

Attachment 2

Environmental Performance

Carver Boat Corporation Environmental Performance Statement

Carver Boat Corporation, LLC (Carver) is committed to protecting and preserving the environment. Carver is a subsidiary of Genmar Corporation (Genmar) and is expected to maintain as high as an environmental standard as Genmar. Genmar has received many environmental awards including the EPA Clean Air Excellence Award in 2002.

Carver has achieved compliance with all pertinent federal, state and local regulating authorities. We have also established an environmental management system for maintaining all in-house environmental programs and procedures.

In the past five years, Carver has achieved environmental excellence by implementing best management practices that has reduced air emissions by over 40%, hazardous waste minimization programs that have achieved small generator status and reduced wastewater discharges.

Carver has mature recycling programs that have reduced materials sent to the landfill. We have also established the 5Ss and lean manufacturing programs that reduce wastes.

Carver trains all of its employees for various environmental regulations and topics to give them a better understanding of what is expected of them in relation to Carver's environmental policies and procedures. This allows employees to understand the reasoning behind the job tasks that they are required to perform.

Carver's Stormwater Pollution Prevention Management Plan

Current Best Management Practices

- Conduct a comprehensive site compliance evaluation annually at all three facilities.
- Visually inspect all identified stormwater out falls on a quarterly basis for the detection of possible pollution or contamination in the outfall.
- Conduct two annual dry outfall inspections of all identified outfalls to make sure that there is no non-stormwater drainage present in the outfalls.
- Annual sweeping of all parking lots in the spring.
- Weekly inspections by the Employee Safety Committee of all outside areas at Carver with the results being noted on an inspection sheet which a copy is forwarded to the supervisor of that area as well as the Carver Environmental Department for review and follow up if necessary.
- Keeping the area around the trash and waste paper recycling compactors clean.
- Regularly inspect the compactor hydraulic system for leaks and report any leaks found to the Maintenance Department immediately for proper repair.
- Personnel responsible for the implementation of Carver's Stormwater Pollution Prevention Plan will attend WDNR storm water update seminars as they are provided by the agency.

Hazardous and Non-Hazardous Waste Management

Current Best Management Practices

- Inspect and document all hazardous waste satellite accumulation and temporary storage areas weekly for leaks, drum integrity, number of drums present and cleanliness of the area.
- Inspect and document the non-hazardous and empty drum storage cage weekly for the number of drums present, contents of the drums, leaks, drum integrity and cleanliness of the storage area.
- Affected personnel will receive RCRA and Hazardous Waste Handling training before they are allowed to handle the hazardous waste.
- Use of non-hazardous cleaning products where feasible in the production areas thus reducing the amount of hazardous waste produced.
- Carver maintains a Small Quantity Generator (SQG) status because we produce an alternative product to utilize excess chemicals.

Waste Water Management

Current Best Management Practices

- Carver has reduced process waste water by over 20%.
- Increase in pH and environmentally friendly cleaners.
- Revised cleaning process to eliminate Federal Categorical Standards.
- Carver utilizes a re-usable non-hazardous cleaning solvent and water-base coatings.

Spill Prevention and Procedures

Current Best Management Practices

- Carver has a formal written program that covers the prevention of spills, what to do if there is a spill and who to contact.
- All production employees are required to take a refresher training course on a yearly basis pertaining to Carver's Spill Control and Procedures.
- All new employees will be trained on the first day of their orientation at Carver on the spill control and procedures policy.
- There is a Standard Operating Procedure in place for Metal Shop employees that use the nitric acid and soda ash in the finished metal wash process.

Solid Waste Management

Current Best Management Practices

- Recycle reusable cardboard and boxes.
- Recycle office waste paper products.
- Recycle packing materials such as foam packing beads and peanuts.
- Recycle scrap wood products including pallets.
- Recycle scrap metal waste.
- Recycle waste cleaning rags from mold repair.

Universal Wastes Management

- Recycle various computer parts and monitors.
- Recycle lamps and bulbs.
- Recycle used oil.
- Recycle used rechargeable and button batteries.

- Recycle used 12 volt auto and deep cycle batteries.
- Recycle mercury-containing devices/thermostats.

Air Emissions Management

Current Best Management Practices

- Carver continues to implement new technology to reduce VOC emissions.
- Implementation of closed molded part generation with zero emissions.
- Continue to pursue the use of lower VOC products such as resins, gels and vinyl ester barriers that may be feasible to be used in production of the fiberglass parts.
- Use non-hazardous cleaner propylene carbonate to clean all lamination guns and equipment.
- Use low-VOC/low-HAP solvents and cleaning materials.
- Water-based anti-foulant paints and upholstery and carpet glues.
- Use vinyl and foam adhesives that do not contain HAPs.
- Conduct annual air emissions inventory reports to ensure compliance.

Past Performance and Improvements

- Implemented a program to puncture and drain aerosol cans and recycle the empty cans as scrap metal.
- Implemented a Waste Minimization Management Plan to reduce all waste types produced at Carver.
- In 1998, Carver implemented flowcoaters in its lamination areas. Carver has since been replacing its flowcoaters with FIT system equipment, which emits less VOCs than the flowcoaters.
- Carver has reduced its VOC emissions by 40% since 2000.
- Carver has implemented real-time, web access, emission tracking hardware into the Plant 6 South Glass Shop.
- In 2003, Carver installed a state of the art paint process line with high efficiency drying booths that will greatly reduce the amount of energy used in this process as well as reducing maintenance costs and improving employee health exposures and production quality.
- In the last 4 years, Carver has reduced its wastewater discharge into the sanitary by 40%.
- Carver has improved the water quality of its sanitary discharge by adding filtration and sediment traps to its wastewater process.
- Carver has been able to reduce the amount of hazardous waste produced and went from being a large quantity generator to a small quantity generator.
- In 1994, Carver replaced its main chemical cleaner from acetone to non-hazardous propylene carbonate which resulted in the reduction of the amount of hazardous waste produced as well as a reduction of VOCs emitted into the air
- Spent propylene carbonate cleaner is placed into 55 gallon drums and sent to an outside vendor to be recycled and sent back to Carver for re-use
- Carver has a ground maintenance employee on staff that performs various jobs such as removing litter on the ground, keeping all green spaces properly maintained and repairing areas that may show signs of potential erosion.

Future Goals

- Continued implementation of Carver's Environmental Policies and Procedures.
- Continued compliance with all regulatory reporting requirements.
- Continued reduction of water and energy consumption.
- Site closure on Carver's ground water remediation/ site contamination projects.
- Continue waste minimization efforts.
- Continue to pursue low-Voc/low-HAP products to be used in the production areas where feasible.
- Continue working toward becoming an industry leader in excellence in environmental performance and management.