EVALUATION OF THE PERFORMANCE TRACK PROGRAM IN EPA REGION ONE

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EXECUTIVE SUMMARY

The Environmental Protection Agency 's (EPA's) National Environmental Performance Track (Performance Track) is a national voluntary program designed to recognize and encourage top environmental performers. The program participants, referred to as members, go beyond compliance with regulatory requirements to attain levels of environmental performance that benefit people, communities, and the environment. Performance Track encourages participation by small, medium and large facilities and its members are located throughout the United States, including Puerto Rico. In order to assess the progress achieved by participating members, EPA New England conducted an evaluation to examine the environmental commitments and progress achieved of its Performance Track members, highlight areas of success, and identify areas of improvement for the Performance Track program. In conducting this evaluation, EPA New England hoped to:

- Assess the progress achieved by EPA New England Performance Track members in meeting their environmental commitments;
- Communicate the environmental achievements of New England Performance Track members and understand how they have been successful in meeting their environmental commitments; and
- Provide recommendations for improving the Performance Track program at the regional and national levels.

Each Performance Track member is required to identify four commitments for accomplishing environmental improvements in a three-year period for different categories, each of which contains more detailed divisions referred to as Aspects. Members report on progress each year through submission of an Annual Progress Report (APR).

To conduct the evaluation, EPA examined the environmental results reported in the APRs for 2001, the first year of performance, for each New England member. EPA also conducted follow-up discussions with representatives of a number of New England Performance Track members to understand how these members were approaching their commitments and how they were defining success for their facility. This evaluation report includes the following sections:

- A discussion of the APR organized by each Aspect;
- A brief summary of the first year results for each Performance Track member;
- A discussion of the main points gleaned from discussions with individual Performance Track members; and
- Conclusions and a discussion of developing a communication strategy for the Performance Track program in New England.

When data are available, the report includes a discussion of normalized data as well as the observed results. Normalized data are the result of the Performance Track members' efforts to recognize that some changes in environmental impact are the result of changing level of production,

and not changing environmental behaviors. For example, normalization factors account for changes in production, staff, or resource costs.

Performance Track members have demonstrated environmental gains in the first year of reporting. As illustrated by the aggregate results organized by Aspect and the individual facility discussions, Performance Track members in New England have realized large actual reductions in the amount of solid and hazardous waste handled, water and energy used, and VOCs and other gases emitted into the air. As shown in the table below, Performance Track members in New England made good progress toward realizing commitments in just the first year of the program. It is important to reiterate that members have three years to achieve their commitments and this report focuses only on progress in the first year

ASPECT	# QUANTIFIABLE COMMITMENTS	FIRST YEAR RESULTS
Total Solid Waste	13	Six have been achieved, three other members are at least 73 percent of the way to the commitment, and four others did not report on progress in this APR.
Hazardous Waste	11	Eight members have met their commitments, one other is 86 percent of the way to the commitment and two others did not report on progress in this APR.
Changes in Water Use	9	Five members had met their commitments, two were making substantial progress toward them (at least 70 percent) and two reported no progress toward the commitment in this APR.
Changes in Energy Use	17	Six members have met their commitment, six others have made some progress toward them, and five reported no progress toward the commitment in this APR.
VOC Emissions	6	One member has met its commitment and the remaining five members noted progress, ranging from 20 percent to 50 percent of the commitment.

Based on the detailed results included in the APRs as well as the follow-on discussions conducted with a number of Performance Track members, the evaluation team identified a number of recommendations, focusing on improving communication among members and with those not yet in the program.

- EPA can help encourage new members to apply by increasing outreach of the results on an individual and aggregate basis. Communication of results needs to be tailored to specific audiences. For example, for purposes of getting the word out about Performance Track, to the public and other facilities, EPA should focus on presenting actual results and noting the environmental benefits accruing from the changes.

- To enhance internal reporting or in developing more detailed analyses on the impact that the specific activities undertaken by facilities have had, EPA should make greater use of normalized data. This will allow readers to gain a better understanding of the impact of different activities and help evaluate the Program.

- EPA New England should develop a communications strategy for Performance Track. Working with the Performance Track members, EPA New England should identify more specifically the audiences it needs to reach and how it plans to reach them. The *strategy* should identify how and what information *is to be* presented to different audiences.

I. INTRODUCTION

The Environmental Protection Agency 's (EPA's) National Environmental Performance Track (Performance Track) is a national voluntary program designed to recognize and encourage top environmental performers. The program participants, referred to as members, go beyond compliance with regulatory requirements to attain levels of environmental performance that benefit people, communities, and the environment. Performance Track also provides recognition, regulatory flexibility, and other incentives that promote high levels of environmental performance and provides a learning network where best practices can be shared. In addition, the program encourages continuous environmental improvement through the use of environmental management systems and fosters public outreach, community involvement, and performance measurement.

Performance Track encourages participation by small, medium and large facilities and its members are located throughout the United States, including Puerto Rico. All of the major industries are represented, with manufacturers of chemical, electronic and electrical, and medical equipment composing nearly 40 percent of the members. Over the last three years, Performance Track has received 421 applications and accepted 345. Currently, there are approximately 300 members, 33 of which are located in EPA New England.[1] These 33 members are listed on the next page.

In order to assess the progress achieved by participating members, EPA New England conducted an evaluation to examine the environmental commitments and progress achieved of its Performance Track members, highlight areas of success, and identify areas of improvement for the Performance Track program. EPA New England's Performance Track Program worked closely with EPA's Office of Policy, Economics, and Innovation and hired Industrial Economics, Inc. as contractor support.

[1]As of September 10, 2003, there are a total of 319 Performance Track members nationwide, 34 of which are in New England.

New England Performance Track Members	
BAE SYSTEMS- South Nashua Facility (BAE SYSTEMS)	Nashua, NH
Clairol Worldwide Beauty Care (Clairol)	Stamford, CT
DDLC Energy	New London, CT
DDLC Fuels	Danielson, CT
DePuy Orthopaedics, Inc. (DePuy- Raynham)	Raynham, MA
DePuy Orthopaedics, Inc. (DePuy- New Bedford)	New Bedford, MA
Heidelberg Web Systems (Heidelberg)	Dover, NH
Henkel Loctite	Seabrook, NH
IBM- Burlington	Essex Junction, VT
INERT Corporation (INERT)	Newfields, NH
Interface Fabrics Group Inc., Guilford Facility (Guilford)	Guilford, ME
International Paper, Androscoggin Mill (IP- Androscoggin)	Jay, ME
Johnson & Johnson Medical (J&J Medical)	Southington, CT
Johnson & Johnson Mitek East Ethicon (J&J Mitek)	Westwood, MA
Naval Undersea Warfare Center Division, Newport (Naval Undersea)	Newport, RI
New Hampshire Ball Bearings, Inc. (NH BB)	Peterborough, NH
Oil Express	East Falmouth, MA
PerkinElmer Optoelectronic (PerkinElmer)	Salem, MA
Acushnet Rubber Company, DBA PRECIX, Inc. (PRECIX)	New Bedford, MA
Shipley Company, LLC (Shipley)	Marlborough, MA
Skanska USA Building, Inc. - New England Division (Beacon Skanska)	Boston, MA
Snap-On Natick Plant (Snap-On)	Natick, MA
Teradyne Inc. (Teradyne)	North Reading, MA
Texas Instruments Incorporated, Sensors and Controls (Texas Instruments)	Attleboro, MA
The Topflite Golf Company (Topflite)	Chicopee, MA
Timken U.S. Corporation – Watertown, CT (Timken)	Watertown, CT
US Coast Guard Air Station Cape Cod (USCG Cape Cod)	Air Station Cape Code, MA
Unilever Home & Personal Care USA (Unilever)	Clinton, CT
United States Postal Service, Hartford Processing and Distribution Center (USPS Hartford P&DC)	Hartford, CT
United States Postal Service, Hartford Vehicle Maintenance Facility (USPS Hartford VMF)	Hartford, CT
United States Postal Service, Portland Processing and Distribution Center (USPS Portland P&DC)	Portland, ME
USGen New England- Hydro Generation (USGen)	Concord, NH
Valley Oil	Willimantic, CT

Performance Track Requirements

Performance Track members must have:

- Adopted and implemented an Environmental Management System (EMS);
- A record of sustained compliance with environmental requirements;
- Demonstrated specific environmental achievements and committed to continued environmental improvement; and
- Committed to public outreach and performance reporting.

Each Performance Track member is required to identify four commitments for accomplishing environmental improvements in a three-year period; small facilities (generally less than 50 employees) are required to make two commitments. Participating members commit to environmental results for different categories, each of which contains more detailed divisions referred to as Aspects. A large percentage of the commitments undertaken by members in New England fall into five of the Aspects as shown in the table below. It is important to note that in some cases a member may have more than one commitment for the same aspect.

Category	Aspect	Number of Commitments to Aspect in New England
Waste	Total Solid Waste	32
Energy Use	Total Energy Use	20
Waste	Hazardous Solid Waste	16
Water Use	Total Water Use	16
Air Emissions	Emissions of VOCs	6

Performance Track members determine how to achieve their commitments. In completing their application to the program, members report their current levels of waste, emissions, and pollution- generally referred to as a baseline quantity. For the members included in this analysis, the baseline year is generally either 1999 or 2000. The commitments indicate the goals the members plan to reach over the next three years against this baseline. The Performance Track program encourages members to set aggressive targets, though members are not penalized for not meeting their goals provided they make a concerted effort. Members submit annual summaries of their progress--termed Annual Performance Reports (APRs)--to EPA, which are placed on the EPA website.[2] EPA then tallies environmental progress for all the members to access their environmental improvements on a national basis.

[2]Annual Performance Reports can be accessed at
http://www.epa.gov/performancetrack/program/report.htm

II. EVALUATION APPROACH AND METHODOLOGY

Evaluation Goals

In conducting this evaluation, EPA New England hoped to:

- Assess the progress achieved by EPA New England Performance Track members in meeting their environmental commitments;
- Communicate the environmental achievements of New England Performance Track members and understand how they have been successful in meeting their environmental commitments; and
- Provide recommendations for improving the Performance Track program at the regional and national levels.

Evaluation Methodology

The evaluation team focused on an examination of the environmental results reported in the APRs for each New England member. In addition, environmental results from individual members were combined to determine the overall impacts from efforts to improve certain aspects of environmental conditions. The team also conducted follow-up discussions with a number of New England Performance Track members to understand how these members were approaching their commitments and how they were defining success for their facility.

APR Data

This report captures only those achievements reported in the first year, 2001, and it is important to note that Performance Track members have two additional years to reach their goals. The team reviewed the APRs and examined the baseline data, commitments undertaken by program members, and first year results. As the data allow, this report shows actual changes, normalized changes, and progress towards the stated commitments in percentage terms. In some cases, this progress could not be determined, as members did not present commitments in their first year APRs. In other situations, commitments are included, but cannot be analyzed because the data cannot be compared to the actual baseline and Year 1 information (e.g., a commitment that is expressed as a percentage reduction from a projected future value, rather than a reduction from the baseline level). Throughout this report we refer to these commitments as "nonquantifiable commitments."

Normalized data are the result of the Performance Track members' efforts to recognize that some changes in environmental impact are the result of changing level of production, and not changing environmental behaviors. For example, normalization factors account for changes in production, staff, or resource costs. If production slows, this may result in changes in emissions of certain pollutants, independent of any changes made to meet their commitments. When possible, Performance Track members included information to account for these changes.

This report uses contextual references to help illustrate the impact members achieve through progress in meeting the commitments. For example, with regard to solid waste, the tons of material disposed is related to similar measures for municipal solid waste and volumes that are relevant to the general public in order to put the information in context for the reader.

Follow-up Discussions

To complement the information gleaned from the review of the APRs and related documents, the evaluation team conducted interviews with representatives from 16 members. The evaluation team used a core set of questions to help structure the discussions and EPA representatives contacted program-members to determine if they were interested in participating in the discussions (a complete list of those interviewed, as well as the guide used, is included as Attachment A). [3]

The evaluation team did not interview representatives from each member, but chose among those members that had reported data that needed further clarification or represented examples of issues that seemed common across many APRs. For example, there is a clear challenge in using normalized results to capture the success of changing environmental impacts and the evaluation team chose several members that had results needing greater interpretation to understand the normalization process. The discussions focused on the quantitative results as reported in the APRs and on the process used by participants in determining whether to join the program and how to set specific commitments. In addition, the evaluation team wanted to learn how the members viewed the program, whether they had any suggestions for improving the program, and lessons learned that might be useful to other facilities considering applying for membership.

Organization of This Report

The next chapter of the report includes a discussion of the data reviewed from the APRs, focusing on aggregate results, organized by Aspect. Chapter IV includes a brief summary of the first year results for each Performance Track member, incorporating APR data and information gleaned from the interviews, and Chapter V includes the key findings from the member discussions that address broader questions about Performance Track. Finally, Chapter VI includes a series of overall conclusions and discusses possible development of a communication strategy for the Performance Track program in New England.

[3] In order to comply with provisions of the Paperwork Reduction Act we used the interview guide to generally direct the discussions but did not ask the same questions of each interviewee; allowing them to direct the conversation to areas of interest.

III. RESULTS OF 2001 APR REVIEW

This chapter of the report presents the environmental results achieved by the New England members in the first year of the program as reported in their APRs. The report first discusses actual changes in performance and progress towards commitments at the reporting members. In addition, the report includes a discussion, when data are available, of normalized results, which attempt to correct for changes in production or activity levels. It is important to reiterate that members have three years to achieve their commitments and this report focuses only on progress in the first year.

Presenting the Results

The following sections cover five of the Aspects included in the 2001 APRs as of May 6, 2003: solid waste management, hazardous waste management, water usage, energy usage, and emissions of Volatile Organic Compounds (VOCs). For each of these Aspects, the report first includes a discussion of the progress made by members toward their commitments. As discussed below and shown in the accompanying exhibits, in some instances members did not include a specific quantitative commitment in their APR, although they may have included commitments in subsequent revisions finalized after this analysis was conducted. For these members, the report does not include any discussion towards commitments and the exhibits indicate that no quantitative commitment exists, at least for the first year of the program. In addition to discussing the progress toward commitments, the report includes, for each Aspect, a discussion of the actual and normalized results, when those data are available. Finally, the report also includes a section that discusses the results for other Aspects, not highlighted in the analysis.

A. TOTAL SOLID WASTE

Progress Toward Commitments

Of the 13 quantitative commitments included in the 2001 APRs, six have already been achieved, three other members are at least 73 percent of the way to the commitment, and four others have not seen any progress to date. The team could not analyze three of the commitments because no data were provided.

Actual Results

The 2001 APRs included 32 Solid Waste commitments from 26 different members. However, our analysis, as seen in Exhibits 1 - 3, includes data from 14 Performance Track members who reported on reductions in production and handling only. Of these, 11 of the members had identified specific commitments to reduce their solid waste, accounting for 13 commitments.[4] In addition, three members did not specify a numeric commitment in their report (see Exhibit 1).

[4] In their applications, the Johnson and Johnson facilities left the commitment column blank.

Several of the members did not report any results in their APR and three others reported on increases in recycling rather than on reductions in production and handling of solid waste. One additional company, IP- Androscoggin, also made a commitment to reduce solid waste generation but reported its commitment and results in cubic yards, which could not be converted to mass units that would allow aggregation with the other data.[5]

EXHIBIT 1
SOLID WASTE- POUNDS MANAGED

Member	Baseline	2001	Percent Improvement	Commitment	Progress to Commitment in 2001*
BAE SYSTEMS	2,800,000 (2000)	1,700,000	39.29	2,700,000	Achieved
Beacon Skanska	64,116,000 (1999)	485,000,000		70,000,000	No progress in first year
DePuy- New Bedford	488,000 (2000)	544,000	-11.48	NA	No commitment specified
DePuy- Raynham	2,132,000 (2000)	2,000,000	6.19	NA	No commitment specified
Guilford	216,000 (1999)	146,000	32.41	162,000	Achieved
Henkel Loctite	122,000 (1999)	68,822	43.96	91,500	Achieved
Heidelberg	12,500 (2000)	3,200	74.40	1,860	87% achieved
Heidelberg	102,000 (2000)	64,000	37.25	50,000	75% achieved
J&J Medical	964,000 (2000)	788,000	18.26	NA	No commitment specified
Naval Undersea	834,240 (2000)	856,870	-2.71	834,240	No progress in first year
Teradyne	116 (2000)	0	100	0	Achieved
Teradyne	8,000 (2000)	10,600	-32.50	1,000	No progress in first year
Timken	315,050 (2001)	315,050	0.00	311,900	No progress in first year
Unilever	200,000 (1999)	173,700	13.55	180,000	Achieved
USCG Cape Cod	2,164,000 (1999)	1,542,000	29	1,600,000	Achieved
USPS Hartford VMF	834 (2000)	459	44.96	317	73% achieved

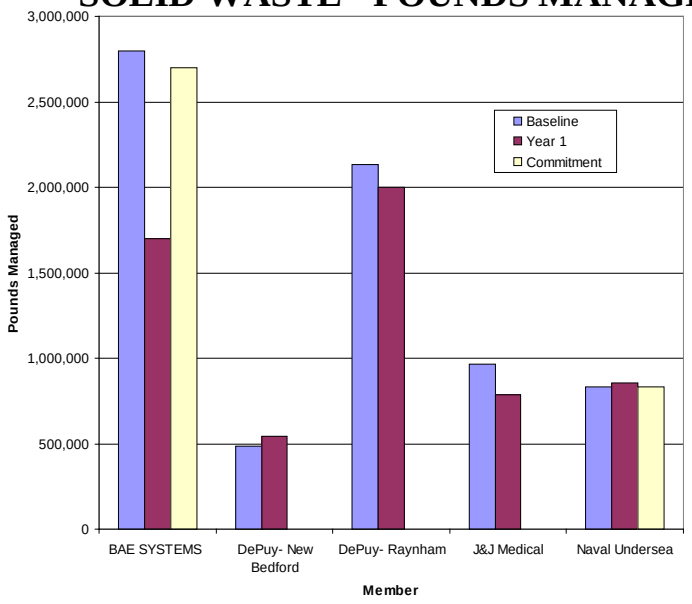
* Each member has until 2003 to meet its commitments

Results from all reporting New England Performance Track members actually showed an increase in the total volume of solid waste generated, due primarily to the significant increase reported by one member, Beacon Skanska. Beacon Skanska reported more than 485 million pounds of waste generated, due for the most part to special projects. Unlike other Performance Track members, which usually generate municipal solid waste, Beacon Skanska, a construction management firm, generates soil and rock that is typically not managed through land filling and

[5] IP- Androscoggin produced 182,530 cubic yards of solid waste in its baseline year of 1999 and made a commitment to reduce that value to 55,727 cubic yards by 2003. In its 2001 APR, the member reported it had produced 95,770 cubic yards of waste; a reduction of approximately 89,600 cubic yards of waste and had made 70 percent of its commitment.

incineration. Excluding the Beacon Skanska number, the total volume of solid waste reductions reported, against the baseline, amounted to more than two million pounds, with most of the reduction coming from the BAE SYSTEMS facility. This translates to the amount of waste generated annually by approximately 1,200 people.[6] Excluding Beacon Skanska, the Region 1 members reduced solid waste generation by 21 percent from the baseline. These results are shown graphically in Exhibits 2a and 2b.

EXHIBIT 2a
SOLID WASTE - POUNDS MANAGED



Note: Because their quantities of solid waste are disproportionately high, Beacon Skanska is not included in this exhibit.

Normalized Data

As shown on Exhibit 3, 11 members provided both normalized first year results and quantitative data on 13 commitments. Of these, five have been met, three have made at least 64 percent progress toward the commitment and five have not yet made progress toward the commitment. A review of Exhibit 1 shows that applying the normalization factors does not affect all members in the same way. For example, while Guilford met its commitment in actual terms, it made progress (71 percent) towards the goal, but did not yet realize it in normalized terms. On the other hand, Heidelberg met its commitment using normalized data, but not using actual data.

6 Based upon the average waste generated per person per day, USEPA Office of Solid Waste, Municipal Solid Waste Website, http://www.epa.gov/epaoswer/non-hw/muncpl/facts.htm.

EXHIBIT 2b
SOLID WASTE - POUNDS MANAGED

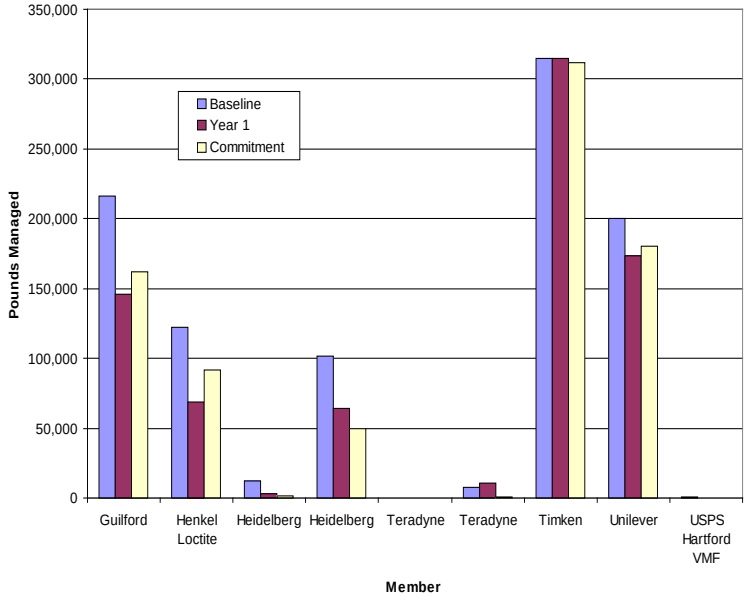


EXHIBIT 3
SOLID WASTE - POUNDS MANAGED
SUMMARY OF NORMALIZED DATA

Member	Normalized 2001*	Normalized Progress** to Commitment	Normalizing Factor and Basis
BAE SYSTEMS	1,307,000	Achieved	(1.13) Annual Sales
Beacon Skanska	373,410,000	No progress in first year	(.13) tonnage
Guilford	177,600	71% achieved	(.82) Woven Linear Yards
Henkel Loctite	79,105	Achieved	(.87) production
Heidelberg	4,320	77% achieved	(.72) # Employees
Heidelberg	29,080	Achieved	(2.2) Total Weight Shipped
Naval Undersea	856,870	No progress in first year	(1) no factor
Teradyne	0	Achieved	(.18) product level
Teradyne	58,800	No progress in first year	(.18) product level
Timken	315,050	No progress in first year	(1) no factor
Unilever	222,600	No progress in first year	(.78) lbs. of bath beads purchased
USCG Cape Cod	1,542,000	Achieved	(1.0) facility operation
USPS Hartford VMF	504	64% achieved	(.91) Vehicle Service

* Normalization takes into account changes of the member in an effect to allow a more complete understanding of member observed change.
** Each member has until 2003 to meet its commitment.

B. HAZARDOUS SOLID WASTE

Progress Toward Commitments

As seen in Exhibit 4, as a group, the members included in this report have made significant progress in achieving their commitments. Eight of the 11 members that included a commitment have met the commitment, in actual terms.

Actual Results

Sixteen members made a commitment to reduce hazardous solid waste. Exhibits 4 - 6 present the data from 12 of these members. One member was not included because they reported an increase in recycling, rather than a decrease in waste. Another member's waste quantities increase over time, indicating a potential reporting error. Finally, two members reported no hazardous waste in their baseline and maintained that through the first year. Since no progress beyond their baseline can be reported, these two members were also excluded from the analysis.

EXHIBIT 4
HAZARDOUS WASTE - POUNDS MANAGED

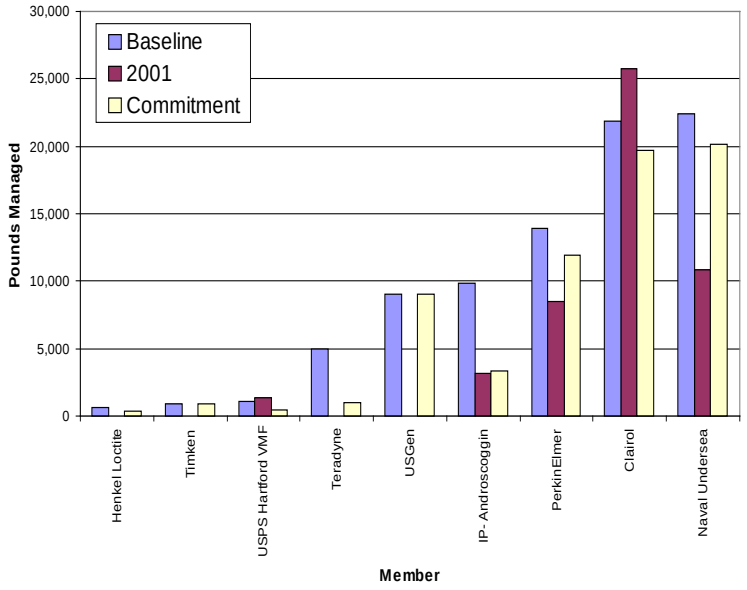
Member	Baseline	2001	Percent Improvement	Commitment	Progress to* Commitment in 2001
Clairol	21,885 (1999)	25,732	-17.58	19,696	No progress in first year
Henkel Loctite	675 (1999)	0	100.00	350	Achieved
IBM- Burlington	1,128,000 (1999)	1,737,000	-53.99	NA	No commitment specified
IP- Androscoggin	9,891 (1999)	3,177	67.88	3,300	Achieved
Naval Undersea	22,431 (2000)	10,848	51.64	20,188	Achieved
PerkinElmer	13,921 (2000)	8,509	38.88	11,900	Achieved
Shipley	1,800,000 (2000)	1,040,000	42.22	918,000	86% achieved
Teradyne	5,000 (2000)	0	100.00	1,000	Achieved
Texas Instruments	445,000 (2000)	253,000	43.15	275,000	Achieved
Timken	890 (1999)	0	100.00	900	Achieved
USGen	9,000 (1999)	0	100.00	9,000	Achieved
USPS Hartford VMF	1,053 (2000)	1,365	-29.63	429	No progress in first year
Total	**3,457,746**	**3,079,631**	**10.94**	**1,259,763**	

* Each member has until 2003 to meet its commitments

The members reduced hazardous waste disposal by approximately 189 tons in 2001, an average change of 10.94 percent from their baseline generation rates. Four members entirely eliminated their generation of hazardous waste streams reported to the Performance Track program through process changes. One other member, Shipley, contributed the greatest volume reduction by

reducing hazardous waste by 380 tons. However, IBM- Burlington, saw its waste increase by more than 250 tons.[7] This information is shown graphically in Exhibits 5a and 5b.

EXHIBIT 5a
HAZARDOUS WASTE- POUNDS MANAGED
SMALL PRODUCERS



Unlike Solid Waste, which is generated by households as well as commercial and industrial facilities, the regional generation and management of hazardous waste is almost entirely the responsibility of industrial production such as those represented by Performance Track members.

Normalized Data

Of the nine members that reported both normalized quantities of hazardous waste and a quantitative commitment to reduce these, four have met the commitment. Three of the remaining members have accomplished approximately 80 percent of their commitments while the two others have not demonstrated any progress to date. These results are illustrated in Exhibit 6.

7 In 2000 and 2001, IBM- Burlington modified their manufacturing processes, increasing their use of a particular solvent. This change resulted in increased hazardous waste quantities in 2001. However, the facility is working on waste minimization projects, as well as looking for opportunities to reuse or recycle the solvent.

EXHIBIT 5b
HAZARDOUS WASTE- POUNDS MANAGED
LARGE PRODUCERS

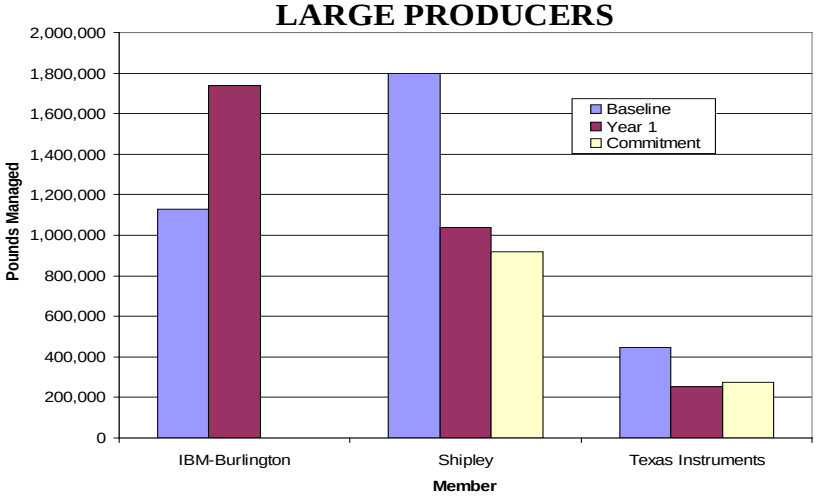


EXHIBIT 6
HAZARDOUS WASTE - POUNDS MANAGED
SUMMARY OF NORMALIZED DATA

Member	Normalized 2001*	Normalized Progress** to Commitment	Normalizing Factor
Clairol	22,183	No progress in year 1	(1.16) Kg products
Henkel Loctite	0	Achieved	(1.0) actual tank volume
IBM- Burlington	2,208,000	No commitment specified	(.787) production-ba
IP- Androscoggin	3,275	Achieved	(0.97) tons of production
Naval Undersea	24,487	77% achieved	(0.44) total run time
PerkinElmer	8,509	Achieved	(1) no factor
Shipley	1,118,000	77% achieved	(0.93) # batches
Teradyne	0	Achieved	(.18) production level
Texas Instruments	308,537	80% achieved	(0.82) production activity
USPS Hartford VMF	1,500	No progress in year 1	(0.91) # vehicles serviced

* Normalization takes into account changes of the member in an effect to allow a more complete understanding of member observed change.
** Each member has until 2003 to meet its commitment.

C. CHANGES IN WATER USE

Progress Toward Commitments

Of the nine members that reported a quantitative commitment, the APRs showed that five of the members had met their commitments, two were making substantial progress toward them (at least 70 percent) and two reported no progress toward the commitment to date. These results are presented in Exhibit 7.

Actual Results

A total of 14 members made commitments to reduce water use with nine of these members included a quantifiable commitment. Overall, these efforts have resulted in savings of more than 138 million gallons, with an overall reduction of approximately seven percent from baseline levels. Two members reported that their water use increased versus the baseline. Results for these members are shown in Exhibits 7 and 8.

EXHIBIT 7
WATER USE - GALLONS

Facility	Baseline	2001	% Imprvmnt	Commitment	Progress to* Commitment in 2001
Clairol	105,950,331 (1999)	108,767,428	-2.66	104,075,825	No progress in first year
DePuy- New Bedford	2,299,882 (1999)	2,347,907	2.09	NA	No commitment specified
DePuy- Raynham	9,584,690 (1999)	10,749,425	-12.15	NA	No commitment specified
Guilford	71,492,820 (1999)	56,479,920	21.00	63,912,810	Achieved
IBM- Burlington	1,669,000,000 (1999)	1,593,000,000	4.55	NA	No commitment specified
J&J Medical	4,293,060 (1999)	4,189,769	2.41	NA	No commitment specified
J&J Mitek	198,657 (1999)	330,479	66.36	NA	No commitment specified
NH BB	4,264,170 (1999)	3,858,694	9.51	4,065,732	Achieved
PerkinElmer	1,618,672 (1999)	1,453,602	10.20	1,387,810	72% achieved
PRECIX	22,919,270 (1999)	14,148,650	38.27	19,481,380	Achieved
Shipley	13,750,000 (1999)	8,870,000	35.49	13,000,000	Achieved
Snap-On	7,143 (1999)	5,588	21.77	6,072	Achieved
Timken	4,120,000 (1999)	4,120,000	0.00	4,000,000	No progress in first year
USPS Hartford P&DC	9,171,700 (1999)	8,376,300	8.67	8,257,400	87% achieved
Total	**1,918,670,395**	**1,816,697,762**	**5.31**		

* Each member has until 2003 to meet its commitments

EXHIBIT 8a
WATER USE - GALLONS

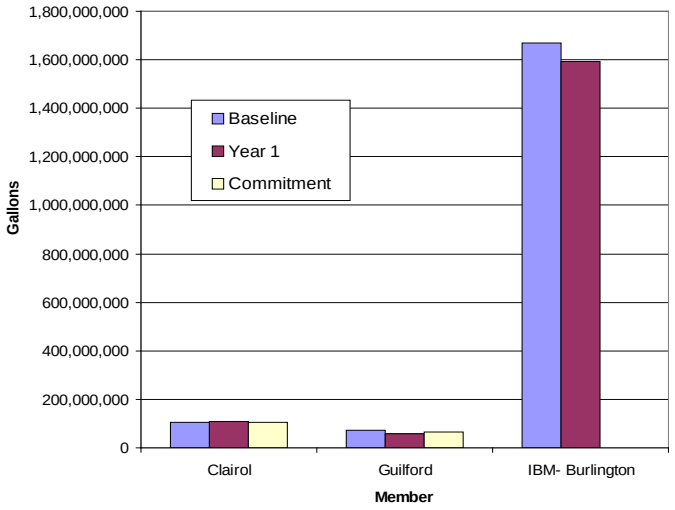
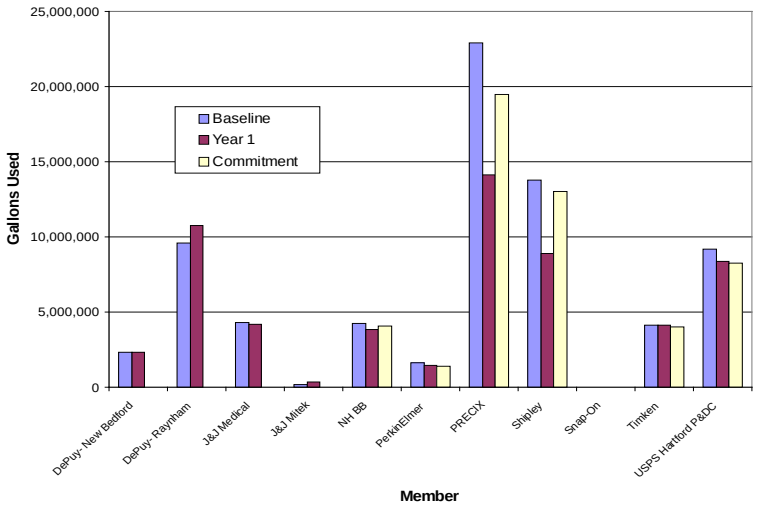


EXHIBIT 8b
WATER USE - GALLONS



Normalized Data

Nine members reported both normalized quantities of water used and commitments to reduce those quantities. Of these, four members had met their commitments; three had made some progress, and two virtually no progress to date. Results are shown graphically in Exhibit 9.

EXHIBIT 9
WATER USE - GALLONS
SUMMARY OF NORMALIZED DATA

Facility	Normalized 2001*	Normalized Progress to** Commitment In 2002	Normalizing Factor and Basis
Clairol	93,765,024	Achieved	(1.6) Kg products
Guilford	68,710,360	36% achieved	(.822) woven linear yards
NH BB	3,870,715	Achieved	(.99) direct labor hours
PerkinElmer	1,453,602	72% achieved	(1) no factor
PRECIX	18,232,790	Achieved	(.78) pounds of rubber used
Shipley	9,336,482	Achieved	(.95) number of batches made
Snap-On	7,121	2% achieved	(.785) production based
Timken	4,120,000	No progress in year 1	(1.0) *unknown*
USPS Hartford P&DC	8,376,300	87% achieved	(1) building area

* Normalization takes into account changes of the member in an effect to allow a more complete understanding of member observed change.
** Each member has until 2003 to meet its commitment.

D. CHANGES IN ENERGY USE

Progress Toward Commitments

In 2001, six New England members have met their commitment, in actual terms, six others have made some progress toward them, and five have not reduced energy use from their baseline. These results are presented in Exhibit 10.

Actual Results

Nineteen members committed to reduce energy use, with one member making two commitments to this Aspect, for a total of 20 commitments. One member's commitment cannot be quantified and one commitment appears to increase. The analysis focuses on the remaining 18 commitments. Members made progress towards 13 of the 18 commitments, with the remaining five members increasing their energy use over the same period. As can be seen on Exhibit 10, the

members reported a total reduction of energy demand of 10,500 mmBTU. The results for these members are shown graphically on Exhibits 11a and 11b. The total energy saved is equivalent to the annual energy use of more than 100 households and the energy used for nearly 200 residential water heaters. Overall, the reporting members indicated energy savings of approximately 0.25 percent.

Normalized Data

Of the16 members that reported both normalized results for 2001 and quantitative data for 17 total commitments, three met their commitment, four others achieved some progress (ranging from 36 percent to 89 percent of the commitment) and nine reported minimal or no progress in Year 1 (see Exhibit 12). Comparing this to the results for the actual data shows the importance of considering the normalized data, especially when evaluating progress toward the commitments, rather than overall environmental improvement. For example, IBM was able to maintain energy consumption at a constant level (e.g., maintain actual quantities) while increasing production rates, thus improving energy efficiency (e.g., decreasing normalized quantities).

EXHIBIT 10
ENERGY MMBTU

Member	Baseline	2001	Percent Improvement	Commitment	Progress to Commitment in 2001*
Clairol	236,414 (1999)	242,619	-2.6	231,623	No progress in first year
DDLC Energy	18,246(2000)	18,981	-4.03	16,579	No progress in first year
DDLC Fuels	4,819 (2000)	4,739	1.66	4,599	36% achieved
Guilford	163,204 (1999)	145,584	10.8	150,030	Achieved
IBM- Burlington	2,614,382 (1999)	2,755,814	-5.41	2,313,038	No progress in first year
INERT	2,251(2000)	2,953	-31.2	1,801	No progress in first year
Naval Undersea	249,351(2000)	224,973	9.8	245,000	Achieved
NH BB	52,089 (1999)	51,736	0.7	46,241	6% achieved
PerkinElmer A	15,484(2000)	14,501	6.3	14,245	79% achieved
PerkinElmer B	4,499(2000)	4,246	5.6	3,999	51% achieved
PRECIX	76,429 (1999)	54,545	28.6	68,688	Achieved
Shipley	90,221 (2000)	89,424	0.9	85,710	18% achieved
Snap-On	4,947 (1999)	5,417	-9.5	4,205	No progress in first year
Texas Instruments	536,014(2000)	461,000	14.0	509,000	Achieved
Timken	32,892 (1999)	30,162	8.3	32,563	Achieved
USCG Cape Cod	37,581 (1999)	36,549	2.7	34,750	36% achieved
USGen	42,589 (1999)	27,941	34.4	38,897	Achieved
Valley Oil	4,566(2000)	4,302	5.8	3,797	34% achieved
Total MMBTU	**4,185,978**	**4,175,486**	**0.25**	**3,804,765**	

* Each member has until 2003 to meet its commitments

EXHIBIT 11a
ENERGY MMBTU

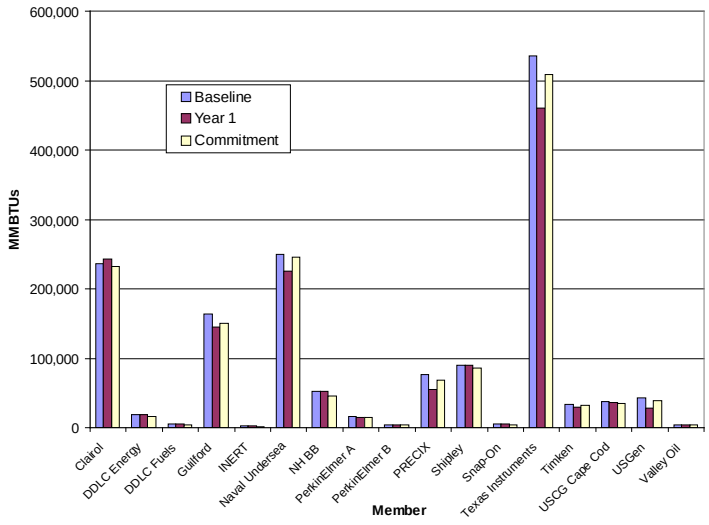


EXHIBIT 11b
ENERGY MMBTU

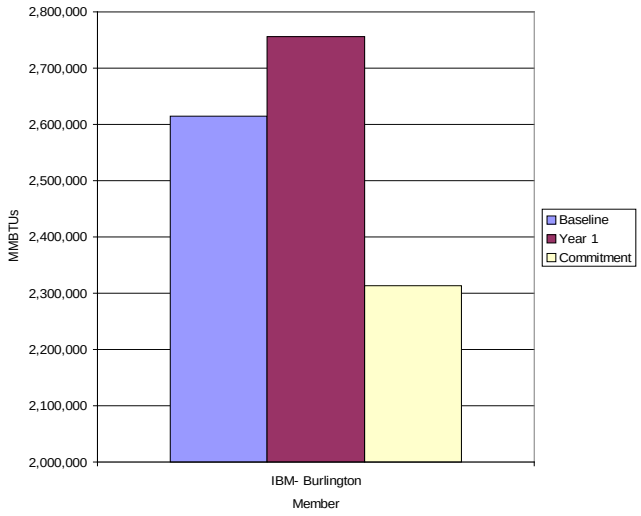


EXHIBIT 12
ENERGY MMBTU- SUMMARY OF NORMALIZED DATA

Member	Normalized 2001*	Normalized Progress** to Commitment	Normalizing Factor
Clairol	209,154	Achieved	(1.16) Kg product batched
DDLC Energy	22,597	No progress in first year	(.67) change in customer base
DDLC Fuels	7,073	No progress in first year	(.67) change in customer base
Guilford	177,110	No progress in first year	(.822) woven linear yards of fabric
IBM- Burlington	2,437,769	59% achieved	(1.13) *unknown*
INERT	4,044	No progress in first year	(.73) gross weight of product received
Naval Undersea	229,799	Achieved	(.98) # work years
NH BB	51,897	3% achieved	(.99) labor hours
PerkinElmer A	14,501	79% achieved	(1)
PerkinElmer B	4,246	51% achieved	(1)
PRECIX	71,207	No progress in first year	(.766) pounds of rubber used
Shipley	75,783	Achieved	(1.18) number of sources
Snap-On	6,903	No progress in first year	(.785) production based
Texas Instruments	512,000	89% achieved	(.9) production and heating
USCG Cape Cod	36,549	36% achieved	(1)
USGen	39,916	No progress in first year	(0.7)production-based
Valley Oil	6,017	No progress in first year	(0.7) change in customer base

* Normalization takes into account changes of the member in an effect to allow a more complete understanding of member observed change.
** Each member has until 2003 to meet its commitment.

E. EMISSIONS OF VOCs

Progress Toward Commitments

One member has met its three-year commitment to reduce volatile organic compounds (VOCs) in this first year. The remaining five members noted progress, ranging from 20 percent to 50 percent of the commitment.

Actual Results

Six members reported progress in reducing the amount of VOCs emitted to the air (see Exhibits 13 and 14). The members reduced VOC emissions by approximately 13.5 tons or about 24 percent of their baseline amount (see Exhibits 13 and 14).

Normalized Data

An additional member met its commitment on a normalized basis, versus the actual data, and one other member progressed to 92 percent of its commitment. One other member reported reaching 50 percent of its committed reductions on a normalized basis while two others reported no decreases in the normalized VOC emissions from the baseline in Year 1 (see Exhibit 15).

EXHIBIT 13
VOC EMISSIONS

Member	Baseline	2001	Percent Improvement	Commitment	Progress to* Commitment in 2001
Heidelberg	10,780 (2000)	9,825	8.9	6,000	20% achieved
Henkel Loctite	1,288 (1999)	817	36.6	364	51% achieved
PRECIX	16,295 (1999)	3,039	81.4	11,406	Achieved
Teradyne	6,000 (2000)	3,200	46.7	1,000	56% achieved
Unilever	24,800 (1999)	21,000	15.3	8,000	23% achieved
USCG Cape Cod	50,000 (1999)	45,000	10.0	40,000	50% achieved
Total	**109,163**	**82,881**	**24.1**	**66,770**	

* Each member has until 2003 to meet its commitments

EXHIBIT 14
VOC EMISSIONS

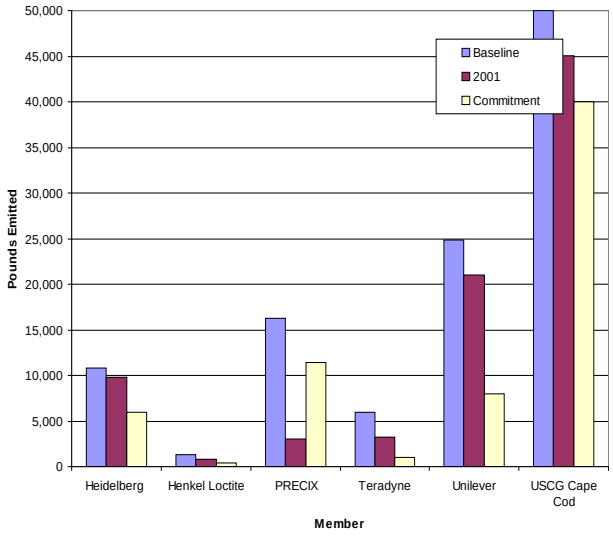


EXHIBIT 15
VOC EMISSIONS
SUMMARY OF NORMALIZED DATA

Member	Normalized 2001*	Normalized Progress** to Commitment	Normalizing Factor
Heidelberg	4,466	Achieved	(.18) total weight of presses shipped
Henkel Loctite	439	92% achieved	(1.86) # gallons processed
PRECIX	3,588	Achieved	(.85) pounds of ??? produced
Teradyne	16,700	No progress in first year	(.18) production
Unilever	25,400	No progress in first year	(.83) gallons of ethanol consumed
USCG Cape Cod	45,000	50% achieved	(1)

* Normalization takes into account changes of the member in an effect to allow a more complete understanding of member observed change.
** Each member has until 2003 to meet its commitment.

F. OTHER COMMITMENTS

Some EPA New England Performance Track members committed to environmental improvements that could not be categorized under the standard Aspects. Two of these are noted below:

X Beacon Skanska has committed to increase the number of sites that are developed using sustainable principles and that incorporate energy saving construction practices. As noted in its APR, the firm did complete one new site development using sustainable principles and also increased from one to three the number of sites employing increased energy efficiency practices.

X USGen has committed to stabilize the lead paint at some of its facilities that provide the potential for future lead contamination of the local environment. In 2001, they completed 48 of these projects, and the three-year commitment is to clean up 166 sites.

This report also includes data on Aspects including material use, accidental releases of gasoline, greenhouse gas emissions, emissions of toxics and COD to water, hazardous material use, and recycled and reused materials. These data are shown in Exhibits 16 - 29.

EXHIBIT 16
ACCIDENTAL RELEASES - GALLONS

Member	Baseline	2001	Percent Improvement	Commitment	Progress to Commitment in 2001*
DDLC Energy	25 (2000)	6	76.00	0	76% achieved
DDLC Fuels	15 (2000)	3	80.00	0	80% achieved
Oil Express	0 (2000)	0	NA	0	Achieved
Valley Oil	0 (2000)	3	0.00	0	No progress in first year

* Each member has until 2003 to meet its commitments

EXHIBIT 17
ACCIDENTAL RELEASES - GALLONS
SUMMARY OF NORMALIZED DATA

Member	Normalized 2001*	Normalized Progress** to Commitment	Normalizing Factor and Basis
DDLC Energy	7	72% achieved	(0.86) Gallons of Fuel Oil Sold
DDLC Fuels	4	73% achieved	(0.80) Gallons of Fuel Oil Sold
Oil Express	0	Achieved	(0.92) Gallons of Fuel Oil Sold
Valley Oil	4	No progress in first year	(0.80) Gallons of Fuel Oil Sold

* Normalization takes into account changes of the member in an effect to allow a more complete understanding of member observed change.
** Each member has until 2003 to meet its commitment.

EXHIBIT 18
EMISSIONS OF GREENHOUSE GASES - POUNDS

Member	Baseline	2001	Percent Improvement	Commitment	Progress to Commitment in 2001*
Clairol	37,568,686 (1999)	37,717,895	-0.40	36,820,564	No progress in first year
DePuy- New Bedford	5,740,916 (1990)	9,733,179	-69.54	5,626,098	No progress in first year
DePuy- Raynham	12,829,868 (1990)	29,940,294	-133.36	12,573,271	No progress in first year
Heidelberg	90,000 (2000)	36,000	60.00	72,000	Achieved
J&J Medical	10,469,166 (1990)	16,841,426	-60.87	10,259,783	No progress in first year
J&J Mitek East	1,171,595 (1990)	1,151,358	1.73	1,148,163	86% achieved

* Each member has until 2003 to meet its commitments

EXHIBIT 19
EMISSIONS OF GREENHOUSE GASES - POUNDS
SUMMARY OF NORMALIZED DATA

Member	Normalized 2001*	Normalized Progress** to Commitment	Normalizing Factor and Basis
Clairol	32,515,427	Achieved	(1.16) Kg Product Batched
Heidelberg	50,000	Achieved	(.72) Number of Employees

* Normalization takes into account changes of the member in an effect to allow a more complete understanding of member observed change.
** Each member has until 2003 to meet its commitment.

EXHIBIT 20
EMISSIONS OF PARTICULATE MATTER - POUNDS

Member	Baseline	2001	Percent Improvement	Commitment	Progress to Commitment in 2001*
DDLC Energy	17,500 (2000)	12,888	26.35	15,453	Achieved
DDLC Fuels	5,913 (2000)	4,104	30.59	5,221	Achieved
Oil Express	7,184 (2000)	6,434	10.44	7,153	Achieved
Valley Oil	5,264 (2000)	4,019	23.65	5,227	Achieved

* Each member has until 2003 to meet its commitments

EXHIBIT 21
EMISSIONS OF PARTICULATE MATTER - POUNDS
SUMMARY OF NORMALIZED DATA

Member	Normalized 2001*	Normalized Progress** to Commitment	Normalizing Factor and Basis
DDLC Energy	15,036	Achieved	(.86) Gallons of Fuel Oil Sold
DDLC Fuels	5,163	Achieved	(.80) Gallons of Fuel Oil Sold
Oil Express	7,023	Achieved	(.92) Gallons of Fuel Oil Sold
Valley Oil	5,055	Achieved	(.80) Gallons of Fuel Oil Sold

* Normalization takes into account changes of the member in an effect to allow a more complete understanding of member observed change.
** Each member has until 2003 to meet its commitment.

EXHIBIT 22
COD DISCHARGES TO WATER - POUNDS

Member	Baseline	2001	Percent Improvement	Commitment	Progress to Commitment in 2001*
IP- Androscoggin	31,654,974 (2000)	29,823,785	5.78	22,397,900	22% achieved
Unilever	74,500 (1999)	19,800	73.42	2,585	76% achieved

* Each member has until 2003 to meet its commitments

EXHIBIT 23
DISCHARGES OF TOXICS TO WATER - POUNDS
SUMMARY OF NORMALIZED DATA

Member	Normalized 2001*	Normalized Progress** to Commitment	Normalizing Factor and Basis
IP- Androscoggin	30,432,434	13% achieved	(.98) air-dried tons of unbleached pulp
Unilever	23,294	71% achieved	(.85) industrial wastewater treated

* Normalization takes into account changes of the member in an effect to allow a more complete understanding of member observed change.
** Each member has until 2003 to meet its commitment.

EXHIBIT 24
HAZARDOUS MATERIALS USE - POUNDS

Member	Baseline	2001	Percent Improvement	Commitment	Progress to Commitment in 2001*
NH BB	8,555 (1999)	11,745	-37.29	0	No progress in first year
PRECIX	2,184 (1999)	2,018	7.6	1,695	34% achieved
Shipley	483,416 (1999)	371,331	23.19	386,733	Achieved

* Each member has until 2003 to meet its commitments

EXHIBIT 25
HAZARDOUS MATERIALS USE - POUNDS
SUMMARY OF NORMALIZED DATA

Member	Normalized 2001*	Normalized Progress** to Commitment	Normalizing Factor and Basis
NH BB	11,782	No progress in first year	(.996) Direct Labor Hours
PRECIX	2,635	No progress in first year	(.77) Pounds of Rubber Mixed or Used
Shipley	277,113	Achieved	(1.34) Number of Batches

* Normalization takes into account changes of the member in an effect to allow a more complete understanding of member observed change.
** Each member has until 2003 to meet its commitment.

EXHIBIT 26
RECYCLED/REUSED MATERIALS USE - POUNDS

Member	Baseline	2001	Percent Improvement	Commitment	Progress to Commitment in 2001*
Guilford	8,545,874 (1999)	8,491,788	-0.63	10,345,360	No progress in first year
USGen	0 (2000)	4,950	NA	4,950	Achieved
USPS Hartford P&DC	0 (2000)	12,300	NA	7,500	Achieved
USPS Hartford VMF	0 (2000)	15,854	NA	28,860	54% achieved
USPS Portland P&DC	0 (2000)	54,080	NA	7,000	Achieved

* Each member has until 2003 to meet its commitments

EXHIBIT 27
RECYCLED/REUSED MATERIALS USE - POUNDS
SUMMARY OF NORMALIZED DATA

Member	Normalized 2001*	Normalized Progress** to Commitment	Normalizing Factor and Basis
Guilford	10,368,480	Achieved	(.82) Total Textile Raw Materials
USGen	4,950	Achieved	(1) Employees
USPS Hartford P&DC	12,300	Achieved	(1) Employees
USPS Hartford VMF	17,422	60% achieved	(1) Number of Vehicle Services
USPS Portland P&DC	64,381	Achieved	(1) Employees

* Normalization takes into account changes of the member in an effect to allow a more complete understanding of member observed change.
** Each member has until 2003 to meet its commitment.

EXHIBIT 28
TOTAL MATERIALS USE - POUNDS

Member	Baseline	2001	Percent Improvement	Commitment	Progress to Commitment in 2001*
DePuy- Raynham	677,314 (2000)	947,987	-39.96	NA	No commitment specified
DePuy- New Bedford	308,686 (2000)	215,437	30.21	NA	No commitment specified
NH BB	31,988 (1999)	28,789	10	21,810	31% achieved
J&J Medical	1,109,871 (2000)	2,055,803	-85.23	NA	No commitment specified
Snap-On	331.5	342.1	-3.20	281.7	No progress in first year
Texas Instruments A	4,253	3,208	24.57	3,162	96% achieved
Texas Instruments B	171,787	106,937	37.75	33,070	47% achieved

* Each member has until 2003 to meet its commitments

EXHIBIT 29
TOTAL MATERIALS USE - POUNDS
SUMMARY OF NORMALIZED DATA

Member	Normalized 2001*	Normalized Progress** to Commitment	Normalizing Factor and Basis
NH BB	28,879	31% achieved	(.996) Direct Labor Hours
Snap-On	436	No progress in first year	(.78) Production Hours
Texas Instruments A	3,912	31% achieved	(.82) Units Manufactured
Texas Instruments B	108,017	46% achieved	(.99) Net Revenue

* Normalization takes into account changes of the member in an effect to allow a more complete understanding of member observed change.
** Each member has until 2003 to meet its commitment.

G. OUTREACH ACTIVITIES

Performance Track applications and Annual Performance Reports include sections for members to describe their outreach activities. In general, these activities are related to how well the members communicate environmental results to the public, and how the Annual Performance Reports are distributed. Of the 19 reporting members, 11 of them noted that they hold meetings or participate in meetings related to environmental management. Three of the 19 explicitly noted meeting city or town officials regarding their facility's operations, and two of the 19 members use public advisory groups as formal mechanisms to discuss environmental issues.

Fifteen of the 19 reporting members note on their Annual Performance Reports that the primary method of public distribution is through the Internet. In a brief review of the websites noted on the 2001 APRs, three sites contained reference to Performance Track; in one case information on the commitments was reported. No information about Performance Track or the Annual Performance Reports was located on the other 12 member sites. To ensure public access to Annual Performance Reports, members may provide links to EPA's Performance Track website where all reports are available.

IV. MEMBER SPECIFIC REVIEWS

This chapter includes a brief overview of the progress reported by each member in its APR, complemented by additional information collected during clarifying follow-up discussions conducted as part of the evaluation. Each member is listed in alphabetical order. Exhibit 30 lists each member, their location, and the aspects included in their 2001 APR.

Exhibit 30
NEW ENGLAND PERFORMANCE TRACK MEMBERS AND COMMITMENTS[8]

Acushnet Rubber Company, DBA PRECIX, Inc. (PRECIX) New Bedford, MA	Total Water Use
	Total Energy Use
	Emissions of VOCs
	Hazardous Materials Use
BAE SYSTEMS- South Nashua Facility (BAE SYSTEMS) Nashua, NH	Hazardous Solid Waste
	Total Solid Waste
	Removal
Clairol Worldwide Beauty Care (Clairol) Stamford, CT	Total Energy Use
	Total Water Use
	Emissions of Greenhouse Gases
	Hazardous Solid Waste
DDLC Energy New London, CT	Emissions of Particulate Matter
	Total Solid Waste
	Release History
	Total Energy Use
DDLC Fuels Danielson, CT	Total Solid Waste
	Release History
	Emissions of Particulate Matter
	Total Energy Use
DePuy Orthopaedics, Inc. (DePuy- Raynham) Raynham, MA	Total Materials Use
	Total Water Use
	Emissions of Greenhouse Gases
	Total Solid Waste
DePuy Orthopaedics, Inc. (DePuy- New Bedford) New Bedford, MA	Total Water Use
	Total Solid Waste
	Emissions of Greenhouse Gases
	Total Materials Use
Heidelberg Web Systems (Heidelberg) Dover, NH	Emissions of VOCs
	Total Solid Waste
	Emissions of Greenhouse Gases
	Emissions of NOx
	Emissions of Carbon Monoxide

[8] One member, The Topflite Golf Company (Topflite) of Chicopee, MA is not included in this Exhibit because at the time of this analysis, Topflite's 2001 APR was not finalized.

Exhibit 30 NEW ENGLAND PERFORMANCE TRACK MEMBERS AND COMMITMENTS[8]	
Henkel Loctite Seabrook, NH	Total Solid Waste
	Hazardous Solid Waste
	Emissions of Toxics
	Emissions of VOCs
IBM- Burlington Essex Junction, VT	Total Water Use
	Total Energy Use
	Hazardous Solid Waste
	Emissions of Greenhouse Gases
INERT Corporation (INERT) Newfields, NH	Total Solid Waste
	Total Energy Use
	Expected Lifetime Energy Use of Product
Interface Fabrics Group Inc., Guilford Facility (Guilford) Guilford, ME	Total Solid Waste
	Total Water Use
	Total Energy Use
	Recycled/Reused Materials Use
International Paper, Androscoggin Mill (IP- Androscoggin) Jay, ME	Total Solid Waste
	COD Discharges to Water
	Hazardous Solid Waste
	Dicharges of Toxics to Water
Johnson & Johnson Medical (J&J Medical) Southington, CT	Emissions of Greenhouse Gases
	Total Materials Use
	Total Solid Waste
	Total Water Use
Johnson & Johnson Mitek East Ethicon (J&J Mitek) Westwood, MA	Emissions of Greenhouse Gases
	Total Materials Use
	Total Solid Waste
	Total Water Use
Naval Undersea Warfare Center Division, Newport (Naval Undersea) Newport, RI	Total Solid Waste
	Total Energy Use
	Hazardous Solid Waste
	Habitat Impacts
New Hampshire Ball Bearings, Inc. (NH BB) Peterborough, NH	Total Energy Use
	Total Materials Use
	Total Water Use
	Hazardous Materials Use
Oil Express East Falmouth, MA	Emissions of Particulate
	Total Solid Waste
	Total Energy Use
	Release History
PerkinElmer Optoelectronic (PerkinElmer) Salem, MA	Total Water Use
	Total Energy Use
	Hazardous Solid Waste

Exhibit 30 NEW ENGLAND PERFORMANCE TRACK MEMBERS AND COMMITMENTS[8]	
Shipley Company, LLC (Shipley) Marlborough, MA	Hazardous Solid Waste
	Hazardous Materials Use
	Total Energy Use
	Total Water Use
Skanska USA Building, Inc. - New England Division (Beacon Skanska) Boston, MA	Total Solid Waste
	Total Energy Use
	Other
Snap-On Natick Plant (Snap-On) Natick, MA	Total Water Use
	Total Materials Use
	Total Energy Use
	Hazardous Solid Waste
Teradyne Inc. (Teradyne) North Reading, MA	Total Solid Waste
	Emissions of VOCs
	Hazardous Solid Waste
Texas Instruments Incorporated, Sensors and Controls (Texas Instruments) Attleboro, MA	Hazardous Solid Waste
	Total Materials Use
	Total Energy Use
Timken U.S. Corporation – Watertown, CT (Timken) Watertown, CT	Total Solid Waste
	Total Water Use
	Total Energy Use
	Hazardous Solid Waste
US Coast Guard Air Station Cape Cod (USCG Cape Cod) Air Station Cape Code, MA	Emissions of VOCs
	Total Solid Waste
	Total Energy Use
	Hazardous Solid Waste
Unilever Home & Personal Care USA (Unilever) Clinton, CT	Emissions of VOCs
	Total Solid Waste
	Packaging Materials Used In Product
	COD Discharges to Water
United States Postal Service, Hartford Processing and Distribution Center (USPS Hartford P&DC) Hartford, CT	Recycled/Reused Materials Use
	Total Solid Waste
	Total Water Use
United States Postal Service, Hartford Vehicle Maintenance Facility (USPS Hartford VMF) Hartford, CT	Recycled/Reused Materials Use
	Total Solid Waste
	Hazardous Solid Waste
United States Postal Service, Portland Processing and Distribution Center (USPS Portland P&DC) Portland, ME	Hazardous Solid Waste
	Recycled/Reused Materials Use
	Total Solid Waste
USGen New England- Hydro Generation (USGen) Concord, NH	Total Energy Use
	Hazardous Solid Waste
	Recycled/Reused Materials Use
	Remediation

Exhibit 30 NEW ENGLAND PERFORMANCE TRACK MEMBERS AND COMMITMENTS[8]	
Valley Oil Willimantic, CT	Emissions of Particulate Matter
	Total Energy Use
	Release History
	Total Solid Waste

BAE SYSTEMS- SOUTH NASHUA FACILITY

BAE SYSTEMS accomplished a significant reduction in solid waste disposal. After BAE SYSTEMS implemented an enhanced recycling program, they were able to reduce more than 500 tons (1,000,000 pounds) or almost half of its baseline generation. In addition, the member has a commitment to reduce hazardous waste generation, and while the gross levels of hazardous waste increased 25,000 pounds, the rate of hazardous waste generated per dollar revenue dropped almost 5 percent.

BAE SYSTEMS also undertook two sets of projects to reduce the threat from exposure to hazardous chemicals. They reported the removal of an underground storage tank for fuel oil and the removal of 49,000 square feet and 5980 linear feet of asbestos-containing material.

CLAIROL WORLDWIDE BEAUTY CARE

Clairol committed to reduce total water and energy use, to reduce emissions of greenhouse gases and the amount of hazardous waste produced. Energy use includes the energy to run the manufacturing processes and the facility heating and cooling. On a normalized basis, energy consumption declined more than ten percent while greenhouse gas emissions declined approximately 14 percent. The greenhouse gas reduction is related more directly to fuel oil used for facility heating during the winter. Since the overall production in the facility increased by 16 percent over the base period, at least some of the reduction in energy use is due to implementing new efficient processes and devices.

While the APR noted a small increase in actual water use, the per unit use of water decreased more than 10 percent. Water use is closely related to the production levels in the facility and the normalized reduction is a good reflection of the implementation of water conservation strategies. The reduction in water use continues a significant trend reported in the application, where the facility discontinued the release of cooling water and implemented a closed loop design, reducing the water consumption by approximately 15 million gallons per year.

Hazardous waste generation increased almost 20 percent, but this increase was due to some one-time events related to the transfer of ownership of the company and cleaning out old operations.

INTERFACE FABRICS GROUP INC., GUILFORD FACILITY

This textile plant committed to decreasing water use, solid waste, and energy as well as increasing the recycled content of its products. Its Annual Performance Report showed that it was able to reduce water use by 21 percent (a reduction of 15,000,000 gallons). However, this reduction occurred while production also decreased by 18 percent, resulting in a per unit reduction of water use of about 3 percent. A similar story is true for solid waste reduction. Guilford set a 25 percent target and its reduction on a per unit basis is almost 18 percent after the first year.

Progress made in reducing energy usage is less clear. While energy use decreased by almost 10 percent, the 18 percent reduction in production suggests a per unit energy consumption rate greater than its baseline. The normalized quantity may not illustrate energy efficiency accurately because of Guilford's fixed energy use, which is independent of production.

Guilford uses recycled fiber in its textile manufacturing and has set a goal of achieving 80 percent recycled content (from a 66.1 percent baseline in 1999). It accomplished this in 2001 and as a result, the company has used two million pounds less of raw material.

HEIDELBERG WEB SYSTEMS

Heidelberg committed to reducing air emissions of VOCs and other gases and to reduce the amount of solid waste it produces. By reducing vehicle use between two locations, it achieved reductions of carbon monoxide, oxides of nitrogen, and carbon dioxide emissions. A shift of operations reduced the number of trips by approximately 60 percent and resulted in a reduction of more than 3,000 pounds of carbon monoxide, 200 pounds of NOx, and 54,000 pounds of carbon dioxide.

In addition, two recycling efforts have reduced the solid waste generation rate significantly. Recycling of bottles in the cafeteria has reduced shipments of waste to the landfill by more than 4.5 tons. Paper recycling has increased almost 20 tons due to an expanded program that includes mixed paper waste.

Another commitment focuses on the generation of VOCs in its painting operations. While the member saw a 10 percent reduction in VOC release in its first year of participating in Performance Track, it also completed a research project aimed at reducing VOCs by almost 80 percent.

HENKEL LOCTITE

Henkel Loctite manufactures adhesives and other specialty chemicals for use by consumers and other industries. One of their goals is to reduce their solid waste generation by 25 percent; Henkel Loctite accomplished greater than 43 percent reduction in its first year. This approximately 25 ton reduction means at least one fully loaded truck is not hauling waste to a landfill. According to

the company, this improvement is the result of process changes that improved production controls and thus, reduced waste product.

Henkel Loctite also agreed to reduce VOCs by 70 percent. The actual reduction reported was 37 percent from its 1999 baseline, but production also increased 86 percent resulting in a per unit VOC reduction of more than 71 percent. These reductions are the result of a process change that decreased the purging time between runs.

The company agreed to a 50 percent reduction in toxic release and will need to carry out more analysis before implementing its strategy. However, a strategy to reduce hazardous waste generation in one of its cleaning processes has proved to be successful by entirely eliminating the use of caustic in cleaning one of its process tanks.

IBM- BURLINGTON

The Essex Junction, VT chip development and manufacturing plant committed to reducing the release of PFCs (perfluorocarbons--a class of potent greenhouse gasses), the generation of hazardous solid waste, and its use of water and energy. The member successfully reduced PFC releases by identifying opportunities to replace those solvents with NF_3 (Nitrogen Triflouride), which is less active as a greenhouse gas. This also reduces the release of stratospheric ozone depleting chemicals.

In the case of water use and energy use, the overall results are complicated by the consideration of normalization factors. Energy use increased at the plant, but these increases are the result of significant process changes that require higher levels of energy consumption. These process changes do not result in a change in actual production level and it is unclear if the process change is captured by the normalization factor used. Water use is decreasing, but the application of a normalization factor based on production suggests that per unit water use is increasing. In the notes accompanying the Annual Performance Report, the member reports that water use is largely fixed and implementing some changes in operating procedures and reusing some water is the basis for actual reductions, rather than a decrease in plant activity.

With regard to reductions in hazardous waste, the conversion from one solvent to another with lower volatility resulted in a significant increase in the quantity of solvent that enters the waste stream. However, the member expects that greater experience with the new solvent will lead to a reduction in its disposal in the longer term.

INERT CORPORATION

The INERT Corporation (formerly DMC Electronics Recycling) recycles electronic components, and plans to increase the proportion of materials it processes that is recycled. While recycling is not an identified Aspect, the company has made a commitment to increase its use of recycled materials. As a past achievement, the company notes that it increased the amount of recycled material from its operations more than 10 fold in the two years prior to its application. INERT's commitment for the Performance Track program is to further increase the proportion of material recycled from 66.5 percent to 80 percent. The results from the first year were not positive because of the overall downturn in their volume, thus reducing opportunities for recycling.

INERT also committed to a 20 percent reduction in energy use. In its first Annual Performance Report, INERT reports that energy use increased because of unexpected contractual requirements. INERT committed to reduce its production of hazardous waste and exceeded its goal of increasing the diversion rate to 95 percent. The baseline diversion rate was 84.1 percent in 1999 and by 2001, the company was diverting more than 96.4 percent of its hazardous waste from off site treatment, storage and disposal.

Lastly, the company committed to increase the re-use of some of the computers that it processed, but challenges in providing necessary technical support to recipients caused the company to withdraw that commitment. While not an approved commitment, the Company is working to increase the number of its waste handling vendors that have accomplished an audit of their practices. In just one year, the proportion of audited vendors increased from 27 percent to 45 percent.

INTERNATIONAL PAPER- ANDROSCOGGIN MILL

IP- Androscoggin will work towards reducing solid waste generation by almost 70 percent and accomplished almost a 50 percent reduction in its first year. This reduction is a continuation of reductions implemented prior to the Performance Track agreement and reported in the section of Previous Accomplishments in the Application. The member also met its commitment to reduce hazardous waste by two thirds.

IP- Androscoggin also committed to an almost 50 percent reduction in the release of color to the Androscoggin River. It accomplished a little less than a ten percent reduction to date. IP-Androscoggin also committed to an almost 30 percent reduction in COD load to the river. The member reported a four percent reduction in its first year and continues to work toward meeting this target.

NAVAL UNDERSEA WARFARE CENTER DIVISION, NEWPORT

Naval Undersea is a military facility and provides a range of support to submarines and other undersea operations. In the period leading up to its application, it had reduced its solid waste stream

by almost 20 percent and its hazardous waste stream by almost 10 percent. To participate in Performance Track, the company committed to a continuation of solid waste diversion through recycling. The first Annual Performance Report showed that the commitment was met and solid waste diversion rates increased to 65 percent.

In addition to solid and hazardous waste, the company targeted a four percent reduction in energy use and a commitment to ensure that offshore testing took place in the presence of trained monitors. The energy use for the facility dropped by almost ten percent and eight of the nine offshore tests had trained observers on board almost meeting the 95 percent target.

NEW HAMPSHIRE BALL BEARINGS, INC.

NH BB is a manufacturer of ball and roller bearings. In its application, the company notes that it reduced water use 18 percent on a per unit basis between 1997 and 1999. The company agreed to a further reduction of 15 percent over the three years of the Performance Track Program. During its first reporting period, the improvement was more than nine percent. The 400,000 gallons of water that it saved would be enough to meet the needs of four households.

NH BB also agreed to reductions of total energy use of about ten percent. The first Annual Performance Report shows about a one percent reduction as the result of lighting upgrades. But, even this small reduction would supply the electricity needs of ten average households.

The company is committed to a reduction in hazardous waste with the aim of totally eliminating the use of nitric acid in one of its process steps. An interim step in implementing a new technology actually led to increases in hazardous waste production with better results expected in the future. Finally, the company has set a commitment target of a 32 percent reduction in the use of oil in one of its departments. After the first year, the reduction amounts to almost ten percent.

PERKINELMER OPTOELECTRONICS

PerkinElmer is a manufacturer of scientific equipment. Its facility in Salem, Massachusetts concentrates on photoelectronic devices. Prior to its application for Performance Track, it accomplished a 16 percent reduction in electricity use by implementing an energy management plan. The company has established a further commitment to decrease electricity use by 8 percent. In its first Annual Performance Report, the member showed a reduction of almost six percent or about two-thirds of its three-year commitment. These reductions were accomplished by changing the operations of its high temperature ovens when not in use.[9] The savings translate to the electric water heating needs of more than 150 homes.

9 A second energy reduction commitment appears similar and differences need to be described.

The company also committed to expand on its progress in hazardous waste reduction. Between 1997 and 1999, the Salem plant reduced hazardous waste generated by 19 percent and committed to an additional 15 percent, which it exceeded in its APR for 2001. In addition to energy and hazardous waste, the company is committed to reducing its use of water by almost 15 percent and is more than half way to meeting that commitment.

SHIPLEY COMPANY, LLC

Shipley is a specialty chemical manufacturer and processor. Prior to application for Performance Track, the company reduced its use of hazardous material by 17 percent in a cleaning operation by changing the configuration of piping. The company committed to further reduce hazardous material use 20 percent through additional changes in the cleaning process. The first Annual Performance Report shows a decrease in hazardous solvent use of more than 100,000 pounds despite increasing productivity of 37 percent. This exceeds the commitment after just the first year of its participation.

Shipley also intends to use similar approaches to reduce water consumption. It has committed to a five percent reduction and accomplished a 30 percent reduction. This improvement is due, in part, to a better understanding of their water use. By reviewing some specific applications, they found that earlier practices led to greater water use than necessary. Changing the configuration of the manufacturing process allowed for the proper water use activities to be segregated. The initial commitment to energy use was to reduce natural gas use five percent by implementing a capital improvement. The company shifted its strategy to participate in an electric utility-sponsored rebate program that included occupancy sensors and a change to more efficient lighting. Those efforts, together with greater employee awareness accomplished a 15 percent reduction in electricity use normalized to the number of units that the facility utilizes. (The actual electricity reduction amounted to about one percent but an increase in the facility size (as measured by units) led to lower levels of per unit electricity consumption.)

Shipley plans to implement new technologies to reduce its volume of hazardous waste generation by about 35 percent. While that technology is still in development, the company has reduced its hazardous waste generation more than 40 percent through better waste stream separation and more detailed analysis of the individual wastes. The future process changes will further reduce its disposal of hazardous waste.

SKANSKA USA BUILDING, INC.- NEW ENGLAND DIVISION

Beacon Skanska is a construction management company that works on site preparation for large construction projects. One of its primary commitments was to reduce the amount of solid waste generated during its projects. However, as noted in Chapter II of this report, in 2001, specific projects generated more than 200,000 tons of material causing an increase in the generation of wastes from their 1999 baseline. The APR notes that the 2001 results were due to what Beacon Skanska

refers to as special projects. Unlike other Performance Track members that usually generate municipal solid waste, Beacon Skanska generates soil and rock that is typically not managed through land filling and incineration.

In addition to its solid waste commitment, the company is following through on efforts to promote commuting alternatives for its employees. The company estimates that its first year of incentives for employees has resulted in as much as a 33,000 pound reduction in carbon monoxide and a 264,000 pound reduction in carbon dioxide. This has resulted from the reduced use of about 13,200 gallons of vehicle fuel.

The company has also set other goals, relating to increasing energy efficiency in site development and making greater use of sustainable site design standards. In 2001, the company increased the number of energy efficient projects from one to three and increased the number of sites that follow sustainable site design standards from one in the baseline year to 2 in 2001. This represents a step on the way to their overall goal of 10 sustainably developed sites.

SNAP-ON NATICK PLANT

Snap-On is a manufacturer and distributor of automotive tools. They committed to reduce their energy, water, and materials use. The first Annual Performance Report shows water use declined by more than 20 percent but only marginally in normalized terms so the observed reduction likely resulted from reduced production activities. Energy and material use increased during the first reporting period, in both actual and normalized terms. The company met its commitment of generating no hazardous waste.

TERADYNE INC.

This manufacturer of circuit boards committed to reducing lead contaminated debris and VOCs while increasing the recycling of two materials. In its first Annual Performance Report, it showed a more than 40 percent reduction of VOC releases, which amounts to 1.4 tons less VOCs entering the environment, equivalent to removing 80 cars from use. It should be noted that most of this improvement ***may*** result from a significant reduction in production activity at the facility.

Teradyne has been successful in removing aerosol cans and lead contaminated debris from its waste stream. In both cases, the company reprocessed the materials, thereby keeping them out of the waste stream. The company has plans to identify recycling opportunities for its carbon/resin filter media as well, although no progress was identified in the first reporting cycle.

TEXAS INSTRUMENTS INCORPORATED, SENSORS AND CONTROLS

The Texas Instruments facility in Attleboro, Massachusetts develops new products and processes for the corporation. As a result, many of the environmental improvements accomplished

in Attleboro become a part of an overall improvement in Texas Instruments manufacturing plants around the country and the world.

The Attleboro facility agreed to commitments in reducing hazardous waste, energy use, and the use of lead and halogenated solvents. Much of the progress in meeting these commitments is the result of analysis and investments the company made during the 1990s investigating pollution prevention activities. For example, about twenty different process changes have led to the reduction of almost 100 tons of hazardous waste.

The member has also accomplished some energy reductions in its first year of Performance Track participation. Texas Instruments employs an energy use model that controls for changes in processes as well as changes in external factors such as the weather. As a result, the four percent reduction in energy use reported in its Annual Performance Report is intended to entirely represent the change in efficiencies in its operations and is not a consequence of other changes at the plant.

The Attleboro facility also reported on a reduced use of halogenated solvents. In this case, the reported reductions are corporate-wide based on the logic that the Attleboro facility tests new processes and any changes that take place in its other facilities are the result of progress made in Attleboro. For this reason, it is not appropriate to consider the reductions as a part of the improved impact on the New England environment, but it is another part of the success represented by this Performance Track participant.

TIMKEN U.S. CORPORATION- WATERTOWN, CT

The Torrington plant produces automotive parts. As with several manufacturing members, it is continually changing and updating its production processes. For Torrington, the plant underwent some significant changes between its baseline year and the first reporting year and measures such as water use and energy use are simply not comparable.

In the case of hazardous solid waste, the member reported that in 2001, it eliminated the hazardous waste that it shipped off site. However, while there were no shipments, some hazardous waste was still being generated.

The member also made a commitment to reduce water use but did not make any progress toward that commitment. However, the text in the report notes that the initial application represented a different set of manufacturing practices than the 2001 conditions. Similarly, the 1999 baseline is not useful for measuring trends in energy use. The member continues to upgrade compressors and other energy using items and on a case-by-case basis, these upgrades increase the efficient use of electricity and natural gas.

UNILEVER HOME & PERSONAL CARE

The Unilever facility in Clinton, CT committed to an almost complete elimination of Chemical Oxygen Demand in its wastewater effluent. During the first year of participation, it accomplished a 70 percent reduction by installing biological treatment capacity. In future years, the company will include additional technologies to complete the COD reductions. The company also committed to reducing VOC emissions, although it delayed the change in operations until 2002, therefore, it did not record a significant decrease in 2001 releases.

The other commitments were to reduce solid waste generated during the production process and reduce the amount of material in its packaging. The production waste reduction accomplished some success although the normalization process suggests that the waste was not reduced on a per unit basis. As a result of interviews, it appears that the reductions that took place are independent of production levels and therefore, it is appropriate to consider the gross changes. The packaging reduction strategy is on track to reduce the total packaging in a single product line by about 350 tons annually.

USGEN NEW ENGLAND- HYDRO GENERATION

USGen operates hydroelectric generating capacity in New England. One of its commitments was to accomplish a reduction in electricity use by promoting efficient lighting, hot water heating and pumps and motors. The first Annual Performance Report showed the successful reduction of about 1.4 percent although the calculation is complicated by a significant reduction in the generation of electricity at its facilities. In addition to energy use, the company agreed to pursue recycled paper products for its purchases. In its first year, it purchased almost two-and a half tons of recycled paper.

The company also initiated a program to reduce the potential exposure to lead by identifying and removing lead painted surfaces. In the first year represented by the Annual Performance Report, they had accomplished 48 lead removal projects on their way to the three-year target of 166 projects. One of its commitments is being discontinued, which is to reduce the amount of oily wastes from cleaning generator components. They are decreasing the frequency of these cleaning events making the reduction in oily waste less meaningful.

UNITED STATES POSTAL SERVICE HARTFORD PROCESSING & DISTRIBUTION CENTER

USPS Hartford P&DC focuses two of its commitments on the recycling of paper wastes. It is important to note that while increasing recycling rates is important, it is not a recognized pollution prevention commitment for purposes of the Performance Track program. In both corrugated cardboard and mixed paper from undelivered third class mail, the member accomplished a 100 percent recycling rate. In addition to recycling, USPS Hartford P&DC reduced its water use by 10 percent less water than the baseline year.

UNITED STATES POSTAL SERVICE HARTFORD VEHICLE MAINTENANCE FACILITY

USPS Hartford VMF committed to reduce the amount of solid waste that results from its parts washing program. In 2001, the member reduced the material used in its parts washer by more than 40 percent, which reduced the waste generation by almost 400 pounds. The member also committed to reduce its hazardous waste from painting operations. However, this new technology will be implemented in 2002 and the member did not report progress in the first Annual Performance Report.

USPS Hartford VMF did initiate a program to recycle used motor oil back to lubricants (as opposed to using it as a fuel for boilers) and reclaimed more than 2000 gallons of used oil. As with other Postal Service Performance Track members, USPS Hartford VMF achieves a 100 percent recycling rate for corrugated cardboard, removing 11 tons of waste from landfills and incinerators.

UNITED STATES POSTAL SERVICE PORTLAND PROCESSING & DISTRIBUTION CENTER

USPS Portland P&DC is maintaining two recycling programs that keep more than six hundred tons of paper waste from the landfill. In the first Annual Performance Report, the increase in recycled cardboard amounted to more than ten tons and achieved their three-year commitment. USPS Portland P&DC also maintains a computer recycling program that in 2001 kept 600 pounds of electronics material from the waste stream. Finally, USPS Portland P&DC was successful in increasing the amount of recycled paper that it uses for its operations. In 2001, they purchased more than 50,000 pounds of recycled product.

IV. SUMMARY OF FOLLOW-UP CONVERSATIONS

In addition to clarifying information that was included in the APRs, the follow-up conversations were designed to gather additional information on a number of questions related to the Performance Track Program in general. A summary of the discussions is noted below along with selected questions.

- **Have any of your regulatory or pollution prevention activities changed as a result of participation in Performance Track?**

In a small number of cases, respondents indicated that the Annual Performance Report process provided the motivation to focus on particular aspects of pollution prevention and other voluntary activities. However, for the most part participation in Performance Track was not the main driver for changes in activities. In most cases, it is the existing facility-based Environmental Management System that is a bigger factor in deciding Performance Track commitments. In a few cases, the facility is directed by corporate priorities, which leads to the choice of commitments. Therefore, Performance Track serves more as a mechanism to facilitate activities rather than initiate new ones.

- **In implementing some of the strategies to meet your commitments, what lessons have you learned that might benefit other facilities?**

Most of the specific activities implemented as a result of Performance Track commitments are unique to individual facilities though the general strategies (process improvement, recycling, etc) are more broadly applicable. Several respondents did note a general advantage of participation in Performance Track that helped them reinforce their attention to specific environmental improvements. That general benefit could be communicated to other facilities within their own corporation and possibly to other facilities in the region.

- **To what extent does the process for establishing the specific commitment change facility behavior?**

Respondents indicated that they generally set the numeric values for their commitments by predicting the changes in environmental releases or resource use based upon the presumed results of activities already decided upon for the facility. Individuals did not set targets prior to thinking about individual strategies that would accomplish the results.

- **Is there something the EPA could be doing to improve the application and reporting process?**

Most contacts indicated that the reporting process was not especially burdensome and they did not identify any specific actions to make reporting easier. It was noted in two cases that the

electronic reporting mechanism does help in making the reporting process simple. The greater effort in developing reports is in accumulating the data within the facility and that range of effort varies markedly depending upon whether the data collection systems are institutionalized or data are only collected for the purpose of the Annual Performance Report.

- **Do you have suggestions for improving Performance Track?**

The most commonly heard suggestion related to the desire on members' part for EPA to improve the incentives process. In addition, the interviewees encouraged the reporting of results from the regional Performance Track members, especially to encourage new facilities to join and to inform the public of progress, but had no specific suggestions for circulating the report.

- **What regional Performance Track activities are most valuable?**

The semi-annual meetings of New England Performance Track members serve two functions that the interviewees found positive. For some, the opportunity to strengthen a network of facilities and companies focusing on environmental improvement is important. For others, the opportunity to have a forum regarding the specifics of Performance Track including the possibilities for improving its effectiveness is also useful.

In addition, participants appreciate the recognition that the region provides to its Performance Track members. Members note that recognition from EPA, which includes plaques and occasional press events, help keep senior management aware of the program and keeps environmental issues in focus for the corporation.

Several members noted that EPA could do a better job of providing robust incentives for participating. The kinds of incentives that are available are not as robust as initially suggested. These same responders also recognize the challenges that EPA faces in implementing these incentives.

- **How can EPA or its partner states increase participation in the program?**

In addition, some respondents suggested that EPA take a more active role in circulating reports that demonstrate the value of the Program.

V. CONCLUSIONS AND RECOMMENDATIONS

Conclusions

- Performance Track members have demonstrated environmental gains in the first year of reporting. As illustrated by the aggregate results organized by Aspect and the individual member discussions, Performance Track members in New England have realized large actual reductions in the amount of solid and hazardous waste handled, water and energy used, and VOCs and other gases emitted into the air.

- Performance Track members value their membership. The recognition that EPA can provide to other facilities and the general public is seen as the greatest benefit for participating members.

Recommendations

- Enhanced marketing can result from better communication of results and enhanced incentives. While noting the importance of gaining recognition for their participation, many Performance Track members do not actively spread the word of their results. EPA can help encourage new members to apply by increasing outreach of the results. Some interviewees also noted that EPA could encourage greater participation by enhancing the incentives it provides to participants.

- Communication of results needs to be tailored to specific audiences. In developing an appropriate communication model to spread the word about Performance Track, EPA and its partners should be sure to provide information in a clear consistent manner that meets the needs of different recipients. For example, for purposes of getting the word out about Performance Track, to the public and other facilities, EPA should focus on presenting actual results and noting the environmental benefits accruing from the changes. Showing the pounds of solid waste being reduced and discussing the benefits in terms meaningful to the general public will have the most impact and engender the recognition sought by participants in the program. The report should be long on graphics and tables and short on text.

- On the other hand, in terms of its internal reporting or in developing more detailed analyses on the impact that the specific activities undertaken by members have had, then the report should make greater use of normalized data. This will allow readers to gain a better understanding of the impact of different activities and help evaluate the Program.

- EPA New England should develop a communications strategy for Performance Track. Working with the Performance Track members, EPA New England should identify more specifically the audiences it needs to reach and how it plans to reach them. The *strategy* should identify how and what information *is to be* presented to different audiences. The Agency and participants can then ensure that the information is reported in a way that can accommodate the reporting needs.