



INDIANA ENVIRONMENTAL STEWARDSHIP PROGRAM ANNUAL PERFORMANCE REPORT

State Form 53475 (R6 / 2-19)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
ENVIRONMENTAL STEWARDSHIP PROGRAM

Indiana Department of Environmental Management

Office of Program Support
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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
GM Marion Metal Center

Name of parent company (if applicable)
General Motors, LLC

Street address (number and street)
2400 West Second Street

City / State / ZIP code
Marion, IN 46952

Website of facility / company
www.gm.com

CONTACT INFORMATION

Name of Contact (Mr. / Mrs. / Ms. / Dr.)
Jeff Blankenberger

Title
Senior Environmental Engineer

Telephone number
(765) 432-2129

FAX number
()

E-mail address
jeffrey.blankenberger@gm.com

Mailing address (if different from facility address)

City / State / ZIP Code

REPORTING PERIOD

Reporting period dates from prior calendar year (mm/dd/yyyy – mm/dd/yyyy)
01/01/19 – 01/01/20

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. City of Marion Earth Day event, prepped community gardens for planting, Riverwatch monitoring, and maintained Wildlife Habitats.

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.>) ☐ Open house ☒ Meetings ☐ Press releases ☒ Other IDEM Website

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? July 30 - Aug 1, 2018

2. Name, title, and organization of ISO 14001 EMS Lead Auditor who conducted the most recent EMS assessment: Julie Lenz, Staff Environmental Engineer, Strategic Environmental Solutions, General Motors, LLC

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:

- | | | |
|------------------------------|-----------------------------|---|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Evidence of senior management support, commitment, and approval. |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | A written environmental policy directed toward compliance, pollution prevention, and continuous improvement. |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Identification of the environmental aspects at the entity. |
| <input type="checkbox"/> Yes | <input type="checkbox"/> 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. |
| <input type="checkbox"/> Yes | <input type="checkbox"/> 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. |
| <input type="checkbox"/> Yes | <input type="checkbox"/> 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. |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Incorporation of environmental and pollution prevention planning in the development of new products, processes, and services and modifications of existing processes. |
| <input type="checkbox"/> Yes | <input type="checkbox"/> 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. |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Documentation of the implementation procedures and the results of implementation. |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Appropriate written EMS procedures. |
| <input type="checkbox"/> Yes | <input type="checkbox"/> 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

☐ No

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

- ☒ ISO 14001:2015 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
☐ 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: August 30, 2019Who headed the review (name and title)? Jeff Blankenberger, Senior Env. Engineer, and Brandon Hart, Env. Engineer

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: Local, State, Federal compliance, and conformance to GM reqs.Month(s) / Year(s): March - May, 2019Who conducted the audit(s) (e.g., facility staff, corporate, third party)? Facility and corporate staff.

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?

Experienced a reportable release of oil to storm water discharge system resulting in oil sheen on Mississinewa River. Emergency plans and EMS were effective in facilitating the response and clean up. Following the event, emergency plans and procedures were reviewed and modified to include additional spill response equipment and locations.

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).

Utilizing problem solving tools, continuous improvement made in SWPPP training, EMS document review & approval process, and hazardous waste land disposal restriction documentation.

☐ 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 (12) months.
See attachment 1.

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

Yes, announced compliance inspections.

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?

Currently ISO 14001:2015 self-certified.

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: Oily WasteIndicator 1: Waste to Energy (WTE)

Baseline

(indicate measurement unit)

Current

(indicate measurement unit)

Cost Savings

Calendar year

2018

2019

Actual quantity (per year)

9,191 pounds

6,128 pounds

Production unit (select one)

Earned Labor Hours

Production units

Production lbs.

Other — specify (e.g. Gallons, length, etc.)

Production Quantity

152,768 tons

132,608 tons

NA

Normalization factor (Current year production ÷ Baseline year production) 0.868Normalized quantity (Actual current year quantity - Actual baseline quantity) x Normalization factor -2,659 pounds

Briefly describe how you achieved improvements for environmental initiative #1 or, if relevant, any circumstances that delayed progress.

See attachment 1.

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 environmental initiative #2 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 environmental initiative #3 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. See attachment 1

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

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 objective and target associated with the improvement initiative was successful and the process of centrifuging oily solid materials to remove used oil for recycling will continue into CY 2020. With an estimated generation rate of 25,000 pounds of oily waste material in CY 2020, approximately 33% of the total (8,250 pounds) of used oil will be diverted from incineration and sent for recycling.

4. Please provide a narrative summary of progress made toward qualitative, significant EMS objectives and targets, if any.
Completed 3 Community Outreach Activities - Partnered with City of Marion Parks Dept. in Earth Day event (distributed tree saplings), prepped City Community Gardens for planting, conducted Riverwatch monitoring event with local school, and enhanced Wildlife Habitat areas to increase Wildlife Habitat Council score.

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).
Indiana Partners for Pollution Prevention

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 next 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 19	Future Year 20 20	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	8,981,055.5	8,711,623.8	Gallons
<input checked="" type="checkbox"/> Energy Use	<input checked="" type="checkbox"/> Electricity	41,292.3	40,053.5	kWh / MWh, Btu / MMBtu
	<input type="checkbox"/> Steam			kWh / MWh, gallons, ft ³
	<input checked="" type="checkbox"/> Natural gas	142.9	138.6	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			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 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 type="checkbox"/> Nutrients			Pounds, tons of N or P
	<input type="checkbox"/> Sediment from runoff			Pounds, tons
	<input type="checkbox"/> Pathogens			MPN/ml, CFU/ml
<input type="checkbox"/> Non-hazardous Waste	<input type="checkbox"/> Landfill			Pounds, tons
<input type="checkbox"/> Hazardous Waste	<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

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. _____
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)? _____
Initiatives will include; rightsizing closed looped water system, isolate energy sources to unallocated production lines, complete energy shutdown of outbuildings, and conduct monthly energy observation tours across the site.
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

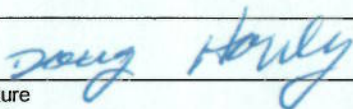
On behalf of (name of facility) General Motors, LLC - Marion Metal Center

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, Marion Metal Center, 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)

3/20/2020

Printed signature

Doug Hanly

Title

Plant Director

Attachment 1 – GM-Marion Metal Center

Section C

4. Were any deficiencies found during the most recent EMS assessment? If yes, describe any deficiencies found and the corrective action taken to address each deficiency:

- a. Emergency Preparedness & Response – The following items were identified: - Site Security is not sending incident reports to the environmental engineers in all instances, and Form EMS012 (Environmental Emergency Incident Evaluation) is not complete for all emergencies reported to them by Security as required.

Added a column under category 4 of the incident report draft that asks if Environmental was contacted, date, time, and who was contacted. Train all security staff to this standard.
(Corrective actions have been verified and are effective.)

- b. Operational Control – Workplace Organization (WPO) requirements for waste containers requiring Visual Management Signs (VMS) are not implemented in all instances. For example, non-hazardous drums for oily rags are labeled but do not have VMS. Additionally, the floor marking for the non-hazardous oily rag drum located at Q4 is “Haz Barrel”, which is incorrect.

Communicated to plant personnel indicating WPO/VMS items needing addressed. Also included in Team Meeting packets. Update WPO manual with current environmental standards. Teams will audit areas going forward.
(Corrective actions have been verified and are effective.)

- c. Operational Control – Spent lead acid batteries are currently being managed under two different regulations, Subpart G and Universal Waste, both of which are correct. The standard work document does not clarify the preferred management method.

Updated master document to have two-line items noting management methods and updated standard work document accordingly.
(Corrective action has been verified and is effective.)

- d. Environmental Objectives – The following issues were noted with the Business Plan Deployment boards: - noted an unreasonable objective for cost savings on MPS board. Countermeasures were developed in April and appear to be ineffective based on trended data. Countermeasures have not been modified or replaced nor has the overall objective been modified. Caravan and North Press boards have not been updated monthly in all cases.

MPS board objective has been modified based on data. Caravan and North Press BPD Boards were updated and persons responsible for board re-trained on importance of updating board on a monthly basis.
(Corrective actions have been verified and are effective.)

- e. Competence - The site has a robust system for tracking and documenting training completed and deficiencies. However, one training course is not adequately documented. The course is accomplished by self reviewing hard copy materials that are made available during Health and Safety Annual Review. Better documentation of who receives and self reviews the training material is needed.

The Training Dept. provided a course number for the training material. Team meetings were utilized for delivery of the training, which required completion of a training sign-in sheet referencing the course number. Training completion is now being tracked by the Training Dept. through closure.

(Corrective action has been verified and is effective.)

- f. Management Review - The site has not incorporated all of the requirements for Management Review that are included in the revised 2015 Standard. Specifically, performance trends have not been incorporated for corrective actions, monitoring and measuring results, compliance obligations and environmental performance.

Will ensure incorporation of missing elements at next scheduled Management Review.
(Corrective action has been verified and is effective.)

- g. Documented Information - Control of Record requirements are not documented in procedure EAP-08 Document Control in all cases. Additionally, weekly satellite container inspection records should be retained as described in GM's FAQ document and related legal memo (31 days).

Updated EAP-08 Document Control document to include all requirements. Eliminate records passed 31 days.

(Corrective action has been verified and is effective.)

- h. Nonconformity and corrective action - Internal Audit findings with NC listed on MAR208 have no records of root cause analysis.

Updated standard work and MAR 208 Audit Summary Report and Tracking to include requirement.

(Corrective action has been verified and is effective.)

Section D

1. *In addition to ESP, please list environmental awards received or voluntary programs participated in during the past twelve (12) months.*
 - a. Maintained Wildlife Habitat certification (Silver Certified) – periodic monitoring events.
 - b. Member Indiana Partners for Pollution Prevention.
 - c. Partnered with City of Marion Parks Dept. in Earth Day event (distributed 1200 maple tree saplings), April 2019.
 - d. Assisted City of Marion Community Gardens by preparing soil for planting in April 2019.

- e. Conducted ISO 14001:2015 EMS internal audits – July and December 2019.
- f. Held GM Green/Earthforce/Hoosier Riverwatch monitoring event on Mississinewa River with St. Paul's Catholic School on October 8, 2019.

Section E

Initiative #1 - Established a CY 2019 goal to reduce the quantity of non-hazardous industrial waste sent offsite for incineration (waste to energy). Achieved reduction of approximately 2,700 pounds in in CY 2019.

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

Oily material waste is the single largest non-hazardous industrial waste stream generated from the manufacturing process and totals approximately 25,000 pounds per year. The waste stream generally consists of oil-soaked wipes, absorbent pads, and spill socks. Following an in-depth review of potential methods to reduce this non-hazardous industrial waste, the site partnered with a vendor that utilizes centrifuge technology to separate liquids from solids. Beginning in July 2019, a total of 43 – 55-gallon drums of oil material waste were centrifuged in CY 2019. This effort resulted in the separation of approximately 33% of the total volume in the form of used oil, which was sent offsite for recycling. Approximately 36% of the centrifuged material is managed as plant trash. We are evaluating reuse opportunities for a portion of this material. The remaining 31% is still managed as non-hazardous industrial waste because it was deemed non-spinnable.

Total weight of drums prior to centrifuging:	9,191 pounds – previously incinerated
Collected used oil for reclaim:	3,063 pounds – now sent to oil recycler
Total weight of material to plant trash/reuse:	2,727 pounds – sent to incinerator
Total weight of material deemed non-spinnable:	3,401 pounds – sent to incinerator

Preliminary Goals for the next four years:

- Continued focus on water, electricity, and natural gas reduction opportunities.
- Reduction in plant-fault scrap metal quantity.
- Maintenance of certified wildlife habitat footprint.
- Material use reductions.
- Increase onsite oil reclamation.