

Vinyl Institute Environmental Award Program
DRAFT Expansion Ideas
May 2001

FACT SHEET

I. Purpose

To develop a fair and reasonable Environmental Award Program for Vinyl Institute (VI) Member Companies and their Customers.

II. Reason for Expansion

- Current Award Program is based on the VCM NESHAP only, which regulates VCM emissions to air; expansion of the Award Program will be more comprehensive by including measurement criteria for other environmental media (i.e., water and land) and additional pollutants (e.g., EDC, HCl);
- Companies are benchmarking environmental performance on more than just the VCM NESHAP;
- Upcoming enforcement efforts will focus on newer regulations (e.g., Hazardous Organic NESHAP or "HON") rather than VCM NESHAP; and,
- In VCM/EDC Units, recent air regulations can overlap and supersede the VCM NESHAP.

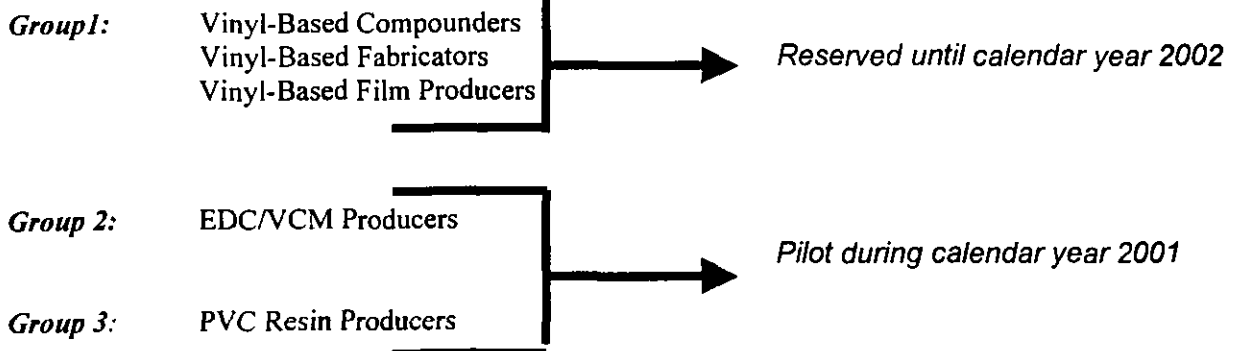
III. Categories/Groups

Units would be broken into two **Categories** to account for differences in size:

Small – Units that produce < 500,00 lbs. PVC/yr; or < 1 billion lbs./yr VCM
Large - Units that produce ≥ 500,00 lbs. PVC/yr; or ≥ 1 billion lbs./yr VCM

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Categories would be further broken down into **Groups** to account for regulatory differences:



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IV. Two Awards Available

One Environmental Award would be available for each Category and Group (i.e., 6 Awards would be available, assuming enough Units fit into each Category and Group).

1. **Environmental Honor Award** – Best VI Environmental Award Score for the calendar year (i.e., Best Performer).
2. **Most Improved Environmental Performance Award** – Award to the Unit with at least 50% improvement in its VI Environmental Award Score for three consecutive years beginning in 2001 and that meets the Criteria defined in Section V. of the Award Program.

V. VI Focus Chemicals

The VI Member Companies will focus its efforts on reducing environmental releases of the following TRI chemicals:

- | | |
|---------------------------------|--------------------------|
| • Vinyl Chloride Monomer (VCM) | • Section 313 Phthalates |
| • 1,2 Ethylene Dichloride (EDC) | • Lead* |
| • Chlorine (Cl ₂) | • Cadmium |
| • Hydrochloric Acid (HCl) | • Mercury* |

*Starting in release year 2001, the TRI Reporting threshold for Lead, which is a listed Persistent Bioaccumulative Toxic (PBT) Chemical, is 100 pounds per year. Starting in release year 2000, the reporting threshold for Mercury, which is a PBT Chemical also, is 10 lbs. For all other chemicals, the reporting threshold is if more than 25,000 pounds are manufactured or processed, or 10,000 pounds are "otherwise used."

Units would be disqualified from participating in the Award Program if certain events occurred. For example: A single release event that was more than 1,000 pounds of VCM, or a fatality due to the release of a VI Focus Chemical would disqualify a Unit from participation.

VI. Award Criteria Basis – Best Performer/Most Improved

- Participating Companies would calculate a Score based upon several criteria, which varies depended upon the type of Unit.
- Unit with the highest score and/or greatest improvement would receive the Award.