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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Indianapolis, IN 46204-2251
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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
Guardian Automotive Trim, Inc. dba SRG Global, Inc.

Name of parent company (*If applicable*)
SRG Global, Inc.

Street address (*number and street*)
601 North Congress Avenue

City / State / ZIP code
Evansville, IN 47715

Web site of Facility/Company
www.srggi.com

CONTACT INFORMATION

Name of Contact (Mr. / Mrs. / Ms. / Dr.)
Angela Casbon-Scheller

Title
Environmental Manager

Telephone number
812-473-6231

FAX number
812-473-0023

E-mail address
ascheller@srggi.com

Mailing address (*if different from facility address*)

City / State / ZIP Code

REPORTING PERIOD

Reporting period dates (*month, day, year*)
January 1, 2011 - December 31, 2011

1a. Is this the third 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?	What do you need to do?
IDEM needs to know how environmental information was shared with the public.	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. Held an Environmental, Health & Safety Fair for employees and their families. Invited community organizations (i.e. American Red Cross, Master Gardeners, Veolia Environmental Services, C&I Electronics for electronics recycling dropoff, Sheriff's department) to participate as vendors. Sponsored the annual Indiana Pollution Prevention Conference.

Please indicate which of the following methods your facility plans to use to make its ESP Annual Performance Report available to the public. Please check as many as appropriate.

☐ Web site (http://www._____) ☐ Open house ☐ Meetings ☐ Press releases ☒ Other available upon request

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? December 2011

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:

   ☐ 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 14001:2004 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: Thomas Ollier, Lead Auditor, BSI

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: December 2011

   Who headed the review *(name and title)*? Angela Casbon-Scheller, Environmental 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: Air, Water, Hazardous Waste, Spill Prevention, DOT Hazardous Materials

Month(s) / Year(s): October, 2011

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

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?

A gasket leak for the Nitric Acid bulk storage tank, resulting in a loss of xxxx gallons. The release was contained, the tank locked out to prevent further loss, and the repairs were made. On-site trained responders followed response plans without incident or injury. The Contingency Plan was determined to be effected and no changes were warranted.

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).

☐ 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)
Reduce Metals Loss from Plater (Cu, Cr, Ni)	Cu = 31% decrease (17,570 lbs.), Cr = 50% decrease (35,154 lbs.), Ni = 42% decrease (55,501 lbs.)
Reduce NG Usage in Plating Boiler	Plating Boiler was shut down all year except for Maintenance and Testing (84% reduction in NG usage for Plating Boiler = 218,061 ccf reduction)

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.

Indiana Partners for Pollution Prevention, Southwest Indiana Chamber of Commerce Enviornmental Committee, USEPA WasteWise, Adopt-A-Spot

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. Incentives were implemented in 2009. Reduced reporting and monitoring frequencies were incorporated into the Title V renewal. Internal monitoring frequencies have not been reduced as a best management practice, although the reduced requirement in our permit is considered a valuable incentive. Advanced notice of routine inspections is beneficial in helping to insure appropriate representatives are present to facilitate efficient 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?

Registered prior to becoming an ESP member.

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: Water Use Indicator: Total Water Used	Baseline Quantity	Future Goal Quantity	Current Quantity	Cost Savings
Calendar year	2010	2011	2011	$5,242
Actual quantity (per year)	11,157,300	10,599,435	9,248,700	
Normalized quantity (per year)				
Basis for your normalizing factor (e.g., gallons of paint produced)				
Measurement unit (e.g., pounds)	gallons			

Briefly describe how you achieved improvements for this environmental initiative or, if relevant, any circumstances that delayed progress.
Intallation of PLC's on Electroplater to regulate amount of water used in relation to square feet of product plated.

Please list any state, U.S. EPA, or other partnership programs to which you are reporting this data (e.g., Energy Star, Project XL).

(Optional) If your facility has experienced continued results for environmental improvement initiatives pursued in past years of ESP membership, please share those results here.

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 2011	Future Year 2012	Unit
☐ Material Procurement	☐ Recycled content			Pounds, tons
	☐ Hazardous/toxic components			Pounds, tons
☐ Suppliers' Environmental Performance	☐ Specify indicator: _____			As specified for the particular indicator
☐ Material Use	☐ Materials used			Pounds, tons
	☐ Hazardous materials used			Pounds, tons
	☐ Ozone depleting substances used			CFC-11 equivalent pounds
	☐ Total packaging materials used			Pounds, tons
☐ Water Use	☐ Total water used			Gallons
☒ Energy Use	☒ Electricity	49,936,800	48,500,000	kWh / MWh, Btu / MMBtu
	☐ Steam			kWh / MWh, gallons, ft^3
	☐ Natural gas			Btu / MMBtu
	☐ Diesel			Gallons
	☐ Propane / LPG			Btu / MMBtu, gallons
	☐ Gasoline			Gallons
	☐ Solar			kWh / MWh
	☐ Wind			kWh / MWh
	☐ Landfill gas			Btu / MMBtu
	☐ Combined heat and power			kWh / MWh, Btu / MMBtu
	☐ Other: _____			_____
☐ Land and Habitat	☐ Land and habitat conservation			Square feet, acres
	☐ Community land revitalization			Square feet, acres
☐ Air Emissions	☐ Total GHGs			MTCO2E
	☐ VOCs			Pounds, tons
	☐ NOx, SOx, $PM_{2.5}$, PM_{10}, or CO			Pounds, tons
	☐ Air toxics			Pounds, tons
	☐ Odor			European Odour Units
	☐ Radiation			Curies, Becquerels
	☐ Dust			Pounds, tons
☐ Discharges to Water	☐ COD or BOD			Pounds, tons
	☐ Toxics			Pounds, tons
	☐ Total suspended solids			Pounds, tons
	☐ Nutrients			Pounds, tons of N or P
	☐ Sediment from runoff			Pounds, tons
	☐ Pathogens			MPN/ml, CFU/ml
☐ Non-hazardous Waste ☐ Hazardous Waste	☐ Landfill			Pounds, tons
	☐ Incineration			Pounds, tons
	☐ Reused/recycled off-site			Pounds, tons, gallons
	☐ Other: _____			Pounds, tons, gallons
☐ Noise	☐ Noise			dBA
☐ Vibration	☐ Vibration			Inches per second
☐ Products	☐ Expected lifetime energy use			kWh / MWh, Btu / MMBtu
	☐ Expected lifetime water use			Gallons
	☐ Expected lifetime waste to air, water, or land from product use			Pounds, tons
	☐ 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)? Monitor & repair air leaks, improved shutdown processes

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*) Guardian Automotive Trim, Inc. dba SRG Global, 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, Guardian Automotive Trim, Inc. dba SRG Global, 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 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	Date (*month, day, year*)
	Operations Manager	3/29/2012
Printed signature Brent Rasche		

Z 1

Visit Receipt & A7 Coversheet

SMO	Functional Location	SAP Material
7407376	0047059965-000	200462213

Please sign below to acknowledge receipt of the assessment visit described in this report.

Signature: _____ **Date:** 12/16/2011

Print name: Angela Scheller

BSI signature: _____ **Date:** 12/16/11

Print name: Thomas K. Oiler Jr.