INDIANA ENVIRONMENTAL STEWARDSHIP PROGRAM ANNUAL PERFORMANCE REPORT

State Form 53475 (R4 / 3-16)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
ENVIRONMENTAL STEWARDSHIP PROGRAM

Indiana Department of Environmental Management
Office of Program Support
MC 64-00, Room IGCN 1316
100 North Senate Avenue
Indianapolis, IN 46204-2251
Telephone: (800) 988-7901
FAX: (317) 233-5627
E-mail: esp@idem.IN.gov

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 yea, 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
Cummins Fuel Systems Plant

Name of parent company (*If applicable*)
Cummins Inc.

Street address *(number and street)*
1460 N National Rd

City / State / ZIP code
Columbus, IN 47201

Web site of Facility/Company
http://www.cummins.com

CONTACT INFORMATION

Name of Contact (Mr. / Mrs. / Ms. / Dr.)		Title
Susie Wehrkamp / Anna Baker		Plant Manager / Environmental Analyst
Telephone number	**FAX number**	**E-mail address**
(812) 377-6364	( )	susie.b.wehrkamp@cummins.com / anna.e.baker@cummins.com

Mailing address (*if different from facility address*)
Same---Mailcode 41622

City / State / ZIP Code
Columbus, IN 47201

REPORTING PERIOD

Reporting period dates (*mm/dd/yyyy – mm/dd/yyyy*)
1/1/2015 - 12/31/2015

1a. Is this the fourth 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:

☒ 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.

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.cummins.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 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 EMS Lead Auditor performed an EMS assessment at your facility? October 2015

2. Name, title, and organization of ISO 14001 EMS Lead Auditor who conducted the most recent EMS assessment:

Rocky Myers, Safety Engineer, Cummins Inc.

3. Is the date of the most recent EMS assessment performed by an ISO 14001 EMS Lead Auditor within the past 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)* 6/9/2016

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:

Please see attachment.

☐ 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)*: _____

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: July 2015

   Who headed the review *(name and title)*? Ryan Wirtz -- HSE Manager, Susie Wehrkamp-- Plant 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: Compliance to applicable environmental regulations (IDEM, EPA, & local regs)

   Month(s) / Year(s): February 2015

   Who conducted the audit(s) (e.g., facility staff, corporate, third party)? Bart King - US Safety Depot, Indianapolis

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?

   Small spill of less than 5 gallons spilled into a drain that went to our retention pond. Oil was sucked off of pond by third party vendor and root cause analysis completed. Yes the plans detailing how to react during a spill were effective. Contact information has been updated to reflect current HSE personnel on site.

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).
    Please see attachment A

    ☐ 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.

1. In addition to ESP, please list environmental awards received or voluntary programs participated in during the past twelve months.

   Entire site is actively pursuing ISO 50001 EnMS SEP certification.

2. Has your facility taken advantage of any ESP incentives? If so, please describe the implementation process and list additional benefits IDEM should consider.

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?

   Site registered to ISO14001:2004 since 2004.

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: Energy Used Indicator 1: MMBTUs	Baseline *(indicate measurement unit)*	Current *(indicate measurement unit)*	Cost Savings
Calendar year	2013	2015	
Actual quantity *(per year)*	453,930 MMBTU	464,452 MMBTU	
Production unit *(select one)*	Earned Labor Hours x Production units Production lbs. Other -- specify (e.g. Gallons, length, etc.)		
Production Quantity	2,332,441 hrs	2,792,549 hrs	NA

Normalization factor (Current year production ÷ Baseline year production)	1.197
Normalized quantity (Actual Current year quantity ÷ Normalizing factor)	388,013 MMBTUs

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

Site is pursuing an ISO 50001 Certification and began the work of implementing the management system. Site participated in holiday machinery and office unplugged challenges for Thanksgiving and Christmas holidays. Site has increased communication around energy and has an energy team that strives to improve our energy performance.

SECTION E	ENVIRONMENTAL IMPROVEMENT INITIATIVE RESULTS *CONTINUED*		
Initiative #2			
Category 2: Non-Haz Waste Landfilled Indicator 2: Pounds (lbs)	Baseline *(indicate measurement unit)*	Current *(indicate measurement unit)*	Cost Savings
Calendar year	2013	2015	
Actual quantity *(per year)*	578,120 lbs	183,740 lbs	
Production unit *(select one)*	Earned Labor Hours x Production units Production lbs. Other -- specify (e.g. Gallons, length, etc.)		
Production Quantity	2,332,441 hrs	2,792,549 hrs	NA
Normalization factor (Current year production ÷ Baseline year production)		1.197	
Normalized quantity (Actual Current year quantity ÷ Normalizing factor)		153,500 lbs	

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

All general refuse trash now goes to Covanta for incineration for energy recovery. Site is utilitize ways to improve process derived land filled waste such as laundered absorbents instead of disposable.

Initiative #3			
Category 3: Water Indicator 3: Gallons	Baseline *(indicate measurement unit)*	Current *(indicate measurement unit)*	Cost Savings
Calendar year	2013	2015	
Actual quantity *(per year)*	23,714,742	25,230,000	
Production unit *(select one)*	Earned Labor Hours x Production units Production lbs. Other -- specify (e.g. Gallons, length, etc.)		
Production Quantity	2,332,441 hrs	2,792,549 hrs	NA
Normalization factor (Current year production ÷ Baseline year production)		1.197	
Normalized quantity (Actual Current year quantity ÷ Normalizing factor)		21,077,694 Gallons	

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

Site participated in an environmental month celebration in which an entire week was dedicated to water conservation and awareness.

1. Briefly describe the *impacts or wastes* eliminated resulting from the environmental initiative(s). If multiple initiatives, please indicate which specifically.

An entire was stream was eliminated from going to the landfill (general refuse) in 2015, by compacting the trash and sending it to Covanta in Indianapolis. Also the old air compressor system was demolished and a new integrated efficient air compressor system was brought online to better utilitize our compressed air production.

2. Are there other best management practices (BMPs) you can share correlating to your initiative(s)?

The site actively involves cross functional groups in initiatives such as energy. This allows for a wide span of experience and ideas to be brought to the table when investigating improvements and performance.

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.

Site has experienced difficulty in eliminating all waste to go to the landfill due to the unique process of our facility. This makes finding suitable recycling or reuse options for some process waste rather difficult. Site will be implementing an "ECO team" similiar to the energy team which will work on environmental performance and improvement opportunities in the areas of energy, waste, and water.

4. Please provide a narrative summary of progress made toward *qualitative, significant* EMS objectives and targets, if any.

FSP/GOB has established a foundation for ISO 50001 management system and is actively working to achieve SEP certification by EOY 2017. This management system will be integrated with the existing HSEMS system and in the process updates to the HSEMS policies and procedures are happening at the same time to overall create an improved site wide HSEMS.

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 2013	Future Year 2016	Unit
☐ Material Procurement	☐ Recycled content			Pounds, tons
	☐ Hazardous/toxic components			Pounds, tons
☐ Suppliers' Environmental Performance	☐ Specify indicator: _____			As specified for the particular indicator
☐ Material Use	☐ Materials used			Pounds, tons
	☐ Hazardous materials used			Pounds, tons
	☐ Ozone depleting substances used			CFC-11 equivalent pounds
	☐ Total packaging materials used			Pounds, tons
☒ Water Use	☒ Total water used	23,714,742	25,230,000	Gallons
☒ Energy Use	☒ Electricity	397,611 MMBTu	389,658 MMBTu	kWh / MWh, Btu / MMBtu
	☐ Steam			kWh / MWh, gallons, ft^3
	☒ Natural gas	51,139 MMBTu	49,860 MMBTu	Btu / MMBtu
	☐ Diesel			Gallons
	☐ Propane / LPG			Btu / MMBtu, gallons
	☐ Gasoline			Gallons
	☒ Solar	0	+	kWh / MWh
	☐ Wind			kWh / MWh
	☐ Landfill gas			Btu / MMBtu
	☐ Combined heat and power			kWh / MWh, Btu / MMBtu
	☐ Other: _____			_____
☐ Land and Habitat	☐ Land and habitat conservation			Square feet, acres
	☐ Community land revitalization			Square feet, acres
☐ Air Emissions	☐ Total GHGs			MTCO2E
	☐ VOCs			Pounds, tons
	☐ NOx, SOx, $PM_{2.5}$, PM_{10}, or CO			Pounds, tons
	☐ Air toxics			Pounds, tons
	☐ Odor			European Odour Units
	☐ Radiation			Curies, Becquerels
	☐ Dust			Pounds, tons
☐ Discharges to Water	☐ COD or BOD			Pounds, tons
	☐ Toxics			Pounds, tons
	☐ Total suspended solids			Pounds, tons
	☐ Nutrients			Pounds, tons of N or P
	☐ Sediment from runoff			Pounds, tons
	☐ Pathogens			MPN/ml, CFU/ml
☒ Non-hazardous Waste ☐ Hazardous Waste	☒ Landfill	578,120 lbs	28,906 lbs	Pounds, tons
	☐ Incineration			Pounds, tons
	☐ Reused/recycled off-site			Pounds, tons, gallons
	☐ Other: _____			Pounds, tons, gallons
☐ Noise	☐ Noise			dBA
☐ Vibration	☐ Vibration			Inches per second
☐ Products	☐ Expected lifetime energy use			kWh / MWh, Btu / MMBtu
	☐ Expected lifetime water use			Gallons
	☐ Expected lifetime waste to air, water, or land from product use			Pounds, tons
	☐ 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.

   Site has improvements to meet "scorecard" requirements based on corporate requirements. These involve different objectives that range from having plans/tools on our performance to specific quantitative objectives.

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)?

   Site will have an Eco Team which will focus on site's environmental performance, improvement opportunities, and raising awareness to employees.

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*) Cummins Fuel Systems

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, Cummins Fuel Systems, 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	Date (*month, day, year*)
	6-27-2016
Printed signature SUSAN WEHRKAMP	**Title** PLANT MANAGER

Attachment A

2015 EMS Audit Findings based on ISO 14001 Standards

- Contractor Management – Policy has not been updated since October 2013. Facilities is not contractor safety policy owner.
    - Policy has been updated and training program updated/implemented
- Management Commitment – Site wide evidence that CFS Columbus Leaders walking past hazards on site.
    - Site leadership team meets on a monthly basis and discusses HSE first in meeting.
- Evaluation of Compliance Audits -- No evidence on actions to correct findings from the present audit.
    - Corrective Actions are tracked on an excel file and audit related corrective actions are tracked on an online database used by Cummins called Enablon. Corrective actions are also discussed during weekly safety meetings with plant leadership.
- Regulatory Agency Communications – lack of evidence of a policy.
    - Policy was created.
- EHS Accident & Incident Investigations -- The evidence found used for incident investigation is the Fast Track Incident form. Completion of the 5 Whys forms need improvement.
    - Incident investigation forms are completed by a cross functional group and reviewed in front of plant leadership in a weekly safety meeting.
- Nonconformance, CARs, and PARs -- There is evidence of tracking, but not robust and not complying with the guidelines of the follow through.
    - Site uses Enablon system to track corrective actions from nonconformances, CARs, and PARs. This system allows actions to be assigned and automatic reminders to be sent via email.
- Management of Change -- No documented policy specific for HSE management of change (in process).
    - MOC procedure and associated documentation has been created. MOC committee has been tentatively selected and site wide affected training will be completed by end of Q3 2016.
- Records Management -- Site policy has no description of how to discard certain documents.
    - Site is updating current policy matrix to reflect this information and consults corporate procedure until this information is up to date in document control system.
- HSEMS Management Review – Duplicate procedures in document control. No management review process with other businesses/organizations within facility.
    - Obsoleted duplicated/out of date procedure in document control database.