



A02-0041

1/24/02

***National  
Environmental  
Achievement Track***

***Application Form***

CPS Corp.

Name of facility

INX International Ink Co.

Name of parent company (if any)

3257 Middle Rd.

Street address

Middle Road

Street address (continued)

Dunkirk/NY/14048

City/State/Zip code

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

Name Kevin Cochran

Title EHS/ISO 14001 Management Rep.

Phone (716)366-6010

Fax (716)366-4962

E-mail cochrank@corp.inxintl.com

# 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?

CPS Corp. manufactures fine printing ink and printing ink products.

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  
2893

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.

NYD981180680

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.

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?

CPS Corp. became an ISO 14001 certified company in 1996 and was the first Ink Company in North America to receive this Environmental certification.

# Section B

*Tell us about your EMS.*

## ***Why do we need this information?***

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

## ***What do you need to do?***

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

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

- a.* Environmental policy  Yes
- b.* Planning  Yes
- c.* Implementation and operation  Yes
- d.* Checking and corrective action  Yes
- e.* Management review  Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)?  Yes

3 Did this cycle include both an EMS and a compliance audit?  Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS?  Yes

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

- Self-assessment
- GEMI  Other
- CEMP
- Third-party assessment
- ISO 14001 Certification
- Other

# Section C

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

## ***Why do we need this information?***

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

## ***What do you need to do?***

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

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

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

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

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units lb/yr	Quantity	Units lb/yr
Total Solid Waste	526800		400467	
<p>i. How is the current level an improvement over the previous level?</p> <p>During a two year period CPS has managed to decrease the generation of its municipal waste by approximately 15%. By generating less municipal waste we alleviated stress and space consumption of our local landfill.</p>				
<p>ii. How did you achieve this improvement?</p> <p>We achieved this reduction by initiating and supporting cardboard, paper, metal drum and pallet recycling. Also a requested reduction in packaging of our raw material vendors added to the decrease.</p>				

**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 lb/yr	Quantity	Units lb/yr
Hazardous Solid Waste	10846		7106	
<p>i. How is the current level an improvement over the previous level?</p> <p>The current level (2000) is 34% improvement over the previous level (1998). Even though this liquid waste (mineral spirits, toluene, naphtha) goes to a cement kiln to be used as a replacement for less efficient fuels, any reduction of hazardous waste is welcomed. Less regulatory requirements (now a small quantity generator) and also decreased possibility of environmental impact due to spills, usage, etc., were accomplished.</p>				
<p>ii. How did you achieve this improvement?</p> <p>We achieved this improvement by modifying work procedures used in the quality control testing of our products and also by substituting hazardous solvents with more environmentally friendly soaps in cleaning our containers in which we ship our product.</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 page.

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

**First aspect you've selected**

a. What is the aspect? Total Energy Usage

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.

<input type="checkbox"/> Option A: Absolute value	(Quantity/Units)
<input checked="" type="checkbox"/> Option B: In terms of units of production or output	.29 kW/lb ink produced (Quantity/Units)

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

- Option A:  
Absolute value (Quantity/Units)
- Option B:  
In terms of units of production or output .24 kW/lb ink produced (Quantity/Units)

e. How will you achieve this improvement?

This 20% reduction of electrical energy use will be achieved through the elimination of a third mill pass on some formulas and also the staggard use of Kady's (varnish preparation equipment) to take advantage of decreased load usage at peak demand. This also frees up additional kilowatts for the general public during peak home usage demand.

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### ***Second aspect you've selected***

a. What is the aspect?

Hazardous Solid Waste

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

- Yes  No

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

- Option A:  
Absolute value 7106/lb (Quantity/Units)
- Option B:  
In terms of units of production or output (Quantity/Units)

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

- Option A:  
Absolute value 5984/lb (Quantity/Units)
- Option B:  
In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

By modifying quality control work procedures to try to incorporate a reusable solvent that can be reworked into our product. Also by continual substitution in the production process with more environmentally friendly soaps/solvents. Our goal is to find a solvent that is non-hazardous and infinitely reusable - therefore, eliminating the need for disposal.

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**Third aspect you've selected**

- a. What is the aspect? Total Solid Waste
- b. Is this aspect identified as significant in your EMS?  Yes  No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- Option A:  
Absolute value (Quantity/Units)
- Option B:  
In terms of units of production or output .0007 lb/lb of ink produced (Quantity/Units)
- d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- Option A:  
Absolute value (Quantity/Units)
- Option B:  
In terms of units of production or output .0006 lb/lb of ink produced (Quantity/Units)
- e. How will you achieve this improvement?
- This decrease in solid waste (for example, varnish, dry pigment and flowable material) that is not under our municipal waste stream, could amount to thousands of pounds of material diverted from being "waste". This will be achieved through better education to the work force and also changes to the work procedures to try to eliminate the waste from being generated initially. Better rework of waste procedures will also aid in the reduction.
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**Fourth aspect you've selected**

- a. What is the aspect? Material Usage- Recycle/Reuse "scrap" materials
- b. Is this aspect identified as significant in your EMS?  Yes  No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- Option A:  
Absolute value 99342 lbs (Quantity/Units)
- Option B:  
In terms of units of production or output (Quantity/Units)
- d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- Option A:  
Absolute value 121418 lbs (Quantity/Units)
- Option B:  
In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

This improvement will be achieved through the ongoing efforts to recycle otherwise wasted material. Some future items will be stretch wrap that accompany our pallet shipments and also polypropylene buk bags in which our resin and pigment are shipped.

# Section D

*Tell us about your public outreach and reporting.*

## ***Why do we need this information?***

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

## ***What do you need to do?***

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

1 How do you identify and respond to community concerns?

-Interaction with community groups as needed.

-Open door policy to the community. All communications received from local residents or businesses which involve either environmental and/or safety concerns are immediately forwarded to the EHS/ISO 14001 Management Representative. Responses to the concerns are provided in a timely manner and also communicated to upper management. Meetings with concerned groups are also offered if necessary.

-Procedures in EMS addressing communication with public.

-Fire Department and Local emergency groups tour our facility and relay concerns that they might have.

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

-Local Emergency Planning Community (LEPC)

-Fire Department tours and updated plans of the facility

-Website [www.CPSINX.com](http://www.CPSINX.com)

-Chautauqua County Chamber of Commerce

-Involvement with Fredonia State University and Local Chapter of Air and Waste Management Association.

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

- Website [www.CPSINX.com](http://www.CPSINX.com)
- Newspaper
- Open Houses
- Other

4 Are there any ongoing citizen suits against your facility?

- Yes
- No

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

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	State University of New York College at Fredonia.	Dr. Mike Milligan	(716)673-3281
<i>State/Local Regulator</i>	Chautauqua County Health Department Environmental Division	Michael Vendette	(716)366-8831
<i>Other community/local reference</i>	Water Pollution Control Facility	Chris Surma	(716)366-3611

# Section E

## *Application and Participation Statement.*

On behalf of CPS Corp.  
[my facility],

I certify that

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

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

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

Signature/Date

Printed Name/Title David Maternowski/General Manager

Facility Name CPS Corp.

Facility Street Address 3257 Middle Rd

Facility ID Numbers TRI Fac. ID: 14048-CPSMD-3257M

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](mailto:ptrack@indecon.com). Mail completed applications to:

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

We've included the following Checklist to help you answer questions 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.

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.

### **Air Pollution Requirements**

*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)*

- 13. Other Federal, State, Tribal, or Local Regulations not listed above.

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### **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):

- 8. Other Federal, State, Tribal, or Local Regulations not listed above.

40 CFR 260 and 40 CFR 273

Universal Waste Requirements

### 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)

Other (you must list these):

- 6. Other Federal, State, Tribal, or Local Regulations not listed above.
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### 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):

- 6. Other Federal, State, Tribal, or Local Regulations not listed above.
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### 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. NEDES 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 Water Pollution Control Facility: Dunkirk, NY  
ID # of POTW NY0027961

- 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):

- 17. Other Federal, State, Tribal, or Local Regulations not listed above.

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### 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):

- 7. Other Federal, State, Tribal, or Local Regulations not listed above.

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## 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)

- 10. Other Federal, State, Tribal, or Local Regulations not listed above.

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## Pesticide Regulations

Check all that apply.

- 1. FIFRA Pesticide Use Classification (40 CFR 162)
- 2. Procedures for 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)

- 9. Other Federal, State, Tribal, or Local Regulations not listed above.

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**Environmental Clean-up, Restoration, and Corrective Action**

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

\_\_\_\_\_  
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2. RCRA Corrective Action

\_\_\_\_\_  
\_\_\_\_\_

3. Other Federal, State, Tribal, or Local Environmental Clean-up, Restoration, Corrective Action Regulations Not Listed Above.

\_\_\_\_\_  
\_\_\_\_\_

Facility name:

\_\_\_\_\_ CPS Corp. \_\_\_\_\_

Facility location:

\_\_\_\_\_ 3257 Middle Rd Dunkirk, NY 14048 \_\_\_\_\_

Facility ID numbers:

\_\_\_\_\_ TRI Fac. ID: 14048-CPSMD-3257M \_\_\_\_\_

EPA ID: NYD981180680