

ENCOURAGING ENVIRONMENTAL EXCELLENCE GOLD LEVEL MEMBERSHIP ANNUAL PERFORMANCE PLAN

June 12, 2014

Introduction

Membership in the Gold Level of the Encouraging Environmental Excellence Program (E3) is for a three year term that can be renewed for an additional three years at the end of the term. An annual performance plan is required for each year of membership. The first plan is due one year after the member has been notified they have been accepted into the Gold Level program. Future annual performance plans are due on that date for each subsequent year the facility is a member of the gold level program. The annual performance plan:

- describes efforts to achieve the environmental improvement activities across all environmental media (air, water and land) described in the initial gold level application or the previous annual performance plan,
- describes new environmental improvement activities across all environmental media (air, water and land) for the next year,
- updates the status of a member's EMS, and
- demonstrates an ongoing record of positive compliance with Ohio EPA's environmental laws and regulations.

Applicants can be removed from the gold level program for not providing this information or not maintaining an ongoing record of positive compliance with Ohio EPA's environmental laws and regulations. Be aware that information submitted in annual performance plans will be used by OCAPP to publicize your participation in the Gold Level of the Encouraging Environmental Excellence Program. Use your discretion in determining the type of information contained in your application. If you determine that information may qualify as either trade secret or confidential business information under Ohio's laws, discuss this with your reviewer. The annual performance plan form is available at Ohio EPA's E3 website at:

<http://epa.ohio.gov/ocapp/ohioe3.aspx>.

GOLD LEVEL ANNUAL PERFORMANCE PLAN INSTRUCTIONS

Provide the appropriate responses after each question below. Response information can either be inserted below each question or provided in a separate document.

Facility Information

Name of facility:

Name of parent company:

Location of facility (number and street address):

City, State and ZIP Code:

If your facility has multiple buildings or locations, list the addresses for these buildings and locations:

Contact Information

Name of contact (Mr., Mrs., Ms., or Dr.):

Title:

Telephone number:

FAX number:

E-mail address:

Mailing address (if different from street address):

City, State and ZIP code:

Reporting Period

1. Identify the dates covered by the Annual Performance Plan: (*month, day, year to month, day, year*)
2. Is this the third Annual Performance Plan of your three year membership term? If yes, answer question 3 of this section, if no, you do not need to answer question 3.
3. Indicate whether you wish to renew your membership in the Gold Level program. If yes, please complete all sections of this Annual Performance Plan. If no, please complete all sections of this Annual Performance Plan except for the “New Environmental Improvement Initiative” section.

Operational Changes

In your initial application or in previous Annual Performance Plans you described what your facility does or makes. Please describe any changes or additions since your last Annual Performance Plan or your initial application if this is your first Annual Performance Plan.

Environmental Compliance

Gold level members must maintain an ongoing record of positive compliance with Ohio EPA’s environmental laws and regulations during their three year membership term in the gold level program. Applicants can be removed from the gold level program for not maintaining an ongoing record of positive compliance with Ohio EPA’s environmental laws and regulations. Describe any changes to your environmental compliance status since your last Annual

Performance Plan or your initial application if this is your first Annual Performance Plan. OCAPP will complete a compliance check upon receipt of your annual performance plan.

Environmental Management System Assessment

1. What is the most recent date that an EMS assessment was performed at your facility?
2. If the EMS assessment was completed within the past 36 months, please skip to question 3 in this section. If not, please indicate whether your EMS meets the following criteria for gold level membership. **A “yes” or “no” response is sufficient for each of these items.**
 - A. Evidence of senior management support, commitment, and approval.
 - B. A written environmental policy directed toward compliance, pollution prevention, and continuous improvement.
 - C. Identification of the environmental aspects at the entity.
 - D. Prioritization of the environmental aspects and a determination of those aspects deemed significant considering, at the minimum, environmental impacts and applicable laws and regulations.
 - E. 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.
 - F. An established community outreach mechanism that includes the following:
 - Identifying and responding to community concerns.
 - Informing the community of important matters that affect the community.
 - Reporting on the EMS, including, at a minimum, reporting to the public on the environmental policy and significant aspects.
 - G. Incorporation of environmental and pollution prevention planning in the development of new products, processes, and services and modifications of existing processes.
 - H. Evidence of clear responsibility for implementation, training, monitoring, EMS maintenance, and taking corrective action and for ensuring compliance with applicable environmental laws, regulations, and permit conditions. Examples for ensuring environmental compliance include third-party environmental consultant compliance audits and corporate environmental compliance audits.

- I. Documentation of the implementation procedures and the results of implementation.
 - J. Appropriate written EMS procedures.
 - K. An annual evaluation of the EMS with written results provided to senior management and affected employees.
3. Summarize progress made towards EMS objectives and targets focusing on environmental aspects that are significant and where progress has been made in the past year.

Regulatory Flexibility

Gold level members have the option to work with the Director's Office of Ohio EPA to obtain regulatory flexibility for their operations. Options do not have to be restricted to regulatory requirements and may include changes in Ohio EPA operating procedures and policies. The Ohio EPA's Director's Office and gold level members may work together to determine what type of regulatory flexibility options are feasible. This will help Ohio EPA determine if changes to existing procedures, policies and regulatory programs are feasible for gold level members. Please indicate whether your facility has worked with the Director's Office on regulatory flexibility issues over the last year as part of its participation in the Gold Level and describe what activities have been completed.

Results of Environmental Improvement Activities

One of the requirements for the Gold Level is to identify environmental improvement activities across all environmental media (air, water and land) you commit to pursue during your first year and to commit to pursue additional environmental improvement activities across all environmental media (air, water and land) for each of the subsequent two years of your three year membership. These environmental improvement activities should build on your existing environmental stewardship efforts. Summarize your facility's progress on achieving the environmental improvement activities across all environmental media (air, water and land) identified in your initial application or last year's annual performance plan.

- 1. Describe the environmental improvement activities across all environmental media (air, water and land) completed during the past year including the quantities for the baseline year and quantities for the future goal year.
- 2. Briefly describe any barriers encountered during implementation of your environmental improvement activities.

New Environmental Improvement Activities

Describe the new environmental improvement activities across all environmental media (air, water and land) you commit to pursue during the next year of your membership in the Gold Level program. Your activities must be expressed in terms of quantitative improvements. If you

choose activities that are regulated, then you must commit to performance goals that go beyond the Federal, State, and local regulatory requirements.

1. Identify your environmental improvement activities.

Describe your environmental improvement activities across all environmental media (air, water and land) based on your existing environmental stewardship activities. Provide the baseline year and the future goal year the improvements are expected to be achieved. Describe the annual quantities recorded from the baseline year and the quantities you are committing to achieve. Describe what activities or process changes you plan to undertake at your facility to accomplish your activities (*e.g., technology changes in a particular process line, employee training, etc.*). Some examples of potential environmental improvement activities are included in the gold level application instructions.

2. Do these activities address significant aspects in your EMS?

During the planning phase of your EMS, you should have designated some of your environmental aspects as “significant.” Indicate whether or not your environmental improvement activities address any of those significant aspects, and if they don’t, explain why you believe they should be included as environmental improvement activities.

3. Are you subject to Federal, State or local regulatory requirements for these activities?

Indicate if you have any regulatory requirements related to these activities – even if they do not directly address quantitative limits. If you have any regulatory requirements related to these activities, list those requirements and explain how your commitments exceeds these requirements. This information is needed to make sure your commitments go beyond compliance.

Certification

On behalf of (*name of facility*), _____
I certify that the information contained in this Annual Performance Plan 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.

We commit to maintaining the principles and goals outlined in our Environmental Management System for our facility’s Ohio EPA Gold Level Encouraging Environmental Excellence Program status. We agree to maintain an ongoing record of positive compliance with all regulations promulgated by the U.S. EPA, state, or local jurisdictions. We understand that the Annual Performance Plan must be submitted to Ohio EPA annually on the date our initial application was accepted and that we must reapply to the Ohio EPA Gold Level Encouraging Environmental Excellence Program every three years.

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 Plan.

Signature:

Title:

Date (*month, day, year*):

Printed signature:

How to Submit a Gold Level Annual Performance Plan

A completed Annual Performance Plan must be submitted in either hard copy or electronic formats. Additional copies of these Annual Performance Plan instructions are available at: <http://epa.ohio.gov/ocapp/ohioe3.aspx>. Copies of these Annual Performance Plan instructions can also be requested using the contact information below.

Hard copy applications should be submitted to:

Bill Narotski
Office of Compliance Assistance and Pollution Prevention
Ohio EPA
P.O. Box 1049
Columbus, OH 43216-1049

Electronic format applications should be submitted to:

william.narotski@epa.ohio.gov

Optional supporting documents, including charts, photographs, news clippings, news releases, publications or other materials may be included if it will provide greater understanding of the activities described in the application. Be aware that information submitted will be used by OCAPP to publicize your participation in the Gold Level of the Encouraging Environmental Excellence Program. Use your discretion in determining the type of information contained in your application. If you determine that information may qualify as either trade secret or confidential business information under Ohio's laws, discuss this with your reviewer.

Questions regarding the Gold Level of the Encouraging Environmental Excellence Program should be directed to Bill Narotski at:

Phone (Direct): 614-728-1264
Phone (General): 614-644-3469
Phone (Toll-Free): 800-329-7518
Fax: 614-644-2807

Gold Level Annual Performance Plan Review Deadlines

Ohio EPA will review the Annual Performance Plan within 60 days of receipt. Any questions and/or request for additional information will be made within this review period. A facility may be asked to host a site visit based on information submitted in annual performance plans. Photographs of the applicant's operations may be taken during site visits to help promote the Encouraging Environmental Excellence Program and the activities described in the application.