



U.S. Borax Inc.
26877 Tourney Road
Valencia, CA 91355-1847
tel: (1) 661 287 5400
fax: (1) 661 287 5495

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
2000

September 29,

To Whom It May Concern:

Enclosed please find completed applications for the "National Environmental Performance Track" for our four (4) facilities, all of which are located in California.

Should you have any questions or require amplification to any of the responses please contact Gerald Pepper at (661) 287-5788.

Sincerely,

A handwritten signature in cursive script that reads "Gerald Pepper".

Gerald Pepper
Manager, Environmental Affairs

cc: Elaine Dorward-King

A09-0018



***National
Environmental
Achievement Track***

Application Form

U.S. Borax Inc. - Owens Lake Operations

Name of facility

Rio Tinto Limited

Name of parent company (if any)

P.O. Box 37

Street address

209 N. Main Street

Street address (continued)

Lone Pine, CA 93545

City/State/Zip code

Give us information about your contact person for the National Environmental Achievement Track Program.

Name Gerald M. Pepper

Title Manager, Environmental Affairs

Phone (661) 287-5788

Fax (661) 287-5566

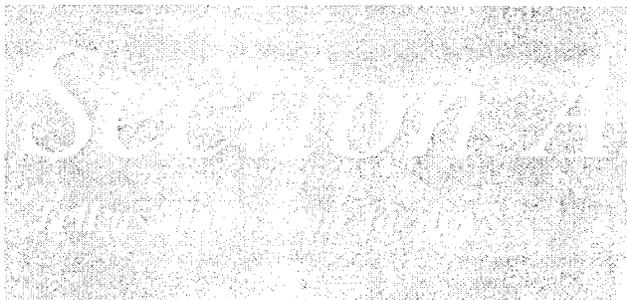
E-mail gerry.pepper@borax.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.



1 What do you do or make at your facility?

Trona is mined from evaporite deposits at Owens Dry Lake and is stockpiled and shipped.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
1474

NAICS
212 391

3 Does your company meet the Small Business Administration definition of a small business for your sector?

Yes No

4 How many employees (full-time equivalents) currently work at your facility?

- Fewer than 50
 50-99
 100-499
 500-1,000
 More than 1,000

5 Does your facility have an EPA ID number(s)?

Yes No

If yes, list in the right-hand column.

CAL000202796

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

Checklist attached

7 Check the appropriate box in the right-hand column.

I've listed the requirements above.

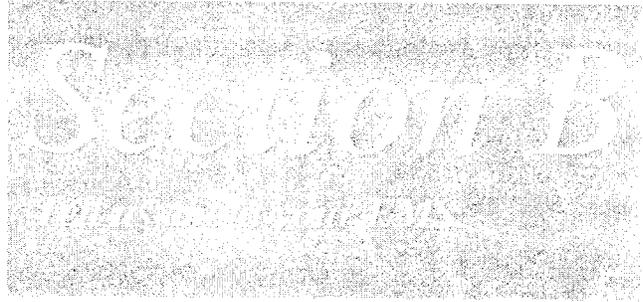
I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Office is located on Lone Pine, CA and trona surface mining operation is on Owens Lake, located approximately 18 miles south of Lone Pine. Trona is a double salt of sodium carbonate and sodium bicarbonate with two water molecules. There are no reportable quantities of chemicals at either site. Facility has been ISO 14001 registered since July 2000. EMS has been audited internally and externally. Registrar NSF-ISR.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.



What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

- a. Environmental policy Yes
- b. Planning Yes
- c. Implementation and operation Yes
- d. Checking and corrective action Yes
- e. Management review Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? Yes

3 Did this cycle include both an EMS and a compliance audit? Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? Yes

If yes, what method of EMS assessment did you use?

- Self-assessment
 - GEMI Other
 - CEMP Internal pre ISO GAP, assessments using employees and consultants.
- Third-party assessment
 - ISO 14001 Certification
 - Other

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Replace Above Ground Fuel Storage Tank (potential accidental to release to groundwater, release to air)	7100	Gallons	5000	Gallons
<p>i. How is the current level an improvement over the previous level?</p> <p>The old tank was a single wall fuel trailer.</p> <p>The new tank is a ground-mounted, dual wall unit, meeting UL-142 requirements for secondary containment. The tank is equipped with ground level fill and spill containment. The gasoline tank is equipped with phase one vapor recovery and drop tube fill.</p> <p>This has eliminated a potential for release to the ground and reduced emissions to the air.</p>				
<p>ii. How did you achieve this improvement?</p> <p>Purchased a new storage tank.</p>				

Second aspect you've selected

What aspect have you selected? Replaced old equipment (I.C engine emissions to air)	What was the previous level (2 years ago)?		What is the current level?	
	Quantity 7	Units old pieces of equipment	Quantity 7	Units new pieces of equipment
<p>i. How is the current level an improvement over the previous level? The average age of the old I.C. engines was 25 years older than present</p> <p>ii. How did you achieve this improvement? Purchased newer equipment including an excavator, bulldozer, motorgrader, front end loader, pump, service truck, and a pickup.</p>				

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect? Emissions to air

b. Is this aspect identified as significant in your EMS? Yes No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Option A: Absolute value (Quantity/Units)

Option B: In terms of units of production or output 31% (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- Option A:
Absolute value (Quantity/Units)
- Option B:
In terms of units of production or output 6% (Quantity/Units)

c. How will you achieve this improvement?

Adding gravel to unstable portion of our haul road. Gravel along with water is 31% more efficient for dust control, we will treat approximately 20% of our road.

Second aspect you've selected

a. What is the aspect?

Energy Use

b. Is this aspect identified as significant in your EMS?

Yes No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Option A:
Absolute value 105,500,000 btu/year (Quantity/Units)

Option B:
In terms of units of production or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

Option A:
Absolute value 19,000,000 btu/year savings (Quantity/Units)

Option B:
In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

Replace old office furnace which has a burner efficiency of 80% with one of 95%. This will require 18% less propane

Third aspect you've selected

- | | |
|---|--|
| a. What is the aspect? | Resource Use |
| b. Is this aspect identified as significant in your EMS? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output. | <input type="checkbox"/> Option A:
Absolute value
(Quantity/Units) |
| | <input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output
0%
(Quantity/Units) |
| d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output. | <input type="checkbox"/> Option A:
Absolute value
(Quantity/Units) |
| | <input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output
50%
(Quantity/Units) |
| e. How will you achieve this improvement? | Office paper recycling is not available in Lone Pine, we will bag paper and transport it to the Valencia Office for recycling. |

Fourth aspect you've selected

- | | |
|---|---|
| a. What is the aspect? | Emissions to Air |
| b. Is this aspect identified as significant in your EMS? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output. | <input type="checkbox"/> Option A:
Absolute value
(Quantity/Units) |
| | <input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output
3
(Quantity/Units) |
| d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output. | <input type="checkbox"/> Option A:
Absolute value
(Quantity/Units) |
| | <input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output
3
(Quantity/Units) |
| e. How will you achieve this improvement? | Will replace three of our R-12 air conditioned machines either with new machines or by conversion to R-134a refrigerant |

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.



What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

Identity is established by local newspaper, attending public meetings, attending service organization meetings, and participating in local government. Response is by participation on committees and boards, and working on projects.

2 How do you inform community members of important matters that affect them?

The Owens Lake Operations maintains close ties with county government officials, organizations, and emergency responders. In the event of an emergency or disaster, written programs are in place for company staff to communicate as required with local community. Our disaster management plans are available for inspection at any time.

3 How will you make the Achievement Track Annual Performance Report available to the public?

- Website www.borax.com
- Newspaper
- Open Houses
- Other

Local community organization meetings, public school awareness programs, etc.

4 Are there any ongoing citizen suits against your facility? Yes No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	Ducks Unlimited	Bruce Ivey	(760) 876-4595
<i>State/Local Regulator</i>	Inyo County Board	Michael Dorame	(760) 876-5086
<i>Other community/local reference</i>	Boulder Creek RV Resort	Jaque Hickman	(760) 876-4243

Section E

Application and Participation Statement.

On behalf of U.S. Borax Inc., Owens Lake Operations
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Joseph A. Carrabba 10/27/00

Printed Name/Title

Joseph A. Carrabba
Chief Operations Officer

Facility Name

U.S. Borax Inc. - Owens Lake Operations

Facility Street Address

209 N. Main Street

Facility ID Numbers

Inyo County Facility ID# 36 001, CA EPA ID# 000202796, Federal Mine ID# 04-02834, CA Mine ID# 91-14-0012

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name U.S. Borax Inc., Owens Lake Operations
Facility Location: 209 N. Main St., Lone Pine, CA 93545
Facility ID Number(s): Inyo County Facility ID# 36-001, CA EPA ID# 000202796, Federal
(attach additional sheets if necessary) Mine ID# 04-02834, CA Mine ID# 91-14-0012

Air Pollution Regulations

Check All
That Apply

- | | |
|---|-------------------------------------|
| 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) | <input type="checkbox"/> |
| 2. Permits and Registration of Air Pollution Sources | <input checked="" type="checkbox"/> |
| 3. General Emission Standards, Prohibitions and Restrictions | <input checked="" type="checkbox"/> |
| 4. Control of Incinerators | <input type="checkbox"/> |
| 5. Process Industry Emission Standards | <input type="checkbox"/> |
| 6. Control of Fuel Burning Equipment | <input type="checkbox"/> |
| 7. Control of VOCs | <input type="checkbox"/> |
| 8. Sampling, Testing and Reporting | <input type="checkbox"/> |
| 9. Visible Emissions Standards | <input type="checkbox"/> |
| 10. Control of Fugitive Dust | <input type="checkbox"/> |
| 11. Toxic Air Pollutants Control | <input type="checkbox"/> |
| 12. Vehicle Emissions Inspections and Testing | <input checked="" type="checkbox"/> |

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)

- | | |
|-----|--------------------------|
| 13. | <input type="checkbox"/> |
| 14. | <input type="checkbox"/> |

Hazardous Waste Management Regulations

- | | |
|---|-------------------------------------|
| 1. Identification and Listing of Hazardous Waste (40 CFR 261) | |
| - Characteristic Waste | <input checked="" type="checkbox"/> |
| - Listed Waste | <input checked="" type="checkbox"/> |
| 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262) | |
| - Manifesting | <input checked="" type="checkbox"/> |

- Pre-transport requirements
- Record keeping/reporting
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - Transfer facility requirements
 - Manifest system and record-keeping
 - Hazardous waste discharges
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards
 - Preparedness and prevention
 - Contingency plan and emergency procedures
 - Manifest system, Record keeping and reporting
 - Groundwater protection
 - Financial requirements
 - Use and management of containers
 - Tanks
 - Waste piles
 - Land treatment
 - Incinerators
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265)
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- 7. Administered Permit Program (Part B) (40 CFR 270)

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- 8.
- 9.

Hazardous Materials Management

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153)
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- 5. Community Right-to-Know Regulations (40 CFR 350-372)

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

- 6.
- 7.

Solid Waste Management

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
- 2. Permit Requirements for Solid Waste Disposal Facilities
- 3. Installation of Systems of Refuse Disposal

- 4. Solid Waste Storage and Removal Requirements
- 5. Disposal Requirements for Special Wastes

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

- 6.
- 7.

Water Pollution Control Requirements

- 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- 2. Designation of Hazardous Substances (40 CFR 116)
- 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- 4. NPDES Permit Requirements (40 CFR 122)
- 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)
- 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
- 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
- 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
- 10. Water Quality Standards
- 11. Effluent Limitations for Direct Dischargers
- 12. Permit Monitoring/Reporting Requirements
- 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
- 14. Collection, Handling, Processing of Sewage Sludge
- 15. Oil Discharge Containment, Control and Cleanup
- 16. Standards Applicable to Indirect Discharges (Pretreatment)

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

- 17.
- 18.

Drinking Water Regulations

- 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
- 2. National Primary Drinking Water Standards (40 CFR 141)
- 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)
- 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- 5. Underground Injection Control Requirements

- 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

- 7.
- 8.

Toxic Substances

- 1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704)
- 2. Import and Export of Chemicals (40 CFR 707)
- 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)
- 4. Chemical Information Rules (40 CFR 712)
- 5. Health and Safety Data Reporting (40 CFR 716)
- 6. Pre-Manufacture Notifications (40 CFR 720)
- 7. PCB Distribution Use, Storage and Disposal (40 CFR 761)
- 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
- 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

- 10.
- 11.

Pesticide Regulations

- 1. FIFRA Pesticide Use Classification (40 CFR 162)
- 2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165)
- 3. Certification of Pesticide Applications (40 CFR 171)
- 4. Pesticide Licensing Requirements
- 5. Labeling of Pesticides
- 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- 7. Disposal of Pesticide Containers
- 8. Restricted Use and Prohibited Pesticides

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

- 9.
- 10.

Environmental Clean-Up, Restoration, Corrective Action

- 1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)

2. RCRA Corrective Action (identify)

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration,
Corrective Action Regulations Not Listed Above (identify)**

3.
4.