



# Bendix Commercial Vehicle Systems LLC

Elyria, Ohio

<b>DETAIL PROCESS PROCEDURE:</b> Bendix ZERO Waste to Landfill Verification  <b>Policy Owner:</b> Maria Gutierrez <b>KE CVS Next Level Process:</b> Secure Health, Safety & Environment	<b>DEPARTMENT:</b>	HSE
	<b>PLM Team:</b>	EAX4
	<b>DPP Number:</b>	Y384430
	<b>REVISION:</b>	1
	<b>ISSUE DATE:</b>	6/1/2020
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## 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): **Elyria** (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
<input type="checkbox"/> Lebanon	<input type="checkbox"/> Irvine	<input type="checkbox"/>	<input type="checkbox"/>	

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	L. Quinones				
APPROVED BY	M. Gutierrez				
ISSUE DATE	6/1/2020				
APPROVAL SIGNATURE	Teamcenter				

Please note: Revised text is in italics and underline.

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## 1.0 PURPOSE

The purpose of this verification process is to provide a guideline to verify that all Zero Waste to Landfill conditions are met by a specific facility in order to receive approval to display and to use the Zero Waste To Landfill Banner for the site.

## 2.0 APPLICABILITY

This procedure applies to all Bendix's site that would like to apply for the Zero Waste To Landfill program, Bendix's Corporate Sustainability Policy states that all manufacturing sites will have the goal of becoming Zero Waste To Landfill by 2020, leading the way for the Knorr-Bremse adoption of the United Nations Sustainable Development Goals "Responsible Consumption and Production"

## 3.0 DEFINITIONS

- 3.1 Waste: waste is any unavoidable material from an activity for which no economic demand exists and which must be disposed of. This includes solids, liquids and sludges, but excludes aqueous waste that is treated on site and directly discharged to a POTW. In addition, it excludes gaseous discharges, such as vented gases. Hazardous and non-hazardous material that is re-used or recycled is not counted as waste.
- 3.2 Waste Management: All activities surrounding the generation, handling, recycling, recovery, reuse, reclamation, treatment, storage, transportation and disposal of wastes.
- 3.3 Waste Generation: Process of temporary accumulation of waste onsite for future disposal
- 3.4 Waste Disposal: Process of shipping off site waste generated on site for final disposition.
- 3.5 Industrial Waste: Wastes generated by the production or manufacturing processes. It includes both hazardous and non-hazardous waste. It does not include material that is sent off for recycling.
- 3.6 Hazardous Waste: Industrial waste classified as hazardous waste in accordance with local regulations (usually listed or characteristic). For waste generation, regulations governing the physical location of the site shall be used to categorize waste streams. However, for waste disposal, regulations applicable to the destination shall be used.
- 3.7 Universal wastes: Hazardous wastes that if reclaimed can be managed on special requirements. Materials include: batteries, pesticides, mercury-containing equipment, and lamps.
- 3.8 Bio-hazardous waste: Wastes that have been generated through contamination of infectious or potential infectious bodily fluids. Special attention shall be paid to sharp materials such as needles, blades, or glass that can cause harm during handling of waste.
- 3.9 Non-Hazardous Waste: Non-hazardous waste shall include industrial waste that is not classified as hazardous.
- 3.10 Trash: Non-industrial solid waste such as garbage and refuse. Commonly referred to as municipal solid waste (MSW). Includes wastes from sources such as office, cafeteria, bathroom, construction activities, etc.
- 3.11 Recovered Materials: Materials that otherwise would have been waste if not managed through the 4R's (refuse, reduce, reuse and recycle) for a potential economic or ecological benefit to avoid disposal.
- 3.12 Source Reduction: Activities aimed at reducing the amount of waste/spent materials generated. Using less material in the manufacturing of goods is one way to reduce waste. Another way is to utilize products for functions other than what they were initially produced for. An example would be eliminating unnecessary packaging materials.



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- 3.13 Re-use: Activities aimed at re-using materials on-site or externally for its original intent or an alternate use generally with minimal or no processing. Examples include the re-use of boxes, pallets or drums/containers.
- 3.14 Recycled: Materials that are used again for economic benefit through transformation or remanufacture into usable or marketable products or materials. Materials used as an ingredient, as product substitute, or returned to the production process without first being reclaimed.
  - 3.14.1 Recycled Metals: Includes scrap metal, machining chips, turnings & shavings, scrap metal parts, metal blast media and other metals that can be recycled.
  - 3.14.2 Recycled Materials: All other recycled materials that are not metal, such as cardboard, wood, paper, plastic, glass, compost, etc.
- 3.15 Reclaimed Materials (a.k.a.- Reclamation): A material is “reclaimed” if it processed to recover a useable product, or if it is regenerated. Reclamation generally still creates byproducts that may need to be disposed of. Examples of reclaimed materials include: light bulbs, batteries, e-waste, used paint reblending, used parts cleaning programs.
- 3.16 Resource Recovery: The extraction of useful material or energy from disposed materials. Reclamation is a type of resource recovery. Examples include fuel-blending and burning for waste-to-energy (WTE) purposes.
- 3.17 Waste-to-Energy (WTE): Incineration process in which waste is converted into thermal energy to generate steam that drives turbines for electricity generators.
- 3.18 Incineration: The thermal destruction of a waste for the primary purpose of disposal. Results in the creation of ashes which require disposal.
- 3.19 Waste Diversion from Landfill: The prevention/avoidance of waste & spent material disposal to landfill through approved methods of diversion.
- 3.20 Spent Materials: Includes all wastes and recovered materials tracked and reported as defined in this guideline. Spent materials include:
  - 3.21 Industrial Waste: hazardous, non-hazardous, universal, bio-hazardous
  - 3.22 Non-industrial waste: Trash (MSW), cafeteria trash, yard trash
  - 3.23 Recovered material: recycled metals and recycled materials
  - 3.24 Reused material: skids, drums, boxes
- 3.25 Zero-Waste: Zero Waste refers to waste management and planning approaches which emphasize waste prevention as opposed to end-of-pipe waste management. Zero waste encompasses more than eliminating waste through recycling and reuse, it focuses on redesigning production and other processes to avoid, eliminate, or reduce waste generation (volume and toxicity).

## 4.0 RELATED DOCUMENTATION

- 4.1 [Y082501](#) Waste Management
- 4.2 [Y084358](#) Managing Waste Disposal
- 4.3 [Y259969](#) Managing Spent Material – A Roadmap to Zero Waste
- 4.4 [Y259682](#) Zero Waste to Landfill
- 4.5 Y384429 Zero Waste To Landfill Facility Submission Form
- 4.6 Y384428 Waste Disposed to Landfill Identification Form
- 4.7 Y384426 100% Diversion From Landfill Deviation Form
- 4.8 Y384418 ZWTL Requirement Non-Compliance Form



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## 5.0 RESPONSIBILITIES

To ensure that this Hazard Communication Program is implemented and maintained in accordance with the procedures listed in this program, the following personnel are given the following responsibilities

- 5.1 **Environmental Technicians:** The environmental technician has the responsibility of overseeing the day to day waste handling operations, tracking mechanisms and provide all the correct and accurate waste information for the supervisors, the responsibility could include waste shipping scheduling and proper paperwork.
- 5.2 **HSE Leader, Coordinator, Specialist:** HSE leader, coordinator, specialist has the responsibility of oversee the day to day waste operations and proper handling. Ensure all information provided is accurate and reported to the HSE Manager.
- 5.3 **HSE Manager:** The HSE Manager is responsible of providing accurate information in a timely manner as outlined in the Environmental KPI's. Provide the information to the plant leadership in order to ensure the program is being followed and the continuous improvement of the program is maintained. Track in a monthly basis the waste information reported to ensure the Diversion Rate reported is accurate and implement actions in the case that a deviation is observed as soon as it is detected.
- 5.4 **Plant Leadership Team:** Provide adequate support for Waste Diversion activities.
- 5.5 **Human Resources / Training:** Provide support for the adequate training program outlined in this procedure.
- 5.6 **Plant Manager:** Executive overview of the overall program and provide the adequate resources to maintain and improve the Zero Waste To Landfill program.

## 6.0 PROCEDURES

- 6.1 **Zero Waste To Landfill Program:** The facility shall apply for the verification process and complete a form, the submissions are reviewed and analyzed by Group HSE to make a determination about the Zero Waste To Landfill Program. The submission includes the following credits.
  - 6.1.1 The facility has achieved 100% Diversion from Landfill for Industrial Waste according to Y144707 - KPI Diverted from Landfill. In accordance with Y144687- Waste Definition & Reporting Guideline. The facility must achieve this percentage for at least 3 months consecutively to apply for the verification.
  - 6.1.2 The facility has a documented waste management process implemented.
  - 6.1.3 The facility currently has an accurate and complete data collection system for all waste streams. (Quantify and Track, Generation and Disposal)
  - 6.1.4 Facility currently have at least a RECYCLING program for the following commodities:
    - 6.1.4.1 Metals
    - 6.1.4.2 Cardboard
    - 6.1.4.3 Paper
    - 6.1.4.4 Plastic
    - 6.1.4.5 Wood
    - 6.1.4.6 Electronic Waste
  - 6.1.5 All associated waste vendors are evaluated per Y082502 – Waste TSDF Evaluation Form and approved according to Y144703 – Approved Waste Management & Disposal Sites.
  - 6.1.6 Shipping records for all waste categories are maintained.
  - 6.1.7 The facility provides Waste Management training to all employees.



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- 6.2 Once the facility gets their submission approved, Group HSE will provide a banner with the official ZERO Waste to Landfill logo and the facility is allowed to start using the Zero Waste To Landfill denomination.
- 6.3 The % Diverted From Landfill will be reviewed in a monthly basis by the HSE Manager, if there is a deviation from 100%, the facility needs to launch a TIER III incident report and start the form "100% Diversion From Landfill Deviation Form" so the proper problem solving is done and the corrective and preventive actions are assigned and tracked to ensure the deviation is corrected.
- 6.4 The other 7 credits are to be reviewed on a yearly basis via the process determined by Group HS. Any identified deviation triggers an "Other Credit Deviation Form" to identify the deviation and the actions taken to correct it.
- 6.5 Any deviation that causes the % Diverted to Landfill to be less than 100% will revoke the distinction and the facility must re-apply in order to get the status back.
- 6.6 Any outside factors that create a deviation for example:
  - 6.6.1 An approved waste vendor fails to divert a waste from landfill due to a vendor issue.
  - 6.6.2 An approved waste vendor goes out of business.
  - 6.6.3 Outstanding recycling market conditions affect an approved waste vendor.
  - 6.6.4 Any other instance where the facility does not have control or influence.Will be handled in a case by case scenario by Group HSE and will only be authorized by the Corporate Environmental & Sustainability Manager and the Director of Corporate Responsibility & Sustainability.