



A06-0051 07-07-03

Application Form

CYRO Industries

Name of facility*

CYTEC Industries & Degussa.

Name of parent company (if any)

1500 Richard Prewitt Drive

Street address

P.O. Box 388

Street address (continued)

Osceola AR 72370

City/State/Zip code

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

Name Mr./Mrs./Ms./Dr. Mr. Ed Smith

Title Safety, Health & Environmental Manager

Phone 870-563-1672

Fax 870-563-1679

E-mail ebs@cyro.com

Facility/Company Website www.cyro.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?

Acrylic molding compounds and acrylic sheet

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

NAICS
3081 _____

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?

Our facility has been inspected by OSHA and we have been certified as a VPP Star facility as of March, 2003.

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) Jan 2003
- 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 Self audit to ISO 14001 Standard

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 VOCs	
2 What units are you using to quantify this aspect? (See Table, page 29-31.)	tons/year	
	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).	1.9	1.3
4 What are the years for which you are reporting these quantities?	2000	2002
5 Estimate your past normalizing factor (Page 18 of the Instructions will help you calculate this.)	0.76	1.0
6 What is your normalizing factor based on (e.g., production, employment)?	lbs of production	
7 You reported an improvement in the quantity of the aspect in Question 3. How did you achieve this improvement?	Installed catalytic oxidizers on point sources to destruct VOCs from process vents. The catalytic oxidizers thermally destruct our lone HAP (methyl methacrylate). The oxidizers are 99.9 % efficient. We manifolded several process vents together and destruct the vapor that was previously released to the atmosphere.	

Section C, continued

Second achievement

1 What aspect have you selected from the Table on page 29-31?	Total hazardous waste	
2 What units are you using to quantify this aspect? (See Table, page 29-31.)	lbs	
	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).	666,800	504190
4 What are the years for which you are reporting these quantities?	2000	2002
5 Estimate your past normalizing factor (Page 18 of the Instructions will help you calculate this.)	0.76	1.0
6 What is your normalizing factor based on (e.g., production, employment)?	lbs of production	
7 You reported an improvement in the quantity of the aspect in Question 3. How did you achieve this improvement?	We directed a process waste stream through an additional recovery unit which which allows us to recover usable raw material. Before adding the additional recovery unit, the material became hazardous waste and was sent out for disposal.	

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?	Total hazardous waste	
2 What units are you using to quantify this aspect?	lbs	
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.		
	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.	504,190	300,000
5 What are the years for which you are reporting these quantities?	2002	2005
6a (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	
6b (Optional) What is your normalizing factor based on (e.g., production, employment)?		
7 You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	We plan to directed a process waste stream through an additional recovery unit which which will allow us to recover usable raw material. When we istall this recovery unit, the hazardous waste generated will be half of 2000 levels.	
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 rules for LQG of hazardous waste This commitment will reduce the amount of hazardous waste generated even though we will still remain a LQG.	

Section C, continued

Second commitment

1 What aspect have you selected from the Table on pages 29-31?	Hazardous Solid Waste	
2 What units are you using to quantify this aspect?	lbs	
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.		
	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.	200	0
5 What are the years for which you are reporting these quantities?	2002	2005
6a (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	
6b (Optional) What is your normalizing factor based on (e.g., production, employment)?		
7 You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	Replace all mercury containing light tubes with non-mercury containing tubes. Light tubes are being replaced as they are used up.	
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 requirements for universal waste. There is no requirement to use environmentally friendly light tubes but CYRO chooses to do so.	

Section C, continued

Third commitment

1 What aspect have you selected from the Table on pages 29-31?	EMISSIONS OF VOCS	
2 What units are you using to quantify this aspect?	lbs	
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.		
	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.	8415	1000
5 What are the years for which you are reporting these quantities?	2002	2005
6a (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	
6b (Optional) What is your normalizing factor based on (e.g., production, employment)?		
7 You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	CYRO will upgrade its leak detection and repair program for valves, pump seals, and flanges for equipment not monitored by automated monitoring 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.	SIP air permit. CYRO will reduce the permitted fugitive HAP emissions from 8,415 lbs. to 1,000 lbs by using this LDAR program.	

Section C, continued

Fourth commitment

1 What aspect have you selected from the Table on pages 29-31?	Noise	
2 What units are you using to quantify this aspect?	dBA	
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.		
	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.	90	85
5 What are the years for which you are reporting these quantities?	2002	2005
6a (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	
6b (Optional) What is your normalizing factor based on (e.g., production, employment)?		
7 You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	Install sound absorbing material in high noise areas.	
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.	29CFR 1910.95 Hearing Conservation Reduce noise in specific areas in the plant to below 85 dBA	

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?

We have a written procedure, EOP 43-02 which outlines the steps to take when someone expresses an interest regarding environmental issues. All external contacts are documented and followed up when necessary.

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

Newspaper ads, presentations at local community groups (Chamber of Commerce, Kiwanis, Rotary, etc.) local fire department tours, and the local Plant Manager's Association

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

- Website [www.](#)
- Newspaper
- Open Houses
- Other

CYRO will place an ad in the local newspaper describing the EMS annual summary and reference the report at the EPA website.

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

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	Northeast Arkansas Clinic	Dr. Brewer Rhodes	870-563-5888
<i>State/tribal/local regulator</i>	Arkansas Department of Environmental Quality	Ron Alexander	501-682-0866
<i>Other community/local reference (e.g., emergency management official or business associate)</i>	Osceola Fire Department	Eldon Walker	870-563-2022

Section E

Application and Participation Statement.

On behalf of CYRO Industries
[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. Clifford J. Thompson - Plant Manager</u>
Phone Number/E-mail	<u>870-563-1611 cjt@cyro.com</u>
Facility Name	<u>CYRO Industries</u>
Facility Street Address	<u>1500 Richard Prewitt Drive P.O. Box 388</u>
City/State/Zip Code	<u>Osceola, AR 72370</u>

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).
CAA 0509300194 State of Arkansas Air Permit

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).
RCRA ARD 139607048 Federal

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).

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

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

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).

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

Other (you must list these if applicable)

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

Environmental Clean-Up, Restoration, Corrective Action

- 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 CYRO Industries

Facility Location: 1500 Richard Prewitt Drive, Osceola, AR 72370

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 an 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