

**SATURN +5 ISO 14000 PILOT PROJECT  
MEMBER ORGANIZATION QUESTIONNAIRE**

**Summary for  
ACD Tridon  
Lawrenceburg, Tennessee**

**FOCUS:** *Uncover and compare means of managing environmental affairs of the respective member organizations*

**Preliminary Issues**

**1. Briefly describe the company's industry and products (i.e., automobile manufacturer, etc.).**

The Lawrenceburg plant manufactures windshield wipers. Currently, the plant has two separate and independent divisions: (1) After-Market Division which produces wipers for the post-vehicle-purchase market (approximately 40,000,000 per year) and (2) Original Equipment Division which manufactures original equipment for customers such as Saturn and Volkswagen.

**2. Briefly describe the company's size and number of plant and corporate locations.**

ACD Tridon has 3 plants located in Tennessee. The company is headquartered in Smyrna, Tennessee. The Smyrna plant manufactures steel hose clamps. The Springfield, Tennessee plant manufactures turn signals and flashers. The Lawrenceburg plant manufactures windshield wipers and employs approximately 350 persons.

**3. Briefly describe the major environmental aspects of the company's operations.**

- Largest impact is from chlorine used to treat rubber used to make wiper components (affects wastewater pretreatment system and air permit discharge limits)
- Salt waste stream from heat treating bath in wiper manufacturing process
- Waste rubber (excess given to the City of Lawrenceburg; if the City cannot sell the rubber, the City will landfill it)
- Waste oils from machining processes (recycled through vender that supplies new oil)
- Large cardboard recycling program
- Air emissions (TDEC permit)
- Wastewater pretreatment and storm water permits
- General municipal solid waste

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4. *Briefly describe the company's strategic business plan. Are environmental issues a part of that plan and, if so, what part?*

At the moment, ACD Tridon is up for sale. Pending the outcome of the sale effort, the present plan is to relocate the Original Equipment Division of the Lawrenceburg plant to another location outside of Lawrenceburg. The After-Market Division will remain within the Lawrenceburg plant.

### EMS Issues

1. *Does the company have what it considers a formal Environmental Management System (EMS) in place?*

No. The Lawrenceburg plant does have certain written procedures for handling environmental issues such as waste oils and waste salt. There is no single notebook or other compilation of these procedures available. Primarily, these procedures are maintained in a filing system of which Mark Dorth, Safety & Environmental Facilitator is the custodian.

2. *If not, what is the status of company efforts to develop an EMS?*

It is assumed that the new owners will want to develop a formal EMS. However, any formal efforts to do so are on hold pending the outcome of the current sale effort. In addition, because of the potential relocation of the Original Equipment Division, a new manager with environmental responsibilities for the OE division will eventually be designated.

3. *Does the company have a written EMS or a written policy statement on environmental management within the company?*

ACD Tridon has a blanket environmental policy. The Lawrenceburg facility does not yet have permission to release it for review.

4. *Would you prefer your EMS system to be integrated with your QM system or would you prefer them to run separately? Why or why not?*

Yes. The primary reason for preferring integration of EMS with the QM system is space concerns. Integration would promote efficient use of space especially in record keeping.

5. *What perceived level of value does the top/upper level management of the company place on EMS and environmental issues faced by the company?*

The level of value perceived is high. Upper management is interested in staying out of environmental "trouble" and doing what is right.

6. *What is the company's view of the utility of ISO 14000 certification?*

ACD Tridon-Lawrenceburg believes they will get more business by being ISO 14000 certified. This results from its experience with QS 9000 certification. The Lawrenceburg plant was the first company in Lawrenceburg to become QS 9000 certified. ACD Tridon-Lawrenceburg also perceives that ISO 14000 certification will eventually become a requirement for doing business with the major automobile manufacturers in the United States.

## Questionnaire Results: ACD Tridon

7. *Does the company have any concerns about becoming ISO 14000 certified? If so, what are they? What potential downsides do the company feel ISO 14000 may bring?*

Based upon the company's experience with QS 9000 certification, the answer is no to the first question and none to the last.

8. *What is the status of ISO 14000 certification with the company today?*

On hold pending the outcome of the potential sale of the company. Participation in the Saturn +5 ISO Pilot Project is an initial step in the direction of eventually pursuing ISO 14000 certification.

## Organizational Issues

1. *Is there a manager dedicated solely (or primarily) to overseeing environmental management issues in the company?*

No.

2. *If not, what persons or departments in the company are considered "in charge" of overseeing and addressing environmental management issues faced by the company?*

Mark Dorth, Safety & Environmental Facilitator for ACD Tridon-Lawrenceburg. Mr. Dorth spends about 20 percent of his time on environmental management issues.

3. *Is environmental management a distinct operating division within the firm, or are environmental tasks delegated to various members of different departments of the firm?*

There is no separate environmental department or distinct environmental operating division at ACD Tridon-Lawrenceburg. There are significant environmental tasks delegated to the maintenance department, such as monitoring machines, record keeping, etc.

4. *Are there cross-functional teams focusing specifically on environmental issues within the company?*

Yes, primarily Mark Dorth and members of the maintenance department.

5. *If some distinct environmental departments exist, how are the departments structured? What tasks are performed within that structure?*

Not applicable.

6. *Do environmental managers consider staffing to be adequate for the tasks that must be performed by the environmental structure of the firm? Does upper management consider staffing to be adequate for the same purpose?*

At the moment, Mark Dorth handles environmental management tasks for both divisions at Lawrenceburg. Eventually, another person will be designated to undertake Mark Dorth's role on behalf of the potentially-to-be relocated Original Equipment Division and Mark will continue on behalf of the After-Market Division. Mark Dorth does not consider staffing to be adequate at all times for environmental tasks which must be handled for the company.

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**7. *What type of software systems does the company use to manage environmental information?***

The chlorine air scrubber has a dedicated computer with dedicated software which measures the amounts of materials going in and out of the system. Otherwise, ACD Tridon has developed some customized data bases in Microsoft Excel to handle environmental information.

**8. *How does the company operationally track information such as material flow, purchasing, etc. that relates to environmental issues?***

Material requirements for products manufactured by ACD Tridon-Lawrenceburg do not change all that often. Thus, this is not a difficult task. The main chemical used is chlorine which is tracked at the time of purchase. Salt can be tracked at the time of purchase.

**9. *How does the company compile and disseminate critical information that affects the company's business and projects?***

Mark Dorth is responsible for reporting to the appropriate managers at ACD Tridon-Lawrenceburg regarding environmental information.

**10. *Describe the chain of command within the environmental management structure of the company (including facility vs. corporate headquarters structure).***

Mark Dorth reports to the Manufacturing Engineering Manager who reports to the Operations Manager for the After-Market Division who reports to the Vice President of the After-Market Division.

**11. *Describe any issues of concern regarding communication between facility and corporate offices on environmental management issues.***

None.

**12. *Describe the chain of command from environmental management to top/upper level management of the company.***

See the response to question 10 (Organizational Issues) above.

**13. *Generally, where does primary decision making authority over environmental issues reside within the firm? What type of decisions require approval outside of the environmental management structure (i.e., from top/upper level management)?***

“Consensus decisions” are reached between Mark Dorth and any combination of the managers referenced in the response to question 10 (Organizational Issues) above. Often, the issue will first be run by the corporate environmental consultant who maintains an office in the Smyrna headquarters of ACD Tridon.

**14. *Are environmental management decisions often made at the facility level rather than corporate level? What type of facility level decisions require approval from corporate environmental managers?***

Decisions involving significant expenditures of funds, or across the board decisions affecting all three plants, are made at the Smyrna headquarters.

## Questionnaire Results: ACD Tridon

**15. Describe the level of integration of environmental departments or personnel with the rest of the company.**

Because of the size of the Lawrenceburg operations, the level of integration is moderately high. Mark Dorth is routinely consulted by upper management on environmental issues as they arise.

**16. In a related vein, what are the relationships between environmental departments/personnel and other departments within the company? (In other words, what links are in place to allow environmental personnel to effectively perform their jobs within the company?)**

The relationship between environmental management and the maintenance department is good because of the high number of environmental issues handled by the maintenance department.

**17. Describe any concerns with communication between environmental departments or cross-functional environmental employees and other departments with the firm.**

None.

**18. Does the firm rely upon outside consultants to handle environmental tasks? How often?**

Yes. The corporate environmental consultant based at the Smyrna plant is often consulted and utilized in handling environmental issues for the Lawrenceburg plant.

**19. What factors are considered in determining whether to utilize consultants or handle an environmental matter in-house?**

Generally expertise and time constraints. The corporate environmental consultant has far more expertise to handle a number of tasks (i.e., permit applications, in-house environmental assessments) than any employee in the three ACD Tridon plants.

**20. How is the performance of the environmental management department evaluated within the firm?**

Not applicable.

**21. Upon what criteria would departmental performance be judged?**

Not applicable.

**22. Are individuals with environmental management responsibilities evaluated on their performance of those responsibilities?**

Yes, with respect to Mark Dorth.

**23. Who conducts such evaluations and what criteria are used to do such evaluations?**

The Manufacturing Engineering Manager conducts Mark Dorth's evaluation.

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### “Perfect World” Issues

1. *Could the environmental management system of your company be better? How? What would you change if you could? Why?*

Yes. In a perfect world, time constraints to handle environmental tasks would be eliminated. Problems would be handled at an earlier stage rather than dealt with at the last minute.

2. *What degree of influence over corporate structure or policy does environmental management have? What degree do you think it should have? Why?*

Environmental managers have input at ACD Tridon-Lawrenceburg. However, present environmental managers believe that setting policy should be the responsibility of upper management, including as to environmental issues and concerns.

3. *Are matters being handled by other departments in the firm that would be better served if they were handled by environmental?*

No. Personnel in the maintenance department are more experienced and better suited to handling many of the environmental tasks necessary to perform at ACD Tridon-Lawrenceburg. These tasks are part of their job and they are more knowledgeable and capable to handle them than anyone else at the plant.

4. *Are there issues being handled by environmental that should be handled by other departments?*

No.

5. *When and to what extent is environmental consulted on issues of public relations, marketing, product development, etc. now? When and to what extent do you think it should?*

Mark Dorth is consulted regularly on issues of marketing, design and product development within the Lawrenceburg operation.

6. *What meetings do environmental managers attend that are not run by environmental managers? Are there meetings that you think environmental should attend now but they are not?*

Because Mark Dorth has many significant responsibilities other than environmental at ACD Tridon-Lawrenceburg, he attends numerous meetings that may not be “environmental” meetings, but at which he can interject on environmental issues as the need arises. The response to the second question above is no.