

System Level Annual Audit - Operation Clean Sweep Initiatives

Section		Yes	No	Comments - Response
0 Pledge signatory and acknowledgment of responsibility				
0.1	Are you aware of the responsibilities and commitments set in the OCS pledge for your site?			
	<i>Explanation: This question is referring to the implementation of a site specific program similar to the nature of "Operation Clean Sweep" which aims at achieving zero plastic pellet and flake loss to the environment.</i>			
0.2	Does your site have a designated OCS Champion or team?			
1 Improve your worksite(s) set-up to prevent spills				
1.1	Does the site have a procedure in place to analyze sources / areas of (potential) pellet and flake spills at your facility on a routine basis? (Document method in comments)			
1.2	Does the site have an action plan to address analysed sources / spots of (potential) pellet spills at your facility?			
	<i>Explanation: Facility should have a documented method of tracking spill concern areas and a timeline of implementation of permanent mitigations. Long term projects should have documented temporary measures in place.</i>			
1.4	List one or more examples of measures and/or actions that have been implemented at your facility to mitigate sources/areas of potential pellet and flake spills.			
2 Have in place internal procedures towards "Zero Pellet Loss" goals				
2.1	Does the site have an internal procedure to handle pellet spills?			
	<i>Explanation: It does not have to be an OCS dedicated procedure but can be embedded into existing management system procedures.</i>			
2.2	Does the site have internal goals in place to reducing pellet and flake spills?			
	Qualitative goals			
	Quantitative goals			
3 Provide employee and contractor training on the OCS Program				
3.1	Is OCS awareness level training offered as part of an annual training program for employees?			
3.2	Is OCS awareness level training offered to new employees and contractors?			
4 Audit program implementation regularly				
4.1	Does your facility perform audits/assessments to verify your system level implementation and performance regarding OCS?			

	<i>Explanation: This refers to system level audits conducted on a regular basis to ensure all intentions of the local OCS program are met (ie. This audit)</i>			
4.2	Is OCS part of external management certification or audit (e.g. ISO14001, Responsible Care, EMAS, ...)?			
	<i>Explanation: External Management Certification could per example be achieved by identifying OCS as a "compliance obligation" as part of ISO certifiable management systems or audited as part of a Responsible Care requirement.</i>			
5 Comply with all applicable local and national regulations governing pellet containment				
5.1	Does your facility have a process to verify compliance with local and national regulations governing pellet containment and loss?			
5.2	Do the facility's local or national regulatory authorities require reporting of data specifically related to pellet containment and loss (eg. Volumes or weight of pellets)?			
	<i>Explanation: These reporting requirements may be from your local OCS program administrator or from a government agency as required in permits</i>			
6 Encourage partners (contractors, transporters, distributors, etc.) to join the program as well?				
6.1	Can your facility (or company) demonstrate that it encourages its value chain partners (eg. contractors, transporters, distributors, customers etc.) to participate in pellet management best practices?			
	<i>Explanation: There are different ways to encourage your value chain partners: via letters, mails, agenda point in meetings, part of supplier audits, talks and dialogue with truck drivers, customers and other companies when they are at your facility.</i>			

Plastic Manufacturing and Production				
0- Loading and Receiving	1- Reactor Area (Powder Handling)	2- Finishing and Transfer	3- Lab	4- Facilities General
Bulk hopper car/truck loading area Pellet Silos Car Wash Transloading Area Bagging/Boxing Atmospheric vents Loading areas - paved vs unpaved Additive receiving	Classifiers Flake sample area Degassing area Compressor deck Reactor area Transfer lines Transfer blower Flake/powder Silos	Pellet blending Sampling Activities Extruder Transfer blower Silo areas Atmospheric vents Additive Feeders Additive/Flake Conveyors Additive warehouse Classifier Transfer bag house Transfer lines Dryers Surge hopper	Pellet Storage Sample Receiving Blown Film Lines Scrap Pellet Collection Areas Floors Sinks	Pellet sumps Pellet scrap collection areas Pellet Recovery Equipment Roadways Storm drains Ponds Ditches Outfalls Plant perimeter

Plastic Converters		Production and External Logistics			
Process Areas	General Facility	Bagging Operations (Plant)	Rail Operations (Plant)	Terminals	Warehouses
Bulk hopper car/truck loading area Pellet Silos Transfer lines Extruder Areas Regrind Area	Storm Drains Pellet scrap collection areas Pellet sumps Storm ponds Outfalls Ditches Roadways Sampling activities	Unloading areas - paved vs unpaved Sampling activities Storage areas Roadways Storm drains Receiving areas Ditches	Sampling Activities Transloading Area Bagging/Boxing Unloading areas - paved vs unpaved Rail tracks Scale Rail Car Wash Pellet recovery at car wash Parking areas Ditches Car Heel Removal Rail Car Maintenance	Transloading Area Rail Tracks Scale	Bagging Area Receiving Storage areas Floor sweep collection areas Floor drains Facility perimeter Facility drainage Parking lots Rail tracks Scale Unloading areas - paved vs unpaved

Audit Info	Site Name and Location:	
	Area Assessment Lead:	
	Assessment Participants:	

4	Facility General			
4.01	Pellet Sumps			
	Is there a loss of containment potential?	Yes	No	N/A (Explain)
	What is the root cause of loss of containment?			
	What is the path of the lost pellets/flake if no action is taken?			
	What is currently done to recover the pellets/flake? (Potential best practice)			
Solution/Comments - <i>Can we do something different to catch it earlier? (Gap)</i>				
4.02	Pellet Scrap Collection Areas			
	Is there a loss of containment potential?	Yes	No	N/A (Explain)
	What is the root cause of loss of containment?			
	What is the path of the lost pellets/flake if no action is taken?			
	What is currently done to recover the pellets/flake? (Potential best practice)			
Solution/Comments - <i>Can we do something different to catch it earlier? (Gap)</i>				
4.03	Pellet Recovery Equipment			
	Is there a loss of containment potential?	Yes	No	N/A (Explain)
	What is the root cause of loss of containment?			
	What is the path of the lost pellets/flake if no action is taken?			
	What is currently done to recover the pellets/flake? (Potential best practice)			
Solution/Comments - <i>Can we do something different to catch it earlier? (Gap)</i>				