

A07-0012



***National
Environmental
Achievement Track***

Application Form

Firestone Agricultural Tire Company

Name of facility

Bridgestone / Firestone

Name of parent company (if any)

Second Avenue & Hoffman Road

Street address

Street address (continued)

Des Moines, Iowa 50313

City/State/Zip code

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

Name Dain M. Brandrup

Title Environmental / Utilities Engineer

Phone (515) 243-1211 x5258

Fax (515) 237-5695

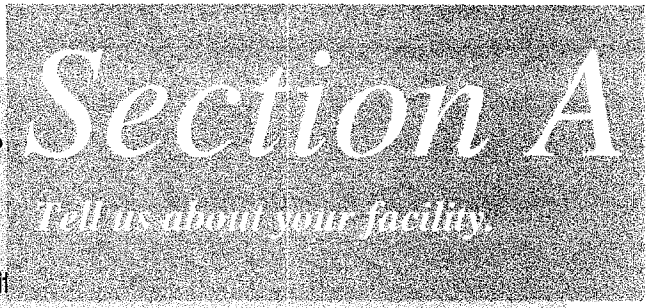
E-mail brandrupdain@firestoneag.com

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?

The Firestone Ag Tire Company manufactures radial and bias agricultural tires, forestry tires, curing bladders and rubber tracks.

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
3011

NAICS
326211

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.

IAD073494296

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.

Please see enclosed 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?

ISO 14001 certified on October 14, 1999

Section B

Tell us about your EMS.

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 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

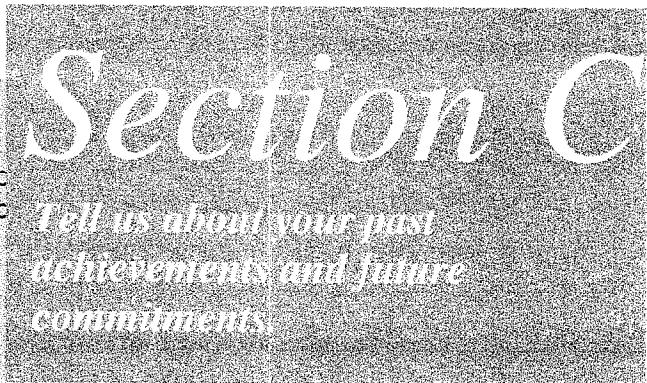
Other

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make 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 lbs landfilled / Mlbs production	Quantity	Units lbs landfilled / Mlbs production
Solid Waste Landfilled	23.7		20.3	
<p>i. How is the current level an improvement over the previous level?</p> <p>Decreased the weight of landfilled waste from a high of 68.0 lbs per Mlb of production in the benchmark year of 1988 to 23.7 lbs / Mllb of production at year's end 1997. Since 1998 the amount of landfilled waste has continued to improve to 20.3 lbs per Mlb of production (as of year end numbers 1999).</p> <p>ii. How did you achieve this improvement?</p> <p>Improvements have been achieved through a combination of increased kaisan activities, the C-95 program (an internal corporate cost reduction initiative) and increased recycling of potentially landfilled waste streams.</p>				

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
Uncured Rubber Waste Landfilled	5.99	lbs rubber / Mlb of production	4.20	lbs rubber / Mlb of production
<p>i. How is the current level an improvement over the previous level?</p> <p>The Firestone Agricultural Tire Company has reduced the overall amount of rubber waste that is sent to the landfill by 1.79 lbs per Mlb of production.</p>				
<p>ii. How did you achieve this improvement?</p> <p>Improvements have been achieved by increasing the amount of waste rubber compound that is remilled and reused internally. The majority of landfilled uncured rubber waste is not recyclable because it is burnt, scorched, lumpy or excessively hard to handle.</p>				

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

- | | |
|--|---|
| <p>a. What is the aspect?</p> | <p>Material Use - Total Material Use of Wooden Pallets</p> |
| <p>b. Is this aspect identified as significant in your EMS?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> |
| <p>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.</p> | <p><input checked="" type="checkbox"/> Option A:
Absolute value 1,003.70 / Mlbs
(Quantity/Units)</p> <p><input type="checkbox"/> Option B:
In terms of units of production or output (Quantity/Units)</p> |

- 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 501.85 / Mlbs
(Quantity/Units)
- Option B:
In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement?
- Due to quality and environmental issues wood pallets will be phased out of use at the Firestone Agricultural Tire Company. Using the first half of 2000 as a benchmark, we will reduce the total amount of pallets used (and then subsequently recycled or landfilled) by half.

Second aspect you've selected

- a. What is the aspect?
- Air Emissions - Emissions of Toxics from cements, solvents, paints and inks used in production
- 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 0.90 tons / year
(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 0 tons / year
(Quantity/Units)
- Option B:
In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement?
- Substitute existing cements, solvents, paints and inks that contain hazardous air pollutants (HAPs) used in production with 'non-HAP' cements, solvents, paints and inks.

Third aspect you've selected

- a. What is the aspect? Material Use - Hazardous Material Use of slab lube soap containing glycol ethers
- 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.
- | | |
|---|---|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 274,472 lbs / year of slab lube soap containing glycol ethers
(Quantity/Units) |
| <input type="checkbox"/> 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.
- | | |
|---|---|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 0 lbs / year of slab lube soap containing glycol ethers
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of units of production or output | (Quantity/Units) |
- e. How will you achieve this improvement? Product substitution. This will be an improvement because it will eliminate the discharge/release of a TRI chemical to the land and water.

Fourth aspect you've selected

- a. What is the aspect? Energy Use - Total 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.
- | | |
|--|---|
| <input type="checkbox"/> Option A:
Absolute value | (Quantity/Units) |
| <input checked="" type="checkbox"/> Option B:
In terms of units of production or output | 11.0 MBtu / lb annually
(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.
- | | |
|--|--|
| <input type="checkbox"/> Option A:
Absolute value | (Quantity/Units) |
| <input checked="" type="checkbox"/> Option B:
In terms of units of production or output | <10.0 MBtu / lb annually
(Quantity/Units) |

e. How will you achieve this improvement?

The Firestone Agricultural Tire Company will reduce total energy consumption by installing new energy efficient equipment, retiring older / inefficient equipment, continuing insulation projects and looking for energy saving opportunities when possible.

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide 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?

The Firestone Agricultural Tire Company has developed, through its EMS, an organized and efficient approach to identifying and responding to community concerns. External calls relating to environmental concerns are directed to the Environmental Department. This includes both verbal and written requests. Additionally telephone contacts with regulators / interested parties are recorded on an External Communications log and followed-up accordingly.

Internal concerns are also directed to the Environmental Department and are also followed up accordingly.

The Firestone Agricultural Tire Company is also an active member of the Association of Business and Industry in Iowa, which holds regular environmental meetings. These meetings provide regulators and the regulated community a forum in which the concerns and goals of each party can be communicated. These meetings also allow for discussion and response about issues specifically raised by citizens and the general public.

Lastly, the Firestone Agricultural Tire Company identifies issues that concern the community by participating in the Greater Des Moines Area Chamber of Commerce and via our Plant Manager's involvement with the Simpson College Advisory Board.

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

As a member of the Iowa Association of Business and Industry, the Firestone Agricultural Tire Company Tire has an opportunity to inform the community of environmental matters that affect them. Additionally, the general public is informed on an as-needed basis about environmental matters through local news media (newspaper, radio, television) and via the company's Web site.

The Firestone Agricultural Tire Company is also involved with various community groups to maintain community relations. Groups such as the United Way, Convalescent Home for Children and the Variety Club of Iowa provide the company and its employees an opportunity to share resources and information about the company with the community.

Another way that the Firestone Agricultural Tire Company promotes communications is through the numerous public tours that are conducted throughout the year for various commercial, civic and community groups.

The Firestone Agricultural Tire Company also encourages its employees to play an active role in community programs. Through community service, our employees are able to share important news with the community.

Finally, the Firestone Agricultural Tire Company communicates with its own employees through a monthly newsletter. This is in addition to internal departmental communications, periodic training updates (including on-site college courses), and a plant-wide video communication system.

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

- Website www.firestoneag.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

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	United Way	Mary Hall	(515) 246-6511
<i>State/Local Regulator</i>	Polk County Air Quality Division	Gary Young	(515) 286-3372
<i>Other community/local reference</i>	Wastewater Reclamation Facility	Royce Hammitt	(515) 323-8010

Section E

Application and Participation Statement

On behalf of the Firestone Agricultural Tire Company
[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 *L. E. Groff* 9/28/00

Printed Name/Title L. E. Groff

Facility Name Firestone Agricultural Tire Company

Facility Street Address Second Avenue & Hoffman Road

Facility ID Numbers IAD073414296

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 Firestone Agricultural Tire Company
Facility Location: Des Moines, IA
Facility ID Number(s): IAD073494296
(attach additional sheets if necessary)

Air Pollution Regulations

- | | Check All
That Apply |
|---|-------------------------------------|
| 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) | <input checked="" type="checkbox"/> |
| 2. Permits and Registration of Air Pollution Sources | <input checked="" type="checkbox"/> |
| 3. General Emission Standards, Prohibitions and Restrictions | <input type="checkbox"/> |
| 4. Control of Incinerators | <input checked="" type="checkbox"/> |
| 5. Process Industry Emission Standards | <input checked="" type="checkbox"/> |
| 6. Control of Fuel Burning Equipment | <input checked="" type="checkbox"/> |
| 7. Control of VOCs | <input checked="" type="checkbox"/> |
| 8. Sampling, Testing and Reporting | <input checked="" type="checkbox"/> |
| 9. Visible Emissions Standards | <input checked="" type="checkbox"/> |
| 10. Control of Fugitive Dust | <input checked="" type="checkbox"/> |
| 11. Toxic Air Pollutants Control | <input checked="" type="checkbox"/> |
| 12. Vehicle Emissions Inspections and Testing | <input type="checkbox"/> |

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)

- | | |
|------------------------------------|-------------------------------------|
| 13. 567 IAC Chapters 20-25, 28, 29 | <input checked="" type="checkbox"/> |
| 14. | <input type="checkbox"/> |

Hazardous Waste Management Regulations

- | | |
|---|-------------------------------------|
| 1. Identification and Listing of Hazardous Waste (40 CFR 261) | |
| - Characteristic Waste | <input checked="" type="checkbox"/> |
| - Listed Waste | <input checked="" type="checkbox"/> |
| 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262) | |
| - Manifesting | <input checked="" type="checkbox"/> |

- 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. 567 IAC Chapter 149
- 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. 567 IAC Chapter 131
- 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. 567 IAC Chapters 100-101
- 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. 567 IAC Chapters 60-64
- 18. Municipal Code of Des Moines - Chapter 21 Subchapter 7

Drinking Water Regulations

- 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 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. Allegations/Significant Adverse Reactions (40 CFR 717)
- 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)
-

2. RCRA Corrective Action (identify)

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

3. July 7, 1986 IDNR Letter of Agreement & Amendments (Remediation, Monitoring and Reporting)

4.