



# 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  
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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 1<sup>st</sup> 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](mailto: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](mailto:esp@idem.IN.gov) or (800) 988-7901.

## SECTION A FACILITY INFORMATION

Name of facility	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	

## CONTACT INFORMATION

Name of Contact (Mr. / Mrs. / Ms. / Dr.)	Jeff Blankenberger	Title	Supervisor, Environmental Engineering
Telephone number	(765) 668-2358	FAX number	( )
Mailing address (if different from facility address)		E-mail address	<a href="mailto:jeffrey.blankenberger@gm.com">jeffrey.blankenberger@gm.com</a>
City / State / ZIP Code			

## REPORTING PERIOD

Reporting period dates (mm/dd/yyyy – mm/dd/yyyy)	01/01/2018 - 12/31/2018
1a. 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.
1b. Do you wish to renew your Indiana Environmental Stewardship Program membership?	<input 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?

☐ 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, Maintenance of Community Gardens, World Env. Day with Girl Scouts, Riverwatch monitoring, & re-certified Wildlife Habitat footprint

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? <u>July 30 - Aug 1, 2018</u>																																		
2.	Name, title, and organization of ISO 14001 EMS Lead Auditor who conducted the most recent EMS assessment: <u>Julie Lenz, Staff Environmental Engineer, Eco-System Services, General Motors LLC</u>																																		
3.	<p>Is the date of the most recent EMS assessment performed by an ISO 14001 EMS Lead Auditor within the past thirty-six (36) months?</p> <p><input checked="" type="checkbox"/> Yes—If yes, skip to Question 4.</p> <p><input type="checkbox"/> 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:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 10%;"><input type="checkbox"/> Yes</td> <td style="width: 10%;"><input type="checkbox"/> No</td> <td>Evidence of senior management support, commitment, and approval.</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> <td>A written environmental policy directed toward compliance, pollution prevention, and continuous improvement.</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> <td>Identification of the environmental aspects at the entity.</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> <td>Prioritization of the environmental aspects and a determination of those aspects deemed significant considering, at the minimum, environmental impacts and applicable laws and regulations.</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> <td>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.</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> <td>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.</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> <td>Incorporation of environmental and pollution prevention planning in the development of new products, processes, and services and modifications of existing processes.</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> <td>Evidence of clear responsibility for implementation, training, monitoring, EMS maintenance, taking corrective action, and ensuring compliance with applicable environmental laws, regulations, and permit conditions.</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> <td>Documentation of the implementation procedures and the results of implementation.</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> <td>Appropriate written EMS procedures.</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> <td>An annual evaluation of the EMS with written results provided to senior management and affected employees.</td> </tr> </table>		<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. 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<p>Signature of ISO 14001 EMS Lead Auditor _____</p>		<p>Date (month, day, year) _____</p>																																	
4.	<p>Were any deficiencies found during the most recent EMS assessment?</p> <p><input checked="" type="checkbox"/> Yes—If yes, describe any deficiencies found and the corrective action taken to address each deficiency: <u>See Attachment 1</u></p> <p><input type="checkbox"/> No</p>																																		
5.	<p>What type of protocol was used to perform the independent EMS assessment?</p> <p><input checked="" type="checkbox"/> ISO 14001:2015 Certified audit</p> <p><input type="checkbox"/> ISO 14001:2004 Certified audit</p> <p><input type="checkbox"/> ESP Independent Assessment Protocol</p> <p><input type="checkbox"/> Other (please specify): _____</p>																																		
6.	<p>Is the EMS certified to a recognized standard?</p> <p><input checked="" type="checkbox"/> Yes—If yes, what standard does the EMS follow (please provide a copy of the most recent certificate)?</p> <p style="margin-left: 40px;"> <input checked="" type="checkbox"/> ISO 14001:2015  <input type="checkbox"/> ISO 14001:2004  <input type="checkbox"/> Responsible Care EMS  <input type="checkbox"/> Responsible Care 14001         </p> <p><input type="checkbox"/> No</p>																																		

## SECTION C

ENVIRONMENTAL MANAGEMENT SYSTEM ASSESSMENT  
CONTINUED

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

Month / Year: June 27, 2018Who headed the review (name and title)? Jeff Blankenberger, Supervisor Environmental Engineering, and Maya Collins, Associate Environmental 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, and federal compliance; and conformance to GM requirementsMonth(s) / Year(s): March - May, 2018Who 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?

No reportable releases requiring activation of emergency plans during past year.

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 employees env. training, sewermanhole survey and monthly tank inspection documentation, community and outreach notifications.☐ 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 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](mailto:esp@idem.IN.gov).

## Initiative #1

Category 1: <u>Water Use</u>	Baseline	Current	Cost Savings
Indicator 1: <u>Total Water Used</u>	(indicate measurement unit)	(indicate measurement unit)	
Calendar year	<u>2017</u>	<u>2018</u>	
Actual quantity (per year)	<u>9,225,681</u>	<u>9,294,101</u>	
Production unit (select one)	Earned Labor Hours      Production units      Production lbs. Other – specify (e.g. Gallons, length, etc.) <u>Gallons</u>		
Production Quantity	<u>157,694 tons</u>	<u>152,768 tons</u>	<u>NA</u>

Normalization factor (Current year production ÷ Baseline year production) 0.969Normalized quantity (Actual current year quantity - Actual baseline quantity) × Normalization factor +66,299 Gallons

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

See Attachment 1

SECTION E	ENVIRONMENTAL IMPROVEMENT INITIATIVE RESULTS CONTINUED		
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<b>Initiative #2</b>			
Category 2: <u>Energy Use</u> Indicator 2: <u>Electricity</u>	Baseline <i>(indicate measurement unit)</i>	Current <i>(indicate measurement unit)</i>	Cost Savings
Calendar year	2017	2018	
Actual quantity <i>(per year)</i>	47,594	45,800	
Production unit <i>(select one)</i>	Earned Labor Hours      Production units      Production lbs. Other – specify (e.g. Gallons, length, etc.)      MWh		
Production Quantity	157,694 tons	152,768 tons	NA
Normalization factor (Current year production ÷ Baseline year production) 0.969			
Normalized quantity (Actual current year quantity - Actual baseline quantity) x Normalization factor -1,738 MWh			
Briefly describe <i>how</i> you achieved improvements for this environmental initiative or, if relevant, any circumstances that delayed progress.			
See Attachment 1			

<b>Initiative #3</b>			
Category 3: <u>Energy Use</u> Indicator 3: <u>Natural Gas</u>	Baseline <i>(indicate measurement unit)</i>	Current <i>(indicate measurement unit)</i>	Cost Savings
Calendar year	2017	2018	
Actual quantity <i>(per year)</i>	41,284	42,198	
Production unit <i>(select one)</i>	Earned Labor Hours      Production units      Production lbs. Other – specify (e.g. Gallons, length, etc.)      MWh		
Production Quantity	157,694 tons	152,768 tons	NA
Normalization factor (Current year production ÷ Baseline year production) 0.969			
Normalized quantity (Actual current year quantity - Actual baseline quantity) x Normalization factor +885.6 MWh			
Briefly describe <i>how</i> you achieved improvements for this environmental initiative or, if relevant, any circumstances that delayed progress.			
See Attachment 1.			

1. Briefly describe the <i>impacts</i> or <i>wastes</i> eliminated resulting from the environmental initiative(s). If multiple initiatives, please indicate which specifically.
2. Are there other best management practices (BMPs) you can share correlating to your initiative(s)?
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. Targets to reduce electricity, natural gas, and water have been carried over to CY 2019 and include the following objectives: Continued Energy Observation Tours (EOT) to drive team engagement, reduce electrical costs with expansion of Peak Demand Control via Building Management System, revise closed-looped water system to eliminate water waste, and implement U.S. DOE 50001 Ready Energy Management System.
4. Please provide a narrative summary of progress made toward <i>qualitative, significant</i> EMS objectives and targets, if any. Completed 4 community outreach activities. Enhanced paper recycling efforts on production floor by increasing availability of recycling containers and employee communication.
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? <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.

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 2018	Future Year 2019	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 <sup>3</sup>
	<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 <sub>2</sub> E
	<input type="checkbox"/> VOCs			Pounds, tons
	<input type="checkbox"/> NO <sub>x</sub> , SO <sub>x</sub> , PM <sub>2.5</sub> , PM <sub>10</sub> , 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 checked="" 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 checked="" type="checkbox"/> Other: Oil reused/recycled on-site	4,865 Gal.	5,400 Gal.	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](mailto: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)? \_\_\_\_\_  
Enhance/modify existing procedures and process to ensure the proper segregation and collection of used oils at the point of generation to facilitate onsite recycling and reuse of the oils in the production process.
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 1<sup>st</sup> 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)

3/25/2019

Printed signature

Thomas A. Gallagher III

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.

- 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.

- 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.

- 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.

- 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.

- 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.

- 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.

- 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.

## Section D

- 1. *In addition to ESP, please list environmental awards received or voluntary programs participated in during the past twelve (12) months.*

- a. Achieved Wildlife Habitat recertification (Silver Certified) - August 27, 2018.
- b. Member Indiana Partners for Pollution Prevention.
- c. Partnered with City of Marion Parks Dept. in Earth Day event (distributed 1200 oak tree saplings), April, 2018.
- d. Assisted with City of Marion Community Gardens planting in May, 2018.
- e. Hosted Girl Scouts for World Environment Day event (birdhouse building, and wildlife habitat monitoring), June, 2018.
- f. Self-certified to new ISO 14001:2015 - July, 2018.
- g. Conducted GM Green/Earthforce/Hoosier Riverwatch monitoring event on Mississinewa River with St. Paul's Catholic School on October 4, 2018



## Section E

Established CY 2018 goal to reduce energy (electricity & natural gas), and water usage by 3% normalized to production volume from CY 2017 baseline. Achieved reduction of approximately 4% electricity, natural gas increased approximately 2%, and water usage was flat.

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

### Electricity

Performed energy observation tours (EOTs) with responsible teams to optimize effective equipment shutdown.

Replaced and on boards with digital TV screens on production floor.

Replaced select pneumatic pumps with electric where feasible.

Improved Sunday shutdowns.

Established process to identify and repair compressed air leaks.

Installation of occupancy sensors in all plant restrooms.

Converted T8 lighting to LED in select areas.

### Natural Gas

Shutdown steam during heating season as opportunities were available.

### Water

Optimized operation of cooling towers.

Optimize operation of weld water circulation system.

Shutdown steam during heating season as opportunities available.

Shutdown cooling towers during suitable times and when weld water flow allowed.

Reduction target attainment was negatively impacted to a certain extent due to the following factors:

There were minimal opportunities to shutdown steam during the CY 2018 heating season due to inclement weather, which impacting natural gas and water usage.

Significant weekend overtime hours were worked in support of preproduction activities and new product launch. These hours were not included in normalization factor (product tons shipped), which impacted electricity, natural gas, and water usage.

### Preliminary Goals for the next four years:

- Continued focus on water, electricity, and natural gas reduction opportunities.

- Reduction in plant-fault scrap metal quantity.
- Additions/enhancements to certified wildlife habitat footprint.
- Material use reductions.
- Increase onsite oil reclamation.