



Annual Performance Report

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

Facility Name: BMW Manufacturing Corp.
Performance Track ID #: A040001
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:** BMW Manufacturing Corp.
- A.2 Name of your parent company:** BMW Group
- A.3 Facility contact person for the Performance Track program:**
Name: Mr. Gary Weinreich
Title: Environmental Services Manager
Phone: 864-989-5764
Fax: 864-801-5764
E-mail: gary.weinreich@bmwmc.com
- A.4 Facility's location**
Street Address: 1400 Highway 101 South

Address (cont.):

City: Greer

State: SC

Zip Code: 29651

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

www.bmwusfactory.com

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:

336111 336112

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".

Since becoming Performance Track members, our company has applied for and received an innovative air permit that satisfies EPA's New Source Review and Prevention of Significant Deterioration requirements. The permit also features flexibility provisions including preapproved changes and plantwide applicability limits. In return the permit contains emission limits that are significantly lower than the industry average. A Title V air operating permit was issued simultaneously.

**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, 9001	ISO 14001 and ISO 9001:2000 combined certification audit was conducted of all facilities at this location. Scope included the plant's Baldrige-type management system including quality and environmental components	06/2001

b. Was an internal or corporate EMS audit conducted? Yes

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

Scope	Date (mo/yr)
Our facility conducts combined internal environmental compliance and management system audits of individual process areas. Nineteen such audits were conducted in CY 2001	01/2001

c. Was a compliance audit conducted?

Yes

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 audits are conducted simultaneously with our environmental management system audits above. Our staff also conducts an evaluation of our legal and other requirements annually to verify that all commitments are being met.	01/2001	Environmental staff

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

Our facility conducts Baldrige-type process assessments, including environmental processes, at several levels (senior management, process units, etc.). In addition, our facility was the subject of several regulatory inspections in 2001 including a joint EPA-State hazardous waste inspection, two state air compliance inspections, an FAA hazardous materials shipment inspection, a DOT hazardous materials inspection, and a wastewater inspection by the local authority with jurisdiction over

our industrial wastewater pretreatment permit.

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

New floor coating was applied in hazardous waste storage building and in wastewater collection drains and sumps in paint shop

Production scheduling software was modified to decrease number of color changes (reduce air emissions and waste)

Environmental training software was improved to provide reminders of required refreshers and mandatory training.

Added requirement that two individuals review and sign off on all waste profiles.

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.

Our company is working through Performance Track with EPA and the state regulatory agencies to implement a regulatory improvement/innovation project concerning purge solvent management in automobile manufacturing plants. All observations identified during inspections were promptly resolved using the company's Corrective and Preventive Action Procedure.

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

06/2002

Who headed the review? Name: Mr. Carl W. Flesher **Title:** Vice President and Env. Management Representative

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?

06/2002

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."

<i>Environmental Aspect</i>	<i>Progress Made This Year</i> (e.g., quantitative or qualitative improvements, activities conducted)
Energy Consumption	Instituted a plantwide program to identify and correct compressed air leaks. Added local controllers to turn off task lighting when not in use. Added motion detectors to conference rooms. Included T-8 fixtures in new construction areas.
Air Emissions	Reduced the number of color changes in paint shop, reducing waste paint and solvent purge while improving quality. Reduced number of primer colors to further reduce required color changes. Evaluated feasibility of a landfill gas utilization project and developed contracts.
Solid Waste	Converted a number of parts suppliers to returnable packaging, reducing wood, cardboard, and plant trash.
Chemical Waste	Send paint sludge to energy recovery to avoid land disposal. Verified non-hazardous composition of wastewater sludge and completed EPA "delisting" process.

Toxic Releases	Eliminated MTBE from majority of initial gasoline fill. Color blocking project (above) reduced toxic releases.
Wastewater	Conducted wastewater study at request of municipality to improve their ability to provide optimum treatment. Installed piping to reduce deionized water usage and chemical waste resulting from deionized water production.

**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.

Category:	Energy Use				
Aspect :	Total Energy Use				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	1999	2001	2002	2003	2003
Actual Quantity (per year)	1065000	1281000			Optional:
Measurement Units	mmBtu				
Normalizing Factor	1.0	2.37			Optional:
Basis for your Normalizing Factor	number of vehicles produced				
Normalized Quantity* (per year)	1065000	540506.3			827000
*Calculated for you					

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

Implemented program to identify and reduce compressed air leaks, associate awareness, HVAC controls, lighting controls (and a cooler than average summer and a very mild winter helped considerably).

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.

Category :	Air Emissions				
Aspect :	Emissions of Toxics				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	1999	2001	2002	2003	2003
Actual Quantity (per year)	61930	162050			Optional:
Measurement Units	lbs				
Normalizing Factor	1.0	2.37			Optional:
Basis for your Normalizing Factor	number of vehicles produced				
Normalized Quantity* (per year)	61930	68375.5			51600
*Calculated for you					

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

Reduced solvent usage by reducing number of color changes. Modified production control software to paint larger blocks of same color. Reduced number of primer colors. Phasing out MTBE from gasoline. Investigating use of non-toxic solvent formulations for implementation during 2002/2003. Expect to achieve target if projects prove technically feasible.

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.

Category :	Waste				
Aspect :	Hazardous Solid Waste				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	1999	2001	2002	2003	2003
Actual Quantity (per year)	369	606			Optional:
Measurement Units	tons				
Normalizing Factor	1.0	2.37			Optional:
Basis for your Normalizing Factor	number of vehicles produced				
Normalized Quantity* (per year)	369	255.7			323
*Calculated for you					

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

Reduced solvent usage by reducing number of color changes. Modified production control software to paint larger blocks of same color. Reduced number of primer colors. Reducing color changes reduces paint waste (chemical waste) and purge solvent used (chemical waste, VOC emissions to air, and organic load to wastewater)

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.

Category :	Air Emissions				
Aspect :	Emissions of VOCs				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	1999	2001	2002	2003	2003
Actual Quantity (per year)	140400	253200			Optional:
Measurement Units	lbs				
Normalizing Factor	1.0	2.37			Optional:
Basis for your Normalizing Factor	number of vehicles produced				
Normalized Quantity* (per year)	140400	106835.4			123850
*Calculated for you					

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

Reduced solvent usage by reducing number of color changes. Modified production control software to paint larger blocks of same color. Reduced number of primer colors to reduce number of purge cycles. Best management practices for paint booth cleaning.

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).

Our facility released to the public its fourth biennial environmental report (mailings and web page). Our Community Advisory Panel held five meetings and discussed a variety of environmental and social issues of importance to the local community. We provided information and conducted laboratory tests to address concerns from the local wastewater utility. We conduct regular plant tours and host special group visits including environmental professional societies and environmental interest groups.

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

URL: www.bmwusfactory.com

Open House

Meetings

Press Releases

Community Advisory Panel

Other

Other: Visitor center and plant tours include environmental performance information. We also honor requests for information sharing on best environmental practices between companies as members of Performance Track, SC Environmental Excellence Program, and ISO 14001.

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

On behalf of **BMW Manufacturing Corp.,**
(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

Dr. Helmut Leube

Title

President

Phone Number

864-989-5501

E-mail Address

helmut.leube@bmwmc.com

Facility Name

BMW Manufacturing Corp.

Facility Street Address

1400 Highway 101 South

Greer, SC 29651

Performance Track ID#

A040001

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

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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.