



**INDIANA ENVIRONMENTAL STEWARDSHIP PROGRAM
ANNUAL PERFORMANCE REPORT**

State Form 53475 (R3 / 1-11)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
ENVIRONMENTAL STEWARDSHIP PROGRAM

Indiana Department of Environmental Management
Office of Pollution Prevention and Technical Assistance
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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. Section C of your APR should be signed by your ISO 14001:2004 EMS Lead Auditor. 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
Manchester Tank & Equipment Co.,

Name of parent company (If applicable)
a Division of McWane, Inc.

Street address (number and street)
3630 Manchester Drive

City / State / ZIP code
Elkhart, IN 46514

Web site of Facility/Company
www.mantank.com

CONTACT INFORMATION

Name of Contact (Mr. / Mrs. / Ms. / Dr.)
Mr. Stephen Jacobson (Steve)

Title
Environmental Manager

Telephone number
574-970-8240

FAX number
574-293-6148

E-mail address
steve.jacobson@mantank.com

Mailing address (if different from facility address)

City / State / ZIP Code

REPORTING PERIOD

Reporting period dates (month, day, year)
January 1st, 2010 through December 31st, 2010

1a. Is this the third Annual Performance Report of your membership term?
 Yes—If yes, answer question 1b.
 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?
 Yes—If yes, please complete all sections of this annual report.
 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?
 Yes—If yes, please describe them: In 2010, Manchester Tank added a production line to manufacture 1-pound refillable propane cylinders for the outdoor power equipment and camping accessories industries. The 1-pound cylinders and filling equipment will be manufactured in Elkhart, Indiana as of March, 2011. This product line will offer an alternative to disposable, single-use propane cylinders.
 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. In 2010, community interaction included participation with the Greater Elkhart Chamber of Commerce Environmental Council, the Indiana Partners for Pollution Prevention (P4P2) Executive Committee, the ESP Meeting with the IDEM Commissioners day, and the St. Joseph River Cleanup day in Elkhart. Environmental performance data was shared with the other facilities in the McWane organization, to the Environmental Stewardship Program and to the P4P2. This facility's public outreach and community involvement was also the topic of a monthly webinar.

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.

Web site (<http://www.mantank.com>, www.mcwane.com) Open house Meetings Press releases Other _____

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 14001:2004 EMS Lead Auditor at least every 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 14001:2004 EMS Lead Auditor performed an EMS assessment at your facility? 10/20/2010

2. Is the date of the most recent EMS assessment performed by an ISO 14001:2004 EMS Lead Auditor within the past 36 months?

Yes—If yes, skip to Question 3.

No—If no, please have your ISO 14001:2004 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 14001:2004 EMS Lead Auditor

Date (month, day, year)

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

No—If no, skip to Question 4.

Yes—If yes, describe any deficiencies found and the corrective action taken to address each deficiency: _____

4. Name, title, and organization of ISO 14001:2004 EMS Lead Auditor that conducted the most recent EMS assessment: Shayla Barrett, Auditor, Comersotne Environmental

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

- ISO 14001:2004 Certified audit
- Responsible Care EMS audit
- Responsible Care 14001 audit
- ESP Independent Assessment Protocol
- Other (*please specify*): _____

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 14001:2004
- Responsible Care EMS
- Responsible Care 14001

No.

7. When was the last Senior Management review of your EMS completed?
 Month / Year: October, 2010
 Who headed the review (name and title)? Jill Drajer, General Manager

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: Air, EPCRA, DOT, RCRA, SPCC, Water (Storm / Wastewater)
 Month(s) / Year(s): March, 2010
 Who conducted the audit(s) (e.g., facility staff, corporate, third party)? Facility staff using Dakota Auditor software

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?
 The facility experienced a grass fire started by a passing train, but the EMS emergency and contingency plans were not tested due to the fire being quickly brought under control by facility personnel.

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).
Updated container closure work instruction for Universal Waste, corrected an error in the facility's SPCC plan, implemented pH testing by facility staff for industrial waste water samples, updated the task management system to ensure non-routine environmental samples are submitted on time.
 No—If no, please explain your plans to correct these instances.
 No such instances identified.

11. (Optional) Please provide a narrative summary of progress made toward EMS objectives and targets other than those reported as an Environmental Performance Initiative in Section E. You may limit the summary to environmental aspects that are significant and towards which progress has been made during the last calendar year. Attach additional sheets as necessary.

Environmental aspect	Progress made this year (e.g., quantitative or qualitative improvements, activities conducted)
Natural Gas Usage	2.19% reduction in natural gas consumption (normalized "per-cylinder") from 2009 to 2010
Water Usage	6.8% reduction in water usage (normalized "per-cylinder") from 2009 to 2010

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.

1. In addition to ESP, please list environmental awards received or voluntary programs participated in during the past twelve months.
McWane 2010 EHS Excellence Award recipient, Indiana Partners for Pollution Prevention, St. Joseph River Cleanup

2. Has your facility taken advantage of any ESP incentives? If so, please describe the implementation process and list additional benefits IDEM should consider.
In 2010, the facility's Environmental Manager and General Manager attended the ESP Meet the IDEM Commissioners day. In 2011, the facility plans to use the ESP flexible permitting incentive during its air permit renewal.

3. 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?
Not applicable

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.

What do you need to do? Summarize your facility's progress on achieving the initiative you identified in the application or last year's APR.

Category: Indicator:	Baseline Quantity	Future Goal Quantity	Current Quantity	Cost Savings
<u>Material Procurement Recycled Content</u>				
Calendar year	2009	2010	2010	\$55.53 for a 15,000 pound order vs. 15,000 pounds of new powder paint. (Our goal was to not have an increase in cost.)
Actual quantity (per year)	0	0	15,120	
Normalized quantity (per year)	1,636	2,789	15,120	
Basis for your normalizing factor (e.g., gallons of paint produced)	2.5% of total powder purchased			
Measurement unit (e.g., pounds)	Pounds			

Briefly describe how you achieved improvements for this environmental initiative or, if relevant, any circumstances that delayed progress.
 To achieve this initiative, the facility sent waste powder paint to our supplier in order to obtain a 20# then a 100# batch on which we could test color, gloss, salt-spray performance and adhesion when applied in our two powder booths. Initial testing on the 20# sample indicated the project would be successful and the 100# sample was used to paint 108 cylinders to be sold to customers in October of 2010. Customer feedback indicated the recycled content powder was equivalent to the new powder. The vendor committed to a price that was competitive with new powder coatings and the facility issued a purchase order for 15,000 pounds of recycled content powder paint in our standard gray to be used on a variety of product lines going forward. Pricing volatility in the powder coating industry, long lead times on the recycled content powder (3 to 4 months), and concerns over possible quality issues have all contributed to delays in

the implementation of this initiative, but the facility is on track to re-use all of its waste powder paint as recycled content paint this year and in the future.

Please list any state, U.S. EPA, or other partnership programs to which you are reporting this data (e.g., Energy Star, Project XL).
Not applicable

(Optional) If your facility has experienced continued results for environmental improvement initiatives pursued in past years of ESP membership, please share those results here.
Manchester Tank recycled or reused 90.3% of its waste in 2010 (2008 ESP Initiative to recycle 90% of the facility's waste) by identifying recycling, reuse and return options for a variety of waste materials.

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.

- 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., 2009) and the **future year** (e.g., 2010). 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 2010	Future Year 2011	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 type="checkbox"/> Water Use	<input type="checkbox"/> Total water used			Gallons
<input 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 type="checkbox"/> Other: _____			_____
<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			MTCO2E
	<input type="checkbox"/> VOCs			Pounds, tons
	<input type="checkbox"/> NOx, SOx, 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 checked="" type="checkbox"/> Toxics (oil & grease)	903 pounds	258 pounds	Pounds, tons
	<input type="checkbox"/> Total suspended solids			Pounds, tons
	<input type="checkbox"/> Nutrients			Pounds, tons of N or P
	<input type="checkbox"/> Sediment from runoff			Pounds, tons
<input type="checkbox"/> Non-hazardous Waste <input type="checkbox"/> Hazardous Waste	<input type="checkbox"/> Pathogens			MPN/ml, CFU/ml
	<input type="checkbox"/> Landfill			Pounds, tons
	<input type="checkbox"/> Incineration			Pounds, tons
	<input type="checkbox"/> Reused/recycled off-site			Pounds, tons, gallons
	<input type="checkbox"/> Other: _____			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

2. 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)? Lubricant substitution, new pollution controls,
3. 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) Manchester Tank & Equipment

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, Manchester Tank & Equipment, 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 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 three 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		Title	Environmental Manager	Date (month, day, year)	04/04/2011
Printed signature	Stephen D. Jacobson				