



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

No-sag Products

Name of parent company (if applicable)

Leggett & Platt Incorporated

Street address (number and street)

2225 Production Road

City / State / ZIP code

Kendallville, IN 46755

Website of facility / company

www.leggett.com

CONTACT INFORMATION

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

Mr. Russell Dunton

Title

General Manager

Telephone number

(800) 345-0775

FAX number

(260) 347-4764

E-mail address

russ.dunton@leggett.com

Mailing address (if different from facility address)

City / State / ZIP Code

REPORTING PERIOD

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

06/01/2016--06/01/2017

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. Donations of recycled mattresses to local charities. Meetings with local city officials.

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.leggett.com>) ☐ 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?	<u>080116</u>																																	
2.	Name, title, and organization of ISO 14001 EMS Lead Auditor who conducted the most recent EMS assessment: _____ <u>Drinda Smith, Environmental Auditor, L&P Incorporated</u>																																		
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? <input checked="" type="checkbox"/> Yes—If yes, skip to Question 4. <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: <table border="0"><tr><td><input type="checkbox"/> Yes</td><td><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> <div style="display: flex; justify-content: space-between;"><div> Signature of ISO 14001 EMS Lead Auditor</div><div><u>060117</u> Date (month, day, year)</div></div>		<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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4.	Were any deficiencies found during the most recent EMS assessment? <input type="checkbox"/> Yes—If yes, describe any deficiencies found and the corrective action taken to address each deficiency: _____ <u>_1_OBSERVATION Attachment Included: CAR 5801-05-16</u> <input type="checkbox"/> No																																		
5.	What type of protocol was used to perform the independent EMS assessment? <input type="checkbox"/> ISO 14001:2015 Certified audit <input type="checkbox"/> ISO 14001:2004 Certified audit <input type="checkbox"/> ESP Independent Assessment Protocol <input checked="" type="checkbox"/> Other (please specify): <u>EFEC/ECO Initiative</u>																																		
6.	Is the EMS certified to a recognized standard? <input type="checkbox"/> Yes—If yes, what standard does the EMS follow (please provide a copy of the most recent certificate)? <table border="0"><tr><td><input type="checkbox"/> ISO 14001:2015</td></tr><tr><td><input type="checkbox"/> ISO 14001:2004</td></tr><tr><td><input type="checkbox"/> Responsible Care EMS</td></tr><tr><td><input type="checkbox"/> Responsible Care 14001</td></tr></table> <input type="checkbox"/> No		<input type="checkbox"/> ISO 14001:2015	<input type="checkbox"/> ISO 14001:2004	<input type="checkbox"/> Responsible Care EMS	<input type="checkbox"/> Responsible Care 14001																													
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SECTION C**ENVIRONMENTAL MANAGEMENT SYSTEM ASSESSMENT
CONTINUED**

7. When was the last Senior Management review of your EMS completed?
 Month / Year: January, 2017
 Who headed the review (name and title)? L. Dunton, Quality Manager
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: Environmental Compliance/EMS Procedures
 Month(s) / Year(s): July, 2016
 Who conducted the audit(s) (e.g., facility staff, corporate, third party)? Corporate Environmental
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?
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).
(1) Observation
 Attachment Included: CAR 5801-05-16
- ☐ 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.
2. Has your facility taken advantage of any ESP incentives? If so, please describe the implementation process and list additional benefits IDEM should consider.
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?

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>Natural Gas</u> Indicator 1: <u>Btu Consumption</u>	Baseline (indicate measurement unit)	Current (indicate measurement unit)	Cost Savings
Calendar year	<u>2014</u>	<u>2017</u>	
Actual quantity (per year)	<u>16,896,606,510</u>	<u>14,947,211,000</u>	<u>\$5,343.29 @ .2741/therm</u>
Production unit (select one)	Earned Labor Hours Production units Production lbs. Other -- specify (e.g. Gallons, length, etc.)		
Production Quantity			<u>NA</u>

Normalization factor (Current year production ÷ Baseline year production)

Normalized quantity (Actual current year quantity - Actual baseline quantity) x Normalization factor

Briefly describe how you achieved improvements for this environmental initiative or, if relevant, any circumstances that delayed progress.
 2014-2015 we increased our wire volume through our oven by 1,500tons of wire annually. This was accomplished by re-sizing / tuning our main oven burner to optimum performance.

SECTION E ENVIRONMENTAL IMPROVEMENT INITIATIVE RESULTS CONTINUED			
Initiative #2			
Category 2: <u>Noise</u> Indicator 2: <u>sound</u>	Baseline (indicate measurement unit)	Current (indicate measurement unit)	Cost Savings
Calendar year	2014	2015	
Actual quantity (per year)	98dBA	85dBA	
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. We have undertaken a project that will automate one process in our facility. this will allow us to run our equipment for a longer duration at a slower speed. this will significantly reduce the noise in this production area, as well as move our employees away form the point of noise production. this is a continuation of past efforts to make meaningful reduction to our noise output. this will be accomplished by utilizing robots to replace the operators in this very noisy area.			
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.			
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.			
4. Please provide a narrative summary of progress made toward <i>qualitative, significant</i> EMS objectives and targets, if any.			
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).			
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 checked="" type="checkbox"/> Yes <input 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 20__	Future Year 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"/> 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"/> 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 checked="" type="checkbox"/> Noise	<input checked="" type="checkbox"/> Noise	98	90	dBA
<input type="checkbox"/> Vibration	<input type="checkbox"/> Vibration			Inches per second
<input type="checkbox"/> Products	<input type="checkbox"/> Expected lifetime energy use			kWh / MWh, Btu / MMBtu
	<input type="checkbox"/> Expected lifetime water use			Gallons
	<input type="checkbox"/> Expected lifetime waste to air, water, or land from product use			Pounds, tons
	<input type="checkbox"/> Waste to air, water, or land from disposal or recovery			Pounds, tons

If you need assistance filling out the form, please contact the ESP program manager at either esp@idem.in.gov or 1-(800) 988-7901.

SECTION F

FUTURE YEAR ENVIRONMENTAL IMPROVEMENT INITIATIVE

CONTINUED

2. If the environmental improvement initiative(s) will be *qualitative* in nature, please describe. _____
3. What activities or process changes do you plan to undertake at your facility to accomplish your initiative (e.g., technology changes in a particular process line, employee training)? _____
The addition of robotics.
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

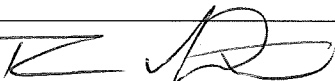
On behalf of (name of facility) No-sag Products, L&P Incorporated

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, No-sag Products, 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)

060117

Printed signature

Russ Danton

Title

General Manager

Certificate of Registration

Presented to

Leggett & Platt
No Sag Products

In Recognition of Meeting all the Elements Required for

EFEC Registration

12-121

Signature

June 8, 2015

Date

A. J. McCanell

Signature

June 8, 2015

Date





Corrective/Preventive Action Request

Customer	<input checked="" type="checkbox"/> Internal <input type="checkbox"/> External	Date	8/18/2016
Supplier	<input type="checkbox"/> Internal <input type="checkbox"/> External	Response Due	8/31/2016
Branch Issuing CAR	Br. 5801	Sent To	EFEC Program Director
Person Issuing CAR	R. Dunton	Attn. To	J. Maneke
Reference Documents	EFEC Maint Audit: 7/20/2016		

Description of Nonconformance

ECO Initiative Element: Social Responsibility Activities || No Documentation/Record of Social Activities in-place

Origin:	Shift	Operator ID	MAJOR	MINOR <u>X</u>	Date Mfg.
Department	Process	Quality	Label/Pkg.	Other <u>X</u>	
Raw Material	Process	Shipping	Dmg.-In-Transit	EFEC Audit NCF	

Remedial Action

- Review L&P Eco Initiative Program Notebook.
- Revise EFEC System Procedures, to include [Section: 5](#) L&P Incorporated || Eco Initiative || SUPPLEMENTAL REQUIREMENTS

5.3 SOCIAL RESPONSIBILITY ACTIVITIES

- **Social Responsibility Activities**
 - Branch shall organize and accomplish a, minimum of one, social responsibility activity annually.
 - Activities are documented.

Root Cause

L&P Eco Initiative Program includes supplemental requirements, not required by EFEC Program.

Corrective Action Plan

Eco Initiative/EFEC Program Director, will arrange and schedule a, minimum of one, social responsibility activity annually.

Currently, coordinating with local high school's Environmental Sciences class to be a guest speaker and complete an environmentally focused activity. Specific date of this and project have not yet been determined. We will document when completed.

Recipient's Signature	Jason Maneke	Date: 8/25/2016	Quality Mgr. Acceptance Signature:
Start Date:	8/18/2016	Scheduled Complete Date: 8/31/2016	LL. Dunton
Follow-up	<input type="checkbox"/>	Date:	Date: 08/30/2016
Reviewed by:			CLOSED DATE: 8/30/2016