A07-0015

MAY 01 2001

National Environmental Achievement Track

U.S. Environmental Protection Agency

[redacted]

THURSTON MANUFACTURING COMPANY

Name of facility

Name of parent company (if any)

HWY 87A

Street address

Street address (cont.)

THURSTON, NE 68062-0218

City/State/Zip code

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

Name BERNARD K. GROSS

Title COMPLIANCE DIRECTOR

Phone (402) 385 3041

Fax (402) 385 3043

E-mail bgross@thurstonmfgco.com

Section A

Tell us about your facility.

[redacted]

1 What do you do or make at your facility?

Liquid fertilizer applicators, conservation tillage equipment, industrial and military jacks, tractor trailer side-dumps, and contract manufacturing.

2 List the Standard Industrial Classification (SIC) codes or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC

3523 | 3715 | _____

NAICS

333111 | 336212 | 339999

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.

48898
68062THRSTHWY87
NER000784 (NEDES)
NER000000687
NE0131245 (NE Pretreatment Program)

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.

See attached checklist

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?

In the almost six years that this facility has had an EMS program, we have made continuous improvements in our efforts to protect the environment. After winning the NE Environmental Excellence Award in 1998, we have redoubled our efforts to make this company a showcase for the state.

Environmental Requirements Checklist

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.

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

- [x] 1. Identification and listing of hazardous waste (40 CFR 261)
  - [x] -Characteristic waste
  - [x] -Listed Waste

- [x] 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
  - [x] -Manifesting
  - [x] -Pre-transport requirements
  - [x] -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.

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Hazardous Materials Management

Check all that apply.

- [x] 1. Control of Pollution by Oil and other Hazardous Substances (33 CFR 153)
- [x] 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- [x] 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- [x] 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- [x] 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
- [x] 4. Solid Waste Storage and Removal Requirements
- [x] 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.

- [x] 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- [x] 2. Designation of Hazardous Substances (40 CFR 116)
- [x] 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- [x] 4. NPDES Permit Requirements (40 CFR 122)
- [x] 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- [ ] 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)

Name of POTW _____

ID # of POTW _____

- ☐ 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 Chlorofluorocarbons (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.

☐ 2. RCRA Corrective Action

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

Facility name:

THURSTON MANUFACTURING COMPANY

Facility location:

HWY 87A Thurston, NE 68062-0218

Facility ID number:

48898, 68062THRSTHWY87

Section B

Tell us about your EMS.

Why do we need this information?

Facilities need to have an environmental management system (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the National 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 & future commitments.

Why do we need this information?

[illegible]

What do you need to do?

[illegible]

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
Emissions of VOC's	31,[illegible]	Pounds	27,[illegible]	Pounds

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

The improvement demonstrates our continuing efforts to reduce VOC's are working. A 12 percent decrease is significant when you consider that 5 years ago the level was 56,859 pounds.

ii. How did you achieve this improvement?

We achieved this improvement by reformulating our coatings and working with the chemical and paint companies on selecting the best available solvents and paint formulations.

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)? Quantity	Units	What is the current level? Quantity	Units
Use of hazardous materials	11,136	pounds	[illegible]	pounds

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

A 13.4 percent decrease in the use of hazardous chemicals is a demonstration of our reduction efforts which started 5 years ago at 23,731 pounds usage..

ii. How did you achieve this improvement?

We started working with the manufacturing department and chemical suppliers to find suitable substitutes for the hazardous chemicals.

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? Reduction of Toxic Emissions

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

[X] Option A: Absolute value — 9,642/pounds (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.

[X] Option A: Absolute value — 1000/pounds (Quantity/Units)

[ ] Option B: In terms of units of production or output

e. How will you achieve this improvement? By continuing our efforts to find non-toxic chemicals for use in our processes. Recently concluded testing may allow us to reach our goals sooner than expected.

Second aspect you've selected

a. What is the aspect? Emissions of VOC's

b. Is this aspect identified as significant in your EMS? [X] Yes [ ] No

Second aspect continues on the next page.

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.

- [x] Option A: Absolute value — 27,303/pounds (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.

- [x] Option A: Absolute value — 17,000/pounds (Quantity/Units)
- [ ] Option B: In terms of units of production or output

e. How will you achieve this improvement?

Reformulation of manufacturing aids and coatings, along with new product selection. May reach this goal soon.

Third aspect you've selected

a. What is the aspect?

Emissions of particulate matter

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

- [x] 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 — 1.44/tons (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.

- [x] Option A: Absolute value — 1.00/tons (Quantity/Units)
- [ ] Option B: In terms of units of production or output

e. How will you achieve this improvement?

Use of an air filtering system and new welding materials.

Fourth aspect you've selected

a. What is the aspect? Recycled/Reused Materials 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 — 0/pounds (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 — 2500/pounds (Quantity/Units)

☐ Option B: In terms of units of production or output

e. How will you achieve this improvement?

Our plan is to buy a small unit which will allow us to recover and reuse the solvent we now ship off-site for reclamation.

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

[illegible]

What do we plan to do?

- [illegible]
- [illegible]

1 **How do you identify and respond to community concerns?**

We invite the local Winnebago Tribal representative to accompany EPA Inspectors during inspection visits. This open door policy allows the native american population to understand our committment to a clean environment since our plant is on indian lands.

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

We have direct contact with the local newspaper editor, TV station, Emergency Action Director and Community leaders to keep them abreast of our environmental efforts.

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

- [x] Website www.thurstonmfgco.com
- [x] Newspaper
- [x] Open Houses
- [x] Other

Company newsletter which goes out to dealers and distributors. Safety Director works with school on farm days and talks about chemicals in the home.

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	Emergency Planning Committee	Chuck Obermeyer	(D) 402 385 2703 (N) 402 385 3018
State/Local regulator	Nebraska Department of Environmental Quality	Mike Mallory	(Work) 402 595 1768
Other community/local reference	City of Thurston Water Commissioner	Donald Mahler	(D) 402 385 2614 (N) 402 385 2702

Section E

Application and Participation Statement

On behalf of THURSTON MANUFACTURING CO.
[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	Layton W. Jensen
Printed Name/Title	Layton W. Jensen, President
Facility Name	Thurston Manufacturing Company
Facility Street Address	HWY 87A Thurston, NE 68062-0218
Facility ID Numbers	48898, 68062THRSTHWY87