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Utah Department of Environmental Quality
www.deq.utah.gov/cleanutah
1-800-458-0145

**Partner Level Application
(Tier Two)**

This is a /_X_/ 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:*

Hexcel Corporation
** Site Specific Facility Name*

350
**Number of Employees*

Manufacture of Carbon Fiber and Pre-impregnated Tape, Cloth and Tow for the Aerospace,
Automotive, Construction and Recreational Industries
** Product or Service (What do you do?)*

Hercules –Aerospace – Composite Products Division
** Previous Facility Name(s)*

2824, 2821
**Industry SIC Code (4 digits)*

Parent Company, if applicable

6800 West, 5400 South
**Facility Street Address*

West Valley City
City

84120
Zip

P.O. Box 18748
Mailing Address

Salt Lake City
City

Utah
State

84118-0748
Zip

Shannon Storrud
Contact Name

Environmental Engineer
Title

801-508-8011
Telephone

801- 508-8090
FAX

Shannon.Storrud@Hexcel.Com
E-mail address

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

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:
Air Permit – Approval Order	DAQE-AN1386012-04	UDAQ
Water Discharge - UPDES	UT0025305	UDWQ
RCRA – Hazardous Waste Generator	UTR000002527	UDSHW
Drinking Water System	18001	UDDW

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.

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? / X / Yes / / No

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! Leader Level designation?

/ X / Yes ___ / No

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

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

- Has your EMS been in place for three full cycles? / X / Yes / ___ / No

- Describe third party or self-assessment protocol used to evaluate your EMS: As part of the EMS a comprehensive self-audit program is undertaken each year. In past years the audits were directed toward the individual elements. For 2005 the self-audits are based on process performance and how all the elements relate to the process being audited. The Hexcel EMS has been certified by Llyod's Register Quality Assurance (LRQA) since October 2001 and as such is audited by LRQA every 6 months.

Incentives

All participants:	DEQ-initiated publicity Annual meeting with DEQ policy leaders.
Leader Level:	Use of the Clean Utah Leader 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. Please rank order your preferences, with one being the most preferred.

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.

1. Hexcel would like to extend on-site storage times for hazardous wastes as mandated by the Resource Conservation and Recovery Act (RCRA). Specifically, this incentive would allow Hexcel a large quantity hazardous waste generator up to 180 days (and 270 days if the waste is transported 200 miles or more) to accumulate hazardous waste without a RCRA permit or interim status, provided that Hexcel meet certain conditions (TBD).

2. Part of the Hexcel facility falls under the Miscellaneous Coating MACT and Hexcel would like to take advantage of reducing the frequency of MACT reporting. Also, the incentive also permits alternative, and streamlined, reporting requirements for Performance Track facilities that achieve

MACT or better emission levels. Additionally, if Hexcel eliminated HAP or reduced HAP emissions, the incentive would allow Hexcel to take advantage of either of the following options:

Option 1: Sources that use P2 to completely eliminate HAP emissions from all emission points subject to a particular MACT rule may apply to be exempt from MACT and Title V requirements.

Option 2: Sources that use P2 to reduce HAP emissions to the level of the MACT standard or better (without completely eliminating HAP emissions) can apply for alternative requirements, but technically remain subject to the MACT standard and Title V.

3. Reduced Oversight and/or low inspection priority – Hexcel would be inspected on a less-frequent schedule (to be negotiated with the department). Hexcel understands that all record keeping and related requirements would still remain in effect.

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.

A proposed project cannot be work that is already required - by statute, rule, or as part of a settlement agreement. Wherever possible, your project should be based on environmental aspects identified in your EMS.

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. Summarize the projects you completed to meet the Tier Two requirements and the environmental improvements and benefits your company has had as the result of having an EMS for three complete cycles. See attached 2004 Goals and Objectives Project sheets

Provide an introductory statement outlining your proposed Leadership project. See attached 2005 goals and Objectives

3. Identify the Core area to be benefited by this project. (See Clean Utah policy pages 6 and 7)
Energy Management, Refuse Waste, Recycling Efforts

4. Identify the environmental aspect or aspect(s) you are seeking to improve and why. (From your EMS) Energy and Wastes

5. Outline what you will accomplish and how. Provide enough information that a DEQ staff member will be able to evaluate the project’s feasibility. Include: See Attached 2005 Goals and Objectives

- a timeline with key milestones;
- current, measured pollutant levels (provide the timeframe), targeted reductions, and/or other environmental benefits; and
- a description of how you plan to monitor progress and measure success.

6. Identify any permits or special considerations you may need to do this project. No special considerations.

7. Tell us why you consider your project “significant”. Tell us why this should be considered a “major” leadership project Hexcel considers all goals and objectives significant in that a yield in production uses less energy, produced less emissions and scrap and wastes are recycled or reduced.

8. Tell us how you plan to meet the public participation requirement. (See Clean Utah policy page 9) Not sure on this issue, would like to hear recommendations from program administrators.

9. Any other considerations, information, or clarifications you wish to include.

Terms and Conditions

Acceptance as a Leader 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 Leader 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.

Certification Statement

(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.

Signed

Date

Print Name

Title

Telephone

E-mail address

Objectives and Targets Project Plan

Year: 2005 _____

Project Plan Number: _____ **2005 - 04** _____

Narrative of Objective and Target: *Implement methylene chloride recycling in labs.*
The use of recycled methylene chloride instead of purchasing new methylene chloride will greatly reduce the cost of new product as well as the amount and cost of hazardous wastes.

Assigned To: Ed Gunderson/ Ken Schulte

Due Date: Quarterly tracking of results

Quarter 1 Results: _____ **% Complete: 25**

Quarter 2 Results: _____ **% Complete: 50**

Quarter 3 Results: _____ **% Complete: 75**

Quarter 4 Results: _____ **% Complete: 100**

Assessment of Results:

Comments:

Environmental Engineer Signature _____

Date: _____

Objectives and Targets Project Plan

Year: 2005

Project Plan Number: 2005 - 03

Narrative of Objective and Target: *Fully Integrate Plant-Wide Recycling Program.*
Fully integrate the plant-wide recycling effort in order to recycle usable materials as well as reduce refuse waste and non-hazardous waste disposal costs
Goal is 2.0 MM pounds sent for recycle

Assigned To: Site Management Team – Shannon Storrud assigned team leader

Due Date: Quarterly tracking of results

Quarter 1 Results: % Complete: 25

Quarter 2 Results: % Complete: 50

Quarter 3 Results: % Complete: 75

Quarter 4 Results: % Complete: 100

Assessment of Results:

Comments:

Environmental Engineer Signature _____

Date: _____

Objectives and Targets Project Plan

Year: 2005

Project Plan Number: 2005 - 05

Narrative of Objective and Target: *Reduce plant-wide steam consumption by 10%. (2004 vs. 2005)*

The steam reductions will be reflected in usage units per production units.

Results will be tracked quarterly.

The reduction will be attained by steam usage surveys, repairs and replacement of steam equipment

Assigned To: Energy Management Team – Shannon Storrud assigned team leader

Due Date:

Quarter 1 Results: % Complete: 25

Quarter 2 Results: % Complete: 50

Quarter 3 Results: % Complete: 75

Quarter 4 Results: % Complete: 100

Assessment of Results:

Comments:

Environmental Engineer Signature _____

Date: _____

Objectives and Targets Project Plan

Year: 2004

Project Plan Number: 2004 - 04

Narrative of Objective and Target: *Evaluate Paper Wipes in place of Cloth Wipes in Building 2478*
The use of paper wipes instead of cloth wipes will greatly reduce to amount (volume & weight) of solid waste being shipped as hazardous wastes.

Assigned To: Monique Russek

Due Date: Quarterly tracking of results

Quarter 1 Results: % Complete: 25
No Data Available

Quarter 2 Results: % Complete: 50
From January 2003 to July 2003, 4000 lbs. of rags were used. Cost = \$4900.
From January 2004 to July 2004 a total of 2000 lbs of rags and 10 rolls & 4 boxes of wipes were used totaling \$2908.60
Results - 2000 lbs. of rags not having to be disposed. A product cost savings of approximately \$2000 and a waste disposal cost savings of approximately \$1000.

Quarter 3 Results: % Complete: 75
From July 2003 to Sept 2003, 1900 lbs. of rags were used. Cost = 2327.50.
From July 2004 to Sept 2004 a total of 750 lbs. of rags and 10 rolls of wipes were used totaling \$1309.75
Results - 1150 lbs. of rags not having to be disposed. A product cost savings of approximately \$1018 and a waste disposal savings of approximately \$650

Quarter 4 Results: % Complete: 100
From Sept. 2003 to Dec. 2003, 1500 lbs. of rags were used. Cost = 1837.50.
From Sept. 2004 to Dec. 2004, a total of 750 lbs of rags and 10 rolls of wipes were used totaling \$1309.75
Results - 750 lbs. of rags not having to be disposed. A product cost savings of approximately \$528 And a waste disposal cost savings of approximately \$450

Assessment of Results:
Solid waste rag reduction of 2100 lbs. not having to be sent for incineration. Product cost savings of \$3546 and a waste disposal cost savings of \$2100. Total cost savings of \$5646

Comments:
Other production areas using cloth rags should consider implementing paper wipe replacement

Environmental Engineer Signature _____

Date: _____

Objectives and Targets Project Plan

Year: 2004 **Project Plan Number:** 2004 - 03

Narrative of Objective and Target: *Fully Integrate Plant-Wide Recycling Program.*
 Start and fully integrate a plant-wide recycling effort in order to recycle usable materials as well as reduce refuse waste and non-hazardous waste disposal costs

Assigned To: Site Management Team – Shannon Storrud assigned team leader

Due Date: Quarterly tracking of results

Quarter 1 Results: **% Complete: 25**

- 2,841 pallets shipped to A1 Pallet Co.
- 140,000 lbs of paper shipped to Griff Paper & Film.
- 81,289 lbs. of cardboard shipped to Waste Management.
- 24,654 lbs. of crushed steel drums shipped to Western Metal Recycling.
- 58 drums MECL & 69 drums NMP shipped to Onyx Environmental

Quarter 2 Results: **% Complete: 50**

- 2,745 pallets shipped to A1 Pallet Co.
- 130,000 lbs of paper shipped to Griff Paper & Film.
- 84,440 lbs. of cardboard shipped to Waste Management.
- 21,378 lbs. of crushed steel drums shipped to Western Metal Recycling.
- 45 drums MECL & 23 drums NMP shipped to Onyx Environmental.

Quarter 3 Results: **% Complete: 75**

- 2,938 pallets shipped to A1 Pallet Co.
- 175,000 lbs of paper shipped to Griff Paper & Film.
- 92,695 lbs. of cardboard shipped to Waste Management.
- 30,618 lbs. of crushed steel drums shipped to Western Metal Recycling.
- 39 drums MECL & 29 drums NMP shipped to Onyx Environmental.

Quarter 4 Results: **% Complete: 100**

- 2,682 pallets shipped to A1 Pallet Co. **Year End – 11206 pallets - 448240 lbs.**
- 135,000 lbs of paper shipped to Griff Paper & Film. **Year End – 580000 lbs.**
- 67,700 lbs. of cardboard shipped to Waste Management. **Year End – 326124 lbs.**
- 11,466 lbs. of crushed steel drums shipped to Western Metal Recycling. **Year End – 88116 lbs.**
- 48 drums MECL & 25 drums NMP shipped to Onyx Environmental. **Year total shipped – 190 MECL, 146 NMP**

Assessment of Results:
 Overall 1,634,230 lbs of material sent for recycle in 2004

Comments:
 Will be receiving \$0.02 per pound from Griff Paper & Film for paper in 2005

Environmental Engineer Signature _____ Date: _____

Objectives and Targets Project Plan

Year: 2004 Project Plan Number: 2004 - 05

Narrative of Objective and Target: *Reduce plant-wide energy consumption by 1%.*
The energy reductions will be reflected in usage units per production units.
Results will be tracked monthly or quarterly.
The reduction will be attained by energy conservation "best practices" fiberline startup/shutdown practices and other directives as assigned by the energy management team.

Assigned To: Energy Management Team – Shannon Storrud assigned team leader

Due Date: Monthly tracking of results

Quarter 1 Results: % Complete: 25
See attached energy charts.

Quarter 2 Results: % Complete: 50
See attached energy charts

Quarter 3 Results: % Complete: 75
See attached energy charts

Quarter 4 Results: % Complete: 100
See attached energy charts

Assessment of Results:
Electrical: Fibers - 7.4% increase (Fiber Line 2), Matrix – 9.9% decrease
Natural Gas: Fibers – 16% decrease, Matrix – 8.4% increase (Tower Operation)
Steam: Fibers - 55% increase (Fiber Lines 2 & 3), Matrix – 24% decrease
Water: Fibers – 18% decrease, Matrix: 11% decrease
Comments:
Presently calibrating steam meters and verifying steam consumption with ATK.
Tests show considerable steam consumption by Fiber Line 2

Environmental Engineer Signature _____

Date: