National Environmental PerformanceTrack
U.S. Environmental Protection Agency

A07-0016

NOV 07 2001

Application Form

E.I. du Pont de Nemours and Company
Name of facility

E.I. du Pont de Nemours and Company, Inc.
Name of parent company (if any)

801-35th St.,
Street address

Street address (continued)

Fort Madison, Iowa 52627
City/State/Zip code

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

Name Ray Krogmeier JPL 10/31/01

Title Environmental Resource

Phone (319) 376-5238

Fax (319) 376-5559

E-mail Raymond.B.Krogmeier-1@USA.dupont.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?

Processing/Blending of Pigments, Binders, Water and Solvents to make Printing Inks

Reacting Initiators, Monomers, and Solvents to make Synthetic Resins

Processing/Blending Pigments, Binders, and Solvents to make Surface Coatings, Reducers and Thinners

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 2821 2851

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

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

If yes, list in the right-hand column.

☒ Yes ☐ No

IAD005272398

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?

This Site has not received any RCRA Fines or Penalties in the past for non-compliance.

This site has provided monetary assistance for county conservation board environmental projects.

National Wildlife Habitat Council Certified site - 1998

DuPont Sustainable Growth Excellence Award for Wildlife Habitat Preservation - 1999

US EPA Region VII Pollution Prevention for Environmental Excellence Award - 2001

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 Performance 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 Multimedia Environmental Audit by outside consulting firm.

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	Quantity	Units
Resin Process Wastewater	2,153,170	Pounds	402,555	Pounds

i. How is the current level an improvement over the previous level?

Reduction in volume shipped offsite for treatment of 81.3%

ii. How did you achieve this improvement?

Installation of Macro Porous Polymer Extraction treatment unit to process "Water of Reaction" from the Resin Manufacturing Process

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
Habitat Impacts	40	Acres	49	Acres

i. How is the current level an improvement over the previous level? Increased acreage for native tree planting.

ii. How did you achieve this improvement?

Added 7 Acres, 160 trees, 16 different species to Wildlife Habitat (Aboretum) in 2001

Added 2 Acres, 200 Trees (Pine and Spruce) to Wildlife Habitat, which was part of a "Brownfields" restoration project.in 2000.

Third
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
Air Emissions Reduction	55,560	Pounds	3,075	Pounds

i. How is the current level an improvement over the previous level?

A 94.5% reduction in emissions to air from two sources.

ii. How did you achieve this improvement?

On one unit 6 tank vent lines were manifolded together into one refrigerated vent condenser abatement device. A 95% VOC abatement efficiency was achieved. A duplicate unit was installed on an Acetone storage tank and achieved a minimum 90% VOC abatement efficiency.

Fourth
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
Recycle/Reuse - Wood Pallets	8435	Each	5860	Each

i. How is the current level an improvement over the previous level?

Continued 100% Recycle/Reuse of all wood pallets received on site.

ii. How did you achieve this improvement?

Arranged an agreement with a local pallet dealer to pick up at no cost all wood pallets we cannot use, to be repaired (if necessary) and resold to other customers.

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? Water Use

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 — 1,072,700 Gal/day (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 — 10% Per Year Volume Reduction (Quantity/Units)

☐ Option B: In terms of units of production or output — (Quantity/Units)

e. How will you achieve this improvement?

Primarily through more efficient use of our non-contact process cooling water. Turn off or reduce water flow to cooling jackets on process vessels when not needed.

Second aspect you've selected

a. What is the aspect?

Latex and Ink Mfg. process wastewater

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 — 2,260,000 Pounds/Year (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 — 20% per year volume reduction (Quantity/Units)

☐ Option B: In terms of units of production or output — (Quantity/Units)

e. How will you achieve this improvement?

Installation of Ultrafiltration Unit - which generates a high solids effluent for offsite treatment.

Third aspect you've selected

a. What is the aspect? — Cardboard Recycling

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 — 18,300 Pounds/Year (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 — 15% Per Year Increase (Quantity/Units)
- ☐ Option B: In terms of units of production or output — (Quantity/Units)

e. How will you achieve this improvement? — Education, providing convenient collection containers at key points of generation.

Fourth aspect you've selected

a. What is the aspect? — Continue processing Resin "Water of Reaction" through the Micro Porous Polymer Extraction unit

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 — 81.3% System Effficiency (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 — Work toward a minimum of 85% system efficiency (Quantity/Units)
- ☐ Option B: In terms of units of production or output — (Quantity/Units)

e. How will you achieve this improvement? Fine tuning system, continued maintenance

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?

Fomal / documented procedure to address and respond to community inquiries or complaints.

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

Through the following:

1. Community Advisory Panel
2. Local Emergency Planning Commission
3. Published notices in local newspaper

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

☐ Website www.

☒ Newspaper

☒ Open Houses

☒ Other

LEPC

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

	Organization	*Name*	*Phone number*
Representative of a Community/ Citizen Group	Community Advisory Panel	Tom Buckley, Chairman	(319) 463-7673
State/Local Regulator	Fort Madison Wastewater Treatment Plant	Rick Kuhljuergen, Superintendent	(319) 372-5421
Other community/local reference	Local Emergency Planning Commission	Frank Mohrfeld, Coordinator	(319) 372-4124

Section E

Application and Participation Statement

On behalf of E. I. du Pont de Nemours and Co.
[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* 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 Performance Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

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

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

Signature/Date Ajit Venkatraman 11/01/01

Printed Name/Title Ajit Venkatraman, Plant Manager

Facility Name E.I. du Pont de Nemours and Company

Facility Street Address 801-35th St., Fort Madsion, Iowa 52627

Facility ID Numbers IAD005272398

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. Mail completed applications to:

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

National Environmental Performace Track

Environmental Requirements Checklist

We've included the following Checklist to help you answer questions in Section A, *Tell us about your facility*. The 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 Regulations

Check all that apply.

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

- ☐ 13. Other (you must list these) Federal, State, Tribal, or Local Regulations Not Listed Above

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. Hazardous Waste Permit Program (Part B) (40 CFR 270)

☐ 8. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Hazardous Materials Management

Check all that apply.

☐ 1. Control of Pollution by Oil and Other Hazardous Substances (33 CFR 153)

☒ 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)

☒ 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)

☒ 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)

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

☐ 6. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

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

☐ 6. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Water Pollution Control Requirements

Check all that apply.

- ☒ 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- ☒ 2. Designation of Hazardous Substances (40 CFR 116)
- ☒ 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- ☒ 4. NPDES Permit Requirements (40 CFR 122)
- ☒ 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- ☒ 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)
  Name of POTW Fort Madison Wastewater Treatment
  ID # of POTW 5625001
- ☒ 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)

- ☐ 17. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

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

- ☐ 7. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

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)

- ☐ 10. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Pesticide Regulations

Check All That Apply

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

- ☐ 9. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Environmental Clean-Up, Restoration, Corrective Action

Check all that apply.

- ☒ 1. Comprehensive Environmental Response, Compensation, and Liability Act (Superfund). Please identify.
  Baier/McCarl Superfund site - closed in 1992; continuing to monitor the site and perform periodic monitoring well sampling as required
- ☒ 2. RCRA Corrective Action
  SWMU#1 was remediated in 2000, and clean closed. RFI work is continuing onsite per our RCRA Part B Permit requirements

☐ 3. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Facility Name	E.I. du Pont de Nemours and Company
Facility Location:	801-35th St., Fort Madison, Iowa 52627
Facility ID Number(s):	IAD005272398