



A03-0029 11-22-02

Application Form

Front Royal

Name of facility*

E.I. duPont deNemours and Co., Inc.

Name of parent company (if any)

7961 Winchester Road

Street address

Street address (continued)

Front Royal, Virginia 22630

City/State/Zip code

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

Name Mr./Mrs./Ms./Dr. Mr. James J. Nicola

Title Environmental Manager, DuPont Front Royal

Phone (540) 622-1264

Fax (540) 622-1206

E-mail jim.j.nicola-1@usa.dupont.com

Facility/Company Website virginia.dupont.com

* If you are applying for multiple facilities, you must call 1-888-339-PTRK(7875)

Section A

Tell us about your facility.

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?

The Front Royal site is located on 200 acres in a rural setting in Warren County, about 70 miles from Washington, D.C. Constructed in 1981, the facility is 7 acres under roof with about 9 acres of floor space. It is one of four manufacturing plants with the sole responsibility for manufacture and distribution of DuPont's high performance coatings business in the United States. High performance paint coatings are for industrial, maintenance and automotive finishes industries; about \$4 billion global business for DuPont. For more information regarding our facility and our products, visit our web site at <http://virginia.dupont.com>.

For more than 70 years, DuPont has been the leading name in the automotive refinishing industry. DuPont Performance Coatings, formed from DuPont Automotive finishes and DuPont's acquisition of Herberts, is the world's largest supplier of OEM and aftermarket coatings and the world's third largest coatings company, overall.

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

NAICS
325511 325211 _____

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? If you checked "Yes" in question 3 and have fewer than 50 employees at your facility, then you are considered a "small facility" by the Performance Track Program.

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

5 Complete the Environmental Requirements Checklist on pages 32-38 of the instructions and enclose it with your application.

Section A, continued

- 6 Optional: Is there anything else you would like to tell us about your facility? Do you participate in other voluntary programs at the local, tribal, State, or Federal level?

At The Corporate Level:

DuPont is on a journey, which was set by the focus of CEO Ed Woolard in 1989 when he defined corporate environmentalism as, "an attitude and a performance commitment that places corporate environmental stewardship fully in line with public desires and expectations." Over the past 10 years, DuPont has moved from meeting the standards of regulatory compliance to improving environmental performance beyond requirements and working hard to earn the trust of the public. Our next initiatives are focused on maintaining public trust by demonstrating sustainable growth with a keen awareness and commitment to conducting business practices in a safe and environmentally conscious manner. DuPont believes that all injuries and occupational illnesses, as well as safety and environmental incidents, are preventable, and our goal for all of them is zero.

In 1992 DuPont restructured its corporate Safety, Health, and Environmental program to focus on Responsible Care®. The new Safety, Health, and Environmental Excellence Center - known as the SHE Excellence Center, provides leadership, and oversight of the six Responsible Care® Codes for all of the DuPont sites. Through the SHE Excellence Center, several Corporate Goals were met including a goal for a 90% reduction of air carcinogen emissions, and a goal for a 50% reduction of packaging waste, both by the Year 2000. There is a new corporate goal of holding energy consumption flat to 1990 levels by the year 2010. In addition, by the year 2010, 10% of energy will be derived from renewable resources.

At The Business Unit Level

The major business at the Front Royal Site is Performance Coatings. This business continues to make significant progress towards our goal of zero. Continuously improving environmental performance and working towards established goals and targets involves everyone in the business, including manufacturing, maintenance, technical, and other personnel. Consistent with the Corporation's hierarchical approach to handling wastes and emissions, the Performance Coatings business gives preference to management methods that eliminate or reduce waste and emission generation at the source, followed by methods by which wastes or emitted substances are beneficially reused or recycled. When wastes are generated that can not be reused or recycled, the Performance Coatings business ensures that these materials are treated and/or disposed of safely, effectively, and responsibly. The objective is to achieve sustainable growth through integration of business and environmental plans.

The Performance Coatings business continues to work in the direction of Sustainable Growth which is defined as "the creation of shareholder and societal value while decreasing our environmental footprint." Sustainable Growth has a triple bottom line:

Reducing Safety and Health Incidents and Environmental Footprint
Creating Societal Value
Creating Shareholder Value

At the Front Royal Site Level:

The Front Royal site is located on 200 acres in a rural setting in Warren County, about 70 miles from Washington, D.C. Constructed in 1981, the facility is 7 acres under roof with about 9 acres of floor space. It is one of ten manufacturing plants with the sole responsibility for manufacture and distribution of DuPont's high performance coatings business in the United States. High performance paint coatings are for industrial, maintenance and automotive finishes industries; about \$4 billion global business for DuPont.

At Front Royal DuPont, safety, health and environmental excellence is built into our work practices and operations as vital elements to our overall business success. In January, 2002 the Front Royal Site became an ISO 14001 Certified facility.

As a part of our continual improvement process the Site has significantly decreased emissions. For example, VOC emissions have been reduced by more than 50% since the mid 1990's.

Safety has always been part of the DuPont culture. There is no margin of error for careless acts and each individual is responsible not only for his or her own safety but the safety of colleagues. This individual responsibility along with the belief that all accidents are preventable is our guiding principle. The goal is zero safety incidents.

Front Royal DuPont promotes the general health of its employees and encourages good health through wellness programs and preventive medicine.

Front Royal DuPont is committed to environmental stewardship and has reached goals that go beyond what the law requires. Our site is located in the Shenandoah Valley surrounded by the Blue Ridge and Massanutten Mountains. The two forks of the Shenandoah River meet and the Skyline Drive begins at Front Royal. Operating an industry in such a panorama reinforces our commitment to protect the environment. Our business success and good relationship with our community is a result of commitment to environmental and economic interdependence.

An auditing program exists at Front Royal to improve environmental performance by expanding awareness of environmental matters and by routinely checking compliance with regulations and corporate policies. Front Royal has adopted the following framework for its auditing program:

- Working Principals
- Focus on Goal of Zero
- Strive for continual improvement
- Assess compliance with regulations
- Review documentation of compliance
- Review progress of findings from previous audits

Improve site awareness of environmental issues
Emphasize positive findings

The Front Royal site employees are actively involved in programs throughout the local community. We volunteer our time and efforts to participate in community organizations and charities with the encouragement and support of our site management. Activities include: serving on local government boards, mentoring in the local school systems, contributions to local youth groups, the United Way, March of Dimes, Blood Mobile, CPR/First Aid classes, development of a local fire department and our Adopt-a-Family Christmas program. All these activities are employee-initiated and employee-managed on a volunteer basis. Front Royal employees continue to be proactive in participating in programs to improve our communities and lend a helping hand to our neighbors.

We strive to be a good neighbor, complying with appropriate laws and regulations. In addition, we work for the betterment of the local area, consistent with our relative size within the community, both financially and through participation in appropriate activities and organizations that enhance continued community support of our plant, the DuPont corporate image, and the chemical industry in general. Monthly safety meetings continuously emphasize safety in our work habits as well as crossing over into our personal lives and our neighborhoods.

For more information regarding the DuPont Front Royal Site, please visit our web site at <http://virginia.dupont.com>.

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.

Section B

Tell us about your EMS.

Read the EMS requirements on page 9-12 of instructions.
Tell us if your EMS meets these requirements for:

- 1 Environmental policy _____ Yes No
- 2 Planning _____ Yes No
- 3 Implementing and operation _____ Yes No
- 4 Checking and corrective action _____ Yes No
- 5 Management review _____ Yes No
- 6 Have you done a comprehensive review of all activities conducted at your facility that could impact the environment? (i.e., have you done an aspect analysis?) Yes No
- 7 Have you classified your aspects based on their potential harm to the environment, on community concerns, and/or on other objective factors? (i.e., have you determined your significant aspects?) Yes No
- 8 When did you last update your aspect analysis? (mo/yr) 2/2002
- 9 Have you completed at least one EMS cycle (plan-do-check-act)? Yes No
- 10 Did this cycle include both an EMS and a compliance audit? Yes No
- 11 Have you completed an objective self-assessment or third-party assessment of your EMS? Yes No

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

Self-assessment

Third-party assessment

GEMI

ISO 14001 Certification

CEMP

Other

Other Utilized actual ISO 14001 standards

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.

Section C

Tell us about your past achievements and future commitments.

Part 1 You must report past achievements for at least two environmental aspects, and you must choose these aspects from the Environmental Performance Table on pages 29-31 of the instructions. Please quantify each of your aspects using the units listed for that aspect in the Environmental PTrack Information Hotline at 1-888-339-PTRK.

Note to small facilities: If you are a small facility, you must report past achievements for only one environmental aspect.

First achievement

1 What aspect have you selected from the Table on page 29-31?	Emissions of VOC's	
2 What units are you using to quantify this aspect? (See Table, page 29-31.)	pounds	
	PAST	CURRENT
3 List the past annual quantity of the aspect (from two years ago) and the current annual quantity of the aspect (from the most recent year for which you have data).	242,600	190,000
4 What are the years for which you are reporting these quantities?	1999	2001
5 Estimate your past normalizing factor (Page 18 of the Instructions will help you calculate this.)	1.2	1.0
6 What is your normalizing factor based on (e.g., production, employment)?	Production	
7 You reported an improvement in the quantity of the aspect in Question 3. How did you achieve this improvement?	<p>This has been a result of forming cross-sectional task teams to identify opportunities for reducing source emissions. Examples of specific opportunities identified and addressed by these teams are as follows:</p> <ul style="list-style-type: none"> * Implementing closed loading practices in the manufacturing area * Retrofitted the dispersion mills by enclosing the hoppers * Machined and sealed the product tank manways 	

Section C, continued

Second achievement

1 What aspect have you selected from the Table on page 29-31?	Recycled/Reused Materials Use	
2 What units are you using to quantify this aspect? (See Table, page 29-31.)	pounds	
	PAST	CURRENT
3 List the past annual quantity of the aspect (from two years ago) and the current annual quantity of the aspect (from the most recent year for which you have data).	127,500	207,000
4 What are the years for which you are reporting these quantities?	1999	2001
5 Estimate your past normalizing factor (Page 18 of the Instructions will help you calculate this.)	1.2	1.0
6 What is your normalizing factor based on (e.g., production, employment)?	Production	
7 You reported an improvement in the quantity of the aspect in Question 3. How did you achieve this improvement?	<p>Prior to 1998 there was no market identified for solvent recovery stillbottom waste. Since that time, through engineering and marketing efforts, a sizeable portion of this hazardous waste stream is being utilized as a useful product.</p> <p>Investigation and development of means to convert a hazardous waste stream from the solvent recovery distillation process to a saleable product.</p>	

Part 2 You must make future commitments for at least four environmental aspects, and you must choose these aspects from the Environmental Performance Table on pages 29-31 of the Instructions. The aspects you select for your future commitments should be related to the objectives and targets in your EMS. Where possible, they also should be identified as having a significant environmental impact in your EMS. No more than two of your aspects can be from the same environmental category. If you're not sure how your objectives and targets fit into our aspects or whether your aspects are significant, call the PTrack Information Hotline at 1-888-339-PTRK.

Once you have chosen your four environmental aspects, then fill in all the necessary information for these aspects in the tables on pages 7-10 of this form. Please quantify each of your aspects using the units listed for that aspect in the Environmental Performance Table. Each table that you must fill in corresponds to one of the environmental aspects you have chosen.

We will assume that your performance commitments are based on a constant production or employment level. If you would like to base your commitment on changing production or employment, please fill out optional questions 6a and 6b.

Note to small facilities: If you are a small facility, you must report future commitments for only two environmental aspects.

Section C, continued

First commitment

1 What aspect have you selected from the Table on pages 29-31?	Hazardous Solid Waste (Plant Wide)	
2 What units are you using to quantify this aspect?	pounds	
3a Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3b If no, please explain why you believe this aspect should be included as a performance commitment.	n/a	
	CURRENT	FUTURE
4 List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	8.3 million	11.9 million
5 What are the years for which you are reporting these quantities?	2001	2005
6a (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	1.67
6b (Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
7 You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	Implement wash and save process in isocyanate production facility. This will allow utilizing a batch solvent to wash equipment which will be saved and used as a raw material in the next batch vs being disposed of as waste. In addition efforts are underway to increase effectiveness of the solvent recovery system.	
8a Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
8b If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	RCRA Regulated - There are no quantitative limits or compliance deadlines involved with this waste.	

Section C, continued

Second commitment

1 What aspect have you selected from the Table on pages 29-31?	Emissions of VOC's (Plant Wide)	
2 What units are you using to quantify this aspect?	pounds	
3a Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3b If no, please explain why you believe this aspect should be included as a performance commitment.	n/a	
	CURRENT	FUTURE
4 List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	189,600 Pounds	224,000 Pounds
5 What are the years for which you are reporting these quantities?	2001	2005
6a (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	1.67
6b (Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
7 You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	<p>There several initiatives underway to continually reduce VOC emissions such as:</p> <ul style="list-style-type: none"> * Identifying design changes to the filling machine wash cycle equipment. * Install vapor return system in Resin manufacturing 	
8a Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
8b If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	Clean Air Act Title V Permit- Current VOC limits are 350,000 lbs per year Even with significant increase in production Front Royal is committed to stay well under permit limits.	

Section C, continued

Third commitment

1 What aspect have you selected from the Table on pages 29-31?	Recycled/Reuse Materials Use	
2 What units are you using to quantify this aspect?	pounds	
3a Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3b If no, please explain why you believe this aspect should be included as a performance commitment.	n/a	
	CURRENT	FUTURE
4 List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	207,000	230,000
5 What are the years for which you are reporting these quantities?	2001	2005
6a (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	N/A
6b (Optional) What is your normalizing factor based on (e.g., production, employment)?	N/A	
7 You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	<p>Work with marketing to develop and grow market for Paint Concentrate (i.e. Still bottoms from distillation units normally disposed of as hazardous waste).</p> <p>Work with R&D within DuPont to utilize Paint Concentrate where practical for Industrial Coatings Products made at Front Royal. At this point a normalizing factor has not been identified, however efforts will continue to develop a normalizing factor in the future.</p>	
8a Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
8b If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.		

Section C, continued

Fourth commitment

1 What aspect have you selected from the Table on pages 29-31?	Total Energy use (Resin Area - Peroxide Storage Building)	
2 What units are you using to quantify this aspect?	Btu (Heating) Btu (Cooling)	
3a Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3b If no, please explain why you believe this aspect should be included as a performance commitment.	n/a	
	CURRENT	FUTURE
4 List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	338,078 BTU's (heatings) 765,600 BTU's (Cooling)	154,000 BTU's (Heating) 342,000 BTU's (Cooling)
5 What are the years for which you are reporting these quantities?	2001	2005
6a (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	N/A
6b (Optional) What is your normalizing factor based on (e.g., production, employment)?	N/A	
7 You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	By initiating an one time project to improve insulation effectiveness and improving heating & cooling system for Peroxide Storage building in the Resin Area. The estimated reduction in energy are as follows: Heating: 54% (338,078 btu's to 154,000 btu's) Cooling: 55% (765,600 btu's to 342,000 btu's)	
8a Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
8b If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.		

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.

Section D

Tell us about your public outreach and reporting.

1 How do you identify and respond to community concerns?

This is done in several ways:

- o Through the Front Royal Warren County Chamber of Commerce
- o Our good working relationship with the regulatory community
- o Membership on various local community outreach organizations

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

- o Same as those listed above

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

Website www.virginia.dupont.com (do not type the "www" in the address)

Newspaper

Open Houses

Other

DuPont's Annual Sustainable Growth Progress Report

Section D, continued

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
<i>Representative of a Community/ Citizen Group</i>	Warren County Chamber of Commerce	Kelly Walker	(540) 635-3185
		Maria Dutton	(540) 636-1402
<i>State/tribal/local regulator</i>	Virginia Department of Environmental Quality (DEQ)	Patty Bounviri	(540) 574-7823
		Barry Brandon	(540) 574-7894
		Mike Bahorsky	(540) 574-7856
<i>Other community/local reference (e.g., emergency management official or business associate)</i>	Rotary Club	Doug Stanley	(540) 636-4600

Section E

Application and Participation Statement.

On behalf of DuPont Front Royal
[my facility],

I certify that

I have read and agree to the terms and conditions for Application and Participation in the National Environmental Performance Track, 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 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	_____
Printed Name/Title	<u>Mr./Mrs./Ms./Dr. Mr. John C. LaBarca / Plant Manager</u>
Phone Number/E-mail	<u>(540) 622-1216/john.c.labarca@usa.dupont.com</u>
Facility Name	<u>DuPont Front Royal</u>
Facility Street Address	<u>7961 Winchester Road</u>
City/State/Zip Code	<u>Front Royal, Va 22630</u>

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK (7875) or e-mail ptrack@indecon.com.

To submit your application:

- 1) E-mail the completed application to ptrack@indecon.com,
and
- 2) Fax the completed and signed Section E (**not** the entire application) to (617) 354-0463.

If you cannot e-mail the application, mail a hard copy of the entire completed application to:

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

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 40 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

Environmental Requirements Checklist

Use the Environmental Requirements Checklist to answer Question 5 in *Section A, Tell us about your facility*. This 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.

Fill in your facility information below and enclose the completed Checklist with your application.

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

Other (you must list these if applicable)

- 13. Federal, State, tribal, or local regulations not listed above.
- 14. ID Numbers (specify whether State or Federal).
Air Permit Registration #80992

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)

Other (you must list these if applicable)

- 8. Federal, State, tribal, or local regulations not listed above
- 9. ID Numbers (specify whether State or Federal).
EPA# VAD 980554539

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. Underground Storage Tank Regulations (40 CFR 280-282)

Other (you must list these if applicable)

- 7. Federal, State, tribal, or local regulations not listed above.
- 8. ID Numbers (specify whether State or Federal).
EPA# VAD 980554539

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

Other (you must list these if applicable)

- 6. Federal, State, tribal, or local regulations not listed above.
- 7. ID Numbers (specify whether State or Federal).

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
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)

Other (you must list these if applicable)

- 17. Federal, State, tribal, or local regulations not listed above.
- 18. ID Numbers (specify whether State or Federal).

Drinking Water Regulations N/A

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

Other (you must list these if applicable)

- 7. Federal, State, tribal, or local regulations not listed above.
- 8. ID Numbers (specify whether State or Federal).

Toxic Substances N/A

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)

Other (you must list these if applicable)

- 10. Federal, State, tribal, or local regulations not listed above.
- 11. ID Numbers (specify whether State or Federal).
EPA# VAD 980554539

Pesticide Regulations N/A

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

Other (you must list these if applicable)

- 9. Federal, State, tribal, or local regulations not listed above.
The Site technically is not covered under the above regulatory areas as it contracts thru certified applicators, the use of pesticides, etc. at the Site. The Site does insure that appropriate work practices are utilized by these contractors as they perform contracted services on the Site. No Restricted Use Pesticides are allowed on Site.
- 10. ID Numbers (specify whether State or Federal).

Environmental Clean-Up, Restoration, Corrective Action N/A

- 1. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund). Please identify and include date of Record of Decision.
- 2. RCRA Corrective Action. Please provide date of RCRA/HSWA permits that require corrective action.
- 3. Other Federal, State, tribal, or local environmental clean-up, restoration, corrective action regulations not listed above. Please include date of requirement.

Facility Name DuPont Front Royal

Facility Location: 7961 Winchester Road Front Royal, VA 22630