

**INDIANA ENVIRONMENTAL STEWARDSHIP PROGRAM
ANNUAL PERFORMANCE REPORT**

State Form 53475 (R3 / 1-11)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
ENVIRONMENTAL STEWARDSHIP PROGRAM

Indiana Department of Environmental Management
Office of Pollution Prevention and Technical Assistance
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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. Section C of your APR should be signed by your ISO 14001:2004 EMS Lead Auditor. 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 Nishikawa Cooper LLC - Bremen Facility | | | |
| Name of parent company (if applicable) Nishikawa Rubber Co. LTD & Cooper Standard Automotive Inc | | | |
| Street address (number and street) 501 High Road | | | |
| City / State / ZIP code Bremen/Indiana/46506 | | | |
| Web site of Facility/Company | | | |
| CONTACT INFORMATION | | | |
| Name of Contact (Mr. / Mrs. / Ms. / Dr.) Brad Keller | | | |
| Title EH&S Specialist/Environmental Management Representative | | | |
| Telephone number (574) 546-5938 x 228 | | | |
| FAX number (574) 546-5219 | | | |
| E-mail address bjkeller@niscoseals.com | | | |
| Mailing address (if different from facility address) Same | | | |
| City / State / ZIP Code | | | |
| REPORTING PERIOD | | | |
| Reporting period dates (month, day, year) 01/01/2010 - 12/31/2010 | | | |
| 1a. Is this the third 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? <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. | | | |
| 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 type="checkbox"/> Web site (http://www.) <input type="checkbox"/> Open house <input type="checkbox"/> Meetings <input checked="" 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 14001:2004 EMS Lead Auditor at least every 36 months to assess the EMS.

What do you need to do?
Answer the following questions
about your EMS.

1. What is the most recent date that an ISO 14001:2004 EMS Lead Auditor performed an EMS assessment at your facility? April 5-7, 2010

2. Is the date of the most recent EMS assessment performed by an ISO 14001:2004 EMS Lead Auditor within the past 36 months?

☒ Yes—If yes, skip to Question 3.

☐ No—If no, please have your ISO 14001:2004 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 14001:2004 EMS Lead Auditor

Date (month, day, year)

3. Were any deficiencies found during the most recent EMS assessment?

☒ No—If no, skip to Question 4.

☐ Yes—If yes, describe any deficiencies found and the corrective action taken to address each deficiency:

4. Name, title, and organization of ISO 14001:2004 EMS Lead Auditor that conducted the most recent EMS assessment: Jim Charles, Lead Auditor, Intertek

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

☒ ISO 14001:2004 Certified audit

☐ Responsible Care EMS audit

☐ Responsible Care 14001 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 14001:2004

☐ Responsible Care EMS

☐ Responsible Care 14001

☐ No.

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

Month / Year: January/2011

Who headed the review (name and title)? Brad Keller - EH&S Specialist/Environmental Management Representative

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: ISO 14001/Environmental Compliance
 Month(s) / Year(s): 09/2009
 Who conducted the audit(s) (e.g., facility staff, corporate, third party)? Corporate Auditing Team

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?
Not Applicable

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).
Improved Universal Waste Storage/Improved Refrigerant Program
Improved Stormwater Management
☐ No—If no, please explain your plans to correct these instances. ☐ No such instances identified.

11. (Optional) Please provide a narrative summary of progress made toward EMS objectives and targets other than those reported as an Environmental Performance Initiative in Section E. You may limit the summary to environmental aspects that are *significant* and towards which *progress* has been made during the last calendar year. Attach additional sheets as necessary.

| Environmental aspect | Progress made this year (e.g., quantitative or qualitative improvements, activities conducted) |
|----------------------|--|
| | |
| | |

SECTION D **ADDITIONAL INFORMATION**

Why do we need this information? This information will help IDEM to effectively manage the Environmental Stewardship Program. What do you need to do? Answer the questions as completely as possible.

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

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 - Same Permit Writer/Same Inspector/Expedited Permit Review

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?
Not Applicable

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. What do you need to do? Summarize your facility's progress on achieving the initiative you identified in the application or last year's APR.

| Category: <u>Waste</u> Indicator: <u>Non-Haz Liquid (Landfill)</u> | Baseline Quantity | Future Goal Quantity | Current Quantity | Cost Savings |
|--|---|----------------------|------------------|--------------|
| Calendar year | 2009 | 2010 | 2010 | \$2,300 |
| Actual quantity (per year) | 29,509 pounds | 13,000 pounds | 27,527 pounds | |
| Normalized quantity (per year) | 0.0054 | | 0.0035 | |
| Basis for your normalizing factor (e.g., gallons of paint produced) | product produced | | | |
| Measurement unit (e.g., pounds) | pounds of non-haz liquid waste/pound of rubber consumed | | | |
| Briefly describe how you achieved improvements for this environmental initiative or, if relevant, any circumstances that delayed progress. <u>35% improvement in normalized non-haz liquid waste generation rate. Wastewater evaporator not implemented until Sept. due to economic conditions.</u> | | | | |
| Please list any state, U.S. EPA, or other partnership programs to which you are reporting this data (e.g., Energy Star, Project XL). <u> </u> | | | | |
| (Optional) If your facility has experienced continued results for environmental improvement initiatives pursued in past years of ESP membership, please share those results here. <u> </u> | | | | |

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., 2009) and the **future year** (e.g., 2010). 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__10 | Future Year 20__11 | 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 checked="" type="checkbox"/> Energy Use | <input checked="" type="checkbox"/> Electricity | 1.92 (Normalized) | 1.75 (Normalized) | kWh / MWh, Btu / MMBtu |
| | <input type="checkbox"/> Steam | kWh/lb of rubber | kWh/lb of rubber | kWh / MWh, gallons, ft ³ |
| | <input type="checkbox"/> Natural gas | profile consumed | profile consumed | 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 |

2. 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)? Upgrade to high efficiency lighting/increase awareness of energy conservation at Associate level.
3. 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

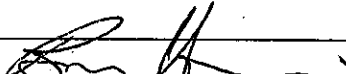
On behalf of (name of facility) Nishikawa Cooper LLC - Bremen Facility

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, Nishikawa Cooper LLC - Bremen Facility, 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 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 three 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



Title
Plant Manager

Date (month, day, year)
03/31/2011

Printed signature

BEEN HARRIS