



OMB No. 2010-0032
Expiration Date 01/31/2010

2008 Performance Track Annual Performance Report

**Louisiana Pacific - Middlebury, Indiana
A050095**

**Year 1 Annual Performance Report
Member Since 2005 (2nd Member Term)**

SECTION A: GENERAL FACILITY INFORMATION**A.1 Name of your facility:**

Louisiana Pacific - Middlebury, Indiana

A.2 Name of your parent company:

Louisiana-Pacific Corporation

A.3 Facility contact person for the Performance Track program:

Name: Mr. Tim Keenoy
Title: Plant Environmental Manager
Phone: 574-825-6548
Fax: 574-825-6547
Email: Tim.Keenoy@LPCorp.com

A.4 Facility location:**Facility Address**

Street Address: 219 U.S. Highway 20 West
Address Cont:
City: Middlebury
State: IN
Zip Code: 46540

Mailing Address

Street Address:	P.O Box 509
Address Cont:	
City:	Middlebury
State:	IN
Zip Code:	46540

If your facility has multiple street addresses, please list any other addresses for its sites or buildings.

A.5 **Facility's website address (if any):**

<http://www.LPCorp.com> (Corporate website)

A.6 **Number of employees (full-time equivalents) who currently work in the facility:**

100-499

A.7 **For the purposes of where your facility would be listed in our Member Directory, please list the North American Industrial Classification System (NAICS) Code(s) that is (are) used to classify business at the facility:**

Primary	Secondary	Tertiary	Quaternary	Quinary
326199				

A.8.a **What activities, products or services take place at your facility?**

Manufacturer of pre-finished foamed plastic trim moulding. The plastic mouldings are pre-finished alternative to traditional wood mouldings used around windows, doors and floors.

Have there been any changes to the activities, products, or services that take place at your facility?

No

A.8.b **Provide the size and general description of your site:**

The plant is about 250,000 square feet in size and is located in an area of farmland and scattered residential housing. The total facility property area is about 35 acres.

Have there been any changes to the size or location of your facility?

No

A.9 Have the environmental requirements applicable to your facility changed during this reporting period?

No

A.10 Is your facility using any of the following Performance Track regulatory and/or administrative incentives?

RCRA 180 day extension
[ExtendedStorageFormPerfTrackReport.doc](#)

SECTION B: ENVIRONMENTAL MANAGEMENT SYSTEM

B.1.a Is your facility certified to ISO 14001?

No

B.2 Note: On this facility's Application or a previous Annual Performance Report, they reported having independent assessment of their EMS in calendar year 2007. Since they are required to have an independent assessment every three years to remain a member of the Performance Track program they will next report their independent assessment in calendar year 2010.

B.3 EPA recommends that Performance Track members conduct an internal EMS assessment (partial or complete) every year. Did you conduct one in calendar year 2008?

No

If not, when is the next audit scheduled?

March 2009

B.4 EPA recommends that Performance Track members conduct a regulatory compliance audit every year. Did your facility conduct any audits in calendar year 2008 to verify compliance with regulatory statutes?

Yes

Regulatory Compliance Audit #1

When was this regulatory compliance audit? May 2008

Which regulations were included in the audit? Clean Air Act (CAA)

Regulatory Compliance Audit #2

When was this regulatory compliance audit? October 2008

Which regulations were included in the audit? Clean Air Act (CAA)

audit?

Clean Water Act (CWA)
 Emergency Planning & Community Right-To-Know Act (EPCRA)
 Resource Conservation and Recovery Act (RCRA)

B.5 Note: Facility will be asked to report other audits and inspections in their 3rd reporting year.

B.6.a Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

Yes

B.6.b Performance Track members should have a Senior Management Review of their EMS every year. Did this review take place in calendar year 2008?

Yes

Who was the senior manager present at the review?

Name: Mr. Jim Kinzler

Title: Plant Manager

B.6.c Performance Track members should conduct a systematic identification and/or review of their environmental aspects at least once every two years. When was your last one conducted?

June 2008

SECTION C: ENVIRONMENTAL PERFORMANCE RESULTS

Goal 1: Louisiana Pacific - Middlebury, Indiana's first goal is to reduce the facility's VOC emissions.

C.1.a Briefly describe your activities and achievements related to this goal or, if relevant, any circumstances that delayed progress this year.

This goal involves the reduction of the emissions of VOCs (volatile organic compounds). The use of inks and paints are the major source of VOC emissions in our plant. About one third of our product line is finished by applying a printed paper laminate to the moulding. In the past, a waterbase primer coat was applied to the mouldings to insure that a good bond was achieved between the hot melt glue and the moulding substrate. We implemented a project to reduce or eliminate this primer coat. The lamination process was studied to determine the optimal conditions for achieving a good bond without the use of a primer. The elimination of the primer coat (and the VOCs associated with its use) is being implemented in three phases. Currently, the first and second phases have been completed.

C.1.b Describe how your facility measured the quantity reported below (e.g., utility bills, manifests, purchasing receipts). If the quantity was derived from any assumptions or estimates, please describe these as well (e.g., multiplying monthly samples by the number of days in the month of emission factors, or converting volume to mass).

Total VOC emissions for the plant are tracked on a monthly basis using a mass balance calculation.

emissions factor for the evaporation of VOCs from the waterbase primer is 100%.

C.1.c Please report your facility's actual performance.

Performance Data						
Calendar Year	Baseline 2007	Year 1 2008	Year 2 2009	Year 3 2010	Perform. Goal	Units
Actual Quantity (per year)	12.58	9.27			n/a	Tons
Change from baseline	NA	26.3%				

C.1.d Normalized progress toward goal.

Normalized Total	Baseline	Year 1	Year 2	Year 3	Perform. Goal	Units
Normalizing Factor	1.0	0.87				
Normalized Quantity	12.58	10.66			11.95	Tons
Basis for your Normalizing Factor:	Annual gross footage of moulding extruded will be the normalizing factor.					

Goal 2: Louisiana Pacific - Middlebury, Indiana's second goal is to reduce the facility's materials use, specifically polystyrene.

C.2.a Briefly describe your activities and achievements related to this goal or, if relevant, any circumstances that delayed progress this year.

The major raw material used for the extrusion of our moulding products is polystyrene. Our goal was reduce the amount of polystyrene used in the mouldings. This was accomplished in two ways. First, variation in the size and weight of the extrusions was reduced with the help of control charts to track parameter. By reducing the variation, the weight target was slightly lowered without affecting the phy performance of the product. Second, some of the moulding profile shapes were modified to reduce th amount of polystyrene need to manufacture the product. This goal involves seventeen moulding prof representing eighty percent of the manufacturing volume.

C.2.b Describe how your facility measured the quantity reported below (e.g., utility bills, manifests, purchasing receipts). If the quantity was derived from any assumptions or estimates, please describe these as well (e.g., multiplying monthly samples by the number of days in the month of emission factors, or converting volume to mass).

The weight (pounds) per 1,000 lineal feet of the moulding profiles is routinely measured. The product footage is then converted to pounds using the wt/1000 ft measurements.

C.2.c Please report your facility's actual performance.

Performance Data						
Calendar Year	Baseline 2007	Year 1 2008	Year 2 2009	Year 3 2010	Perform. Goal	Units

Actual Quantity (per year)	14,172,012	11,511,836			n/a	Pounds
Change from baseline	NA	18.8%				

C.2.d Normalized progress toward goal.

Normalized Total	Baseline	Year 1	Year 2	Year 3	Perform. Goal	Units
Normalizing Factor	1.0	0.839				
Normalized Quantity	14,172,012	13,720,901			13,888,572	Pounds
Basis for your Normalizing Factor:	Annual pounds of polystyrene extruded into mouldings.					

Goal 3: Louisiana Pacific - Middlebury, Indiana's third goal is to increase the facility's procurement of recycled content, specifically recycled polystyrene.

C.3.a Briefly describe your activities and achievements related to this goal or, if relevant, any circumstances that delayed progress this year.

This goal is directly tied to the development of a new "builder grade" moulding product that utilizes a to-us Celuka extrusion process. The special extrusion equipment was purchased and installed and n trials were conducted. The Celuka extrusion process allows the increased use of recycled polystyren Our typical loading of recycled polystyrene is 4%. During the Celuka extrusion trials, post consumer recycled polystyrene was loaded at 35%. The new "builder grade" moulding development trials were successful in that the product was produced at the quality level needed to market the product. Unfortunately, the required higher density of this product coupled with the economic downturn results the projected being put on hold.

C.3.b Describe how your facility measured the quantity reported below (e.g., utility bills, manifests, purchasing receipts). If the quantity was derived from any assumptions or estimates, please describe these as well (e.g., multiplying monthly samples by the number of days in the month of emission factors, or converting volume to mass).

The extruders are fed a blend polystyrene pellets that have been mixed by a gravimetric blender. On feed hopper of the gravimetric blender is for recycled polystyrene. The weight of all the polystyrene pa through all of the hoppers is recorded. The monthly readings from the hoppers of this blender are recorded and used for the calculations.

C.3.c Please report your facility's actual performance.

Performance Data						
Calendar Year	Baseline	Year 1	Year 2	Year 3	Perform. Goal	Units
	2007	2008	2009	2010		
Actual Quantity (per year)	577,717	484,431			n/a	Pounds
Change from baseline	NA	-16.1%				

C.3.d Normalized progress toward goal.

Normalized Total	Baseline	Year 1	Year 2	Year 3	Perform. Goal	Units
Normalizing Factor	1.0	0.87				
Normalized Quantity	577,717	556,817			866,576	Pounds
Basis for your Normalizing Factor:	Pounds of recycled polystyrene processed (extruded) in the facility normalized by the total pounds of polystyrene processed at the facility.					

Goal 4: Louisiana Pacific - Middlebury, Indiana's fourth goal is to perform river water quality monitoring the Little Elkhart River and a tributary.**C.4.a Describe your activities and achievements related to this goal or, if relevant, any circumstances that delayed progress this year.**

Five employees of the plant received Hoosier Riverwatch training in July. Hoosier Riverwatch teaches techniques needed to perform river monitoring including chemical evaluation, habitat assessment, biological assessment and stream flow measurement. Two test kits were acquired through the Elkhart & Water Conservation District. The Little Elkhart River near downtown Middlebury was sampled twice 2008: July and September. We will monitor a second river/creek in 2009.

C.4.b Please summarize progress towards and results of milestones achieved in 2008.

Milestone	Projected Date	Milestone Achieved?	Discuss outcomes of, progress towards, and challenges delaying progress in achieving your milestones.	Enter measurable improvements resulting from your milestones
Recruit interested employees	May 2008	Yes	Five plant employees volunteered to participate in river monitoring.	Volunteer employees more involved in the river
Receive Riverwatch training	June 2008	Yes	Five plant employees were trained on July 9 at the Elkhart Conservation Club facility on Cobus Creek. Training was provided by Hoosier Riverwatch.	Increase river quality of local community.
Establish relationship with Elkhart River Alliance	August 2008	Yes	We are working with Nancy Brown who is the river monitoring chairperson for the Elkhart River Alliance.	Monitoring of local water quality will be of benefit to the re Elkhart River Watershed Protection Plan.
Perform four samplings in 2008	October 2008		Only two samplings were taken in 2008 due to the late training date (July 9).	Provide key information concerning the overall local river.
Perform four samplings in 2009	October 2009		TBD	Provide key information concerning the overall local river.
Perform four samplings in 2010	October 2010			Provide key information concerning the overall local river.

samplings in 2010 2010

TBD

concerning the overall local river.

C.4.c If you have new future milestones to add, please do so below.

Milestone	Project Date of Completion	Desired Outcome & Environmental Benefit	Measurable Improvement, if applicable
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C.4.d List any stakeholders or collaborators that you propose to work with on this project and indicate where you've secured a commitment from them.

We are working with Nancy Brown of the Elkhart County Soil and Water Conservation District and also the monitoring chairperson for the Elkhart River Alliance.

Progress Towards Other Significant Aspects of your EMS

In the table below, please provide a narrative summary of progress made toward EMS objectives and targets other than those reported as Environmental Performance Goals. You may limit the summary to environmental aspects that are significant and towards which progress has been made during the reporting year.

Do you have additional environmental aspects to report? Yes

Environmental Aspect	Progress Made This Year (e.g., quantitative or qualitative improvements, activities conducted)
Reduce the potential for pollution of stormwater	An equipment wash bay was constructed in the plant. This eliminates the need to clean some equipment outside on pavement. The waste water discharge from the wash bay passes through a sand/oil interceptor before going to the local POTW. Also, a "hood" was built over the plant's outdoor trash compactor to prevent precipitation from entering the compactor and container.

SECTION D: PUBLIC OUTREACH AND PERFORMANCE REPORTING

D.1.a Please describe your process to identify potential community environmental concerns.

The plant is a plastics processor (extrusion) with some finishing operations. Plastics extrusion is a relatively clean industry; environmental concerns are minimal. The plant EMS team includes employees from the local community. The local fire department tours the plant on an annual basis. The plant's emergency response includes concern for neighboring residents in catastrophic situations. Complaints from neighbors are non-existent but would be properly addressed if any were received.

D.1.b If you identified community environmental concerns, how did you respond to them?

The plant emits less than 10 tons per year of VOCs. Thus air quality is not an issue. While the plant has no reportable spills, small spills are promptly cleaned up to prevent pollution to land, stormwater, groundwater or wastewater. The plant voluntarily performs an annual wastewater sampling to ensure compliance with the

sewer ordinance.

D.1.c Please describe how you informed the community about environmental matters related to your facility.

The February 16, 2008 edition of the Elkhart Truth newspaper included an article on local "green" companies. Part of the article focuses on Louisiana Pacific. Copies of the air permit renewal application and ultimately the new air permit were provided to the Middlebury Public Library for public viewing. The results of our annual voluntary wastewater sampling are shared during a visit with the superintendent of the Middlebury Wastewater Treatment plant. Plant employees perform river monitoring of a local river in Middlebury. Test results are entered into the Hoosier Riverwatch database which is accessible to the public.

D.2 How did you share information with your community on your own facility's environmental performance including making your APR publicly available? Please check all that apply:

Press Releases, Other

Please Specify Other: Copy of air permit renewal application and 2007 Performance Track report were provided for viewing at the Middlebury Public Library.

OMB No. 2070-0042

SECTION E: SELF-CERTIFICATION OF CONTINUED PROGRAM PARTICIPATION FOR ANNUAL PERFORMANCE REPORT

The U.S. Environmental Protection Agency is not yet in a position to accept electronic signatures and therefore requests a faxed, signed copy of the Section E page. Please complete Section E online, then print Section E using the link on the Overview page. Section E should be signed by the senior manager of your facility and faxed it to the Performance Track Information Center at (617) 354-0463.

On behalf of Louisiana Pacific - Middlebury, Indiana, I certify that:

- I have read and agree to the terms and conditions as 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, 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 Environment 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:

Name: Mr. Jim Kinzler
Title: Plant Manager
Phone Number: 574-825-6501
E-Mail Address: Jim.Kinzler@LPCorp.com
Facility Name: Louisiana Pacific - Middlebury, Indiana
Facility Street Address: 219 U.S. Highway 20 West
Middlebury, IN 46540
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Middlebury, IN 46540
Performance Track ID#: A050095

