LDM
Technologies

January 15, 2002

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
4th Floor
Cambridge, MA 02140

RE: NEPT Application Revisions

To Whom It May Concern:

Enclosed please find a revised application from LDM Technologies, Inc. for the National Environmental Performance Track Program. Highlighted, by my personal initials, are the changes to the application from the original submittal. Please contact me, at (740) 685-2506, with any questions you may have on the application.

Sincerely,

Byron Shaurer
Environmental Manager
LDM Technologies, Inc.

The Art of Technology

LDM Technologies, Inc. ▪ 110 North Eighth Street, Byesville, Ohio 43723 ▪ (740) 685-2506 ▪ Fax: (740) 685-3977

National Environmental PerformanceTrack
U.S. Environmental Protection Agency

A05-0046

JAN 21 2002

Application Form

LDM Technologies, Inc. - Byesville
Name of facility

LDM Technologies, Inc.
Name of parent company (if any)

110 N. 8th Street
Street address

Street address (continued)

Byesville, Ohio 43723
City/State/Zip code

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

Name : Byron Shaurer

Title : Environmental Manager

Phone : (740) 685 - 2506 ext. 402

Fax : (740) 685 - 3977

E-mail : bshaurer@ldmtech.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?

LDM Technologies, Inc. is a Tier II supplier to General Motors of horizontal injection molded plastic automotive products. Both interior and exterior painted products are also manufactured and supplied to General Motors.

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
3089

NAICS

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.

Facility	OHD058392499 BS
NPDES	0GR00199*AG
PTI	06-06362

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.

Please see checklist enclosed

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?

Facility has both ISO 14001 and QS9000 Certifications. Reference is with CRS Registrars.

Why do we need this information?

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

What do you need to do?

- **Confirm that your EMS meets the Performance 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 Internal Auditing
- ☐ CEMP

☒ Third-party assessment

- ☒ ISO 14001 Certification
- ☐ Other

Why do we need this information?

Facilities need to 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 need 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
Total Solid Waste	3,012 BS	tons	1,260 BS	tons

i. How is the current level an improvement over the previous level?

Reduction of 42% per year BS

ii. How did you achieve this improvement?

Implementing recycling programs for plastic, cardboard and ppe in the manufacturing process.

Second 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
Total Water Use	81,250	US gals / mo.	56,250	US gals / mo.

i. How is the current level an improvement over the previous level?

Reduction in water make up usage for painting operations and processes by 31% per monthly usage.

ii. How did you achieve this improvement?

Recycling of water used to clean paint related equipment BS

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 page.

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

First aspect you've selected

a. What is the aspect? Hazardous Waste

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 — 285,000 / lbs (Quantity/Units)

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

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

☒ Option A: Absolute value — 150,000 / lbs (Quantity/Units)

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

e. How will you achieve this improvement?

BS

Install better recovery system, keeping tighter inventories, implementing policy and procedure for trial materials through EMS programs.

Second aspect you've selected

a. What is the aspect?

Total Solid Waste - Spent Absorbent Materials

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 — 6 tons (Quantity/Units)

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

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

☒ Option A: Absolute value — 0 tons (Quantity/Units)

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

e. How will you achieve this improvement?

BS

Implement a cleaning and recycling program for all absorbent materials. This will allow us to reuse the material until it becomes worn out or damaged beyond use. Goal is to eliminate continual purchasing of new materials once used and eliminate land fill.

Third aspect you've selected

a. What is the aspect?	Emissions of VOCs from Mix Room	
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	2.3 lbs/hr (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.	☒ Option A: Absolute value	0 (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
e. How will you achieve this improvement? BS	Still under investigation, but the concept is to control emissions through thermal oxidation. Reducing the emissions from the source will also be an objective.	

Fourth aspect you've selected

a. What is the aspect? BS	Reduce BOD discharges to water via reduction of suspended solids in discharge water	
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	300 lbs (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.	☒ Option A: Absolute value	0 (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)

e. How will you achieve this improvement?

BS

Capture and filter the processes that are currently allowing large amount of particulates from the processes enter the discharge streams. By reducing the amount of suspended inorganic solids, the BOD will be reduced.

Why do we need this information?

Facilities need to 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?	Within the EMS, the environmental aspects will consider concerns within the facility operations, as well as global and local community concerns. A communication log is maintained to identify the varies types of response that is required for local and global environmental partners.
2 How do you inform community members of important matters that affect them?	Local newspaper publications, corporate website available to public access and publications available to public in reception lobby.
3 How will you make the Performance Track Annual Performance Report available to the public?	☒ Website www.ldmtech.com ☒ Newspaper ☐ Open Houses ☒ Other Bulletin Notices Internally

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

	Organization	*Name*	*Phone number*
Representative of a Community/ Citizen Group	LEPC	Tim Milner	740-435-8142
State/Local Regulator	OEPA	Ralph Witte	740-380-5241
Other community/local reference	Byesville POTW	Matt Stiers	740-685-6239

On behalf of LDM Technologies, Inc.
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Performance Track Program Guide* 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 Performance 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 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 Performance 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 01/09/02

BS Printed Name/Title Jeff Longsworth / Plant Manager

Facility Name LDM Technologies, Inc.

Facility Street Address 110 N. 8th Street Byesville , OH 43723

Facility ID Numbers OHD058392499

National Environmental Achievement Track

Environmental Requirements Checklist

We've included the following Checklist to help you answer questions in Section A, Tell us about your facility. The Checklist will help you identify the major federal, state, tribal, and local environmental requirements that apply at your facility, but it is not an exhaustive list of all environmental requirements that may be applicable at your 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).

Air Pollution Regulations

Check All That Apply

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

- ☐ 13. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Hazardous Waste Management Regulations

Check All That Apply

- ☒ 1. Identification and Listing of Hazardous Waste (40 CFR 261)
  - ☒ - Characteristic Waste
  - ☒ - Listed Waste
- ☒ 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
  - ☒ - Manifesting
  - ☒ - 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 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)

☐ 8. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Hazardous Materials Management

Check All That Apply

☒ 1. Control of Pollution by Oil and Other 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)

☐ 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Solid Waste Management

Check All That Apply

☐ 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

☐ 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Water Pollution Control Requirements

Check All That Apply

- ☒ 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)
  Name of POTW Byeville Sewer Dept.
  ID # of POTW
- ☐ 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, and Processing of Sewage Sludge
- ☐ 15. Oil Discharge Containment, Control and Cleanup
- ☒ 16. Standards Applicable to Indirect Discharges (Pretreatment)

- ☐ 17. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Drinking Water Regulations

Check All That Apply

- ☐ 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

- ☐ 7. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Toxic Substances

Check All That Apply

- ☐ 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)

- ☐ 10. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Pesticide Regulations

Check All That Apply

- ☐ 1. FIFRA Pesticide Use Classification (40 CFR 162)
- ☐ 2. Procedures Storage and Disposal 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

- ☐ 9. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Environmental Clean-Up, Restoration, Corrective Action

Check All That Apply

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

- ☐ 2. RCRA Corrective Action

☐ 3. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Facility Name	LDM Technologies, Inc.
Facility Location:	110 N. 8th Street Byesville, OH 43723
Facility ID Number(s):	OHD058392499

A05-0046

AUG 21 2001

National Environmental Achievement Track

Application Form

LDM Technologies, Inc.- Byesville
Name of facility

LDM Technologies, Inc.
Name of parent company (if any)

110 N. 8th Street
Street address

street address
Street address (continued)

Byesville, OH 43723
City/State/Zip code

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

Name Byron Shaurer

Title Environmental Manager

Phone 740-685-2506

Fax 740-685-3977

E-mail bshaurer@ldmtech.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?

LDM Technologies, Inc. is a Tier II supplier to General Motors of horizontal injection molded plastic automotive products. Both interior and exterior painted products are also manufactured and supplied to General Motors.

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
3089

NAICS

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.

OHD058392499

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.

Please see checklist enclosed

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?

Both ISO 14001 & QS9000 Certified

Why do we need this information?

Facilities need to 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 Auditing

☒ Third-party assessment

- ☒ ISO 14001 Certification
- ☐ Other

Why do we need this information?

Facilities need to 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 need 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
Total Solid Waste	$12,000/mo.	US Dollars	$4,000/mo.	US Dollars

i. How is the current level an improvement over the previous level?

Disposal costs is a direct comparison with volume generated for disposal. Therefore, volume generated and costs have been reduced by 66%.

ii. How did you achieve this improvement?

Implementing recycling programs for plastic, cardboard and ppe used in the manufacturing process.

Second 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
Total Water Use	81,250 gallons/mo.	US gallons	56,250 gallons/mo.	US Gallons

i. How is the current level an improvement over the previous level?

Reduction in water make up usage for painting operations and processes by 31% per monthly usage.

ii. How did you achieve this improvement?

Recycling of water blasting water used to clean paint related equipment.

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 page.

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

First aspect you've selected

a. What is the aspect? Hazardous Waste

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 — 285,000 lbs (Quantity/Units)

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

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.	☒ Option A: Absolute value	150,000 lbs (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
e. How will you achieve this improvement?	Implementation of corrective actions and procedures in the format of an EMS Program with goals and objectives.	

Second aspect you've selected

a. What is the aspect?	Total Solid Waste - Spent Absorbent Materials	
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	6 tons (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.	☒ Option A: Absolute value	0 (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
e. How will you achieve this improvement?	Implement Recycling Program for all absorbent materials. Program will be structured into an EMS Program with goals and objectives.	

Third aspect you've selected

a. What is the aspect?	Emissions of VOCs from Mix Room	
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	2.3 lbs/hr (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.	☒ Option A: Absolute value	0 (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
e. How will you achieve this improvement?		

Fourth aspect you've selected

a. What is the aspect?	Discharges of Dissolved Solids to Water	
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	300 lbs (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.	☒ Option A: Absolute value	0 (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
e. How will you achieve this improvement?	Implement a capture and filtration process for treatment of the water prior to discharge. This will be structured in an EMS Program with goals and objectives.	

Why do we need this information?

Facilities need to 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?	Within the EMS, the environmental aspects will consider concerns within the facility operations as well as global and local community conerns. A communication log is maintained to identify what type of response is required for response to local and global environmental partners.
2 How do you inform community members of important matters that affect them?	Local newspaper publications, corporate website available to public access and publications available to public in reception lobby.
3 How will you make the Achievement Track Annual Performance Report available to the public?	☒ Website www.ldmtech.com ☒ Newspaper ☐ Open Houses ☐ Other

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

	Organization	*Name*	*Phone number*
Representative of a Community/ Citizen Group	LEPC	Tim Milner	740-435-8142
State/Local Regulator	OEPA	Ralph Witte	740-380-5241
Other community/local reference	Byesville POTW	Matt Stiers	740-685-6239

On behalf of LDM Technologies, Inc.
[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 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 8-17-01

Printed Name/Title Byron Shaurer / Environmental Manager

Facility Name LDM Technologies, Inc. - Byesville

Facility Street Address 110 N. 8th Street Byesville, OH 43723

Facility ID Numbers OHD058392499

National Environmental Achievement Track

Environmental Requirements Checklist

We've included the following Checklist to help you answer questions in Section A, Tell us about your facility. The Checklist will help you identify the major federal, state, tribal, and local environmental requirements that apply at your facility, but it is not an exhaustive list of all environmental requirements that may be applicable at your 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).

Air Pollution Regulations

Check All That Apply

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

- ☐ 13. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Hazardous Waste Management Regulations

Check All That Apply

- ☒ 1. Identification and Listing of Hazardous Waste (40 CFR 261)
  - ☒ - Characteristic Waste
  - ☒ - Listed Waste
- ☒ 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
  - ☒ - Manifesting
  - ☒ - 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 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)

☐ 8. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Hazardous Materials Management

Check All That Apply

☒ 1. Control of Pollution by Oil and Other 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)

☐ 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Solid Waste Management

Check All That Apply

☐ 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

☐ 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Water Pollution Control Requirements

Check All That Apply

- ☒ 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)
  Name of POTW Byeville Sewer Dept.
  ID # of POTW
- ☐ 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, and Processing of Sewage Sludge
- ☐ 15. Oil Discharge Containment, Control and Cleanup
- ☒ 16. Standards Applicable to Indirect Discharges (Pretreatment)

- ☐ 17. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Drinking Water Regulations

Check All That Apply

- ☐ 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

- ☐ 7. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Toxic Substances

Check All That Apply

- ☐ 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)

- ☐ 10. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Pesticide Regulations

Check All That Apply

- ☐ 1. FIFRA Pesticide Use Classification (40 CFR 162)
- ☐ 2. Procedures Storage and Disposal 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

- ☐ 9. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Environmental Clean-Up, Restoration, Corrective Action

Check All That Apply

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

- ☐ 2. RCRA Corrective Action

☐ 3. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Facility Name	LDM Technologies, Inc.
Facility Location:	110 N. 8th Street Byesville, OH 43723
Facility ID Number(s):	OHD058392499