



Bendix Commercial Vehicle Systems LLC			
Elyria, Ohio			
POLICY TITLE: Zero Waste to Landfill	DEPARTMENT:	HSE	
	PLM Team:	EAX4	
	Policy Number:	Y259682	
	REVISION:	1	
	Guideline Owner: M. Gutierrez	ISSUE DATE:	1/27/2016
	KE CVS Next Level Process: Secure Health, Safety & Environment	PAGE:	1 of 4
		KE CVS next level #	TLE-50-10

Cover Sheet

DISTRIBUTION / PLM Scope:

(LIST THE APPROPRIATE DEPARTMENTS/PLANT LOCATIONS THAT WILL BE RECEIVING THIS POLICY.)

PLM Scope:

- Group BCVS All Locations
- Group BCVS (excludes distribution centers)
- CoC (applies to all functions within a CoC): _____ (list which CoC)
- Local (applies to a specific location): _____ (list which location)
- Multi-Local (applies to more than 1 location, but not all)

If "multi-local" is checked, double click the box and check the additional locations as is applicable below. Otherwise, delete the section.

<input type="checkbox"/> Acuña	<input type="checkbox"/> Bowling Green	<input type="checkbox"/> Elyria	<input type="checkbox"/> Huntington	<input type="checkbox"/> Kalamazoo
<input type="checkbox"/> N. Aurora	<input type="checkbox"/> Richmond, BC	<input type="checkbox"/> Mexico City	<input type="checkbox"/> Montreal	<input type="checkbox"/> Sparks

Please select the functional area(s) to which this instruction is applicable:

<input type="checkbox"/> All Departments				
<input type="checkbox"/> AME	<input type="checkbox"/> Business Development.	<input type="checkbox"/> Customer Service	<input type="checkbox"/> Product Change	<input type="checkbox"/> Sales / Marketing
<input checked="" type="checkbox"/> HS&E	<input type="checkbox"/> HR	<input type="checkbox"/> IT	<input type="checkbox"/> Materials	<input type="checkbox"/> Engineering
<input type="checkbox"/> Purchasing	<input type="checkbox"/> Quality	<input type="checkbox"/> Finance	<input type="checkbox"/> Transportation	<input type="checkbox"/> Warranty
<input type="checkbox"/> Other (List):				

Revision History Table					
REVISION #	Org.	1	2	3	4
WRITTEN BY	T. Kroger	W. Schubert	L. Quinones		
APPROVED BY	M. Gutierrez	M. Gutierrez	W. Schubert		
ISSUE DATE	12/17/2013	1/27/2017	8/20/2021		
APPROVAL SIGNATURE	Teamcenter	Teamcenter	Teamcenter		

Please note: Revised text is in italics and underline.

Rev1: Complete re-write. Revised to leave as policy statement only. Remaining guideline was converted to a PI (Y084358).

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PO	TLE-50-10, Y259682	Zero Waste to Landfill	GRP BCVS ALL LOC	All Locations	Maria Gutierrez	1	US

1.0 PURPOSE

The purpose of this policy is to provide a corporate definition and goals for “Zero Waste to Landfill” (or Landfill-Free) that apply for all Bendix locations, as there is no universally accepted standard, Landfill-free is part of a larger “Zero Waste” aspiration. A roadmap on how to achieve zero waste is provided in the related documents.

2.0 APPLICABILITY

Applies to all Bendix owned and operated facilities.

3.0 DEFINITIONS

3.1 see [Y144687](#) Waste Definitions & Reporting Guideline.

4.0 RELATED DOCUMENTATION

- 4.1 [Y082501](#) Waste Management
- 4.2 [Y259969](#) Managing Spent Material – A Roadmap to Zero Waste
- 4.3 [Y144701](#) KPI - Percent Diverted from Landfill (%DFL)

5.0 POLICY

Disposing of spent materials in landfills causes significant environmental impact including air, water, and soil pollution, as well as the discharge of both carbon dioxide and methane into the atmosphere. In addition, the use of landfills carries a long-term business liability associated with the potential for future failure within the landfill system. It is the desire for Bendix facilities to eliminate the use of landfills for spent material disposition wherever feasible.

5.1 Corporate Definition: It is important to define the spent materials that are included, those that are NOT included, as well as the approved diversion methods.

5.1.1 Spent materials included:

- All those identified and described in [Y144687](#) Waste Definitions & Reporting Guideline Spent materials include:
 - Industrial Waste: (hazardous, non-hazardous, universal, bio-hazardous)
 - Non industrial waste: Trash (MSW), cafeteria trash, yard trash
 - Recovered material: (recycled metals and recycled materials, reused)
- Generated from ongoing, day-to-day operations, including episodic/periodic events such as equipment cleanouts, malfunctions,
- Non-conforming material (including unused chemicals), scrap metal
- Generated from onsite cafeteria unless it is managed by a 3rd party contractor/vendor.
- Generated from one-off or sporadic non-operation events such as onsite company employee events, document clean up, 5s, equipment decommissioning, etc.

5.1.2 Spent materials NOT included:

- Materials from onsite environmental remediation activities/projects



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- Generated from one-off construction and demolition activities (must have to have its own program and tracking methodology)
- Generated from plant closures
- Industrial regulated wastes that that local legal regulations requiring it to be landfilled OR where no recycling alternatives exist are exempt from inclusion. Quantity must NOT exceed 1 percent, by weight, of the facility's total annual industrial waste generation or be < 1,000 kg (2200 lbs) annually.

5.1.3 Boundaries for our definition are the point where a recycling, treatment or disposal facility accepts our waste. Waste generated by the waste handler is not included. (i.e. Byproduct materials from off-site recycling, reclamation or processing center, ashes generated from waste-to-energy).

5.1.4 Bendix approved methods of spent material diversion from landfill - as defined [Y144687](#) Waste Definitions & Reporting Guideline and described in [Y259969](#) Managing Spent Material – A Roadmap to Zero Waste include:

- Source Reduction
- Reuse
- Recycling
- Composting.
- Waste to Energy
- Incineration

5.2 Corporate Key Performance Indicator (KPI): Bendix has chosen a positive metric (avoidance) as the key metric to track performance against this policy.

- The KPI calculation is defined in [Y144701 % Diverted from Landfill \(%DFL\)](#)

5.3 Corporate Designation Levels: The following levels have been established by Bendix

5.3.1 Basic Landfill Waste Diversion (%DFL = 80%)

- Basic level of performance expected from all locations. Once a site has reached this level, site can start communicating/publicizing diversion rates.

5.3.2 Zero Industrial Waste to Landfill (%DFL = 100% for Industrial Waste ONLY)

- Site reaches this level when 100% of Industrial waste generated is disposed through any of the approved spent material diversion methods.

5.3.3 Zero Waste to Landfill: (%DFL = 100% for ALL spent material)

- Site reaches this level when 100% of included spent material is disposed through any of the approved spent material diversion methods.

5.4 Site Qualification Process:

5.4.1 To request designation, site must have demonstrated required level of performance for a minimum of 3 consecutive months.

5.4.2 Corporate will the review site performance records and conduct an audit to validate performance.

- If site has industrial regulated waste going to landfill, validation audit will review materials and applicable regulations to verify regulatory requirement and confirm no alternatives for diversion are available.

5.4.3 Site will earn designation level after successful audit validation AND 6 consecutive months of demonstrated performance.

5.4.4 Sites should continuously improve their waste-reduction efforts even after becoming landfill-free (Zero Waste to Landfill) by seeking ways to design out waste versus



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reusing or recycling (Zero Waste Philosophy). To foster this philosophy, the site will be required to commit to an annual percent reduction in total waste - including scrap metals and recyclables.