


**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
 MC 64-00, Room IGCN 1316
 100 North Senate Avenue
 Indianapolis, IN 46204-2251
 Telephone: (800) 988-7901
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 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 Madison Chemical Company, Inc. |
| Name of parent company (if applicable) |
| Street address (number and street) 3141 Clifty Drive |
| City / State / ZIP code Madison, IN 47250 |
| Website of facility / company www.madchem.com |

CONTACT INFORMATION

| | |
|--|------------------------------------|
| Name of Contact (Mr. / Mrs. / Ms. / Dr.) Dr. Steve Preece | Title Technical Director |
| Telephone number (812) 274-4413 | FAX number () |
| E-mail address steve.preece@madchem.com | |
| Mailing address (if different from facility address) 3141 Clifty Drive | |
| City / State / ZIP Code Madison, IN 47250 | |

REPORTING PERIOD

| |
|---|
| Reporting period dates from prior calendar year (mm/dd/yyyy – mm/dd/yyyy) 01/01/2019 - 12/31/2019 |
| Is this the fourth Annual Performance Report of your membership term? <input type="checkbox"/> Yes—If yes, answer question 1b. <input checked="" type="checkbox"/> No—If no, skip to the "Change in Information" section of this report. |
| Do you wish to renew your Indiana Environmental Stewardship Program membership? <input checked="" type="checkbox"/> Yes—If yes, please complete all sections of this annual report. <input type="checkbox"/> 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? <input type="checkbox"/> Yes—If yes, please describe them: _____ <input checked="" type="checkbox"/> 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. Published NOI letter, January 2019 | |
| 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. | |
| <input checked="" type="checkbox"/> Web site (http://www.madchem.com) <input type="checkbox"/> Open house <input type="checkbox"/> Meetings <input type="checkbox"/> Press releases <input type="checkbox"/> 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.

What is the most recent date that an ISO 14001 EMS Lead Auditor performed an EMS assessment at your facility? June 10, 2019

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

Sandra Warner, C.P.G. Asso.VP, CHA Companies

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:

- 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)

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: Improperly stored used oil drum has been disposed; incorrectly labeled Universal waste drum was relabeled; emergency numbers have been posted in HazWaste storage area

No

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

- ISO 14001:2015 Certified audit
- ESP Independent Assessment Protocol
- Other (please specify): _____

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**

When was the last Senior Management review of your EMS completed?

Month / Year: October 2019

Who headed the review (name and title)? Steve Preece, Technical Director

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: ISO 14001 : 2015

Month(s) / Year(s): November 2019

Who conducted the audit(s) (e.g., facility staff, corporate, third party)? Third party (SAI Global)

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?

Facility has only experienced two incidental chemical releases; emergency response plans have been effective. However, the plans have been up-dated to reflect new Emergency Response team assignments.

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).

Non-conformances have been corrected. Some recommendations actually conflicted with regulatory requirements and have not been implemented.

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.

In addition to ESP, please list environmental awards received or voluntary programs participated in during the past twelve (12) months.
Partners for Pollution Prevention

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

No.

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>Reduce NPE Use</u> Indicator 1: <u>% of total production</u> | Baseline (indicate measurement unit) | Current (indicate measurement unit) | Cost Savings |
|--|---|--|-----------------|
| Calendar year | 2018 | 2019 | |
| Actual quantity (per year) | 0.187% of production | 0.157% of production | |
| Production unit (select one) | Earned Labor Hours Other -- specify (e.g. Gallons, length, etc.) | Production units | Production lbs. |
| Production Quantity | 39,848 lbs | 35,876 lbs | NA |
| Normalization factor (Current year production ÷ Baseline year production) 0.900 | | | |
| Normalized quantity (Actual current year quantity - Actual baseline quantity) x Normalization factor -3575 | | | |

Briefly describe how you achieved improvements for environmental initiative #1 or, if relevant, any circumstances that delayed progress. Results were achieved by researching and replacing NPE surfactants with more environmentally friendly materials where practical.

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 <i>how</i> 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 <i>how</i> 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. Reduced use of nonylphenol ethoxylate surfactants, both in absolute pounds used and as a percentage of total pounds of product blended in the calendar year 2019 versus 2018.

2. Are there other best management practices (BMPs) you can share correlating to your initiative(s)?
Madison Chemical operates an on-site biological wastewater treatment system, which mitigates much of the organic material used in the chemical blending process. The facility is designed to prevent any liquid escapes to the environment. All process rinse waters are captured and their ultimate fate (processing in the wastewater system or removal by a qualified third party) are under the complete control of Madison Chemical.

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 *qualitative, significant* EMS objectives and targets, if any. NPE surfactant use reduction addresses Madison Chemical aspect # 46, regarding SARA 313/Haz Mat Transportation Act. Aspect # 16 is also addressed, which covers hazardous chemical use in production, potential for chemical release / pollution and hazardous waste management. Reducing the amount of NPE surfactant used per year directly reduces the risk associated with these aspects.

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).

NPE surfactants became SARA 313 reportable for RY2019 and Madison Chemical duly reported its total use of said surfactants.

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.

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 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"/> 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 type="checkbox"/> Toxics | | | Pounds, tons |
| | <input type="checkbox"/> Total suspended solids | | | Pounds, tons |
| | <input checked="" type="checkbox"/> Nutrients | 2000 pounds | 1900 pounds | 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"/> Hazardous Waste | <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 |

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

If the environmental improvement initiative(s) will be *qualitative* in nature, please describe. _____

N/A. Future year environmental improvements will be quantitative.

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)? _____

Success in reducing phosphorus in wastewater will be influenced by product mix and poundage, but some control can be achieved by using flocculants (e.g. alum) and allowing solids to settle as much as possible, which will physically remove phosphorus. Wastewater operator skill will be central to this endeavor.

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) MADISON CHEMICAL CO., INC.

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, MADISON CHEMICAL CO., INC. 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

S. R. Preece

Date (month, day, year)

4/14/2020

Printed signature

S. R. PREECE

Title

TECHNICAL DIRECTOR