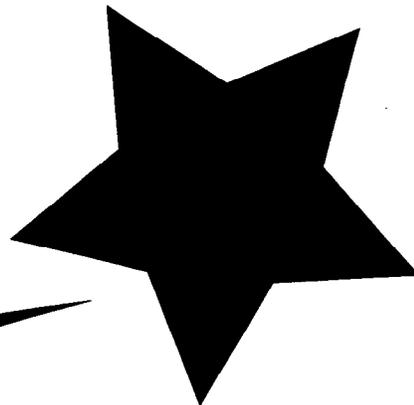


# National Environmental Achievement Track Application Form

*A01-0028*  
A01-0028



**SANDERS**  
A Lockheed Martin Company



November 8, 2000

Ms. Tracy Dyke  
The Performance Track Information Center  
c/o Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, Massachusetts 02140

**Re: Performance Track Program Application - Revised**

Based on our telephone discussion and e-mail from Ms. Jean Holbrook of EPA Region 1, please find the following clarifications to Sanders Performance Track Application.

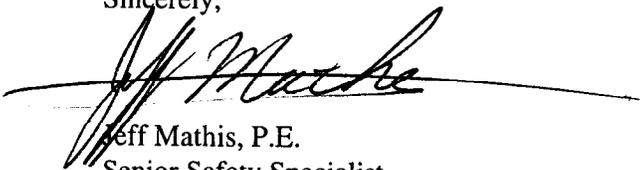
In response to your request for details on the activities that contributed to the reductions claimed in Aspect #2 of Attachment 3 (1998 to 1999 hazardous waste weight reductions), recycling and consolidation of facilities were the most important contributors.

Regarding future Aspect #3 (outdoor environmental conservation activities) and Aspect #4 (indoor or building-related environmental conservation activities) of Attachment 4, Aspect #3 is classified as a significant aspect and Aspect #4 is not classified as a significant aspect. During 2000, Sanders has performed at least two outdoor-related environmental conservation projects for a combined spending of \$200,000. These projects included removal of a crane, coated with lead-based paint and dredging of a stormwater runoff retention pond containing low concentrations (below state remediation standards) of contaminants. This year, Sanders has performed multiple indoor or building-related projects (e.g., asbestos abatement) for a combined spending of \$130,000.

Per my previous discussions with Ms. Holbrook, most of the indoor and outdoor-related environmental conservation activities are business improvement-related which are identified and resolved within one year. Because of the quick resolution of these projects, an up front list is not available. Sanders will provide an annual update of these projects, including baseline environmental levels, environmental improvements, and costs.

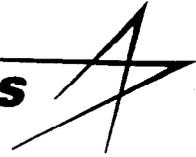
If you have questions regarding this information, please contact me at 603-885-6037.

Sincerely,

  
Jeff Mathis, P.E.  
Senior Safety Specialist

  
William Perry  
Director of Facilities/ES&H

cc: Mr. Dan Sweet, Sanders



September 27, 2000

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

A 01-0028

**Re: Performance Track Program Application**

Please find attached Sanders A Lockheed Martin Company application for the Performance Track Program. This is a multi-facility application of Sanders' facilities located in New Hampshire.

If you have questions regarding the content of this application, please contact me at 603-885-6037.

Sincerely,

  
Jeff Mathis, P.E.

cc: Mr. Ty Perry, Sanders  
Mr. Dan Sweet, Sanders

Attachment.



*National  
Environmental  
Achievement Track*

*Application Form*

Multi-facility application (See Attachment 1)

**Name of facility**

Sanders, A Lockheed Martin Company

**Name of parent company (if any)**

(See Attachment 1)

**Street address**

(See Attachment 1)

**Street address (cont.)**

(See Attachment 1)

**City/State/Zip code**

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

**Name** Mr. Jeffrey D. Mathis

**Title** Senior Safety Specialist

**Phone** 603-885-6037

**Fax** 603-885-0462

**E-mail** jeffrey.d.mathis@lmco.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.

# Section A

*Tell us about your facility.*

1 What do you do or make at your facility?

Aircraft self-protection systems and tactical surveillance and intelligence systems for the military. Other business areas include microwave, mission and space electronics; infrared imaging; and automated mission planning systems.

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  
3699 \_\_\_\_\_

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

*Section A, continued*

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

Yes  No

If yes, list in the right-hand column.

See "Environmental Requirements  
Checklist" (See Attachment 2)

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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.

See Attachment 2

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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?

Sanders has been a two year participant  
in the EPA Region I StarTrack program.

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*Why do we need this information?*

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

*What do you need to do?*

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

# Section B

*Tell us about your EMS.*

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

a. Environmental policy \_\_\_\_\_

Yes Sanders is revising the Environmental Policy to share environmental performance with the community.

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 \_\_\_\_\_

Third-party assessment

ISO 14001 Certification

Other \_\_\_\_\_

# Section C

## *Why do we need this information?*

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

## *What do you need to do?*

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

*Tell us about your past achievements and future commitments.*

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

Past achievements are provided in Attachment 3.

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

### **First aspect you've selected**

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
i. How is the current level an improvement over the previous level?				
<hr/>				
<hr/>				
<hr/>				
ii. How did you achieve this improvement?				
<hr/>				
<hr/>				
<hr/>				

*Section C, continued*

**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
<p>i. How is the current level an improvement over the previous level?</p> <p>_____</p> <p>_____</p> <p>_____</p>				
<p>ii. How did you achieve this improvement?</p> <p>_____</p> <p>_____</p> <p>_____</p>				

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

Proposed environmental aspects are provided in Attachment 4.

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

**First aspect you've selected**

a. What is the aspect? \_\_\_\_\_

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

Yes  No

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

Option A: Absolute value \_\_\_\_\_  
(Quantity/Units)

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

*Section C, continued*

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

Option A:  
Absolute value \_\_\_\_\_  
(Quantity/Units)

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

e. How will you achieve this improvement?

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**Second aspect you've selected**

a. What is the aspect?

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

Yes  No

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

Option A:  
Absolute value \_\_\_\_\_  
(Quantity/Units)

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

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

Option A:  
Absolute value \_\_\_\_\_  
(Quantity/Units)

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

e. How will you achieve this improvement?

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# Section D

Tell us about your public outreach and reporting.

## Why do we need this information?

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

## What do you need to do?

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

1 How do you identify and respond to community concerns?

External communications between Sanders and the public is primarily the responsibility of Communication Services, which is governed by both corporate and company policies and procedures. Communication Services refers all ESH-related questions to the ESH Department and coordinates all responses to the public.

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

Environmental-related information is provided to the public upon request, at the discretion of the ESH Director, and approval of Communication Services.

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

Website www.sanders.com

Newspaper

Open Houses

Other

The report will be made available to the public upon request and in conformance with Sanders' company procedures. This information will be stated on Sanders' web page.

*Section D, continued*

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

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

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5 List references below.

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	Nashua River Watershed Association (NRWA) 592 Main Street Groton, MA 01450	Ms. Elizabeth Aimsley-Campbell, Executive Director	978-448-0299
<i>State/Local regulator</i>	New Hampshire Department Environmental Services Water Division, P.O. Box 95 6 Hazen Drive Concord, New Hampshire 03301	Mr. Robert Minicucci II, P.E. Innovative Technology Director	603-271-2941
<i>Other community/local reference</i>	New Hampshire Business and Industry Association 122 North Main Street Concord, New Hampshire 03301	Mr. Tim Fortier Executive Director	603-226-0400

# Section E

## Application and Participation Statement

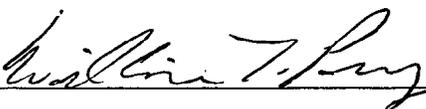
On behalf of See Attachment 1  
[my facility],

I certify that

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

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

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

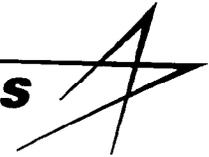
Signature/Date 

Printed Name/Title Mr. William T. Perry, ESH/Facilities Director

Facility Name See Attachment 1

Facility Street Address See Attachment 1

Facility ID Numbers See Attachment 1



## **ATTACHMENT 1**

### **Names of Sanders' Facilities Participating in Performance Track:**

Canal Street Facility  
95 Canal Street  
Nashua, New Hampshire 03060  
EPA ID# NHD000791889

H.W. Pope Technical Park (PTP)  
65 River Road  
Hudson, New Hampshire 03051  
EPA ID# NHD980668867

The PTP facility includes the following locations that is only used occasionally:

Litchfield Property  
Derry Road  
Litchfield, New Hampshire 03051  
EPA ID# NHD980917447

South Nashua Facility  
65 Spit Brook Road  
Nashua, New Hampshire 03061  
This campus includes Sanders Headquarters (NHQ) and the Richard A. Red Microelectronics Center (MEC)  
NHQ EPA ID# NHD001079219  
MEC EPA ID# NHD980914097

Merrimack Facility  
130 D.W. Highway, No.,  
Merrimack, New Hampshire 03054  
EPA ID# NHD000791616

The Merrimack Facility encompasses the following locations that are either used occasionally or staffed with Merrimack Facility-based personnel:

Milford Quarry  
North River Road  
Milford, New Hampshire 03055  
EPA ID# Not Applicable

Manchester 18  
1 Industrial Drive  
Londonderry, New Hampshire 03053  
EPA ID# NHD980916092

## **ATTACHMENT 2**

### **ENVIRONMENTAL REQUIREMENTS CHECKLISTS**

Facility List:

1. Canal Street Facility
2. H.W. Pope Technical Park Facility (includes Litchfield location)
3. South Nashua Facility
4. Merrimack Facility (includes the Milford Quarry and Manchester 18 locations)



**Hazardous Waste Management Regulations**

- 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 Status Standards for TSD Owners and Operators (40 CFR 265)
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- 7. Administered Permit Program (Part B) (40 CFR 270)

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

- 8. Env-Wm 400, 500, 600, 700, 900, 1200, 1400
- 9. \_\_\_\_\_

**Hazardous Materials Management**

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

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

6. \_\_\_\_\_
7. \_\_\_\_\_

**Solid Waste Management**

1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
2. Permit Requirements for Solid Waste Disposal Facilities
3. Installation of Systems of Refuse Disposal
4. Solid Waste Storage and Removal Requirements
5. Disposal Requirements for Special Wastes

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

6. \_\_\_\_\_
7. \_\_\_\_\_

**Water Pollution Control Requirements**

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

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

17. State of New Hampshire DES Water Rules Env-Ws
18. Local sewer ordinance

**Drinking Water Regulations**

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

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

7. \_\_\_\_\_
8. \_\_\_\_\_

**Toxic Substances**

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

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

10. \_\_\_\_\_
11. \_\_\_\_\_

**Pesticide Regulations**

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

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

- 9. \_\_\_\_\_
- 10. \_\_\_\_\_

**Environmental Clean-Up, Restoration, Corrective Action**

- 1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (*identify*)  
\_\_\_\_\_  
\_\_\_\_\_
- 2. RCRA Corrective Action (*identify*)  
\_\_\_\_\_  
\_\_\_\_\_

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

- 3. \_\_\_\_\_
- 4. \_\_\_\_\_



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- 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)**
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- 8. **Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)**
- 9. **Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)**

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

- 10. \_\_\_\_\_
- 11. \_\_\_\_\_

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- 4. Pesticide Licensing Requirements
- 5. Labeling of Pesticides
- 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- 7. Disposal of Pesticide Containers
- 8. Restricted Use and Prohibited Pesticides

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

- 9. \_\_\_\_\_
- 10. \_\_\_\_\_

**Environmental Clean-Up, Restoration, Corrective Action**

- 1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (*identify*)  
\_\_\_\_\_  
\_\_\_\_\_
- 2. RCRA Corrective Action (*identify*)  
\_\_\_\_\_  
\_\_\_\_\_

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

- 3. \_\_\_\_\_
- 4. \_\_\_\_\_

# National Environmental Achievement Track

## Environmental Requirements Checklist

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

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

**Facility Name:** Litchfield Location(included with the H.W. Pope  
Technical Park Facility for Performance Track program  
purposes.

**Facility Location:** Derry Road, Litchfield, New Hampshire 03051

**Facility ID Number(s):** NHD980917447  
*(attach additional sheets if necessary)*

### Air Pollution Regulations

Check All  
That Apply

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

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

- |     |  |                                     |
|-----|--|-------------------------------------|
| 13. | <u>NHDES Air Pollution Control Rules Env-A</u> | <input checked="" type="checkbox"/> |
| 14. | <u></u>  | <input type="checkbox"/>            |

**Hazardous Waste Management Regulations**

- 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 Status Standards for TSD Owners and Operators (40 CFR 265)
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- 7. Administered Permit Program (Part B) (40 CFR 270)

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

- 8. Env-Wm 400, 500, 600, 700, 900, 1200, 1400
- 9. \_\_\_\_\_

**Hazardous Materials Management**

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

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

6. \_\_\_\_\_
7. \_\_\_\_\_

**Solid Waste Management**

1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
2. Permit Requirements for Solid Waste Disposal Facilities
3. Installation of Systems of Refuse Disposal
4. Solid Waste Storage and Removal Requirements
5. Disposal Requirements for Special Wastes

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

6. \_\_\_\_\_
7. \_\_\_\_\_

**Water Pollution Control Requirements**

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

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

- 17. State of New Hampshire Department of Environmental Services   
Water Rules (Env-Ws)
- 18. \_\_\_\_\_

**Drinking Water Regulations**

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

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

- 7. \_\_\_\_\_
- 8. \_\_\_\_\_

**Toxic Substances**

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

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

- 10. \_\_\_\_\_
- 11. \_\_\_\_\_

**Pesticide Regulations**

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

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

- 9. \_\_\_\_\_
- 10. \_\_\_\_\_

**Environmental Clean-Up, Restoration, Corrective Action**

- 1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (*identify*)  
\_\_\_\_\_  
\_\_\_\_\_
- 2. RCRA Corrective Action (*identify*)  
\_\_\_\_\_  
\_\_\_\_\_

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

- 3. \_\_\_\_\_
- 4. \_\_\_\_\_



**Hazardous Waste Management Regulations**

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

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

- 8. Env-Wm 400, 500, 600, 700, 900, 1200, 1400
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**Hazardous Materials Management**

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153)
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- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
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- 5. Community Right-to-Know Regulations (40 CFR 350-372)

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

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**Solid Waste Management**

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

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**Water Pollution Control Requirements**

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

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

17. State of New Hampshire DES Water Rules Env-Ws
18. Local sewer ordinance

**Drinking Water Regulations**

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

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

7. \_\_\_\_\_
8. \_\_\_\_\_

**Toxic Substances**

1. **Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704)**
2. **Import and Export of Chemicals (40 CFR 707)**
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9. **Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)**

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

10. \_\_\_\_\_
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**Pesticide Regulations**

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

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

- 9. \_\_\_\_\_
- 10. \_\_\_\_\_

**Environmental Clean-Up, Restoration, Corrective Action**

- 1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (*identify*)  
\_\_\_\_\_  
\_\_\_\_\_
- 2. RCRA Corrective Action (*identify*)  
\_\_\_\_\_  
\_\_\_\_\_

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

- 3. \_\_\_\_\_
- 4. \_\_\_\_\_

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

Facility Name: MERRIMACK FACILITY

Facility Location: 130 D.W. HIGHWAY NO. MERRIMACK, NEW HAMPSHIRE

RCRA NHD000791616

Facility ID Number(s): \_\_\_\_\_  
(attach additional sheets if necessary)

### Air Pollution Regulations

Check All  
That Apply

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

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

- |     |  |                                     |
|-----|--|-------------------------------------|
| 13. | <u>NHDES Air Pollution Control Rules Env-A</u> | <input checked="" type="checkbox"/> |
| 14. | _____  | <input type="checkbox"/>            |

**Hazardous Waste Management Regulations**

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

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

- 8. ENV.-WM 400, 500, 600, 700, 900, 1200, 1400
- 9. \_\_\_\_\_

**Hazardous Materials Management**

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- 5. Community Right-to-Know Regulations (40 CFR 350-372)

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

6. \_\_\_\_\_
7. \_\_\_\_\_

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

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

6. \_\_\_\_\_
7. \_\_\_\_\_

**Water Pollution Control Requirements**

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2. Designation of Hazardous Substances (40 CFR 116)
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
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7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
10. Water Quality Standards
11. Effluent Limitations for Direct Dischargers
12. Permit Monitoring/Reporting Requirements
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
14. Collection, Handling, Processing of Sewage Sludge
15. Oil Discharge Containment, Control and Cleanup
16. Standards Applicable to Indirect Discharges (Pretreatment)

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

- 17. State of New Hampshire DES Water Rules Env-Ws
- 18. Local sewer ordinance

**Drinking Water Regulations**

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

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

- 7. \_\_\_\_\_
- 8. \_\_\_\_\_

**Toxic Substances**

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

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

- 10. \_\_\_\_\_
- 11. \_\_\_\_\_

**Pesticide Regulations**

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

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

- 9. \_\_\_\_\_
- 10. \_\_\_\_\_

**Environmental Clean-Up, Restoration, Corrective Action**

- 1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (*identify*)  
\_\_\_\_\_  
\_\_\_\_\_
- 2. RCRA Corrective Action (*identify*)  
\_\_\_\_\_  
\_\_\_\_\_

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

- 3. \_\_\_\_\_
- 4. \_\_\_\_\_



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

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

6. State of NH Dept of Env. Svc - Misc. Water Rules ENV-WS
7. \_\_\_\_\_

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

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

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- 7. Disposal of Pesticide Containers
- 8. Restricted Use and Prohibited Pesticides

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

- 9. \_\_\_\_\_
- 10. \_\_\_\_\_

**Environmental Clean-Up, Restoration, Corrective Action**

- 1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (*identify*)  
\_\_\_\_\_  
\_\_\_\_\_
- 2. RCRA Corrective Action (*identify*)  
\_\_\_\_\_  
\_\_\_\_\_

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

- 3. \_\_\_\_\_
- 4. \_\_\_\_\_

# National Environmental Achievement Track

## *Environmental Requirements Checklist*

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

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

**Facility Name:** Manchester 18 (included with the Merrimack Facility  
for Performance Track program purposes)

**Facility Location:** 1 Industrial Drive, Londonderry, New Hampshire

**Facility ID Number(s):** NHD980916092  
*(attach additional sheets if necessary)*

### Air Pollution Regulations

Check All  
That Apply

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

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

- |     |  |                                     |
|-----|--|-------------------------------------|
| 13. | <u>NHDES Air Pollution Control Rules Env-A</u> | <input checked="" type="checkbox"/> |
| 14. | <u>_____</u>                                   | <input type="checkbox"/>            |

**Hazardous Waste Management Regulations**

- 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 Status Standards for TSD Owners and Operators (40 CFR 265)
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- 7. Administered Permit Program (Part B) (40 CFR 270)

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

- 8. ENV-WM 400, 500, 600, 700, 900, 1200, 1400
- 9. \_\_\_\_\_

**Hazardous Materials Management**

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

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

6. \_\_\_\_\_
7. \_\_\_\_\_

**Solid Waste Management**

1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
2. Permit Requirements for Solid Waste Disposal Facilities
3. Installation of Systems of Refuse Disposal
4. Solid Waste Storage and Removal Requirements
5. Disposal Requirements for Special Wastes

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

6. \_\_\_\_\_
7. \_\_\_\_\_

**Water Pollution Control Requirements**

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

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

- 17. STATE OF NH DEPT OF ENV. SVC. MISC. STATE RULES ENV-WS
- 18. \_\_\_\_\_

**Drinking Water Regulations**

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

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

- 7. \_\_\_\_\_
- 8. \_\_\_\_\_

**Toxic Substances**

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

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

- 10. \_\_\_\_\_
- 11. \_\_\_\_\_

**Pesticide Regulations**

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

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

- 9. \_\_\_\_\_
- 10. \_\_\_\_\_

**Environmental Clean-Up, Restoration, Corrective Action**

- 1. Comprehensive Environmental Response, Compensation and Liability  
Act (Superfund) (identify)   
\_\_\_\_\_  
\_\_\_\_\_
- 2. RCRA Corrective Action (identify)   
\_\_\_\_\_  
\_\_\_\_\_

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

- 3. \_\_\_\_\_
- 4. \_\_\_\_\_



November 29, 2000

Ms. Tracy Dyke  
The Performance Track Information Center  
c/o Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, Massachusetts 02140

**Re: Company Name Change Notification and Revision of  
Performance Track Program Application, Attachments 3 and 4**

Please let this correspondence serve as notice that the name of Sanders, a Lockheed Martin Company has been changed to BAE SYSTEMS Information and Electronic Systems Integration, Inc.

Based on my telephone discussion with Ms. Jean Holbrook of EPA Region 1, please find revised versions of Attachments 3 and 4 of the Performance Track Application. These tables have been revised in accordance with our November 8, 2000 correspondence to you.

If you have questions regarding this information, please contact me at 603-885-6037.

Sincerely,

Jeff Mathis, P.E.  
Senior Safety Specialist  
BAE SYSTEMS

William Perry  
Director of Facilities/ES&H  
BAE SYSTEMS

Attachments.

cc: Mr. Dan Sweet, BAE SYSTEMS

**ATTACHMENT #3  
PAST ENVIRONMENTAL ASPECTS GOALS AND OBJECTIVES**

Facility Name	Aspect #1	Aspect #2
Corporate-Wide Aspect Goal	Offset the cost impact of electric rate increases with reductions in consumption achieved through implementing a combination of operational energy conservation efforts and space consolidation projects. The result will be that actual 1999 electric costs will not be greater than 1998 actual electric costs. (Only power consumption rates provided for Performance Track Reporting). This aspect was classified as significant during 1999. Company-wide power consumption was reduced by 1.1% in 1999.	1999 5% weight reduction in hazardous waste from 1998 actual weight. This aspect was classified as significant during 1999. In 1999, company-wide hazardous waste weight was reduced by 66% compared with company-wide 1998 weight. Recycling and consolidation of facilities were the most important contributors to achieving this goal.
Canal Street Facility	1998 Power Consumption: 13,639 K KWH 1999 Power Consumption: 12,961 K KWH Percent Decrease: 5.0% Goal was met for this facility.	1998 Hazardous Waste Disposal Weight: 35,084 lbs 1999 Hazardous Waste Disposal Weight: 35,696 lbs Percent Decrease: -1.7% Goal was not met for this facility.
H.W. Pope Technical Park	1998 Power Consumption: 7,611 K KWH 1999 Power Consumption: 7,666 K KWH Percent Decrease: -0.1% Goal was not met for this facility.	1998 Hazardous Waste Disposal Weight: 3,888 lbs 1999 Hazardous Waste Disposal Weight: 1,743 lbs Percent Decrease: 55% Goal was met for this facility.
South Nashua Facility	1998 Power Consumption: 18,458 K KWH 1999 Power Consumption: 16,933K KWH Percent Decrease: 8.3% Goal was met for this facility.	1998 Hazardous Waste Disposal Weight: 265,517 lbs 1999 Hazardous Waste Disposal Weight: 126,866 lbs Percent Decrease: 52.2% Goal was met for this facility.
Merrimack Facility	1998 Power Consumption: 12,876 K KWH 1999 Power Consumption: 13,013 K KWH Percent Decrease: -1.05% Goal was not met for this facility.	1998 Hazardous Waste Disposal Weight: 9,387 lbs 1999 Hazardous Waste Disposal Weight: 7,753 lbs Percent Decrease: 17% Goal was met for this facility.
Milford Quarry Facility	1998 Power Consumption: 522 K KWH <sup>1</sup> 1999 Power Consumption: 508K KWH <sup>1</sup> Percent Decrease: 2.8% Goal was met for this facility.	1998 Hazardous Waste Disposal Weight: 0 lbs 1999 Hazardous Waste Disposal Weight: 0 lbs Percent Decrease: 0% Goal was not applicable for this facility.
Manchester 18	1998 Power Consumption: 4,488 K KWH <sup>2</sup> 1999 Power Consumption: 4,386 K KWH <sup>2</sup> Percent Decrease: 2.3% Goal was met for this facility.	

**ATTACHMENT 4  
PROPOSED ENVIRONMENTAL ASPECTS GOALS AND OBJECTIVES  
(Years 2000 through 2003)**

Facility Name	Aspect #1	Aspect #2	Aspect #3	Aspect #4
Company-Wide Aspect Goal <sup>1</sup>	Annual normalized hazardous waste disposal weight for each facility will be 2% less than previous years for 2001, 2002, and 2003. These reductions will be compared to a 2000 base year and normalized for annual sales (or labor hours). This aspect is classified as a significant aspect. These reductions will be achieved through recycling and source reduction activities.	Annual normalized non-recycled solid waste disposal weight for each facility will be 2% less than previous years for 2001, 2002, and 2003. These reductions will be compared to a 2000 base year and normalized for annual sales (or labor hours). This activity is classified as a significant aspect. These reductions will be achieved through recycling and source reduction activities.	Spend \$120,000 cumulative for the company over three years for outdoor environmental conservation-related projects that are not mandated by regulatory entities. The company will seek to spend approximately \$40,000 per year, but actual expenditures will vary with the issues as they are prioritized. <sup>2,3</sup> This activity is classified as a significant aspect.	Spend \$150,000 cumulative for the company over three years for indoor or building-related environmental conservation and accidental release-related projects that are not mandated by regulatory entities. The company will spend approximately \$50,000 per year, but actual expenditures will vary with the issues as they are prioritized. <sup>2,4</sup> This activity is not classified as a significant aspect.
Canal Street Facility	The Year 2000 annualized hazardous waste disposal weight is 319 pounds per million dollars sales (lb/\$MM) for combined facilities. The proposed annualized weights are: 313 lb/\$MM for Year 2001 306 lb/\$MM for Year 2002 300 lb/\$MM for Year 2003 Facility contributions to company totals are: 34 lb/\$MM for Year 2000 49 lb/\$MM for Year 2001 48 lb/\$MM for Year 2002 47 lb/\$MM for Year 2003	The Year 2000 annualized hazardous waste disposal weight is 2,762 lb/\$MM sales for combined facilities. The proposed annualized weights are: 2,707 lb/\$MM for Year 2001 2,653 lb/\$MM for Year 2002 2,600 lb/\$MM for Year 2003 Facility contributions to company totals are: 503 lb/\$MM for Year 2000 493 lb/\$MM for Year 2001 483 lb/\$MM for Year 2002 473 lb/\$MM for Year 2003	Due to the nature of these projects and three-year duration of this aspect, facility specific activities cannot be listed. However, these projects will be intended to protect surface and groundwater resources and include remediation, clean up, and exposure reduction.	Due to the nature of these projects and three-year duration of this aspect, facility specific activities cannot be listed. However, these projects will be intended to reduce exposure of company personnel and the public to chemicals (e.g., asbestos), infectious agents, and potential nuisances (e.g., noise abatement). These activities may also include water conservation projects.
H.W. Pope Technical Park (Includes the Litchfield Location)	Facility contributions to company totals are: 2 lb/\$MM for Year 2000 2 lb/\$MM for Year 2001 2 lb/\$MM for Year 2002 2 lb/\$MM for Year 2003	Facility contributions to company totals are: 363 lb/\$MM for Year 2000 356 lb/\$MM for Year 2001 348 lb/\$MM for Year 2002 341 lb/\$MM for Year 2003		
South Nashua Facility	Facility contributions to company totals are: 79 lb/\$MM for Year 2000 113 lb/\$MM for Year 2001 111 lb/\$MM for Year 2002 109 lb/\$MM for Year 2003	Facility contributions to company totals are: 565 lb/\$MM for Year 2000 555 lb/\$MM for Year 2001 543 lb/\$MM for Year 2002 532 lb/\$MM for Year 2003		
Merrimack Facility (Includes the Milford Quarry and Manchester 18)	Facility contributions to company totals are: 91 lb/\$MM for Year 2000 11 lb/\$MM for Year 2001 11 lb/\$MM for Year 2002 11 lb/\$MM for Year 2001	Facility contributions to company totals are: 428 lb/\$MM for Year 2000 420 lb/\$MM for Year 2001 411 lb/\$MM for Year 2002 402 lb/\$MM for Year 2003		

**FOOTNOTES:**

- 1 - Company-wide objectives and goals include facilities that are not included in this Performance Track application.
- 2 - Most of the indoor and outdoor environmental conservation activities are business improvement-related which are identified and resolved within one year. Because of the quick resolution of these projects, an up front list is not available. Therefore, an annual update of these projects, including baseline environmental levels, environmental improvements, and costs will be prepared.
- 3 - During 2000, the company has performed at least two outdoor-related environmental conservation projects for a combined spending of \$200,000. These projects included removal of a crane, coated with lead-based paint and dredging of a stormwater retention pond containing low concentrations (below state remediation standards) of contaminants.
- 4 - During 2000, the company has performed multiple indoor or building-related projects (e.g., asbestos abatement) for a combined spending of \$130,000.