A02-0032

National Environmental Achievement Track

Application Form

Baxter Caribe Inc.
Name of facility

Baxter Healthcare I.V.S. Division
Name of parent company (if any)

Route 3 km 142.5
Street address

street address
Street address (continued)

Guayama P.R. 00784
City/State/Zip code

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

Name Pablo Velez

Title EHS MVF Director

Phone 787-864-5050-x252

Fax 787-866-0087

E-mail PabloVelez@baxter.coml

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?

Baxter Caribe is the major producer of inhalation anesthetics in the USA

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
2834

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)? ☒ Yes ☐ No

If yes, list in the right-hand column. PRD000692525

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?

Section B

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.

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 complicince 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 We used BEHst a 36 ele standard similar to ISO14000 but including health and Safety

☒ 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 me that you can describe past achievements and will m 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 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
Hazardous Waste Generation	.49	841mlbs/ 1711mlbs	.31	864mlbs/ 2809mlbs

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

The ratio of waste per lb of product is more than 60% lower than before.

ii. How did you achieve this improvement?

This improvement was achieved by recycling and reclasifiaction of wastes

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
Emission of VOCs	12.98	tons	.76	tons

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

Actual ratio is more than 15 times less than before.

ii. How did you achieve this improvement?

This improvement was achieved by closing an inneficient unit and transferring its production to a more contrlled and modern unit

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.

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? BOD5 in Waste water Discharge

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 — 243440lbs (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 value or in terms of units of production or output.	☒ Option A: Absolute value	10650lbs (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
e. How will you achieve this improvement?	This will be achieved by improving water treatment processes	

Second aspect you've selected

a. What is the aspect?	Solvent Reuse (Acetone)	
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	113377kg (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 value or in terms of units of production or output.	☒ Option A: Absolute value	26164kg (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
e. How will you achieve this improvement?	We will recuperate acetone from our organic and return it to our process.This is a solvent that will reduce our hazardous waste generation by effect of recycling.	

Signature: Eidiol Ghigliotty by Pablo Féliz
General Mgr.

Pablo Féliz EHS Director

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 — 1700 tons (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 value or in terms of units of production or output.

☒ Option A: Absolute value — 500tons (Quantity/Units)

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

e. How will you achieve this improvement?

This will be achieved by improving our recycling capabilities which started as a full program in 2000

Fourth aspect you've selected

a. What is the aspect?

Energy 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 — (Quantity/Units)

☒ Option B: In terms of units of production or output — 115mbtus/kg of final product (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 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 — 105mbtus/kg of final product (Quantity/Units)

e. How will you achieve this improvement?

This will be achieved by optimization of usage of energy both electrical and steam systems

Section D

Why do we need this information?

Facilities must demonstrate their commitment to publi
outreach and performance reporting. You should ha
appropriate mechanisms in place to identify commur
concerns, to communicate with the public, and to pr
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?	Primary contact is made through switchboard and it is transmited to HR Director and EHS Director who will make the decision of theaction to be taken.There is an SOP on information required and we are members of community organizations such as SARA and Emergency Committee of our region.A 24 hr feedback is guaranteed as needed.
2 How do you inform community members of important matters that affect them?	We have periodic meetings with community members both civic and industrial.
3 How will you make the Achievement Track Annual Performance Report available to the public?	☒ Website www.baxter.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

	Organization	*Name*	*Phone number*
Representative of a Community/ Citizen Group	Civil Defense	Mr Guillermo Torres	787-864-1600
State/Local Regulator	EQB of P.R.	Eng Angel Ramos	787-864-0103
Other community/local reference	Fire Dept	Justiniano Rivera	787-864-2330

Section E

Application and Participation Statement

On behalf of Baxter Caribe Inc,Guayama P.R.
[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 Eidiel Ghigliotty by Pablo Tello

Printed Name/Title General Manager / EHS Director

Facility Name Baxter Caribe Inc.

Facility Street Address Rd 3. Km 142.5, Guayama P.R. (00785)

Facility ID Numbers PRD000692525

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

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

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	Baxter Caribe Inc
Facility Location:	Guayama P.R. 00785
Facility ID Number(s): ***(attach additional sheets if necessary)***	PRD00692525

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	☒
Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)	
13.	☐
14.	☐

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. ☐
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. ☐
18. ☐

Drinking Water Regulations

1. Underground Injection and Control Regulations, Crieria 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)
   Located in a Superfund Site Fibers Wells ☒

2. RCRA Corrective Action (identify) ☐

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

3. ☐
4. ☐

Eidiol Ghigiotty
General Manager

EHS Director