

September 13, 2006

Ms. Renette Anderson  
Clean Utah Project Manager  
Utah Department of Environmental Quality  
168 North 1950 West  
Salt Lake City, UT 84116

Dear Renette,

Enclosed please find the signed certification statement for inclusion with our "Clean Utah" application. We are excited at the prospect of being included in the "Clean Utah" program and look forward to working with you. If there is any additional information you require, please don't hesitate to contact me at (801) 908-4980 or by e-mail at [mccreamike@firestonebp.com](mailto:mccreamike@firestonebp.com).

Thank-you for your assistance with our application.

Sincerely,



Michael A. McCrea  
Plant Manager



**NOBODY COVERS YOU BETTER**

3790 West 2555 South • Salt Lake City, UT 84120 • 801-972-6650  
Facsimile: 801-974-0205



## Partner Level Application (Tier Two)

This is a  single facility /  multiple facility application\*  
Applications are accepted at any time and will be reviewed on a semi-annual basis.  
Type or print the following information:

Firestone Building Products Company less than 50  
\* Site Specific Facility Name \*Number of Employees

make polyiso cyanurate rigid foam insulation  
\* Product or Service (What do you do?)

\* Previous Facility Name(s)

Bridgestone Firestone Diversified Products 326150 (NAICS)  
Parent Company, if applicable \*Industry SIC Code (4 digits)

3790 West 2555 South SLC 84120  
\*Facility Street Address City Zip

same  
Mailing Address City State Zip

Mike McCrea Plant Manager  
Contact Name Title

801-908-4980 801-974-0205 McCrea Mike@Firestonebp.com  
Telephone FAX E-mail address

\* If you are applying for multiple facilities designation, include an additional sheet providing the \* information for each facility.

Accepted into Performance Track August 2006

## Environmental Permits

You are eligible to participate in Clean Utah if you are governed by federal, state, or local environmental regulations.

### *For a Permitted Business:*

List the environmental permits you hold. Attach additional sheets if more space is needed. If you are applying as a multiple facility, make sure the information is complete for all facilities to be covered by the Clean Utah designation.

Type of Permit:	Permit Number:	Issued by:
UAC Rule 307	DAQ E A0491005-03A	DAQ
Utah Water Pollution Control Act Title 19 Chapter 5	UTR 000330	DWA

### *For a Small Business:*

In some cases, small businesses are exempted from permit requirements because of the size of the operation. They may still be required to meet certain federal or state environmental regulations, such as record keeping and pollution prevention steps.

Let us know, in the space below, which environment regulations apply to you and what steps you take to assure your operation meets applicable requirements.

RCRA - Conditionally Exempt Small Quantity Generator  
 RCRA ID# UTD10270370/  
 TRI ID 84120 THRM L3790 W  
 AFS ID 4903500277

**Compliance Eligibility Requirement**

Clean Utah seeks to reward those who are willing to go beyond what is required by rule or statute to prevent or reduce pollution. You are eligible to participate provided you:

- have not been in Significant Noncompliance of Drinking Water, Water Quality, or Hazardous Waste regulations, had a High Priority Violation of Air Quality regulations, had a Severity Level I, II, or III Violation of Radiation Control regulations, or any equivalent violation of any state, federal, or local environmental regulation in the past year and you have not had a total of three such violations in the past three years;
- have not had any criminal violation of environmental regulations for the past five years and are not currently the focus of an environmental criminal investigation.
- have no other open or unresolved violation(s).

Have you continued to meet the compliance eligibility requirement?  Yes  No  
*Screening completed under Performance Track Review Summer 2006*

**Note:**

Compliance history and status will be determined by the appropriate DEQ program(s), in consultation with EPA and the Local Health Department.

**Environmental Management System (EMS)**

To be considered for this Tier, you need to have had an Environmental Management System or EMS for one full or continual cycle. Several EMS models currently exist and you can select a model that best meets your circumstances, provided it meets all the components outlined in the Clean Utah policy. DEQ or its designee reserves the right to request documentation of the EMS and/or to make site visits for verification. Complete the EMS worksheet. Then, answer the following questions:

- Does your company have, in place, an EMS for the facility or facilities requesting the Clean Utah Partner Level designation?

Yes  No

- If you are using a particular EMS model, please name: *ISO 14001 Certification*

- Do you meet all the criteria outlined in the EMS worksheet?  Yes  No

- Has your EMS been in place for one full cycle?  Yes  No

- Describe third party or self-assessment protocol used to evaluate your EMS:

*British Standards Institute (BSI)  
Assessment completed by Wilhelm Wang  
in November, 2005*

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## Incentives

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- All participants: DEQ-initiated publicity  
Annual meeting with DEQ policy leaders.
- Partner Level: Use of the Clean Utah Partner logo  
Negotiated incentives
- Possibilities: Selected permit enhancements (indicate specifically what you are seeking)
- Facility specific incentives (indicate specifically what you are seeking)
- (Water Quality/Drinking Water Projects Only) - Recommendation for a reduced percentage or higher priority on loan funds. (This incentive is conditional, based on the approval of the appropriate Board)
- Low Priority for Routine Inspections
- Self audit
- Other incentives offered by EPA to its Performance Track participants.  
(See website)

In the space below, indicate the incentives you are interested in receiving in return for your participation. If facility-specific incentives are selected, indicate what it is you are seeking. Please rank order your preferences, with one being the most preferred.

1. Recognition - Onsite presentation of award
2. Reduced priority inspection for Air Quality
- 3.

### Note

The granting of incentives is at the discretion of DEQ, based on site-specific conditions, the strength of the proposed environmental projects, and the ability of the applicable DEQ program to provide the requested incentive.

## Environmental Improvement Projects

Partner Level participants are required to work on two projects designed to significantly reduce or prevent pollution. "Significant" will be determined by considering your size, your industry sector, and your previous environmental improvement efforts.

Proposed projects cannot be work that is already required - by statute, rule, or as part of a settlement agreement. Wherever possible, your projects should be based on environmental aspects identified in your EMS. At least one of the two projects should benefit a Core area listed in the Clean Utah policy.

Include with this application, an outline of your proposed projects. Submit a separate write up for each project. Make the proposal brief and succinct while clearly addressing the areas below. As you prepare your proposal, keep in mind that it will be considered by the Public Interest Review Panel as part of the approval process and that it will be part of the Clean Utah public record. Therefore, it is recommended that you provide enough information to justify your proposal but do NOT submit proprietary or confidential information.

1. Begin with an introductory statement outlining your project. Tell us:
  - what you plan to accomplish;
  - how you plan to do it; and
  - why you consider your project "significant" and beyond what is required in statute.
2. Identify whether this is a Core or a Suggested project and which area it falls within. (See Clean Utah policy pages 6 and 7).
3. From your EMS, identify the environmental aspect or aspect(s) you are seeking to improve and why. Tell us how Utah's environment will benefit from your actions.
4. Tell us how you plan to monitor and/or measure your progress.
5. Complete the following for each indicator. Be specific:
  - Targeted Indicator:
  - Baseline year:
  - Baseline total (indicate amount):
  - Targeted reduction (indicate amount):
  - Annual reduction: (indicate amount):
  - Target year to reach this goal:
6. Identify any permits or special considerations you may need to do this project.
7. Tell us how you plan to meet the public participation requirement. (See Clean Utah policy page 9)
8. Any other information clarifications you want us to consider.

### Commitment 1

- 1a What category have you selected from the Environmental Performance Table? Waste
- 1b What indicator have you selected from the Environmental Performance Table? Non-hazardous waste generation

1c Does your commitment include everything covered by the indicator (e.g., all VOCs, all non-hazardous waste), or a specific substance or component (e.g., ethane, cardboard)? All measurements should represent the performance level for the indicator across the entire facility. For many indicators, however, you may choose to focus your commitment on a specific subset of the indicator, e.g. a specific material, a specific group of toxic air emissions, a particular waste component, a specific VOC, etc. Specific

If your commitment is to a specific substance or component, please provide additional detail on your indicator (e.g., specific chemical to be reduced, specific waste component). Non-hazardous waste dust bricks

1d What activities or process changes do you plan to undertake at your facility to accomplish your commitment e.g., technology changes in a particular process line, employee training? Process improvements to reduce amount of dust generated per unit of production, research alternative use for dust bricks (i.e. reduce landfill volume)

2 Are you proposing this as a Challenge Commitment? No

3a Does this commitment address a significant aspect in your EMS? Yes

3b If no, please explain why you believe this indicator should be included as a performance commitment.

In the table below, please enter your facility's amount of non-hazardous waste, broken down by waste management method. Please enter both the amounts that you manage currently and that you intend to manage in 2008. "Waste" is defined as all materials that are sent off-site that are neither product nor product packaging.

Is the goal of your non-hazardous waste commitment to reduce non-hazardous waste, to improve methods of waste management, or a combination of both?	Combination of Both Strategies		
4a Please provide information for these calendar years.	Baseline: 2005	Future: 2008	
4b Method of Waste Management	How much of your waste is handled using each management method?		
	Baseline	Future	Units

Landfill	118.32	100.25	Tons
Reused/recycled off-site	0	12.15	Tons
<b>Total Non-Hazardous Solid Waste</b>	<b>118.32</b>	<b>112.40</b>	<b>Tons</b>

5 Does the quantity presented in the future quantity column represent an absolute goal or a normalized goal? Normalized goal (i.e. indexed to level of business in baseline year)

6 Whether your goal is absolute or normalized, in your annual performance reports you will need to provide normalizing factors and normalized quantities of your annual data. board feet of production

In the textbox to the right, please briefly describe your basis for normalizing. Examples of potential normalizing bases include:

- gallons of paint produced
- square feet of circuit boards sold
- number of patients seen
- dollars of sales adjusted for inflation
- number of employees (for R&D and administrative sites only)

7a Are you subject to Federal, State, Tribal, or local regulatory requirements for this indicator? No

7b If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.

### Commitment 2

1a What category have you selected from the Environmental Performance Table? Material Use

1b What indicator have you selected from the Environmental Performance Table? Materials used

1c Does your commitment include everything covered by the indicator (e.g., all VOCs, all non-hazardous waste), or a specific substance or component (e.g., ethane, cardboard)? All measurements should represent the performance level for the indicator across the entire facility. For many indicators, however, you may choose to focus your commitment on a specific subset of the indicator, e.g. a specific material, a specific group of toxic air emissions, a particular waste component, a Specific



specific VOC, etc.

**If your commitment is to a specific substance or component, please provide additional detail on your indicator (e.g., specific chemical to be reduced, specific waste component).**

Process chemicals (see attachment), facility-wide use

**1d What activities or process changes do you plan to undertake at your facility to accomplish your commitment e.g., technology changes in a particular process line, employee training?**

Technology changes, employee training, optimization of formula

**2 Are you proposing this as a Challenge Commitment? Are you proposing this as a Challenge Commitment to reduce the use of Priority Chemicals?**

No

**If yes, what Priority Chemical are you committing to reduce?**

**3a Does this commitment address a significant aspect in your EMS?**

Yes

**3b If no, please explain why you believe this indicator should be included as a performance commitment.**

	Baseline	Future
<b>4a Please provide information for these calendar years.</b>	2005	2008
<b>4b What units are you using to quantify this indicator?</b>	Pounds	
<b>4c List the baseline annual quantity of the indicator and the annual quantity you are committed to achieve by the future year.</b>	16,628,688	15,797,254

**5 Does the quantity presented in the future quantity column represent an absolute goal or a normalized goal?**

Normalized goal (i.e. indexed to level of business in baseline year)

**6 Whether your goal is absolute or normalized, in your annual performance reports you will need to provide normalizing factors and normalized quantities of your annual data.**

board feet of production

**In the textbox to the right, please briefly describe your basis for normalizing. Examples of potential normalizing bases include:**

- gallons of paint produced
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- dollars of sales adjusted for inflation
- number of employees (for R&D and administrative sites only)

7a Are you subject to Federal, State, Tribal, or local regulatory requirements for this indicator? No

7b If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.

Attachments (if applicable) :

[SLC%20PTrack%20Additional%20Info.pdf](#)

## SECTION D: Tell us about your public outreach and reporting.

1. How do you identify and respond to the community's environmental concerns?

The plant manager responds to all inquiries from the public. The plant manager documents all external communication through a database module. This information is forwarded to corporate personnel for review.

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

The plant manager communicates this information through various local agency contacts in Salt Lake City. He attends LEPC meetings and hosts annual site visits with the local fire department.

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

Web Site

URL: <http://www.bridgestoneamericas.com>

4. Are there any ongoing citizen suits against your facility?

No

If yes, describe briefly below:

5. List references below:

**Representative of a Community/ Citizen Group**

**Organization:** West Lake Business Park Owners Association  
**Name:** B.J. Snedakar - Administrator  
**Phone:** (801) 954-7702

**State/tribal/local regulator**

**Organization:** Utah Department of Environmental Quality  
**Name:** Jay Paul Morris  
**Phone:** (801) 536-4079

**Other community/local reference**  
(e.g., emergency management official or business associate)

**Organization:** Huntsman Chemical  
**Name:** Greg Banks  
**Phone:** (281) 719-4915

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## Terms and Conditions

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Acceptance as a Partner Level participant entitles my facility to:

- display the Clean Utah logo at our place of business and in facility-related publicity. I understand that if my company has multiple facilities in Utah, only those locations covered by the approved application are eligible to use this logo.
  
- participate in DEQ-initiated publicity and in an annual meeting with DEQ policy leaders. Other incentives will be negotiated, based on the requests outlined in this application. I understand that final approval will be outlined in a signed Incentive Agreement and is subject to site-specific conditions and the ability of the applicable DEQ program to provide the incentive.

As a Partner Level participant, I agree to:

- remain in compliance with applicable environmental regulations. I understand that failure to do so may be grounds for removal.
  
- continue our EMS process and actively work on approved Clean Utah projects.
  
- submit an Annual Report, certifying ongoing compliance and including a summary of project commitments, accomplishments to date, major indicators of environmental improvements, and a plan for the upcoming year
  
- conduct appropriate public outreach activities, as outlined in the Clean Utah policy.

All *Clean Utah* participants agree to remain in compliance with applicable environmental regulations. Failure to do so may be grounds for removal.

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### Certification Statement

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*(to be signed by a senior facility manager)*

I have read and agree to the terms and conditions for participation in the Clean Utah Program as described in the Clean Utah policy and application. I have personally examined and am familiar with the information contained in this application and it 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. I agree that Utah DEQ's decision whether to accept participants into or remove them from Clean Utah is wholly discretionary.

I am a 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.

Michael A. McCrea  
Signed

09/13/2006  
Date

Michael A. McCrea  
Print Name

Plant Manager  
Title

(401) 908-4980  
Telephone

mccrea.mike@firestonebp.com  
E-mail address

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**Terms and Conditions**

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*Signed*

*Date*

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*Print Name*

*Title*

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*Telephone*

*E-mail address*