



# Annual Performance Report

OMB No. 2010-0032  
Expiration Date: 06/30/03

**Facility Name:** Baxter Healthcare Corp. of Puerto Rico  
**Performance Track ID #:** A020002  
**Annual Performance Report #:** 1  
**Reporting Year:** 2001  
**Due Date:** 07/01/2002

## Section A. General Facility Information

Please supply or revise information in A.1 – A.8 as is necessary to ensure that it is accurate, complete, and up-to-date. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

**A.1 Name of your facility:** Baxter Healthcare Corp. of Puerto Rico

**A.2 Name of your parent company:** Baxter Healthcare Inc

**A.3 Facility contact person for the Performance Track program:**

**Name:** Mrs. Evet L. Vera

**Title:** Environmental Manager

**Phone:** (787) 735-8021 ext. 2228

**Fax:** (787) 735-6343

**E-mail:** evet\_vera@baxter.com

**A.4 Facility's location**

**Street Address:** Road 721 KM 0.3

**Address (cont.):** Calle Mercedita Serralles

**City:** Aibonito

**State:** PR

**Zip Code:** 00705

**A.5 Facility's Website address (if any):**

**A.6 Number of employees (full-time equivalents) who currently work in the facility:**

More than 1000

**A.7 Does your company meet the Small Business Administration definition of a small business for your sector?**

No

**A.8 North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility:**

339112

**A.9 In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them here:**

No

**A.10 Please update the list of environmental requirements that apply to your facility by listing any changes that have taken place during this reporting period. If you have no changes to report, please enter "No changes".**

No changes

**Section B.  
Environmental Management System**

**B.1 Environmental Management System Assessment. Please summarize EMS assessments conducted *during the year*.**

**a. Was an EMS audit or other assessment done by an independent third party?**

Yes

**If yes, please provide the type (e.g., ISO 14001 certification), the scope, and the dates (mo/yr) of each assessment.**

Type	Scope	Dates (mo/yr)
ISO 14001	<p>The objectives of the audit were to review the facility's:(1)compliance status with respect to applicable EHS laws; (2) conformance with company EHS policies and procedures; (3) implementation of EHS management control systems; (4) assessment of EHS risk; and (5) assess the conformance of the environmental management system with the requirements of the ISO 14001 standard.</p> <p>John Patterson, from ERMCVS and a representative from Puerto Rico performed this audit. The audit was conducted from August 27, 2001 to Aug 28, 2001 utilizing as a protocol the EHS assessment checklist found in Section 1.4.3 of Baxter's EHS Manual and modified to incorporate applicable statutes and regulations, as well as the facility's response to Baxter's Long-Range EHS Audit Survey. The period generally under review was August 1999 through August 2001. The audit included:</p> <ul style="list-style-type: none"> <li>? a physical survey of the facility;</li> <li>? an examination of a sample of records available at the facility;</li> <li>? interviews and discussions with key facility management and staff;</li> <li>? an evaluation of the facility's programs and systems designed to assure continued adherence to EHS laws and regulations and internal environmental policies and procedures;</li> <li>? an assessment of the environmental management system against the ISO 14001 standard.</li> </ul>	08/2001

**b. Was an internal or corporate EMS audit conducted?** No

**If yes, please provide the scope and dates (mo/yr) of each audit.**

Scope	Date (mo/yr)
Audit of our EMS conducted, following EHS assessment checklist found in Section 1.4.3 of Baxter's EHS Manual which covers all the elements of ISO 14001	9/2000

**c. Was a compliance audit conducted?**

No

**If yes, please provide the scope and the dates (mo/yr) of each audit, and indicate who conducted the audit(s) (e.g., facility staff, corporate groups, third party).**

Scope	Dates	Who conducted
-------	-------	---------------

		the audit
Compliance audit conducted, following EHS assessment checklist found in Section 1.4.3 of Baxter's EHS Manual	09/2000	Division Personnel: Pat Bartholomew Excel Olan Facility Personnel: Roberto Mercado Evet L. Vera

**d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here.**

The following inspections are conducted in our facility on a periodic basis:

Weekly : Hazardous Waste Storage Areas

Weekly : Areas covered under SPCC Plan

Weekly : Environmental Management Checklist to verify areas affecting environmental aspects

Monthly : Areas covered under the Storm Water Pollution Prevention Plan

Monthly : Environmental Management Checklist

We also reviewed and updated the SPCC Plan, Emergency Response Plan and SWPP Plan and conducted the NPDES Multi-Sector General Permit Annual Comprehensive Compliance Inspection.

**e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audit**

Corrective actions taken as a result of assessments and compliance audits included; sending a letter to a government agency (PRASA) delegating Authority to Env. Manager to sign letters, conducting a scientific analysis of the waste composition in our facility to identify reuse, reduction and recycling opportunities, improvements were made to the hazardous waste operating procedure to insure proper labeling to include DOT and EPA codes, and a new area was built to store non-hazardous regulated waste, thus liberating space to facilitate management of containers in the hazardous waste storage area.

We have also identified opportunities to reduce hazardous waste generation, increase recycling of non-hazardous waste and reduce water consumption even more.

**f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?**

Yes

**If no, please explain your plans to correct these instances.**

**g. When was the last Senior Management review of your EMS completed?**

11/2001

**Who headed the review? Name:** Mrs. Evet L. Vera **Title:** Sr. Principal Engineer/Environmental Manager

**B.2 ISO 14001 Certification. Is your facility currently certified to ISO 14001?**

Yes

**B.3 Environmental Aspects Identification. When did your facility last conduct a systematic identification and/or review of your environmental aspects?**

10/2001

**B.4 Progress Toward Achieving Objectives and Targets. In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. You may limit the summary to environmental aspects that are *significant* and towards which progress has been made during the *reporting year*. In cases where *progress* relates specifically to a Performance Track performance commitment, complete the Environmental Aspect column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C."**

<b>Environmental Aspect</b>	<b>Progress Made This Year (e.g., quantitative or qualitative improvements, activities conducted)</b>
Generation of Non-Hazardous Waste	We reduced the generation of non-hazardous waste by 13.4% per hour of production. More material was reused this year to manufacture the same line of products (531,076 lb of PVC) sent to a sister facility as raw material. We recycled 13.5% more, which represents an overall of 55% of the waste was recycled and reground for reuse.
Generation of Hazardous Waste	The generation of hazardous waste remained at .019 lb/prod. hours for 2001. Even though we had an increased activity, the usage of solvents was more efficient, generating less waste per hour of production. We expect to see a decrease in waste generation for 2002 due to various automation machines that came into the facility during the third quarter of 2001. Other reduction opportunities were identified and are being implemented this year.
Air Emissions (VOC & HAPS)	See Section C for VOCs. During 2001 we experienced an increase in air emissions (VOC & HAPs) of 6% per production hour caused by an increase of production activity. This increase was more dramatic in the areas where most of the solvents are used. A project was identified to reduce the usage of IPA for sanitizing purposes, which will help reduce VOC emissions in 2002. In addition, it is expected that the automatization of several processes will also help reduce both VOC and HAP emissions due to the increased control of solvent usage in the equipments. Process engineering is also investigating the possibility of replacing methylene chloride with a different solvent thus reducing the emissions of this particular HAP due mainly to its health effects.
Water Usage/Discharge	See Section C In terms of absolute value, comparing the amount of well water used in 2000 vs 2001, we reduced the consumption by 18%. If measured on the basis of gallons used per hours of production, the reduction was close to 26%. This reduction was obtained mainly with the use of the Waste-Saver Evaporator and the recycling program established to reuse the waters in the boiler room. We have to consider that close to 19% of this reduction was caused by maintenance activities at the well (shut down during November 2001). The overall reduction of well water used was 15%.
Energy Usage	See Section C

**Section C.  
Environmental Performance Commitments**

Please use the tables below to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment.

**C.1 Performance Commitment 1**

a. Use this table to report data related to your first performance commitment.

<b>Category:</b>	<b>Water Use</b>				
<b>Aspect :</b>	<b>Total Water Use</b>				
	<b>Aspect Specifics (Optional):</b>				
	<b>Baseline (as stated in your application)</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Performance Commitment (the goal stated in your application)</b>
<b>Calendar Year</b>	<b>1999</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2003</b>
<b>Actual Quantity (per year)</b>	<b>10046500</b>	<b>4867632</b>			<b>Optional:</b>
<b>Measurement Units</b>	<b>gallons</b>				
<b>Normalizing Factor</b>	<b>1.0</b>	<b>1.06</b>			<b>Optional:</b>
<b>Basis for your Normalizing Factor</b>	<b>Facilities Production Hours (Manufacturing Only)</b>				
<b>Normalized Quantity* (per year)</b>	<b>10046500</b>	<b>4592105.7</b>			<b>8050000</b>
<b>*Calculated for you</b>					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

In order to improve the quality and reduce the volume of the process waters discharged at our facility we implemented several projects during 2000-2001, as mentioned in our NEPT application. After completing four of the five projects mentioned, we have eliminated in some cases, reduced the volume in others and improved the quality of the discharged water in our facility, including domestic/sanitary waters. Since March 2001 we are recycling the waters from Prep-Room and Extrusion, thus eliminating process water discharges subjected to the National Pretreatment Standard, and a percentage of Boiler Room Blow downs, which after treatment with the Waste Saver Evaporator, are fed to the boiler. We also replaced the laundry detergent with a vegetable based detergent formulated under the EPA Design for the Environment-Formulator Initiative (zero phosphates, phenols and low surfactant content), in addition to being readily biodegradable, hand soap was also replaced with a more environmentally friendly product. Other projects have been identified and are in progress to reuse discharge waters from the distillers (backwash, rejected for temperature, ect.)in cooling towers and other processes. The Gown Wash Frequency Reduction is awaiting expansion project completion for reevaluation for design and validation.

If you have additional information that you would like to include please attach it here:

Any attachments will be located at the end of the report.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).



**C.2 Performance Commitment 2**

a. Use this table to report data related to your second performance commitment.

<b>Category :</b>	<b>Air Emissions</b>				
<b>Aspect :</b>	<b>Emissions of VOCs</b>				
	<b>Aspect Specifics (Optional):</b>				
	<b>Baseline (as stated in your application)</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Performance Commitment (the goal stated in your application)</b>
<b>Calendar Year</b>	<b>1999</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2003</b>
<b>Actual Quantity (per year)</b>	<b>40981</b>	<b>48027</b>			<b>Optional:</b>
<b>Measurement Units</b>	<b>lbs</b>				
<b>Normalizing Factor</b>	<b>1.0</b>	<b>1.06</b>			<b>Optional:</b>
<b>Basis for your Normalizing Factor</b>	<b>Facilities Production Hours (Manufacturing Only)</b>				
<b>Normalized Quantity* (per year)</b>	<b>40981</b>	<b>45308.5</b>			<b>40098</b>
<b>*Calculated for you</b>					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

During 2001 we experienced an increase in VOC emissions of 10.7%, which represents .003 lbs/prod.hr. more, over 1999 levels, caused by an increase of production activity (6% overall). This increase was more dramatic in the areas of Buretrol and Microbore & Std. Set where the majority of the solvents are used. We performed an evaluation of the natural based substance expected to replace the use of Isopropil Alcohol (IPA) for sanitizing purposes but it did not meet the quality requirements in our facility. However, we identified an oportunity to reduce the use of IPA for sanitizing equipment by replacing the containers with squeeze bottles, this is helping to reduce the amount of IPA used for sanitizing in half. We will also be standardizing the mixtures used for bonding, were possible, to improve solvent management and reduce emissions. Automation of our processes is another aspect that will contibute to reducing fugitive air emissions in our manufacturing areas.

**Attach:**

Any attachments will be located at the end of the report.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

**C.3 Performance Commitment 3**

a. Use this table to report data related to your third performance commitment.

<b>Category :</b>	<b>Energy Use</b>				
<b>Aspect :</b>	<b>Total Energy Use</b>				
	<b>Aspect Specifics (Optional):</b>				
	<b>Baseline (as stated in your application)</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Performance Commitment (the goal stated in your application)</b>
<b>Calendar Year</b>	<b>1999</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2003</b>
<b>Actual Quantity (per year)</b>	<b>16696000</b>	<b>20521949</b>			<b>Optional:</b>
<b>Measurement Units</b>	<b>KwH</b>				
<b>Normalizing Factor</b>	<b>1.0</b>	<b>1.06</b>			<b>Optional:</b>
<b>Basis for your Normalizing Factor</b>	<b>Facilities Production Hours (Manufacturing Only)</b>				
<b>Normalized Quantity* (per year)</b>	<b>16696000</b>	<b>19360329.2</b>			<b>16200113</b>
<b>*Calculated for you</b>					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Due to the introduction of several automated machines during 2000-2001 and the steadily increasing production demands, we experience an increase from the 10.37 KWH/Prod. Hr. in 1999 to 12.33 KWH/Prod. Hr. in 2000, or close to 19% increase. In 2001 we were able to reduce the energy consumed per hour of production by 2.4 % from 2000 level. In addition to the energy saving campaign, projects affecting energy usage were completed (ie. central thermolator replaced with stand alone chillers). In 2002 projects in the Air Conditioning and Compressed Air area have been identified to held control and reduce energy consumption per prod. hr.

**Attach:**

Any attachments will be located at the end of the report.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

**C.4 Performance Commitment 4**

a. Use this table to report data related to your fourth performance commitment.

<b>Category :</b>	<b>Materials Use</b>				
<b>Aspect :</b>	<b>Recycled/Reused Materials Use</b>				
	<b>Aspect Specifics (Optional):</b>				
	<b>Baseline (as stated in your application)</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Performance Commitment (the goal stated in your application)</b>
<b>Calendar Year</b>	<b>1999</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2003</b>
<b>Actual Quantity (per year)</b>	<b>16000</b>	<b>531076</b>			<b>Optional:</b>
<b>Measurement Units</b>	<b>lbs</b>				
<b>Normalizing Factor</b>	<b>1.0</b>	<b>1.06</b>			<b>Optional:</b>
<b>Basis for your Normalizing Factor</b>	<b>Facilities Production Hours (Manufacturing Only)</b>				
<b>Normalized Quantity* (per year)</b>	<b>16000</b>	<b>501015.1</b>			<b>240000</b>
<b>*Calculated for you</b>					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

More PVC material was reused this year to manufacture the same line of products, in total 531,076 lb of PVC were reused, which represented 50.7% of the total scrap PVC generated. The balance 516,411 Lbs of scrap PVC were recycled offsite, for 100% management of scrap PVC. We had committed to increasing the amount of PVC reused to 240,000 Lbs./Yr. and were able to surpass that quantity by 121%. This was done by installing a grinding machine next to the Extrusion area to have better control of the material and grinding the clean PVC scrap generated in Keifel in this same area. We reduced the overall generation of non-hazardous waste by 13.4% per hour of production. We recycled 13.5% more, which represents an overall of 55% waste recycled.

**Attach:**

Any attachments will be located at the end of the report.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).





**Section D.  
Public Outreach and Performance Reporting**

**D.1 Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements).**

EHS personnel are invited to the weekly staff meeting to present information on new initiatives, projects or any other issues requiring management assistance. Monthly meetings are conducted with the participation of administrative personnel, which includes the management, to review the status of the environmental program, the progress towards our targets for the significant aspects and opportunities for improvement. Monthly reports are submitted to the Division with copy to management to keep them informed on the progress of our program and any issues arising in this area. An EHS Show Board is in place where information related to environmental indicators, initiatives, and any other pertinent information is posted.

Personnel directly involved in the area of environmental protection attend quarterly EHS meetings. Topics covered in these meetings included; alternative products (natural base) to replace hazardous material, fire prevention and response, waste reduction and recycling opportunities, etc. We have also attended seminars on sustainable development, waste reduction and recycling in Puerto Rico provided by the Solid Waste Authority and other non-for profit organizations, as well as participated giving a talk on water recycling by industry at a Recycling Seminar. During the Environmental Fair celebrated in our facility in April 2001, we brought in environmental exhibits and provided written information to all interested associates and visiting students on water, air, agriculture, recycling and other environmental topics. We have conducted activities where environmental conservation was the motivation for participation, such as; cleaning campaigns and reforestation activities with the participation of local community school students and associates. We have also participated in giving talks on pollution prevention, environmental conservation and recycling at local schools and have provided assistance to the teachers in implementing Recycling Programs.

**Attachment:**

Any attachments will be located at the end of the report.

**D.2 Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Report available to the public. Please check as many as appropriate.**

Web Site  
Open House  
Meetings

**URL:**

**Section E.  
Self-Certification of Continued Program Participation**

On behalf of **Baxter Healthcare Corp. of Puerto Rico,**  
(name of my facility)

I certify that

- I have read and agree to the terms and conditions as specified in the *National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;
- I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;
- My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, 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 assessments 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 Environment 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 manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date

Printed Name

Mr. Edwin Betancourt

Title

General Manager

Phone Number

787-735-8021

E-mail Address

edwin\_betancourt@baxter.com

Facility Name

Baxter Healthcare Corp. of Puerto Rico

Facility Street Address

Road 721 KM 0.3 Calle Mercedita Serralles

Aibonito, PR 00705

Performance Track ID#

A020002

**Appendix:****Do you want to add Appendix?****When adding additional comments, please refer to question number.****Comments:****Attachment:**

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection information is estimated to average 188 hours per respondent annually. 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.