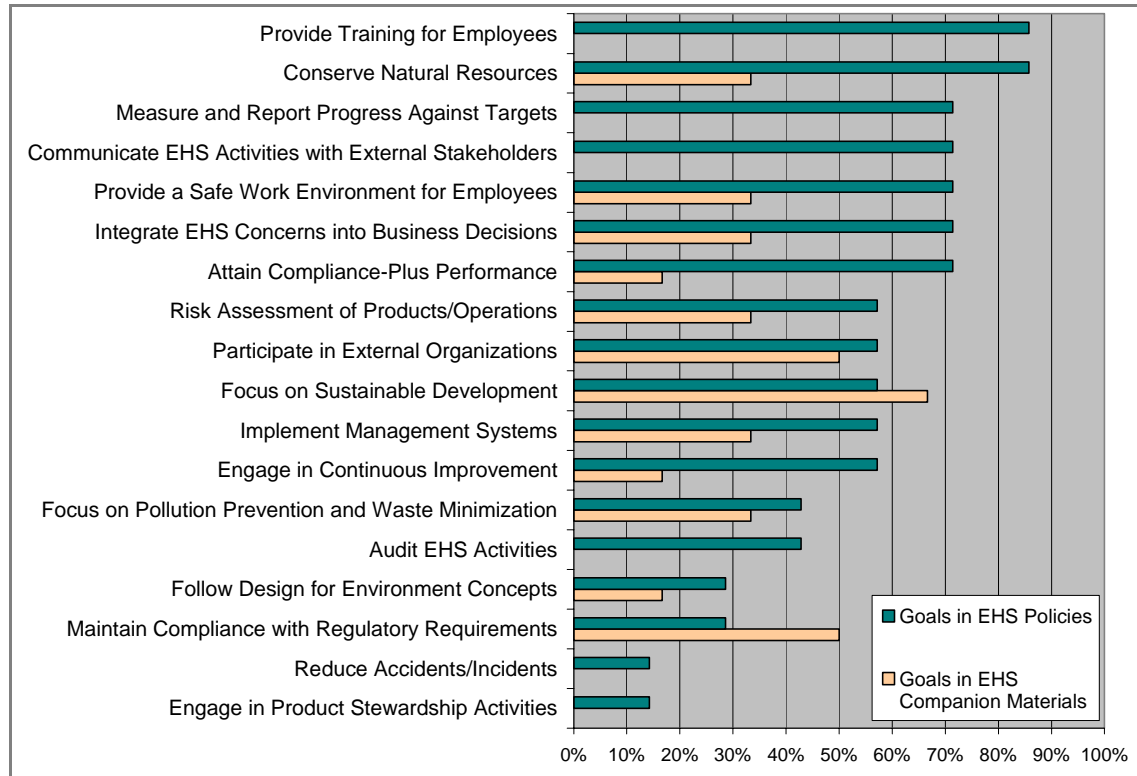
Appendix A: Policy Goals by Industry Category (continued)

Figure 6A. Technology/Telecommunications Sector



Appendix A: Policy Goals by Industry Category (continued)

Figure 7A. Consumer Products/Pharmaceuticals Sector



Appendix B: Materials Reviewed

Appendix B lists the companies included in this survey as well as the type of EHS information gathered for this report. A check mark indicates the type of EHS materials reviewed in this study.

Figure 1B. Chemicals Sector

Company	EHS Policy	EHS Commitment Statement	EHS Principles	EHS/SD Annual Report	Other Company EHS Information
Air Products and Chemical, Inc.	✓				
Ashland Inc.	✓		✓		
Borden Chemicals and Plastics L.P.					✓
Celanese AG	✓		✓		
CF Industries Inc.	✓				
Clariant Ltd.	✓		✓		
Dow Chemical Company	✓		✓	✓	
DuPont and Company		✓		✓	✓
Ethyl Corp.	✓				
FMC Corp.					✓
Kerr-McGee Corp.				✓	
Lyondell Chemical Company					✓
Milliken and Company, Inc.	✓				✓
Monsanto Company	✓				
ONDEO Nalco Company	✓				
Nova Corporation					✓
Olin Corporation	✓				
PPG Industries Inc.	✓		✓		
Rohm & Haas Company			✓		

Appendix B: Materials Reviewed (continued)

Figure 2B. Utilities Sector

Company	EHS Policy	EHS Commitment Statement	EHS Principles	EHS/SD Annual Report	Other Company EHS Information
American Ref-Fuel Company					✓
Cinergy Corp.					✓
CMS Energy Corp.	✓				
Consolidated Edison Inc.	✓	✓			
DTE Energy Company					✓
Duke Energy Corp.	✓				
Dynegy Inc.	✓				
Enron Corp.			✓		
Intergen					✓
Northeast Utilities	✓				
PG&E Corp.	✓				
Southern Company	✓				
TransAlta Corp.	✓				

Figure 3B. Resources/Mining

Company	EHS Policy	EHS Commitment Statement	EHS Principles	EHS/SD Annual Report	Other Company EHS Information
Alcoa Inc.	✓		✓		
Anglo American plc	✓				
ASARCO Inc.	✓				
Dofasco Inc.	✓				
Georgia-Pacific Corp.			✓		✓
Homestake Mining Co.	✓		✓		
Inco Limited	✓				
Noranda Inc.	✓				
Phelps Dodge Corp.	✓				
Rio Tinto	✓				
Weyerhaeuser Company	✓				
WMC Limited	✓				

Appendix B: Materials Reviewed (continued)

Figure 4B. Manufacturing Sector

Company	EHS Policy	EHS Commitment Statement	EHS Principles	EHS/SD Annual Report	Other Company EHS Information
3M Company	✓				
The Boeing Company					✓
Caterpillar Inc.	✓				
Cummins Inc.					✓
Deere & Company	✓				
Delphi Automotive Systems Corp.					✓
General Electric Company	✓				
General Motors Corp.			✓		
Textron Inc.	✓				
United Technologies Corp.	✓				

Figure 5B. Oil Sector

Company	EHS Policy	EHS Commitment Statement	EHS Principles	EHS/SD Annual Report	Other Company EHS Information
Amerada Hess Corp.	✓				
BP plc	✓	✓			
Chevron Texaco Corp.		✓			
CITGO Petroleum Corp.	✓				
Conoco Inc.	✓				
ExxonMobil Corp.	✓				
Imperial Oil Limited	✓				
Marathon Oil Corp.	✓				
Phillips Petroleum Company				✓	✓
Royal Dutch/Shell Group	✓				

Appendix B: Materials Reviewed (continued)

Figure 6B. Technology/Telecommunications Sector

Company	EHS Policy	EHS Commitment Statement	EHS Principles	EHS/SD Annual Report	Other Company EHS Information
AT&T Corp.	✓				
Cisco Systems Inc.	✓				
Compaq Computer Corp.	✓				
Dell Computer Corp.	✓				
Hewlett-Packard Company	✓				
International Business Machines (IBM) Corp.	✓				
Intel Corp.	✓				
Lucent Technologies Inc.	✓				
Motorola Inc.	✓				
Xerox Corp.	✓				

Figure 7B. Consumer Products/Pharmaceuticals Sector

Company	EHS Policy	EHS Commitment Statement	EHS Principles	EHS/SD Annual Report	Other Company EHS Information
Abbot Laboratories	✓				
Anheuser-Busch Companies, Inc.	✓				
Baxter Int'l Inc.	✓				
Bristol-Myers Squibb Company	✓				
The Coca-Cola Co.					✓
Colgate-Palmolive Company			✓		
Delta Air Lines Inc.	✓				
The Gillette Co.					✓
Johnson & Johnson		✓			✓
PepsiCo Inc.		✓		✓	
Pfizer Inc.	✓				
Phillip Morris Companies Inc.			✓		
The Proctor & Gamble Company	✓				

About the Authors

About ICF Consulting

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Please Contact:

Jane E. Obbagy
Vice President and Director
Environmental, Health, and Safety Management
20 Acorn Park
Cambridge, MA 02140
Tel. 1.617.498.5490; E-mail: jobbagy@icfconsulting.com

Seth Lucia
Research Assistant
Environmental, Health, and Safety Management
20 Acorn Park
Cambridge, MA 02140
Tel. 1.617.498.6185; E-mail: slucia@icfconsulting.com