



INDIANA ENVIRONMENTAL STEWARDSHIP PROGRAM ANNUAL PERFORMANCE REPORT

State Form 53475 (R5 / 2-17)
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 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

Schlage Lock Company LLC

Name of parent company (if applicable)

Allegion PLC

Street address (number and street)

2720 Tobey Drive

City / State / ZIP code

Indianapolis, IN 46219

Website of facility / company

www.allegion.com

CONTACT INFORMATION

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

Joseph Jones

Title

EHS Manager

Telephone number

(317) 429-2108

FAX number

()

E-mail address

joseph.jones@allegion.com

Mailing address (if different from facility address)

2720 Tobey Drive

City / State / ZIP Code

Indianapolis, IN 46219

REPORTING PERIOD

Reporting period dates (mm/dd/yyyy – mm/dd/yyyy)

01/01/2017 - 12/31/2017

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. Participated in one or more of the Quarterly Partners for Pollution Prevention Meetings. The company also continues to participate, help facilitate and instruct courses during the IIOA VETEC conference.

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.in.gov/idem/prevention/2400.htm>) ☐ 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 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? January 10-12, 2018

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

Patti Arms, Audit Leader TUV Rheinland

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: _____

Please see Attachment A for description of minor findings communicated by auditor and corrective actions to address each finding.

☐ 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 <i>CONTINUED</i>
7	When was the last Senior Management review of your EMS completed? Month / Year: <u>01/18</u> Who headed the review (name and title)? <u>Joseph Jones, EHS Manager</u>
9	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: <u>Legal and Other Requirements (Compliance Obligations)</u> Month(s) / Year(s): <u>January 2018</u> Who conducted the audit(s) (e.g., facility staff, corporate, third party)? <u>Corporate: Dan Stevens - Senior Global Environmental Specialist</u>
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? N/A
10	Has your facility corrected all instances of potential environmental non-compliance and EMS non-conformance identified during your audits and other assessments? <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input checked="" type="checkbox"/> Yes—If yes, briefly summarize corrective actions taken and other improvements made as a result of your EMS assessment(s) or compliance audit(s). <u>As indicated in Section C 4. and Attachment A</u> </div> <div style="width: 45%;"> <input type="checkbox"/> No—If no, please explain your plans to correct these instances. <input type="checkbox"/> No such instances identified. </div> </div>

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. <u>ISO 14001, OHSAS 18001, Partners for Pollution Prevention, OSHA VPP Star.</u>
2	Has your facility taken advantage of any ESP incentives? If so, please describe the implementation process and list additional benefits IDEM should consider. <u>Yes. Expedited permits. Advanced announcement of routine inspections. Low routine inspection priority. Some reduced reporting frequency.</u>
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? N/A

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: <u>Water Use</u>	Baseline	Current	Cost Savings
Indicator 1: <u>Total water used</u>	<i>(indicate measurement unit)</i>	<i>(indicate measurement unit)</i>	
Calendar year	2016	2017	N/A
Actual quantity (per year)	21,312,673	19,016,493	N/A
Production unit (select one)	Earned Labor Hours <input checked="" type="checkbox"/> Production units Production lbs. Other -- specify (e.g. Gallons, length, etc.)		
Production Quantity	1,393,630.51	1,473,107.53	NA
Normalization factor (Current year production ÷ Baseline year production) <u>1.06</u>			
Normalized quantity (Actual current year quantity ÷ Actual baseline quantity) x Normalization factor <u>-2,433,950 gallons</u>			
Briefly describe how you achieved improvements for this environmental initiative or, if relevant, any circumstances that delayed progress. <u>Improved efficiency of water rinse operations; improved planning of process tank dumps; recycle of chrome scrubber water; installation of improved process controls</u>			

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 Production units Production lbs. Other -- specify (e.g. Gallons, length, etc.)		
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 <i>how</i> you achieved improvements for this environmental initiative 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 Production units Production lbs. Other -- specify (e.g. Gallons, length, etc.)		
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 <i>how</i> you achieved improvements for this environmental initiative or, if relevant, any circumstances that delayed progress.			
1. Briefly describe the <i>impacts or wastes</i> eliminated resulting from the environmental initiative(s). If multiple initiatives, please indicate which specifically. #1: Reduced water use, cost savings, reduced quantity of wastewater requiring treatment			
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. N/A			
4. Please provide a narrative summary of progress made toward <i>qualitative, significant</i> EMS objectives and targets, if any. Integration of more defined environmental awareness and sustainability awareness elements into our new hire orientation and annual refresher training.			
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). N/A			
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? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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.

7. 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 20 <u>17</u>	Future Year 20 <u>18</u>	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			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	<input type="checkbox"/> Pathogens			MPN/ml, CFU/ml
	<input checked="" type="checkbox"/> Landfill	247,979 lbs	238,000 lbs	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

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. _____
N/A

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)? _____
Employee training (recycling). Attempting (again) to find a means of reuse or recycling F006 sludge that is currently going to the landfill.

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) Schlage Lock Company LLC

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, Schlage Lock Company LLC, 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)

03/28/18

Printed signature

Joseph Jones

Title

EHS Manager

Attachment A – Corrective Actions

Environmental Management System

Minor Finding – 9.3 Management Review

Finding Description:

- **9.3 Management Review** - Did not brief “fulfillment of compliance obligations” in management review (9.3.d.3) and two outputs in 9.3):
 - Opportunities to improve integration of the EMS with other business processes, if needed; and
 - Any implication for the strategic direction of the organization

Corrective Action(s):

- Update the management review template with the 3 additional requirements.
- Update the management review written program to include all required inputs and outputs.

Minor Finding – 6.1.4 Planning Actions to Address Risks and Opportunities

Finding Description:

- **6.1.4 Planning Actions to Address Risks and Opportunities** – While risks and opportunities from external/internal issues within the context of the organization were identified, there was no evidence that planning actions were developed to address/take advantage of them.

Corrective Action(s):

- Assess risk and opportunities to determine actions needed to achieve the intended outcomes of the EMS.
- Update Objectives and Targets to include actions based the risk and opportunities assessment.

Minor Finding – 8.1 Operational Planning & Control

Finding Description:

- **8.1 Operational Planning & Control** – Operational controls were not consistently implemented in accordance with established operating criteria.

Corrective Action(s):

- Train/re-train maintenance on the importance of properly managing the wastes that are generated by their activities. Provide standard/template language to be place on Work Orders that have a high probability of generating Universal Waste with guidance for managing the waste properly.
- Revise inspection checklist to include language that is specific to Universal Waste Management activities and review other elements on the inspection checklist for areas where expanded language might improve compliance oversight.
- Establish a systematic process for review and disposition of unused materials and equipment to reduce quantity stored outside uncovered or otherwise establish and implement controls to reduce exposure of unused equipment to storm water in accordance with SWPPP BMPs.

Environmental Regulatory Compliance

Air Permit Deviation

Deviation Description:

- **Permit Condition D.4.4** – Cartridge dust collector for polishing unit PU-6A was not in operation for a period of time <2 hours while the associated polishing facility was in operation.

Corrective Action(s):

- Restarted dust collector immediately upon discovery
- Completed investigation to identify necessary containment actions, root cause, and corrective actions
- Operational review of training and standard work practices
- Installed a system to continuously monitor dust collector for proper air flow during operation with visual signs for operators to regularly monitor throughout their shift
- Reported the deviation to IDEM as required by permit

CERTIFICATE

TUV Rheinland of North America, Inc.
295 Foster Street, Suite 100, Littleton, MA 01460



Hereby certifies that

Allegion Indianapolis Operations

**2720 Tobey Drive
Indianapolis, IN 46219
USA**

has established and maintains an environmental management system for the

**The Manufacture, Assembly and Distribution of Commercial Exit
Devices and Door Accessories.**

An audit was performed and documented in Report No. 4139.
Proof has been furnished that the requirements according to

ISO 14001:2015

are fulfilled.

Further clarification regarding the scope of this certificate and the applicability of
ISO 14001:2015 requirements may be obtained by contacting TRNA.

Certificate Registration No.

74 300 4139

Certificate Issue Date
March 7, 2018

Certificate Expiration Date
March 6, 2021



Reissue Date:03/07/2018

Robert D'Amore

Certification of Management Systems