



Annual Performance Report Form

Facility Name: Firestone Agricultural Tire Company

Performance Track ID #: A070012

Annual Performance Report #: 1

Reporting Year: 2001

Due Date: April 1, 2002

Section A

General Facility Information

To the extent possible, EPA will pre-complete items A.1-A.8 for you. Please ensure that the information in A.1-A.8 below is accurate, complete, and up to date. Please supply or revise any information as necessary and then check the box to the left of the item(s) to indicate where changes have been made. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

Did you make changes? If so, check box.

- A.1 Name of your facility: Firestone Agricultural Tire Company (FSAG)
- A.2 Name of your parent company: Bridgestone Firestone North American Tire, LLC
- A.3 Facility contact person for the Performance Track program:
Name: Mr./Mrs./Ms./Dr. Mr. Dain M. Brandrup
Title: Utilities / Environmental Engineer
Phone: (515)243-1211 x5258 Fax: (515)237-5695 E-mail: brandrupdain@firestoneag.com
- A.4 Facility's location:
Street Address: Second Avenue & Hoffman Road
Street Address (cont.):
City/State/Zip Code: Des Moines, IA 50313
- A.5 Facility's website address (if any): www.firestoneag.com
- A.6 Number of employees (full-time equivalents) who currently work in the facility:
 Fewer than 50 50 - 99 100 - 499 500 - 1000 More than 1000
- A.7 Does your company meet the Small Business Administration definition of a small business for your sector? Yes No
- A.8 North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility: 326211
- A.9 In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them in the space below. Yes No
The Firestone Agricultural Tire Company no longer manufactures rubber tracks. Additionally, the FSAG does manufacture ATV tires (this was inadvertently omitted from the original application). So a current, accurate statement of what FSAG manufactures would be: radial and bias agricultural tires, forestry tires, ATV tires and curing bladders.

A.10



Please update the list of environmental requirements that apply to your facility. In the space below, indicate any changes that have taken place during this reporting period. If you have no changes to report, please write "No changes."
No changes

Section B

Environmental Management System

B.1 Environmental Management System Assessment. Please summarize EMS assessments conducted *during the year*. Attach additional sheets as necessary.

a. Was an EMS audit or other assessment done by an independent third party?

Yes No

If yes, please provide the *type* (e.g., ISO 14001 certification), the *scope*, and the *dates* (mo/yr) of each assessment.

ISO 14001 surveillance audits conducted by Llyod's Register Quality Auditors (LRQA) on the following dates: April 23-25, 2001 (scope was Calendering and Receiving Departments, the Cement Room and Laboratories), November 5-7, 2001 (scope was the Tubing Department, Energy Management and Air Quality Management).

b. Was an internal or corporate EMS audit conducted? Yes No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit.

Department	Date	Auditor
401 Receiving	March-01	Brandrup
461 Cement Room	March-01	Brandrup
422 Calendering	April-01	Mussetter
761 QA Labs	April-01	Mussetter
Purchasing	July-01	Mussetter
426 Tubing	July-01	Mussetter
831 Maintenance	August-01	Brandrup
954 Engineering	August-01	Mussetter
831 Electrical Repair Shop	September-01	Mussetter
Human Resources	September-01	Mussetter
Information Technology	September-01	Mussetter
793 Warehouse / Physical Distribution	September-01	Mussetter
412 Compounding & Mixing	September-01	Mussetter
535 Rubber Tracks	October-01	Mussetter
831 Maintenance	October-01	Mussetter
Cell 2	December-01	Mussetter
Cell 1	January-01	Mussetter
Cell 3	January-01	Mussetter

Objectives: verify compliance, identify potential problems, continuously improve the EMS, prepare for external audits

General Scope: ISO 14001 awareness, environmental policy, operational controls (i.e. standard practices, conspicuous standards), significant environmental aspects, emergency preparedness (i.e. spill response, natural disaster, evacuation, fire), training, document control and area specific issues.

c. Was a compliance audit conducted? Yes No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit, and indicate *who* conducted the audit(s) (e.g., facility staff, corporate groups, third party).

Conducted By: Mitch Mussetter, MWH (environmental contactor)

Completed: December 2001-January 2002

Resources Used: Dakota Auditor Software (version 5.2), Significant Environmental Aspects list, Legal & Other Requirements List

Scope:

Air Quality Management - Emissions Inventory, Permits, Title V, NSPS, PSD, NESHAPs, RMP, Stratospheric Ozone Protection, Compliance Stack Testing, Continuous Release Reporting

Water Discharges - Effluent Discharge Sampling, Sanitary Discharge Sampling, Permits, POTW Inspection, Treatment Systems, NPDES, SPCC, Storm Water Inspections, Storm Water Sampling

Waste Management - RCRA Hazardous Waste Handling and Procedures, Manifests, TSD Facilities, Solid Waste Management, Scrap Tires, Permits, Special Waste, PCBs, Inspections

Chemical Review Process - Chemical Review Process, Form R Reporting, Tier II Reporting, MSDS Management, TSCA Inventory, Imports, Exports, Reporting and Record Keeping

Energy Management - Tracking, Reporting and Record Keeping

Facility & Grounds Issues - FIFRA, Contractor Management, AST, UST Inspections and Management, Letter of Agreement Sampling, Requests for Information

Emergency Preparedness - Spills/Release Reporting

d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here.

Inspection by Brent Blanchard from Polk County Air Quality on 10-29-01. The scope of the audit included a file review, and an inspection of the facility's permitted emission points. No items of concern were noted during the inspection, however, Firestone was informed of a complaint made by an individual residing near the plant. The individual was concerned regarding particulate matter (carbon black) on a boat he was trying to sell. Brent passed on Firestone's contact information (Environmental Engineer and Purchasing Manager), neither were contacted.

Inspection by Larry Hare and Don Fights from the Des Moines Area Water Reclamation Authority (WRA). The inspection included a file review and a plant inspection. No items of concern were noted during the inspection.

Section B

(continued)

B.1

e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audits.

Document control problems were discovered in more than one area. Corrective actions taken to correct document control problems included working with supervisors and reevaluating how many controlled copies of each standard an area needs and where those copies should be located.

Missing EMS training records were also discovered in more than one area. Whenever an employee starts at Firestone Ag Tire or stwiches jobs within Firestone they are required to be trained on the environmental aspects and standards associated with their new job. Training is also required whenever an applicable standard is changed. Documentation of this training is required. During audits it was observed that some employees were aware of what they needed to be but documentaion of their training could not be found. Comprensive self audits were conducted in many areas and employees who were missing training records were retrained and their training records were updated. In additon many areas have instituted annual environmental training reviews to ensure all employees are familiar with the EMS and have the proper training records.

f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

Yes No No such instances identified

If no, please explain your plans to correct these instances. There a few open internal audits that will require additional standards to be created and training for these standards to be completed. Additionally, storm water sampling for Total Zinc has indicated that the facility is over the Cutoff Concentration listed in its NPDES permit (NPDES permit renewal October 2002, hope to address w/ the IDNR at that time).

g. When was the last Senior Management review of your EMS completed? *mo/yr* 10-11-01

Who headed the review?

Name: Mr./Mrs./Ms./Dr. Mr. Lawrence E. Groff

Title: Director of Manufacturing

Section B

(continued)

B.2 ISO 14001 Certification. Is your facility currently certified to ISO 14001? Yes No

B.3 Environmental Aspects Identification. When did your facility last conduct a systematic identification and/or review of your environmental aspects? *mo/yr* 10-05-01

B.4 Progress Toward Achieving Objectives and Targets. In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. **You may limit the summary to environmental aspects that are *significant* and towards which *progress* has been made during the reporting year.** In cases where progress relates specifically to a Performance Track performance commitment, complete the *Environmental Aspect* column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C." Attach additional sheets as necessary.

<i>Environmental Aspect</i>	<i>Progress Made This Year</i> (e.g., quantitative or qualitative improvements, activities conducted)
Energy Management	<p>Corporate Director's Challenge target 10,600 Btu / lb for usage Corporate Director's Challenge actual 11,995 Btu / lb for usage</p> <p>Corporate Director's Challenge target \$47.70 / Mlb for cost Corporate Director's Challenge actual \$52.44 / Mlb for cost</p> <p>NEPT target was 10,000 Btu / lb, see Section C for actual results.</p> <p>Several energy saving projects were completed in 2001 they included; an energy round table meeting and audit which set goals and identified specific energy savings projects, nearly 40 insulation projects saving 24,400 MMBtus per year, the installation of two new pieces of energy efficient equipment; a twin rotary screw positive displacement air compressor and a vector drive unit , resulting in an annual electrical savings of nearly \$70,000, a steam trap survey of the facility's nearly 1,200 steam traps which identified 52 traps as failed open. These traps were repaired by in-house maintenance personnel and have resulted in an annual savings of 5,430 MMBtus per year, a survey of the overhead lighting that identified lighting in three departments with limited production which could be shutoff for 12-hours per day saving \$15,600 annually, rebuilding the decking of a curing system cooling tower which resulted in better water flow over the tower, decreasing the need to continuously run two 5/20-horsepower cooling tower fans.</p> <p>2002 result will show a definite improvement over 2001, please also note that the majority of the energy projects were implimented late in 2001, with little time to recover ROI and that production was down overall as compared to 1999 and 2000.</p>

Solid Waste Landfilled Percentage	On-site recycling activities resulted in the percentage of landfilled waste vs production being reduced to 2.27% exceeding the target of 2.38%. On-site recycling programs that contributed to exceeding the target include the installation of a pigment recycling system that allows the facility to recycle 157 lbs of rubber curing pigment per day and increasing manpower dedicated to refining of rubber which resulted in more than 1.1 million pounds of rubber being diverted from the landfill.
Solid Waste Recycled Percentage	Exceeded the target of recycling 50% of all wastes. The exceedance of the target was accomplished through the continuation of existing recycling programs such as scrap metal, used oil, hydraulic oil, wood pallets, cardboard, paper and the start-up of a new recycling program. In 2001 the facility began sending its mixed curing pigment to a manufacturer of lower grade rubber products. For quality reasons the pigment can not be used in tire production but can be used by the other company to make shoe rubber and truck bed liners. The giving away of the mixed pigment resulted in 78,000 pounds of mixed pigment being recycled that would have otherwise been landfilled.

Section C

Environmental Performance Commitments

Please use the tables on pages 6-9 to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment. If any of the boxes have been pre-completed for you, please verify the information. If you find information that is incorrect, cross it out and write in the correct information. **Leave blank any columns for future reporting years.**

C.1

Performance Commitment 1

a. Use this table to report data related to your first performance commitment.

Category (see page 16 of the instructions): Solid Waste Reduction					
Aspect (see page 16 of the instructions): Packaging Material Used					
	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity (per year)</i>	2,007,400	458,400			1,003,700 (optional)
<i>Measurement Units</i>	lbs				
<i>Normalizing Factor*</i>	1.0	0.89			1.0 (optional)
<i>Basis for your Normalizing Factor*</i>	Production data				
<i>Normalized Quantity* (per year)</i>	2,007,400	515,056			1,003,700
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Partnered with the facility's Quality Assurance department to reduce the utilization of wood pallets for materials shipped to the facility. Wood contamination in rubber stocks and the wood pallets waste stream had been long standing quality and environmental issues here at FSAG. During an average year nearly 2,000,000 pounds of pallets were used to ship products to the facility, which in turn recycled approximately 59% and landfilled approximately 41% of this waste stream.

To accomplish the commitment the FSAG Purchasing, Quality Assurance, Receiving and Environmental departments worked with material / product suppliers to eliminate the utilization of wooden pallets for materials shipped to the facility. Now nearly all raw products are now shipped in/on returnable containers or on recyclable cardboard pallets. Additionally, raw products (such as synthetic and natural rubber) received from intra-company providers are also now received in returnable containers (collapseable aluminum, good packs, returnable pallets/skids, etc.). Please note, the original NEPT commitment was based on a 6-month baseline. For this report the 6-month base line has been annualized.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Section C

(continued)

C.2 Performance Commitment 2

a. Use this table to report data related to your second performance commitment.

Category (see page 16 of the instructions): Air Emissions					
Aspect (see page 16 of the instructions): Emissions of Toxics (from paints, inks and cements used in production)					
	<i>Baseline</i> (as stated in your application)	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment</i> (the goal stated in your application)
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity</i> (per year)	0.90	0.72			0.00 (optional)
<i>Measurement Units</i>	tons				
<i>Normalizing Factor*</i>	1.0	0.89			1.0 (optional)
<i>Basis for your Normalizing Factor*</i>	Production data				
<i>Normalized Quantity*</i> (per year)	0.90	0.81			0.0
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Currently there are 10 products (striping inks) currently identified that require reformulation. FSAG is working with our Akron Technical Center (ATC) in evaluating replacements for 3 of these products this year. Once ATC approval is met FSAG will trial and use the new products - eliminating the HAP emissions for those products. Please note any HAPs emission reduction during this calendar year is merely an incidental reduction due to variations in production.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Section C

(continued)

C.3 Performance Commitment 3

a. Use this table to report data related to your third performance commitment.

Category (see page 16 of the instructions): Material Use					
Aspect (see page 16 of the instructions): Hazardous Material Use (of slab lube soap containing glycol ethers)					
	<i>Baseline</i> <i>(as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment</i> <i>(the goal stated in your application)</i>
<i>Calendar Year</i>	1999	2001			2003
<i>Actual Quantity</i> <i>(per year)</i>	274,472	183,040			0 (optional)
<i>Measurement Units</i>	lbs				
<i>Normalizing Factor*</i>	1.0	0.85			1.0 (optional)
<i>Basis for your Normalizing Factor*</i>	Production data				
<i>Normalized Quantity*</i> <i>(per year)</i>	274,472	215,341			0
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

A replacement material (that has been formulated to be free of glycol ethers) has been identified and approved for on-site trials/testing. Please note, used a 1999 baseline, therefore the normalizing factor based upon production data will be different than the other three commitments.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Section C

(continued)

C.4 Performance Commitment 4

a. Use this table to report data related to your fourth performance commitment.

Category (see page 16 of the instructions): Energy Use					
Aspect (see page 16 of the instructions): Total Energy Use					
	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity (per year)</i>	2,522,130	2,395,990			2,236,130 (optional)
<i>Measurement Units</i>	MMBtu				
<i>Normalizing Factor*</i>	1.0	0.90			1.0 (optional)
<i>Basis for your Normalizing Factor*</i>	Production data and HDD.				
<i>Normalized Quantity* (per year)</i>	2,522,130	2,662,211			2,236,130
*See pages 15-17 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Actual Btu for 2000, 2001 and the performance commitment are reported in MMBtu instead of Btu / lb as in the original application (as per INDECON request). Production and Heating Degree Day (HDD) differences are then accounted for in the normalizing factor.

Progress delays in 2001 included decreased production (with a continued steady "baseload" of utilities) and the implementation of numerous projects late in the year with little time to realize significant savings in 2001.

Completed numerous insulation projects, focused on compressed air and steam leak repair, conducted a steam trap audit, installed energy efficient equipment, completed an energy audit, and attended a company-sponsored energy savings workshop in Wilson, NC.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Section D

Public Outreach and Performance Reporting

D.1 Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements). FSAG communicates pertinent information regarding our facility via many different methods. The following are a few examples of typical public outreach and reporting completed by FSAG in 2001:

FSAG hosted an open house in June of 2001. The open house was by employee invitation and nearly 900 people took the opportunity to tour our facility, check out our tires, see the equipment we supply tires for and enjoy some great food. FSAG also provides facility tours and information throughout the year to suppliers, customers and civic groups.

FSAG also contributed to the Variety Club of Iowa and participated in the Variety Club's telethon, supplying volunteers to man the phones. Additionally FSAG salaried and hourly employees contribute to the United Way and American Red Cross annually.

FSAG was awarded an ISO 14001 Recognition Award by Honda of America Manufacturing, Inc. on May 15, 2001 for excellence in environmental management.

FSAG's participation in the National Environmental Performance Track program was covered in the facility's Tire Tracks newsletter in April of 2001.

FSAG personnel attended the Association of Business & Industry (ABI) Environmental Conference held in September of 2001. The conference is an opportunity to network with other environmental professionals, local, state and federal regulators and environmental products vendors.

FSAG responded to questionnaires regarding our facility's environmental performance from Wacker Silicones (a supplier) and GKN (an OEM customer). FSAG was able to report ISO 14001 certification and involvement in the NEPT program among the key components of the facility's Environmental Management System (EMS).

D.2 Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Performance Report available to the public. Please check as many as are appropriate.

Website (URL www.firestoneag.com)

Open House

Meetings

Press Releases

Community Advisory Panel

Other

Section E

Self-Certification of Continued Program Participation

On behalf of Firestone Agricultural Tire Company,
(name of my facility)

I certify that

- ◆ I have read and agree to the terms and conditions specified in *the National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;
- ◆ I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;
- ◆ My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, 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; and
- ◆ Based on the foregoing compliance assessments 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 Performance 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 manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date _____

Printed Name Mr./Mrs./Ms./Dr. Lawrence E. Groff

Title Director of Manufacturing

Phone Number/E-mail Address (515)243-1211 larrygroff@firestoneag.com

Facility Name Firestone Agricultural Tire Company

Facility Street Address Second Avenue and Hoffman Road, Des Moines, IA 50313

Performance Track Identification Number A070012

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 188 hours per respondent annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.