

AWC's FY2024 Environmental and Safety Goals

| Relevant Plan of General Manager of Department (Office, Plant) | | | |
|--|--|--|---|
| No. | Actions of Department (Office, Plant) | Control items | Target values |
| A-1 | Pollution Problems | Zero outflow and nonconformity of complaints | 100% Compliance |
| B-1 | Promote Reduction of Waste | Reduce Landfill Waste | 5% Reduction from FY23 (49,010 lbs) |
| C-1 | Reduce CO2 Emissions | Reduce CO2 Emissions | 2.8% Reduction from FY23 (1,691 t-CO2) |
| C-2 | Resource Saving | Reduce Water Usage | 5% Reduction from FY23 (2,254,015 gal) |
| D-1 | OHS Management Plan and Performance Chart | Before work, stop once to predict danger, raise awareness, and have a safe workplace | 100% Completion of OHS Plan |

| Action Item Number | Regulatory Program | Action Item(s) | Record(s) or Resource(s) Needed | Resp. | Future Due Date | Cost | Compliance Status | | | | | | | | | | | | | | | | | | |
|--------------------|---|--|--|---|---|---|-------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|--|--|--|--|--|--|--|
| | | | | | | | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | | | | | | | |
| 1 | AHRC Annual Waste Characterization | Send baghouse dust to AAL for analyzing. Send the results to Rumpke. | AAL Waste Characterization Results | EHS | 3/31/24 | \$1,861.00 | | | | | | | | | | | | | | | | | | | |
| 2 | Clean Air Act | Complete the biennial Free Emission Report and submit to OEPA. Verify compliance with permit requirements. Non-file Y. | Monthly Melt data and Natural Gas usage. EHS TC to Assist Chelsea, Release Final Report (before Submitting) | EHS | 4/15/24 | \$400.00 | | | | | | | | | | | | | | | | | | | |
| 3 | Clean Air Act | Submit the annual Permit Evaluation Report to Ohio EPA by February 15th in the following order: P008 Degas Unit Reverse P017 6000-3 Reverse P024 Shopblast Unit Reverse P025 7500-1 Reverse P026 Rotary Furnace | Evaluate Melt data, Natural Gas usage. | EHS, Mailing | 2/15/24 | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 4 | Clean Air Act | Verify tracking of usage and emission calculations monthly. Report any deviations of operational restrictions to Ohio EPA within 30 days for the following sources: P007, P016, P017, P025 | Calculations for Furnaces Sheet. | EHS, Mailing | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 5 | Clean Air Act | Verify that no new sources of air emissions have been installed and that current emission units haven't been modified requiring a new permit. | Notification and information on any new or modified equipment. Environmental file to determine if a permit is needed. | EHS TC Assist Chelsea New Rotary Furnace Permit | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 6 | Clean Air Act | Conduct VE Checks and pollution control equipment checks. | Daily Visible Emissions Checks | Mailing | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 7 | Clean Air Act | Review refrigerant inventory check for any decommissioned equipment. Review records to show the sale, distribution, removal, or additions of Class I or II refrigerants. | Contractor records showing distribution, removal, and additions of Class I and II refrigerants. Review the refrigerant inventory and verify compliance with the regulations. | EHS / FAC | 3/31/2024 Check is included during Evaluation of Compliance | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 8 | Clean Air Act | Confirm training records of all AWC associates or contractors who work on any equipment containing Class I or II refrigerants. | Copies of Contractor CFC training certificates. Review CFC training records to verify compliance. | EHS / FAC | 3/31/2024 Check is included during Evaluation of Compliance | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 9 | Clean Air Act | (BMP) Review the plant wide air source inventory to show/document the regulatory status of each source: i.e. detrimins, exempt, permit-by-rule. Ensure that Detrimins and PBR records are up-to-date. | Plant review of all air contaminant sources and documentation. | EHS / Total Compliance | 3/31/2024 Review is completed during Evaluation of Compliance | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 10 | Clean Air Act | Submit renewal applications for the Permits-to-Install/Operate for the following permitted sources: P007 6000-1 Reverse P008 Degas Unit Reverse P017 6000-3 Reverse P024 Shopblast Unit Reverse P025 7500-1 Reverse P026 Rotary Furnace | Updated material usage and equipment capacity information. Prepare permit applications including any "Air Toxics" modeling that may be required and submit to Ohio EPA. | EHS | 2029 | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 11 | Clean Water Act | Conduct and document quarterly inspections of all Stormwater and SPCC Pollution sources and their associated Best Management Practices. At least one quarterly inspection/year must be conducted during a discharge (rain) event. | Quarterly SWP3/SPCC Inspection Record | EHS | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 12 | Clean Water Act | Conduct Quarterly Visual Assessments of AWC's Stormwater during a discharge (rain) event and document the results on the SWP3 document. At least one inspection each year must be completed during a snow melt discharge event. | Quarterly Visual Assessment Record A clean and clear sample container. | EHS | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 13 | Clean Water Act | After completion of the last quarterly inspection for the year, fill out the OEPA Annual Reporting Form. Responsible Official must sign form listing the summary of findings. The form does not have to be submitted to Ohio EPA, but it must be kept on file. | EPA Annual Reporting Form. Quarterly inspections including visuals. | EHS | 12/31/24 | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 14 | Clean Water Act | Evaluate the facility to confirm that no un-permitted sources of wastewater are discharging into the stormwater system as required by the General Stormwater Permit #CHR000007. Document and certify the results. | Annual Non-Stormwater Inspection Record. Identify any potential non-stormwater sources and certify that they do not discharge into the stormwater collection system (conducted during a dry period). | EHS | By 12/31/2024 | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 15 | Clean Water Act | Conduct Benchmark Monitoring as required by the General Stormwater Permit #CHR000007. Sample Outfall 001 and 002 for the parameters listed for four quarters during the first two years of the permit. Average the results and compare against the benchmarks. If average exceeds benchmarks, conduct review and develop countermeasures to reach compliance with benchmarks. | SWP3 and Benchmark Monitoring Report | EHS/Fac Analytical | 4 Grab Samples By: 12/31/2024 | \$600.00 | | | | | | | | | | | | | | | | | | | |
| 17 | Clean Water Act | Conduct annual training on the Pollution Prevention Plans (SPCC/SWPP3). Maintain training records. Training must include: - Pollution Prevention Team Members - Personnel who could impact stormwater (material and oil handling associates) | Schedule training for all applicable personnel and conduct training sessions. Training to include SPCC & SWPP3 plan requirements. | EHS TC Assist Chelsea with management training | Due by: 6/14/2024 | Included in HAZMAT Class Price. | | | | | | | | | | | | | | | | | | | |
| 18 | Clean Water Act | Review the Spill Prevention Control and Countermeasure (SPCC) and Stormwater Pollution Prevention (SWPPP) Plans annually to ensure that all potential sources are identified and all procedures are current and being followed (maintain the SPCC Plan with PE approval). LAST PE Approval Date: 11/2/2023. Obtain PE review and approval every 5-years if no major changes have occurred. | Review the SPCC and SWPP3 plans. Document the review in Appendix V of the SPCC/SWPP3 binder. | EHS | 5-yr PE review due 11/2/2027 | \$725.00 | | | | | | | | | | | | | | | | | | | |
| 19 | Clean Water Act | Submit a renewal application (NOI) for the NPDES General Industrial Stormwater Permit #CHR000007 | OEPA application forms. | EHS | 5/31/27 | \$350.00 | | | | | | | | | | | | | | | | | | | |
| 20 | Clean Water Act | Conduct quarterly and semi-annual sampling & flow monitoring of the wastewater effluent from WWT and report the average daily aluminum content for the reporting period. Submit discharge monitoring reports (DMRs) to the City of Wilmington (Effluent Discharge and Manhole). Permit #1010C-21 (expires 4/30/2024). | Set-up the composite sampler, sample prep, sample delivery. Laboratory (Paco) submits results to EHS. Submit Discharge Monitoring Report to Wilmington. | EHS/Fac | 3/15/24, 6/15/24, 9/15/24, 12/15/24 | \$22.20 (estimated) | | | | | | | | | | | | | | | | | | | |
| 21 | Clean Water Act | Inform Wilmington within 24 hours of becoming aware of a sampling parameter result violation. Repeat the sampling, pollutant analysis, and report the results within 30 days of the first violation. Permit #1010C-21 (expires 4/30/2024). | Set-up the composite sampler, sample prep, sample delivery. Laboratory (Paco) submits results to EHS. Submit Discharge Monitoring Report to Wilmington. | EHS | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 22 | Clean Water Act | Conduct annual sampling and report analysis of the influent and effluent for the parameters which the system is designed to remove (pretreatment efficiency). Permit #1010C-21 (expires 4/30/2024). | Sample and analyzer for parameter removal efficiency. Submit results in the quarterly report. | EHS/Fac Analytical | 3/15/24 | \$825.20 | | | | | | | | | | | | | | | | | | | |
| 23 | Clean Water Act | Accidental Discharge/Spill Load Report. Report to Wilmington within 1 hour of becoming aware of an accidental discharge or upset in operations that would cause a temporary non-compliance with the permit. Submit a written follow-up report to Wilmington within 5 days of incident. Permit #1010C-21 (expires 4/30/2024) | Notify Wilmington within 1 hour. Submit written follow-up report to Wilmington within 5 days. | EHS | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 24 | Clean Water Act | Submit renewal application for the City of Wilmington Industrial Discharge Permit #1010C-21. (expires on 4/30/2024) | Provide current flow and data regarding any process changes and chemical use in WWT to EHS. Prepare and submit wastewater permit renewal application to Wilmington. | FAC/EHS | Submit renewal application by 1/31/2024 | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 25 | Resource Conservation and Recovery Act | Inspect hazardous waste, used oil, universal waste and infectious waste storage areas each month or after shipment of waste. Verify compliance with storage, labeling, and spill prevention procedures. Verify that Infectious Waste generation rate is <20.5 lbs/month. Verify that Hazardous Waste generation rate is <220.5 lbs/month. | Inspection form. Ship infectious waste to an approved Infectious Waste Incinerator. Check shipping papers and maintain each shipping paper for 3 years. Document the inspection. | EHS / FAC / Nurse | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 26 | Resource Conservation and Recovery Act | Maintain documentation to demonstrate whether each waste is hazardous or non-hazardous (Required). (BMP) Maintain the following hazardous waste documentation: - Waste profiles for the disposal site (if applicable); - Copy of the Land Disposal Restriction form (if hazardous); - Laboratory results (if applicable); - Safety Data Sheets (if applicable); - White paper description to explain why it is hazardous or non-hazardous (if needed). Review these files annually to ensure they are kept up-to-date. | Lab results, SDS for materials that make-up the waste, LDR, and profiles. Review these files annually to ensure they are kept up-to-date. | EHS/FAC | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 27 | Resource Conservation and Recovery Act | Submit the Biennial Hazardous Waste Report to the Ohio EPA if the facility generated >2,200 lb of hazardous waste in any single month. This report is due by March 1st of every even-numbered year. | Hazardous Waste Manifests, Site ID Form, GM Form, OI Form | EHS/TC | 3/1/2024 (if needed) | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 28 | Resource Conservation and Recovery Act | Review all hazardous waste manifests and Land Disposal Restriction forms to ensure that a top copy has been received from the disposal site. Check DOT information, waste codes, and quantity to ensure that all information is correct. | Hazardous Waste Manifests | EHS | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 29 | Resource Conservation and Recovery Act | Conduct Hazardous Waste, Universal Waste and Used Oil Training for all associates who work with these wastes. This can be included with SPCC/SWPP3 training if the associates are the same. | Training materials. | EHS | | Included in HAZMAT Class Price. | | | | | | | | | | | | | | | | | | | |
| 30 | Toxic Substance Control Act and Federal Insecticide, Fungicide, and Rodenticide Act | Verify that all commercial applications of pesticides and herbicides on AWC's property are certified "Commercial Applicators" by the Ohio Department of Agriculture. | Obtain a copy of the Ohio Department of Agriculture "Commercial Applicator" license from contractor. | EHS | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 31 | Emergency Planning and Community Right-to-Know Act | Prepare and submit the annual SARA 312 Chemical Inventory Report (TEIR) to the LEPC, Fire Department, and Ohio EPA. | Material Safety Data Sheets and Material Inventories. Verify material storage locations, hazards, site map, and prepare the Tier II Report. | EHS | 3/1/24 | \$400.00 | | | | | | | | | | | | | | | | | | | |
| 32 | Emergency Planning and Community Right-to-Know Act | Prepare and submit the annual SARA 313 (Toxics Release Inventory) report to Ohio EPA and USEPA. | Annual Material Usage Records, MSDS, Waste Shipped, Waste Analytical Data, Aluminum Consumption, Wastewater Lab Results, Scrap Aluminum, etc. Calculate Toxic Release Emissions and prepare the TRI Form R Reports. | EHS/Total Compliance | 7/1/24 | \$4995.00 (Total Compliance Support) | | | | | | | | | | | | | | | | | | | |
| 33 | Toxic Substance Control Act | Prepare and submit the Chemical Data Report (CDR) Form U to Ohio EPA and USEPA. | Production Volume for Aluminum Dross, Analytical Data, Recycle Facility Information. Collect data and complete the CDR Form U every 4 years. | EHS/Total Compliance | 6/1/24 - 9/30/24 | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 34 | Drinking Water | Maintain an inventory of all backflow prevention devices at AWC. Ensure that all Backflow Prevention Devices are inspected and certified at least once every year. | Plant drawings of potable water piping and backflow prevention devices. Check backflow certification records to ensure compliance with Ohio EPA and City of Wilmington regulations. | FAC/EHS | July 2024 | Facilities Pays the Testing Fee | | | | | | | | | | | | | | | | | | | |
| 35 | US Department of Transportation | Ensure that all "HAZMAT Employees" have received DOT training: - General awareness - Function specific - Emergency response, and - Site security All new "HAZMAT Employees" must be trained within 90-days and all existing associates must receive refresher training every 3 years. (last training was 11/2019) HAZMAT employees are any associate who loads, unloads, or signs shipping papers for HAZARDOUS MATERIALS. | Identification of all HAZMAT Employees at AWC. Evaluate and verify training records for all HAZMAT employees. Coordinate training of all associates who need DOT HAZMAT training. | EHS | | Included in HAZMAT Class Price. | | | | | | | | | | | | | | | | | | | |
| 36 | US Department of Transportation | Submit the DOT Shipper's Registration. Current Reg. No: 060418550068AC | DOT Certification form: DOT-F 5800-2 | EHS | 6/30/24 | \$7,725.00 | | | | | | | | | | | | | | | | | | | |
| 37 | US Department of Transportation | Send batteries offsite one year from collection date. | Waste Manifests | EHS / Facilities | Last Shipment: 7/26/24 | Facilities Pays for Waste Disposal | | | | | | | | | | | | | | | | | | | |
| 38 | ISO 14001 | SRI certification audits to maintain ISO 14001 certification. | SRI Audit Schedule | EHS/SRI/Total Compliance | 7/16/24 (tentative) | \$664.03 (SRI Cost) + 7269.47 (TC Support) + \$1900.00 (Travel) | | | | | | | | | | | | | | | | | | | |
| 39 | ISO 14001 | Conduct an annual management review to check status of EMS (Environmental Management System). Ensure that the following are reviewed: - Results of Internal Audits and Compliance Evaluations - Communication of performance of AWC - Progress towards Objectives and Targets - Status of Preventive and Corrective Actions - Follow-up from Management Reviews - Changes at AWC, regulatory & legal impact to AWC's Aspects - Recommendations for improvement | Prepare a summary of the status of AWC's Objectives/Targets and Audit Findings. Review the status of AWC's Environmental Objectives/Targets and EMS Non-Conformances. | EHS/AWC Management Team | 3/1/24 | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 40 | ISO 14001 | Complete an annual comprehensive ISO 14001 Internal EMS Audit. - Audit all elements - Audit all elements of the ISO 14001 Standard - Review procedures related to objectives and targets. - Check Environmental Activity Plan | EHS and Facilities personnel to provide records and support during audit. Conduct the audit, maintain audit records, and final audit findings report. | EHS / Total Compliance | 4/30/24 | \$4,168.12 | | | | | | | | | | | | | | | | | | | |
| 41 | ISO 14001 | Conduct a complete evaluation of compliance with all regulatory and other requirements (check new or changing regulations). | EHS and Facilities personnel to provide records and support during audit. Conduct the audit, maintain audit records, and final audit findings report. | EHS / Total Compliance | 3/31/24 | \$4,168.12 | | | | | | | | | | | | | | | | | | | |
| 42 | ISO 14001 | Review Environmental Aspects to ensure they are up-to-date. | Current list of Environmental Aspects. Document the review. | EHS | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 43 | ISO 14001 | Evaluate training needs and results for all identified ISO 14001 EMS and Compliance training requirements. Conduct EMS training | Training requirements and associate training records. Document the training. | EHS | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 44 | ISO 14001 | Evaluate Significant Aspects, Legal and Other Requirements, input from interested parties, and develop Environmental Objectives and Targets. | Significant Aspects and Legal and Other Requirements. Develop proposed Objectives and Targets Review and approve proposed Environmental Objectives and Targets | EHS/AWC Management Team | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 45 | ISO 14001 | Test, evaluate, or conduct awareness training of AWC's Emergency Response Procedures. | Emergency Procedures, SPCC/SWPP3 Plan, and ISO 14001 Emergency Preparedness and Response Procedure. AWC Pollution Prevention Team. Document the results of each. | EHS/AWC Management Team | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 46 | ISO 14001 / ATF BCP | Conduct annual OSHA 1910.120 HAZWOPER Emergency Response Training for associates who are identified as "Tier 1 Responders" for spill response. | SPCC/SWPP3 Plan and Emergency Action Plan. | EHS / SRI Response Team Members | | \$2,861.25 | | | | | | | | | | | | | | | | | | | |
| 47 | ISO 14001 | Track, review, and record AWC's progress towards its Objectives and Targets. Record the results. | Monitoring records (i.e. waste tracking, energy usage, GHG calculations). | EHS | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 48 | ISO 14001 | Evaluate all ISO 14001 EMS documents to ensure that they are current and relevant. | EMS Policy, procedures, work instructions, and forms. Document the results of the review. | EHS | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 49 | ISO 14001 | Evaluate the status of all non-conformances, corrective and preventative action, and report an open items to AWC Management. | Non-conformance documentation. | EHS | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 50 | ISO 14001 | Verify calibration of all environmental monitoring equipment (pH probes) | Calibration records. | EHS | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 51 | ISO 14001 | Conduct audit of signed EHS Contractor Guide documents compared to contractors working onsite. | Completed EHS Contractor Guide forms | EHS/HR | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 52 | ISO 14001 | Update Annual Internal and External Communication information to Associates and Website or other applicable method. | Environmental Performance Data | EHS | | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 53 | ISO 14001 / ATF BCP | Annual Fire Drill Test | BCP plan / EAP / Drill evaluation forms | EHS / Staff | August | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 54 | ISO 14001 / ATF BCP | Annual Severe Weather Test | BCP plan / EAP / Drill evaluation forms | EHS / Staff | May | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 54 | ISO 14001 / ATF BCP | BCP Simulation meeting: Caption Train Drill Meeting Electrical Outage Cyber Attack Pandemic Supply Chain Disruption | BCP plan / EAP | EHS / Staff / OI | October | \$0.00 | | | | | | | | | | | | | | | | | | | |
| 53 | Internal SEO Reporting | Gather and submit the A3 Environmental Data to Japan SEO. | Energy usage, water usage, waste lbs. | EHS | The 16th of each month. | \$0.00 | | | | | | | | | | | | | | | | | | | |

All our permits will expire in 2029

Next PE Review will due 11/2/2027

Permit expires 6/31/27

Report was not needed this year due to low amount of haz waste shipped in prior year.

Next Shipment Due: 7/26/25