

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000397

SITE DETAILS

Site: **Ecolab Garyville**

Address: 3628 Highway 44, 70051, Garyville, Louisiana, UNITED STATES

Contact Person: James Cartwright

AWS Reference Number: AWS-000051

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-Mar-14

Validity of certificate: 2026-Mar-14

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)

Audit Type(s): Initial Audit

Audit Start Date: 2022-Oct-10

Lead Auditor: Claudia M. Jaime

Audit team participants:

Gisela Galan

Site Participants:

James Cartwright, Regional Safety Health and Environmental Manager

Nhi Blanchard, Factory H&S Manager

Lilly Mendoza, Utilities Engineer and Team Lead

Rodney Bourgeois, Principal Environmental Engineer

Byron Hollis, Plant Manager

Anna Wertheim, Sustainability Engineer

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ADDITIONAL INFO

Summary of Audit Findings: A total of 22 findings were raised during the certification audit, 7 major non-conformities, 7 minor non-conformities, 8 observations. The major non-conformities were of sufficient concern to warrant the categorization of the non-conformity as major and related to the 5 AWS outcomes.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 60 days of receipt of the audit report by 13th February 2023.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report by 13th March 2023.

Minor non-conformities must be closed out by the time of the next annual audit.

The audit team recommends re-certification of Ecolab Garyville at Core level pending approval of the corrective actions plan and closure of the major non-conformities.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully resolved the major non-conformities and submitted the corrective action plan addressing all findings.

Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of ECOLAB Garyville against the AWS International Water Stewardship Standard Version 2.

Ecolab’s manufacturing facility located in Garyville, Louisiana, is a reaction plant that primarily produces water treatment chemicals blends and polymers. The Garyville facility is located in the Mississippi River Basin, which is part of the largest watershed in the United States, the Mississippi River Watershed. The facility is located in the St. John the Baptist Parish pulls water from the Mississippi River. The water that goes to the Garyville plant comes from the Lions Water treatment facility. Address of that plant is 2062 LA-44, Reserve, LA 70084. The plant pulls directly from the Mississippi at that location. See google maps satellite view. You can also see how close this site is to the Nalco Water GV facility.

The audit was conducted hybrid onsite and remotely (due to COVID) on 10-12 October 2022. The onsite site visit included the assessment of production area, storage room, waste water treatment plant, intake water area and discharge points facilities and activities that were visited onsite as part of the audit.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	8
Minor	7
Major	7

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FINDING DETAILS

Finding No:	TNR-002483
Checklist Item No:	1.1.1
Status:	Open
Finding level:	Observation
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	The Site shall consider to use the same scale on the presented maps and at different scales. This would facilitate its interpretation. Indicate a sampling point in the WWTR in the neutralization tank. Better description of pipping lay out to and from the Mississippi. The Site shall include in their maps the boundaries of the other two companies who operate within the Site's property (Champion X and Evonik).

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Finding No: TNR-001716
Checklist Item No: 1.2.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Oct-09
Checklist item: Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:
- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;
- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;
- Provide evidence of stakeholder consultation on water-related interests and challenges;
- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;
- Identify the degree of stakeholder engagement based on their level of interest and influence.

Findings: The Site should identify all relevant stakeholders and their water-related challenges. Including the process used for stakeholder identification. This process shall:
- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;
- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;
- Provide evidence of stakeholder consultation on water-related interests and challenges.

Corrective action: Expand stakeholder list to include expanded catchment including stakeholders related to Marepas Swamp and relevant vulnerable groups.

Finding No: TNR-002484
Checklist Item No: 1.2.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Oct-09
Checklist item: Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.

Findings: The Site should identify the degree of influence between site and stakeholders for new stakeholders (see 1.2.1), on their updated list of stakeholders. It shall be relevant to understand the rationale behind the rating of their stakeholders. The organization should make a judgement on its potential to influence water stewardship in the catchment. This may be partly based on the findings of the stakeholder engagement process.

Corrective action: Update the degree of influence of the site and stakeholders on the graph.

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Finding No: TNR-002485
Checklist Item No: 1.3.4
Status: Open
Finding level: Observation
Checklist item: Water quality of the site’s water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings: The Site shall quatify the water quality of the Lake Maurepas (ultimate receiving body of water form storms water).

Finding No: TNR-002486
Checklist Item No: 1.3.6
Status: Closed
Finding level: Major
Due date: 2023-Mar-13
Checklist item: On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings: The Site should identify and map on-site IWRA
Corrective action: We will amend the provided site map to add in onsite IWRA (fire water ponds)
Evidence of implementation: IWRA is circled in blue on the attached map. They are our fire water ponds which support local wild life and are enjoyed visually by our employees

Finding No: TNR-001719
Checklist Item No: 1.3.7
Status: Open
Finding level: Observation
Checklist item: Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings: The Site shall include water related cost of bottles water and revenues from the water service agreements with Evonick and Champion.

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Finding No: TNR-001761
Checklist Item No: 1.4.2
Status: Closed
Finding level: Major
Due date: 2023-Mar-13
Checklist item: The embedded water use of outsourced services shall be identified, and where those services originate within the site’s catchment, quantified.
Findings: The Site should quantify the amount of water used for the service provided by the identified drop trailer washouts
Corrective action: We will contact drop trailer washout provider to collect this information or try to estimate accordingly if they cannot provide.
Evidence of implementation: Confirmed with our trailer washout supplier is that we used 123,800 gallons last year from our washouts

Finding No: TNR-001764
Checklist Item No: 1.5.6
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Oct-09
Checklist item: Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings: The Site should identify the condition and potential exposure to extreme events to the water related infrastructure identified.

Existing and planned water-related infrastructure was identified, however condition and potential exposure to extreme events such as hurricanes and freezing were not identified.
Corrective action: Contact parish and state government to gather water related infrastructure information including condition in regard to potential exposure to hurricanes and freezing

Finding No: TNR-001756
Checklist Item No: 1.6.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Oct-09
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.
Findings: The Site should describe the linking between the water challenges identified by stakeholders with the site’s water challenges.
Where shared water challenges are identified, it is important to understand their cause, in order to accurately prioritize, to develop appropriate mitigation actions, and to know whether collective action is appropriate.
Corrective action: We will add a column to the risk assessment outlining the cause of the shared water challenge

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Finding No: TNR-002488
Checklist Item No: 1.6.2
Status: Open
Finding level: Observation
Checklist item: Initiatives to address shared water challenges shall be identified.
Findings: Tha Site shall update their initiatives to be in accordance with the 6 shared water challenges identified (1.6.1).

Finding No: TNR-002495
Checklist Item No: 1.7.2
Status: Open
Finding level: Observation
Checklist item: Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings: Any positive impacts in the catchment and with stakeholders will likely create positive reputational benefits, and this can be evaluated by the site.

Finding No: TNR-001720
Checklist Item No: 2.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Oct-09
Checklist item: A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.
Findings: A strategy overarching vision, mission and goals for Ecolab Garyville was not presented.
Corrective action: Addition of Garyville specific goals to be added for next audit into strategy presentation

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Finding No: TNR-001721
Checklist Item No: 2.3.2
Status: Closed
Finding level: Major
Due date: 2023-Mar-13
Checklist item: A water stewardship plan shall be identified, including for each target:
- How it will be measured and monitored
- Actions to achieve and maintain (or exceed) it
- Planned timeframes to achieve it
- Financial budgets allocated for actions
- Positions of persons responsible for actions and achieving targets
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.

Findings: The WSP of the Site should include for each goal:
- A monitoring
- Financial budget and
- The end time frame

The water stewardship plan should address risks, shared challenges and opportunities, preliminary identified under Step 1, and include due consideration of the five AWS Outcomes. With regard to risk, there are three general categories of water-related risk to consider:
1. Risks to the site and its water supply
2. Risks from the site to other water users and the natural environment
3. Risks related to shared water challenges (which may overlap with the first two categories)

Corrective action: Add in detail for monitoring, financial budget, projected time frame and tie back to risks in the WSP with the help of project and process engineering team.

Finding No: TNR-002490
Checklist Item No: 2.4.1
Status: Closed
Finding level: Major
Due date: 2023-Mar-13
Checklist item: A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.

Findings: The site has not provided information on the co-ordination with public sector agencies. Add in detail of the connection with public sector agencies to address and mitigate shared water risks to the table in 2.4.1

Corrective action: Add in detail of the connection with public sector agencies to address and mitigate shared water risks to the table in 2.4.1

Evidence of implementation: See Public Sector Plan 2.4.1 for our action plans that include coordination with our local community stakeholders including the public stakeholders. See also public sector opportunities for other involvement and opportunities to address shared water challenges in coordination with our local public sector.

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Finding No:	TNR-002496
Checklist Item No:	3.3.1
Status:	Open
Finding level:	Observation
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	For targets defined in Step 2, the organization should show what the targets are and how it has progressed towards them in a format that is clear and appropriate. This would include results from catchment water replenishment projects. Where targets are not met or approached, then justification should be given.
Finding No:	TNR-002491
Checklist Item No:	3.4.1
Status:	Open
Finding level:	Observation
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	The Site shall describe their activities with an end time frame (not as ongoing). For each water quality target, the evidence should show: the water body or feature it applies to, the target water quality and planned timescale to achieve it. The organization should show how it is progressing against this plan.
Finding No:	TNR-002492
Checklist Item No:	3.7.2
Status:	Open
Finding level:	Observation
Checklist item:	Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.
Findings:	The Site shall provide evidence of engagement with service provider related to indirect water use.

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Finding No:	TNR-001767
Checklist Item No:	3.8.1
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-13
Checklist item:	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings:	The Site should identify evidence of engagement and key messages with the owners of any shared water-related infrastructure, relayed with confirmation of receipt.
Corrective action:	Site to reach out to Parish/state around shared water infrastructure around shared water challenges concerns/queries.
Evidence of implementation:	Email to parish inquiring about water infrastructure risk assessments and upgrades especially related to water infrastructure and hurricane preparedness

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Finding No:	TNR-001770
Checklist Item No:	4.1.1
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-13
Checklist item:	Performance against targets in the site’s water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	The performance against targets in the site’s water stewardship was not comprehensively evaluated. The contribution to achieving water stewardship outcomes was not evaluated. The organization should list the targets for action and improvement from its water stewardship plan, and report on to what extent they are being, or have been met. It should also report on how it has contributed to achieving each of the five AWS Outcomes.
Corrective action:	Update WSP to include status of the targets listed and summarize highlights of progress toward targets in the documentation

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Evidence of implementation: For water governance our goal was to maintain good open relationship with local water authorities. We achieved this this past year by re-engaging with CAP and continuing to work with the community especially in the face of the recent hurricanes. This creates invaluable community and cooperation with our local stakeholders in the face of water challenges. We also completed our RC 14001 audit which is a best practice in our industry for water governance and we passed. This helps us show our community and customers our commitment to good water governance and helps show us where we can continue to improve and measure ourselves against in our industry

For sustainable water balance we had a goal of reducing our water usage intensity by 2%. To achieve that we initiated several projects around utility improvement and replacement, improved monitoring systems and improved washout efficiency. Though initiated in 2021 many projects were not completed till 2022 or beyond. Unfortunately, due to capital issues and urgent post hurricane repairs no projects from the WSP were newly completed in 2021. The site also was off target with the intensity reduction and instead had an increase in water usage intensity. This was largely due to delays in repairs from hurricane and other damages.

For good water quality status our goal is to meet or exceed all WW permit requirements. We continue to improve and maintain our water quality testing and participate in the household hazardous waste collection day events. We did have 2 permit violations this year that they have addressed missing our target around staying within the permit levels which corresponds to all outcomes of AWS. Our continues monitoring and our response plans continue to help us catch the events where we have poor water quality and address them swiftly.

For Healthy status of Important Water-Related Areas our goal is to help maintain the same or better status through discharge water quality and public volunteerism. Our nature based solution project with TNC has been completed and continues to be beneficial to the catchment. Our water quality goals also contribute to the healthy status of IWRA.

For WASH our goal is to ensure safe water & sanitation hygiene access to all within the Garyville site & understand how to further this goal within the basin. This year with the hurricane disrupting people’s WASH access we were able to serve our goals through post hurricane outreach and distribution of cleaning products to those affected by the storm. We also continue to make sure there is enjoyable and adequate drinking water at the facility for our employees.

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Finding No: TNR-001771
 Checklist Item No: 4.1.2
 Status: In Progress - CA plan approved
 Finding level: Minor
 Due date: 2023-Oct-09
 Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.
 Findings: The site partially assessed the value creation resulting from the water stewardship plan.
 The site does not specify a timeframe for these benefits and value creation.
 Corrective action: Ensure timeframe for project completion and add in a column for savings/benefits (including water savings and \$ savings, labor savings etc as relevant)

Finding No: TNR-002493
 Checklist Item No: 5.1.1
 Status: Closed
 Finding level: Major
 Due date: 2023-Mar-13
 Checklist item: The site’s water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.

Findings: The Site should disclose The site’s water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations.
 The governance disclosure effort needs to be publicly accessible in a suitable format for the target audience(s).

Corrective action: More detailed format of the internal governance including compliance to water related laws will be written out in public case study. Change in case study "Water Governance
 At the plant level, the Utilities Team leader, Lilly Mendoza, is ultimately responsible for incoming and outgoing water treatment. The site’s environmental engineer and SHE manager, TD Holiday and Nhi Blanchard, is responsible for submitting compliance with water related laws and regulations including wastewater permit compliance and environmental or water-related issues on site. In both cases, the site’s plant manager, Byron Hollis, is ultimately accountable." to Water Governance
 At the plant level, the Utilities Team leader, Lilly Mendoza, is ultimately responsible for incoming and outgoing water treatment. The site’s environmental engineer, Rodney Bourgeois, is responsible for wastewater permit compliance and environmental or water-related issues on site. In both cases, the site’s plant manager, Byron Hollis, is ultimately accountable for compliance for water related laws and regulations."

Evidence of implementation: We have updated our public case study with and updated and more clear internal water governance.

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Audit Number: AO-000397

Finding No:	TNR-001757
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Oct-09
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	The Water Stewardship Plan was presented in the CAP (Community Action Plan) meeting, however, the list of stakeholders who were present during that event is not provided. Communication should be of a level of detail, language and format most relevant to each relevant stakeholder group.
Corrective action:	Detail on stakeholders present and copy of presentation to be shared by the next audit for past and future CAP meetings and other meetings which we presented the WSP

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Report Details

Report	Value
Report prepared by	Cláudia M. Jaime
Report approved by	Lurdes Guerra
Report approved on (Date)	12 December 2022

Surveillance

Proposed date for next audit
2023-Oct-10

Stakeholder Announcements

Date of publication	Location
2022-Sep-09	Sites website https://www.ecolab.com/stories/nalco-water-plant-in-garyville-louisiana-certified
2022-Sep-08	WSAS and AWS Websites

Catchment Information

Catchment Information

ECOLAB Garyville site sits on the Mississippi River in between Baton Rouge and New Orleans in Garyville, Louisiana. The facility is located in a heavily industrial area with Marathon Garyville Refinery, Evonik Stockhausen, Noranda Alumina, and Cargill Reserve all located within a 5 mile radius. The facility is in HUC 08070204 watershed.

The Site receives water from 2 sources. It receives water from St. John Parish Lions water treatment plant which withdraws water from the Mississippi River approximately 4 miles downstream. The Nalco facility also withdraws Mississippi River water directly at the site. The water is softened on site with lime, clarified and passed through a sand filtration unit. This water, "treated river water" or "TRW", is used for vessel washouts and as a precursor for producing ingredient deionized water.



ECOLAB Garyville catchment map.png

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Client Description and Site Details

Client/Site Background

Ecolab’s manufacturing facility located in Garyville, Louisiana, is a reaction plant that primarily produces water treatment chemical blends and polymers.

The facility is Ecolab’s second largest water user and relies on potable water from St. John’s Parrish which sources water from the Lions Water Treatment plant pulling from the Mississippi River. Wastewater is treated on site and discharged directly to the Mississippi River, while stormwater is discharged to the Garyville canal which drains to Lake Maurepas.

In alignment with Ecolab’s commitment to a holistic approach to water management across its manufacturing facilities, the company implemented the Alliance for Water Stewardship (AWS) International Water Standard at its Garyville plant.

Comment <https://en-mx.ecolab.com/stories/nalco-water-plant-in-garyville-louisiana-certified>

Summary of Shared Water Challenges

Summary of Shared Water Challenges

- Natural Disasters (i.e. hurricanes)
- Flooding
- Water pollution
- Loss of wetlands/species
- Water infrastructure (levy, municipal piping)

0.1 General Requirements for Single Sites, Multi-Sites and Groups

0.1.1 Eligibility Criteria

0.1.1.1 *The site(s) occupy one catchment OR an exception has been granted.* ✔
Yes

Comment The Site occupies one catchment.

0.1.1.2 *The scope of the proposed certification shall be under the control of a single management system.* ✔
Yes

Comment The scope of the certification of the Site is under a single management system.

0.1.1.3 *The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.* ✔
Yes

Comment The Site primary production system is homogeneous.


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1 STEP 1: GATHER AND UNDERSTAND

- 1.1** *Gather information to define the site’s physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*

 - 1.1.1** *The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:*
 - Site boundaries;
 - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
 - Any water sources providing water to the site that are owned or managed by the site or its parent organization;
 - Water service provider (if applicable) and its ultimate water source;
 - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
 - Catchment(s) that the site affect(s) and is reliant upon for water.
- 
Obs.

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Comment

The Site sits on the Mississippi River in between Baton Rouge and New Orleans in Garyville, Louisiana. The facility is located in a heavily industrial area with Marathon Garyville Refinery, Evonik Stockhausen, Noranda Alumina, and Cargill Reserve all located within a 5 mile radius. The facility is in HUC 08070204 watershed.

The Site receives water from 2 sources. It receives potable water from St. John Parish Lions water treatment plant which withdraws water from the Mississippi River approximately 4 miles downstream. The Nalco facility also withdraws Mississippi River water directly at the site. The water is softened on site with lime, clarified and passed through a sand filtration unit. This water, "treated river water" or "TRW", is used for vessel washouts and as a precursor for producing ingredient deionized water.

Intake 1) Water extracted directly by Ecolab and treated on site for production and resale purposes.

Intake 2) Potable and sanitation water, provided by St. John Parish Utilities via Lion's Waste Treatment Plant located south of the site.

Ecolab has two wastewater treatment plants, one for each intake, which later converge in one pipe and are discharge in the Mississippi River right next to the Intake 1.

Site Water Related Infrastructure:

The Nalco Water facility has outfalls at the facility with two effluent discharge points. The facility has one permitted discharge point directly to the Mississippi River which includes plant waste water, outfall 001; an on-site sanitary sewer treatment unit, outfall 101; and sand filter backwash and treated river water (TRW) clarifier blowdown sump, outfall 002.

The Evonik Stockhausen facility and the Champion X facility were once a part of the Nalco facility and due to the interconnectedness of the two facilities, Nalco has service agreements in place to treat both process and sanitary waste and to provide TRW and deionized water (DIW) to Evonik and Champion X.

Storm water is collected in a series of private and public manmade channels and ultimately discharged in Maurepas Lake. Outfalls 003, 004 and 005.

Water Service:

St. John the Baptist Parish pulls water from the Mississippi River. The water that goes to the Garyville plant comes from the Lions Water treatment facility. Address of that plant is 2062 LA-44, Reserve, LA 70084. The plant pulls directly from the Mississippi at that location. See google maps satellite view. You can also see how close this site is to the Nalco Water GV facility – it is downstream from us, about 4 miles as the crow flies.

Two companies operate within Ecolab's property: ChampionX and Evonick. The leasing agreement for both includes provision of process water, waste water treatment and discharge. All permits related to the WWTP are held by Ecolab.

Site has provided the following maps Indicator Responses (Garyville) section 1:

- A catchment map indicating IWRAs and potable water service provider.
- A map locating Ecolab and Lake Maurepas, the ultimate receiving body of water of its storm water. Scale provided
- A goggle map picture indicating St. John Parish potable water treatment plant and Ecolab.
- A google map picture indicating intake and discharge points at the Mississippi River.
- A Site map indicating outfalls, intake of potable water, and points of intake and discharge in the Mississippi River is presented. Scale provided, but not clear.
- A diagram indicating the location of the WWTP, boiler house and other infrastructure.

More explanation regarding permits for discharge outfalls and how many permits do they need: LA0038890 9-29-2020.pdf - pag 16 has the details for the discharge permits.

Outfalls are tested weekly and verify by third party for compliance and daily in house.

There is no limit in the amount of water Ecolab can use.

Finding


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Site's boundaries and fire ponds have not been mapped. Indicate a sampling point in the WWTR in the neutralization tank.
General map needs coordinates and scale.

1.2 *Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.*

1.2.1 *Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:* in progress 

- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;
- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;
- Provide evidence of stakeholder consultation on water-related interests and challenges;
- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;
- Identify the degree of stakeholder engagement based on their level of interest and influence.

Comment The stakeholder engagement and influence matrix does not include all relevant stakeholders (individuals or groups) identified.
The stakeholder mapping needs to include the names of the persons contacted.
Water related challenges were not identified for all stakeholders.
The challenges were identified in a general way that does not allow for a real interpretation of their specific challenges/interests.
It is not clear which stakeholder represents Maurepa Lake, the ultimate receiving water body of the Site's runoff water.

Although in the google earth map seems that the site is surrounded by farmers, it is mainly sugar cane, which in general needs no irrigation (attached pictures).

The Site communicate with stakeholders and the community via collective engagement rather than personal meetings, being the most relevant:


- a) Local Mutual Aid and St. John Parish Emergency Operations Center (EOC): Main topics are emergency planning, drills, assistance in case floods or fire and preparedness for hurricanes. Local police, fire department, community members and representatives of local industries attend. Evidence of meeting agenda is attached.
- b) Nalco Marathon Community Action Panel: A group created by Nalco Water and Marathon in 1996 to engage local stakeholders, including local business and community members, on water-related issues. To keep the objectives of the group and an open participation, organizations or politicians are not allowed in the panel.
- c) Louisiana Water Synergy Project: Which ended in 2020 due to the pandemic, but it was a group of 20+ diverse companies in the lower Mississippi River Basin to address a range of water supply, water quality, storm water and coastal resiliency risks. Link for the organization <https://usbcsd.org/water>

d) Supplier Partnership for the Environment and The Water Council: The objective is to talk more about implementation of water stewardship at the Site and share the Site's Water Stewardship journey with members of the auto industry. See evidence attached.

Some comments about the stakeholder list:

- Stake holder name for Marathon missing;
- Emergency preparedness coordinator missing in evidence: Stakeholder Mapping 2022;
- Dylan Waldhuetter does not work in the Water Council anymore.

Finding No: TNR-001716

1.2.2 *Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.* in progress 

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000397

Comment The Stakeholders identified by the Site use water from the Mississippi River Basin and share the challenges of using water from that source: mercury, bacteria, sediment, PCBs (polychlorinated biphenyl), and other nutrients. Attached is the spreadsheet with stakeholder information:
 The Site has identified their most important stakeholders as the companies for which they share their water and effluent with as well as the community through the community action panel.
 The Site is involved with the local magnet school, helping with teacher appreciation and career day at the school.

A matrix identifying the current and potential degree of influence of some stakeholders was presented,
 It would be relevant to understand the rationale behind the rating of their stakeholders

Finding No: TNR-002484

1.3 *Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.*

1.3.1 *Existing water-related incident response plans shall be identified.*


Yes

Comment Freeze Protection Plan prepares treated river water, demineralized water, potable water and sanitary waste systems as well as any chemical (finished product or raw material) susceptible to freezing. The auditee informed that this is a new procedure because freezing is not common in the area but the Site has experienced two incidents in the last two years.

Emergency Response Plan for chemical spills (vapors, liquids and solids, hazardous or not), fire, explosion, tank failure, evacuation, thunder storms, tornados and reporting procedures. Due to the nature of the operations, the plan has a special section to control and monitor vapors depending on the wind direction. Evidence attached. The document does not need to be approved by the authorities.

Storm Water Pollution Prevention Control Plan to assess the rain collected in the tank's emergency retention basins and ditches to decide if it is safe to release it as storm water or send it to the WWTP. Interview with the auditee revealed that, even if the rain collected in the emergency retention basins seems fine, it is sent to the WWTP. The plan also includes actions in case of spills during loading and unloading materials from the trains or trucks. Evidence attached.

Hurricane preparedness and response has two parts; a) On Site to coordinate all the different teams in charge of preparing the Site before landfall, being in the plant during landfall, assessing after, repair, clearance, startup and a separate one that locates all employees and its families to assist them if needed; and b) Off Site with Local Mutual Aid and St. John Parish Emergency Operations Center (EOC) to coordinate evacuations, food, mobility, gas, electricity, etc. See ppt presentation.

Lack of water: Ecolab Garyville has a holding tank for extended supply disruption mitigation. The Site has the ability to treat the municipal water in its holding tank with Chlorine addition.

1.3.2 *Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped*


Yes


Comment The Site has identified and mapped their water balance:
 Water balance = water withdrawn from source(s) + water gathered on site - site water consumption - water discharged from site (per meaningful time unit)

Indicator response document pag. 16 all units gallons/day.
 TRW, treated river water used for clean ups.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000397


1.3.3 *Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.* 
Yes

Comment Inflows, losses, storage and outflows are quantified and reported daily. Annual variances in water usage are presented from April to October of 2022.
The Site is chemical reaction operation, its water use is very consistent thorough the year, it is the cleaning in place that tends to fluctuate. The information presented by the Site should be very reliable because water meters are calibrated annually and the two main ones (inflow and outflow) are calibrated every four months. In addition, water quantification is one of the most important Ecolab's markets.
There is minimal variance in water usage rates annually because our product mix is generally consistent throughout the year and the plant operates at the same capacity year round.

Ecolab has its own truck fleet but are washed outside the catchment.


The graph presented in the evidence shows an increase in water consumption due to damage caused by a hurricane to sand filter backwash recycle system. The Site is working to solve the problem. (See line 31 in sheet 4 of doc: 1.3.3 Copy of 90 day rolling sustainability meter data text 2022)

No water-related challenges that would be a threat to good water quality for people or the environment were identified.

1.3.4 *Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.* 
Obs.

Comment Water quality information is important for understanding risks to and from the organization, as well as showing whether the organization's wastewater has a negative impact. Water quality of the effluents tabulated and graph for each outfall. Although the title of the graphs is not clear and each graphs do not indicate the threshold for the parameter represented (which could make the data more meaningful) the facility report published by EPA shows minor reportable incidents in 2021 that, according to the auditee were controlled on site, therefore did not contaminate IWRAs off site. This interactive report can be seen in the following link also shows the continual improvement of Ecolab since 2012.
<https://enviro.epa.gov/facts/tri/ef-facilities/#/Water/70051NLCCHRIVER>.
The water quality of the Mississippi River (site's water source and ultimate receiving body of water from the WWTP) is quantified in indicator 1.5.4 because this is also the main body of water of the catchment. The Lower Mississippi River Basin receives all the water that flows through the northern sections, as well as the riverine transportation of imports and exports that occur all over the river. This basin received an overall score of D+ in the report card and a "D", specifically in water supply which means that the water quality is poor. However, Ecolab says that the quality of the effluent from their WWTP is better than the intake.

Source of potable water: The Consumer Report from 2021 concluded that "the drinking water is safe and meets Federal and State requirements".

1.3.5 *Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.* 
Yes

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Comment The organization has a responsibility (usually legal, but also ethical) to avoid causing pollution of the natural environment, including water bodies. The Site is required to submit all the information for this indicator in its Storm Water Pollution Prevention Control Plan. A list of all chemicals permitted to be store on site is identified and the storage tanks are mapped, along with the required secondary containments. The site does not store all the chemicals listed on the permit but obtains the permit for all in case it is necessary to take over the production of other Ecolab's sites.

Even though the tanks are mapped, hundreds of pipes on air or underground transport water and chemicals from one side to the other, that's why Ecolab Garyville has extensive and detailed emergency response plans and are taken seriously. Potential sources of pollution have been identified, mapped and a list of chemicals used was provided.

1.3.6 *On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.*


No

Comment The Site has not identified any IWRA before the audit; however during the audit they have mentioned the relevance of their two (man made) fire ponds on site where ducks have found a place to live. Ducks were brought by an employee to show how clean is the water treated in the WWTP. The ponds have an environmental and cultural for the staff of the Site. However, the Site has not present a map and assessment of their status.

Finding No: TNR-002486

1.3.7 *Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.*


Obs.

Comment Water-related costs are often broader than initially perceived; they include more than just procurement of water and treatment of water. Asuming all Ecolab produced products have the same gross margin.

The budget for water related cost for 2022 is based on expenses from 2021. Water Related Projects and Initiatives (CapEx) for 2020 was lower.

Ecolab sells water treatment chemicals, services and software to increase performance in water management and stewardship, therefore considers its total payroll as economic water related value.

The Site does not present any social or cultural value added, however its environmental value added, though indirect, is important because it produces goods and services that contribute to protect and save water. Its Corporate Responsibility Report says that in 2021, as a corporation, Ecolab helped its customers save 215 billion gallons of water (pag 13). Water costs is described in their general document pags 18-20

On August 2021 Hurricane Ida made landfall as Cat 4 in Louisiana as one of the worst storms ever recorded.

1.3.8 *Levels of access and adequacy of WASH at the site shall be identified.*


Yes

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Alliance for Water Stewardship (AWS)

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Comment During the Site’s visit it was possible to observe the water stations are located in the control rooms, water fountains and water jugs are provided also.
 The Site has lockers and 14 restrooms separate for men and women in addition to 10 to 15 portable restrooms in remote locations, quantity depends on the number of employees or subcontractor on site. Hand sanitizer dispensers are available throughout the facility. As well as, safety showers and eye wash stations.
 Ecolab Garyville buys all emergency supplies (water, food, etc.) to prepare for hurricane in advance. This is for employees as well as the community in general.
 The Self Assessment Wash Pledge indicates that Ecolab Garyville is in full compliance with all dimensions.
 During our visit, two kitchenets were observed with ample space for tables, a coffee station, running potable water.
 St John Parish communicates the site when the quality of potable water provider is not acceptable, about 4 times/yr. In this case, employees receive bottled water from Ecolab as needed.
Total Employees
 150 Nalco Water Employees
 75 Resident contractors
 25 Temporary contractors

Total Restroom
 Men and Women's Restrooms: 14
 Portable restrooms in remote locations:10-15

 According to OSHA the site is required to provide workers with restrooms that are sanitary and have cold and hot running water, hand towels or air dryers, and soap. Potable water also is required by law for washing, drinking and food preparation.
<https://www.osha.gov/restrooms-sanitation>
 All the Site’s toilets have soap, running water at both temperature and drying units or hand towels. The Site has also hand sanitizer dispensers throughout the facility (pp. 22).

1.4 *Gather data on the site’s indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*

1.4.1 *The embedded water use of primary inputs, including quantity, quality and level of water risk within the site’s catchment, shall be identified.*


Yes

Comment The embedded water use of primary inputs, including quantity, quality and level of water risk within the site’s catchment was identified.
 None of the primary inputs are produced within the sites catchment.

1.4.2 *The embedded water use of outsourced services shall be identified, and where those services originate within the site’s catchment, quantified.*


No

Comment The Site outsources the following services:
 - Uniform laundry provided by Aramark, located 835c, Pride Dr, Hammond, LA 70401 and LA-1, Plaquemine, LA 70764. Both locations are outside the catchment.
 - Car wash service for the drop trailer washouts, located inside the catchment at 189 Power Blvd, Reserve, LA 70084.

Portafeed washout is done in Lake Charles, LA and Houston, TX so not within their catchment. Portafeed is a returnable chemical delivery developed program by Ecolab that takes back the empty containers, eliminating drum disposal costs or long-term liability.

With the new catchment map the Site do have one outsourced water service for our drop trailer washouts. They are located at 189 Power Blvd, Reserve, LA 70084.

Finding No: TNR-001761

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Audit Number: AO-000397

1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 Yes
Comment	<p>The Site has identified the following governance initiatives: Louisiana Department of Environmental Quality (LDEQ) has programs to protect drinking water, test and protect surface water, manage stormwater, and manage nonpoint source pollution. Programs:</p> <ul style="list-style-type: none"> - Drinking water protection program: here https://www.deq.louisiana.gov/page/drinking-water-protection-program - Source water assessment program: here https://www.deq.louisiana.gov/page/source-water-assessment-program - Ambient water quality monitoring: here https://www.deq.louisiana.gov/page/ambient-water-quality-monitoring-data - Stormwater protection: here https://www.deq.louisiana.gov/page/storm-water-protection. - Nonpoint source Pollution Program: here Nonpoint Source Louisiana Department of Environmental Quality https://www.deq.louisiana.gov/page/nonpoint-source <p>There is no limit on the quantity of water the Site pull from the Mississippi. Only their wastewater is regulated.</p> <ul style="list-style-type: none"> - Stormwater management plan for the Parish: Stormwater Management St. John the Baptist Parish (sjbparish.gov) https://www.sjbparish.gov/Departments/Planning-and-Zoning/Stormwater-Management - 2021 Consumer Confidence Report from the Parish (shows water quality): 2021 Consumer Confidence Reports St. John the Baptist Parish (sjbparish.gov) https://www.sjbparish.gov/Departments/Planning-and-Zoning/Stormwater-Management <p>EPA-States lousiana department environmental policies Summary of USGS</p> <p>2020 Louisiana Water Quality Integrated Report https://deq.louisiana.gov/assets/docs/Water/Integrated_Report/2020_Integrated_Report/20_IR1_A_Master_Text_CORRECTED_FINAL_For_ATTAINS_10-16-2020.pdf</p> <p>Louisiana Department of Environmental Quality (LDEQ) has programs to protect drinking water, test and protect surface water, manage stormwater, and manage nonpoint source pollution. The Site identified seven programs, among those, the Stormwater protection and the Nonpoint source Pollution Program.</p>	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	<p>The Site is required to obtain permits to extract and discharge water, present the correspondence monitoring reports, emission permit, waste water treatment operation, and present the following plans: emergency, storm water pollution prevention plan, spill prevention control plan.</p> <p>In general, it most comply with the clean water act (CWA), clean air act (CAA), Hazardous Waste Act and Drinking Water act, Resource Conservation and Recovery Act (RCRA). All this is overseen by EPA, implemented according to the particular regulation of the State and the requirements specified in each permit.</p> <p>Governing national standard for the availability Water and Sanitation and Hygiene (WASH) is referenced in Occupational Health and Safety Administration section 1910.141 – Sanitation, which is a part of the General Environmental Controls.</p> <p>Applicable water-related legal and regulatory requirements were identified.</p>	

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Audit Number: AO-000397

1.5.3 *The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.* ✔
Yes

Comment Data presented shows that The Mississippi River flow declined 60% between 2020 and 2022. Although this is significant, a longer period of time should be considered to accurately quantify scarcity or identify a tendency. See interactive link: https://waterdata.usgs.gov/nwis/measurements?site_no=07374000&agency_cd=USGS&format=brief_list
Water consumed in catchment = Mississippi River flow upstream + Precipitation – Mississippi River flow down stream
Water consumed in catchment = 294,000 cubic ft/sec + 86 cubic ft/sec - 245,000 cubic ft/sec
Water consumed in catchment = 49,086 cubic ft/sec
Data obtained from:
Upstream of The Site - Monitoring location 07374000 is associated with a stream in West Baton Rouge Parish, LA.
Downstream of The Site - Monitoring location 07374525 is associated with a stream in Plaquemines Parish, LA.
The most recent discharge value of the Mississippi river measured near Baton rouge is 295,000 cubic feet per second (measured 07/25/2022)
The most recent stream water elevation value is 10.34 feet (measured 07/25/2022)
The stream flow of the river is set at 280,000 cubic feet per second (measured on 07/14/2022) at West Baton Rouge Parish, LA (USGS Surface Water for USA: Streamflow Measurements p.26)

Water consumed in the catchment represent 12% of the inflow. This is the consumption of industries located downstream between Ecolab and the USGS station used. Although the number seems high, the Mississippi River is so vast that is not a concern, however, if all industries located along the River depend of the this resource. It will be relevant for the Site to keep a close observation on this issue.

1.5.4 *Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.* ✔
Yes

Comment The Lower Mississippi River Basin receives all the water that flows through the northern sections, as well as the riverine transportation of imports and exports that occur all over the river. This basin received an overall score of D+ in the report card and a “D”, specifically in water supply which means that the water quality is poor.

Ecolab quantified the water quality via several official graphs. Based only in the information presented, specific conductance more than double from 2020 to 2022, the discharge decreased, and nitrate plus nitrite increased 1.25 mg/lit (runoff from agriculture is a major concern in the catchment and the Gulf of Mexico). Dissolved oxygen and temperature seem to keep a regular trend.
Mean turbidity: 19.1^p
Mean salinity: 0.2^p
Median pH of water: 8.2^p
Mean of dissolved oxygen (mg/L): 6.6^p
Mean nitrate/nitrite water in situ (mg/L): 1.65^p
The 2020 Mississippi River Watershed Report Card gives a rating of C-
Lower Mississippi is graded lower than all of the upstream watersheds
Biological status shows as poor
City water - St. John the Baptist Parish:
Water Consumer Confidence Report 2021 shows chemical status
<https://www.sjbparish.gov/Departments/Utilities/2021-Consumer-Confidence-Reports>

(pp.27-40)

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000397

1.5.5 *Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.* ✔
Yes

Comment Ecolab Garyville identified three IWRA in the catchment:

1. Lake Maurepas Management Wetland, comprised of Lake Maurepas, Manchac Swamp and the Garyville & Reserve wetlands. According to the Americas Watershed Report Card, is in a deteriorating state. Lake Maurepas, ultimate receiving body of water of storm water from Ecolab is in a Poor state.
2. Mississippi River. According to the Louisiana Dep of Wild Life and Fisheries, is in Poor state as described in indicator 1.5.4.
3. Maurepas Swamp Wildlife Management Area ;

All IWRAs includes status assessed using scientific information.

(pp. 39-48)

1.5.6 *Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.* ✚
in progress

Comment The Utility Department of the St. John the Baptist Parish is responsible for supplying potable water and waste water services to the citizens, business, and industries around the parish. Each industry along the Mississippi River extracts and treats its water for process.

The potable water system includes three water plants, two water wells, and seven wastewater plants, all require daily monitoring and reporting to the Department of Public Health in the areas.

The 2021 Report card for America’s Infrastructure gave Louisiana a grade of a “D+”. The infrastructure investment and jobs act (IIJA) provides important new funding to improve the state of Louisiana’s infrastructure systems. For the next 5 years, Louisiana will receive 30 million dollars (total, not per year) for wastewater infrastructure from the Clean Water State Revolving Fund Program. Still there is a \$7.3 billion gap for drinking water investment infrastructure.

According to Ecolab, St. John Parish announces boiling water advisory about four times a year and after hurricanes. During these events, users must boil the water for drinking and cooking. Some reasons are: water line breaks, treatment interruptions, and loss of pressure in the distribution system.

Existing and planned water-related infrastructure was identified, however condition and potential exposure to extreme events such as hurricanes and freezing were not identified. Consideration of extreme events, are important to assess risk, specially in a catchment prone to hurricanes and consequent flooding.

Finding No: TNR-001764

1.5.7 *The adequacy of available WASH services within the catchment shall be identified.* ✔
Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000397

Comment As of January 2022, Louisiana had an estimated 3,173 people experiencing homelessness, this represents a WASH challenge for many communities (not just Garyville) due to the lack of services for sanitation required. Ecolab identified 4 shelters however, it is not clear if the demand for services is satisfied.

99.5% of homes possess complete plumbing and 99.7 have plumbing in the kitchen.

Ecolab partially identified the adequacy of available WASH services by accounting the homeless population in the whole State of Louisiana, but not in the catchment and by identifying the % of home with plumbing. Although it is important to mention that the census for the homeless population is far from accurate in almost every state in the USA.

The adequacy of available WASH services within the catchment was identified.

Homeless in Louisiana Statistics 2019. Homeless Estimation by State | US Interagency Council on Homelessness (usich.gov)

In St. John the Baptist Parish there are many homeless shelters where homeless people can gain access to WASH:
<https://www.shelterlistings.org/address.php>

(See document in 1.5.5 pp. 49-50)

1.6 *Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site’s water challenges.*

1.6.1 *Shared water challenges shall be identified and prioritized from the information gathered.*

 in progress

Comment The Site should describe the linking between the water challenges identified. The identified shared challenges should be listed and prioritized in terms of their significance and urgency.. Where shared water challenges are identified, it is important to understand their cause, in order to accurately prioritize, to develop appropriate mitigation actions, and to know whether collective action is appropriate.

- Natural Disasters (i.e. hurricanes) Shared & Site Level
- Flooding Shared & Site Level
- Water pollution Shared & Site Level
- Subsidence Shared
- Water infrastructure Site level
- Loss of wetlands/species Shared
- Water infrastructure (levy, municipal piping) Shared
- Chemical spills Site level

Some of the risks applicable only to the Site and the rest are considered shared.

Finding No: TNR-001756

1.6.2 *Initiatives to address shared water challenges shall be identified.*

 Obs.

Comment The Site has identified 9 initiatives related to the identified shared water challenges (1.6.1) The ranking was based on the number of shared water challenges it addresses. An explanation of each initiative and a detailed rationale for priority is given.





The site has identified 6 shared water challenges; however the list of initiatives includes 2 of the shared water challenges as site challenges (natural disasters and flooding)

1.7 *Understand the site’s water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)




Audit Number: AO-000397

1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Yes
Comment	<p>Ecolab identified 2 site risk (Water infrastructure and Chemical spills) and 3 shared risk (have been considered in 1.6)</p> <p>Potential costs were identified with Water Risk Monetizer, a tool developed by Ecolab which enables businesses to factor current and future water risks into business strategy, based on the information provided by a facility and historical data already incorporated in the tool.</p> <p>Incoming Risk – defined as the monetary value of the impact of water depletion (quantity and quality) and the future cost of water treatment has a likelihood score of LOW.</p> <p>Outgoing Risk - defined as the monetary value of the impact of water pollution and the future cost water treatment, has a likelihood score of LOW, calculated a 00.00 US dollars/yr in the next 10yrs.</p> <p>Finding: Water risks faced by Ecolab were identified, prioritized, including likelihood and the basis for the rating was documented. Business impact is included in the rating. Potential costs were identified as low.</p>	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 Obs.
Comment	<p>The Site identified a list of water related initiatives such as:</p> <ul style="list-style-type: none"> - Reducing water intake by reclaiming process water. - Selling treated water and waste water treatment service to ChampionX and Evonik. - Treating its own water for process. <p>Evidence shows how The Site may participate, assessment and prioritization of potential savings, and business opportunities, being outfall 002 recycling (clarifier effluent) and effluent recycling, the opportunities that could result in grater water savings.</p>	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	<p>The Site has identified these general best practices:</p> <ul style="list-style-type: none"> - Engage with peer organization such as Evonik, ChampionX, Marathon and other stakeholders such as State Police and the neighbour school. - Participate or advocate for the creation of local stakeholder and community governance platforms. - Maintain a positive relationship with the St John Parish who provides the potable water. - Consult with its own employees and organizations such as Nalco Water Commercial Team to assess the technical and financial feasibility of projects. - Become member of relevant organization that advocate for water stewardship such as UNGlobal Compact. <p>All legal compliance will not be considered as best practice (See document at 1.5.4, p 51)</p>	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 Yes

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000397

Comment	<p>The Site has identified these general best practices:</p> <ul style="list-style-type: none"> - Reclaim water, specially to be use for cooling and boilers were much water evaporated. - Constant monitoring, calibration and preventive maintenance of all equipment (pumps, boilers, cooling towers, mixers, storage tanks, etc.) - Constant monitoring of water meters for leak detection, efficiency calculation and opportunities for improvement. - Good housekeeping routine such as check for leaks. - Use of spray balls to reduce water consumption during cleaning in place. - Share best practices with ChampionX and Evonik, the two stakeholders who buy water from Ecolab Garyville. 	
1.8.3	<p><i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i></p>	 Yes
Comment	<p>The Site has identify the following best practise in relation to water quality</p> <ul style="list-style-type: none"> -Ensure that their stormwater quality will not be detrimental to ecosystems. -Certification by an international standard such as ISO14001 and Responsible Care as evidence of compliance and compromise. <p>All legal compliance will not be considered as best practice</p>	
1.8.4	<p><i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i></p>	 Yes
Comment	<p>The Site has identified as best practise for IWRA:</p> <ul style="list-style-type: none"> -Regular monitoring of water source and discharges. -Develop a Stormwater Pollution Prevention Plan. -Develop a water safety plan in the event of an excursion. -Supporting a restoration project or replenishment project that conservers, protects or restores natural areas. 	
1.8.5	<p><i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i></p>	 Yes
Comment	<p>The Sites has identified as best practise fro WASH on site:</p> <ul style="list-style-type: none"> -Be part of The Wash Pledge. -Donation of water and hygiene products in disasters zones. <p>All legal compliance will not be considered as best practice</p>	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000397

2 STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan

2.1 *Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*

2.1.1 *A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:*

- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes
- That the site implementation will be aligned to and in support of existing catchment sustainability plans
- That the site’s stakeholders will be engaged in an open and transparent way
- That the site will allocate resources to implement the Standard.



Yes

Comment: The Site has a public document that meets the requirements of this indicator and the document is signed by the Site plant Manager. Additionally, ECOLAB has a commitment that is publicly available at their web site.

2.2 *Develop and document a process to achieve and maintain legal and regulatory compliance.*

2.2.1 *The system to maintain compliance obligations for water and wastewater management shall be identified, including:*

- Identification of responsible persons/positions within facility organizational structure
- Process for submissions to regulatory agencies.



Yes

Comment: The Site maintains compliance obligations.
 -Site presented a system to maintain compliance obligations and identified the responsible persons/positions.
 -The process for submission is established in the water permit. The procedure is described as follow:

- 1) Environmental Engineer prepares the document
- 2) Plan leadership signs it and uploaded it in the LEDQ platform
- 3) LEDQ send an email to confirm that document was receive and to validate the data submitted with Plant Leadership. Evidence attached.

2.3 *Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*

2.3.1 *A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.*



in progress

Comment: Site presented a strategy for Ecolab at the global level in line with the AWS Standard and other objectives.
 Ecolab Garyville presents its goals towards good water stewardship in line with the AWS standard, however a strategy overarching vision, mission and goals was not presented.


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2.3.2 *A water stewardship plan shall be identified, including for each target:*
- How it will be measured and monitored
- Actions to achieve and maintain (or exceed) it
- Planned timeframes to achieve it
- Financial budgets allocated for actions
- Positions of persons responsible for actions and achieving targets
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.


No


Comment The WSP includes actions to achieve
THE WSP includes a column with measurements; however, not a monitoring
The WSP includes time frames to achieve each goal: however it will be necessary to define the period by year in order to measure the progress
The WSP does not include financial budget for each goal
The WSP includes staff responsible for actions and achieving targets
The WSP includes a link with the AWS outcomes

Assessment:
Water stewardship plans for 2021 and 2022 were presented, both fulfill the requirements of the AWS Standard. However, the 2022 plan includes activities completed before 2021. Column L “Notes and Comments” in the WSP indicate the status of the water balance projects and benefits obtained. 7 of the 15 activities are completed and the rest are in progress. Due to changes in product mix from 2020 to 2021 the site increased water usage intensity by 9.3%, however is working to solve this situation as reflected in its water stewardship plan.

The auditee explained that the damages caused by hurricane Ida took priority over the projects.
Finding No: TNR-001721

2.4 *Demonstrate the site’s responsiveness and resilience to respond to water risks*

2.4.1 *A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.*


No






Comment This indicator is additional to the requirements highlighted in Criteria 1.7 (understanding the site’s water risks and opportunities). This indicator applies mainly to how the site will plan to address external risks outside of the site’s direct control or responsibility, and particularly for those risks associated with dependence on public infrastructure. The Site has submitted a document that contains two columns: the site’s reaction and mitigation techniques.
However, this does not constitute a plan with concrete actions and is not linked to public sector agencies.
Finding No: TNR-002490

3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts		
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	✓ Yes
Comment	<p>The organization should describe how it has supported or contributed to good catchment governance:</p> <ul style="list-style-type: none"> - The Site supports the Mount Airy School. - According to EPA web site, Ecolab is in compliance with its permit requirements. - The Site partners with NGOs such as The Nature Conservancy on the Loch Leven Water Replenishment Project. <p>https://www.facebook.com/MississippiTNC/videos/alex-littlejohn-and-scott-lemmons-talk-a-bout-loch-leven/299484571138536/</p> <ul style="list-style-type: none"> - Ecolab has close contact with two of its most important stake holders, ChampionX and Evonik, and work with them on addressing shared water challenges and opportunities. - Ecolab Garyville plant created the CAP (in partnership with Marathon Petroleum Corporation) which is open to local community members to voice their concerns. 	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	✓ Yes
Comment	<p>This indicator refers to water rights not already covered by legal and regulatory mechanisms as captured in 3.2.2:</p> <ul style="list-style-type: none"> - Garyville is not a scarce or stress water area, citizens receive their water from St. John Parish. - Water is readily available to all citizens, including WASH facilities (e.g., at restaurants, neighbourhood etc.). - The site provides best practice WASH facilities for its employees and visitors. - No rights of external parties that need to be considered beyond internal site WASH requirements were identified by the site or audit team. <p>The site is not restricting access to water for others</p>	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	✓ Yes
Comment	<p>Evidence of the implementation a process to verify full legal and regulatory compliance was identified. The submission of all these documents is reflected in the TRI facility report published by EPA.</p> <p>Evidence of the implementation a process to verify full legal and regulatory compliance was identified.</p>	
3.2.2	<i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i>	✓ Yes
Comment	Water rights are not part of any legal or regulatory compliance for Ecolab Garyville.	
3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	Q Obs.

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Comment	The site has identified the status of progress towards meeting the water balance targets, set out in the sustainable water stewardship plan. As indicated in indicator 2.3.2, the progress status of the incomplete activities presented in the WSP is unclear. However, the site has its own water stewardship tool to measure the progress of these activities. The tool generates a graph showing the following progress: Water balance (85%)	
3.3.2	<i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i>	 Yes
Comment	Water scarcity is not a shared water challenge in the catchment; however the Site has set a goal of 40% reduction by 2030, baseline 2018.	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	There is no legally-binding documentation for the re-allocation of water to social, cultural or environmental needs. However, the Site has funded a project with The Nature Conservancy that restores the Loch Leven floodplain recharging a total of 2.8 billion gallons/year and 101,892,000 gallons/year for 10 years starting in 2018. https://www.facebook.com/MississippiTNC/videos/alex-littlejohn-and-scott-lemmons-talk-about-loch-leven/299484571138536/	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Obs.
Comment	Ecolab Garyville has identified the statue of progress towards meeting water balance targets. Column "Notes and Comments" in the WSP indicate the status of the water quality projects and benefits obtained. 3 of the 7 activities were completed by 2018, 1/7 was completed in 2020 and 3/7 are ongoing. The activities relate to compliance and collection of hazardous household material which should not stay as ongoing.	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	The site has identified water quality as a shared challenge the evidence presented in indicator 1.3.4 is evidence of Ecolab's ongoing water quality monitoring activity. The site identifies and quantifies continuous improvements to achieve best practice in relation to site effluent. The interactive report published by the EPA shows Ecolab's continuous improvement since 2012. None of the incidents reported in 2021 impacted an on-site or off-site IWRA and no enforcement action has been taken against the site. The Site is currently in compliance with their wastewater permits. The Site is also in compliance with the Ecolab Global Supply Chain Environmental policy.	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes

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Comment	<p>By continuing to adhere and improve the Site ability to stay within their permit they are maintaining the site's IWRA and catchment IWRA.</p> <p>In addition, containment systems on site and maintaining hurricane preparedness including shutting down the facility in preparation of hurricanes to prevent any spillage into the Mississippi are all practices set in place to protect the IWRA.</p> <p>Finally, the Loch Leven project as outlined in the WSP and in indicator 3.3.3 are practices to protect and enhance local IWRA.</p> <p>In case that the site includes the On-site IWRA (see 1.3.6) on their WSP, this indicator should be updated.</p>	
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes
Comment	<p>The Site has identified and quantified the provision of adequate access to safe drinking water, effective sanitation and protective hygiene.</p>	
3.6.2	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 Yes
Comment	<p>Garyville is not a scarce or stress water area, citizens receive their water from St. John Parish and no allocation is in place. Additionally, Ecolab Garyville procures its own process water, therefore its operations do not put stress in the municipal water system.</p> <p>The Parrish annual water quality report shows that their water meets or exceeds the EPA clean drinking water act requirements. Therefore, the Site plant is not impinging on WASH within the catchment. In addition, through their replenishment project with TNC groundwater is being recharged in the area surrounding their catchment. In addition, by being available for mutual aid and providing their site employees with additional supplies post hurricane Ida the Site is not impinging on any water rights.</p> <p>Measures to respect the water rights of others including Indigenous peoples, do not need to be implemented by Ecolab Garyville.</p>	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Yes
Comment	<p>The Site did not include any target related to indirect water use.</p>	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 Obs.
Comment	<p>Evidence of engagement with subcontracted water service providers for trailer washes is planned for next year (2023).</p>	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 closed
Comment	<p>No relevant information was provided.</p>	

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3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	Implemented best practices: - Ecolab submit monitoring reports as required by the discharge permits, including third party verification and inhouse daily testing. If a Notice of Violation (NOV) is received, the issue is addressed immediately and all possible efforts are done to achieve compliance by next monitoring date. - The Site contributes with the local school, Garyville Mt. Airy Magnet, by participating in career days, tutoring and donations to teacher appreciation days and sanitation items. One of the main drivers is to spark the children's interest in the areas of science and math and bring more girls in the engineering fields. - Ecolab advocated for integrated water governance at the catchment level by creating, in conjunction with the company Marathon, the CAP group that brought together other companies that operate in the catchment and has brought important benefits to the area. See indicator 3.1.1 - Maintain a positive relationship with the St John Parish who provides the potable water. - A "Systemic Meeting" with plant employees is held weekly to analyze the data obtained from all flow meters and water quality monitoring in order to identify problems and find solutions. If high levels of TOC (total organic carbon) or metals are detected an investigation and incident report is performed to determine root/cause analysis and solve the problem. - The projects presented in the Water Stewardship Plan were developed and are being monitored by The Site in cooperation with the Nalco Water Commercial Team and the Sustainability Executive Advisory Team. - Ecolab is a member of relevant organization that advocate for water stewardship such as UNGlobal Compact, has signed the Wash Pledge, makes public its Corporate Responsibility Report. - Ecolab Garyville published its AWS journey in a case study where water saving projects and results are presented. - Ecolab is member of the American Chemistry Council (ACC). One of its guiding principles is "to cooperate with governments at all levels and organizations..." Member of the ACC must implement the "Responsible Care Management" to demonstrate their commitment to the health and safety of their employees, the communities... and the environment as a whole. The Community Action Panel (CAP) works with communities, Residual management Safety for communities and employees Environment: airpermits, waste, maintenance and calibration. Positive relation with Parish Involvement on CAPs members	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes

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Comment Best practice for water balance within the site varies as it relates to different processes. There are 2 categories of water balance best practice relevant to the Site – Nalco Water site best practices, and Evonik’s best practices. Overall, their best practice philosophy is to understand the water balance on site and tackle issues immediately as they arise. The Site recognises their our problem areas and they have projects in place to optimize them. The Nalco Water commercial team is also an industry expert on water treatment and tracking so we rely on their expertise as best practices in this category as well.

Evonik
 Since tje Site sell water to the plant next door, they maintain an open dialog with them regarding water use and water stewardship. The Site meets with them regularly to discuss. Recently they discussed optimizing scrubbers and reducing washout times through the use of cleanout matrices. The Site shares their best practices with them and are very transparent. They are also members of CAP.

Nalco Water
 They have extensive metering throughout the entire site which allows them to very closely track any variance in their water use. If there is a variance they investigate it immediately. The Site on-site condensate return is currently at about 20%, whereas best practice in this area is about 70-80%. They have a project in place to optimize this. They use Nalco Water 3DTRASAR technology on their cooling towers and boilers which is best in class technology that allows for optimal cooling and heating performance using less chemistry, water, and energy in the process. The Site recently did a feasibility study on a wastewater recycle project that would allow for ~33% of our wastewater to be returned and treated. The Site conducted a pilot study with on-site equipment to prove the concept and determine the capital and operating costs. Unfortunately at this time the project is not financially viable for them as both the capital and operating costs were too high. They have determined multiple additional smaller projects that can help us recover water in smaller recycle loops throughout the plant. These projects have proven to be more financially sustainable at this time.

3.9.3 *Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*  Yes

Comment The Site has implemented actions towards achieving best practice related to water quality.
 -The Spill Prevention Control Plan, Chapter 5, presents the best practices that Ecolab implements on site.
 -Ecolab possesses its own infrastructure to extract and treat water for its process as well as a WWTP. This results in savings on treatment cost and places less stress in the municipal water treatment plant.
 - The Site possess ISO, RC 14001 and AWS certification.
 - Water quality best practice is closely tied to water governance best practice as the main goal is to continue to meet the water discharge permit. As presented in indicator 3.2.1 The Site has been in compliance with monitoring requirements.
 - Site performs daily internal testing and weekly third party testing to assure consistency in the results.
 - Stormwater is catch in ditches and it is sample quarterly. However, stormwater water collected in the ditches can be contained, analyzed and treated, if contamination is suspected.

3.9.4 *Actions towards achieving best practice, related to targets in terms of the site’s maintenance of Important Water-Related Areas shall be implemented.*  Yes

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Comment Best practices on Site:
The best practice presented in the Spill Prevention Control Plan, Chapter 5 are designed to protect the IWRA identified by Ecolab.

Best practices beyond the Site:
-The Site has an agreement with The Nature Conservancy for the restoration of Lock Leven Island located north of the Site. The project consists in opening a water channel to allow water from the Mississippi River flow through the island as it was before the civil war. This will restore the habitat of thousands of animals. Project is under construction. Evidence attached.

-Ecolab contributed with the Hydrological Restoration of McIntyre Scatters in the Mississippi Delta to maintain the integrity of 2,150 acres of wetland habitat, provide 2.8 billion gallons of flood storage capacity to local communities and recharge supplies to the severely depleted underlying Mississippi River Valley alluvial aquifer. Although this project is out of the catchment was considered important for Ecolab because it helps manage the water upstream.

-Ecolab, along with many other companies, participates in the Household Hazardous Material Collection. This keeps hazardous waste away from any bodies of water, and is especially relevant during floods or heavy rains.

Ecolab Garyville has implemented actions towards achieving best practice related to related to targets in terms of the site's maintenance of Important Water-Related Areas.

3.9.5 *Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*



Yes

Comment Ecolab is part of the WASH Pledge.
After hurricanes, The Site donates hygiene products to the community.
Ecolab Garyville has a system in place to locate its employees after hurricanes and make sure they have water and food for them and its family.

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4 STEP 4: EVALUATE - Evaluate the site's performance.

4.1 Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.

4.1.1 Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.


No

Comment The site does not assess performance against the targets in their WSP. The WSP presents for the completion of the activity "ongoing" which is an error as it does not allow the identification of progress made and consequently assess performance against targets.

Finding No: TNR-001770

4.1.2 Value creation resulting from the water stewardship plan shall be evaluated.


in progress

Comment The site identifies two main benefits as value creation from the WSP:
(a) Implementation of the proposed projects in the WSP resulted in 662,823 m3 less withdrawn from the Mississippi River which, according to calculations by Ecolab using the Water Risk Monetizer tool, resulted in risk-adjusted savings of \$3 million.
b) Cost savings in fines for timely compliance with monitoring reporting requirements, which cannot be considered as creation.

Finding No: TNR-001771

4.1.3 The shared value benefits in the catchment shall be identified and where applicable, quantified.


Yes

Comment The site identifies and quantifies the benefits of shared value in the watershed with the application of the WSP that enabled value creation:
According to REF's EcoMetrics accounting, for every \$1 invested in nature-based solutions in the Lower Mississippi River Basin, between \$9 and \$15 of value is created. In nature-based solutions in the Lower Mississippi River Basin, between \$9 and \$15 of value is created. The site invested \$25,000 in the Conservancy's Loch Leven project. Estimated integrated value creation of \$300,000.00.
The site's commitment to water permit compliance, verified by a third party, leads to constant monitoring by the IWRA.
Ecolab's involvement in the local school district adds value through direct financial support of school programmes.
Participation in the Mutual Aid and St. John Parish Emergency Operations Centre creates value by providing emergency resources to those in need, if Ecolab has the necessary equipment. necessary equipment.
Ecolab sells water treatment chemicals, services and software to increase performance in water stewardship and management, so it considers its total payroll of USD "annual payroll" as water-related economic value.

4.2 Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.

4.2.1 A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.




Yes






Comment The site submits an annual written review and analysis of the causes of the year's emergency incidents. The site's response to them is evaluated. The site keeps a log of major and minor incidents and generates a report as required. The detailed report of an incident with root/cause and corrective actions is also attached.

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4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>	
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>	 Yes
Comment	The site identifies stakeholder consultation efforts on the site's water stewardship results. It has also included its projects and progress in the public case study on the Ecolab website. https://www.ecolab.com/corporate-responsibility/environment/water-stewardship . The site shares information on AWS, with key stakeholders such as the Water Council, Evonik, ChampX and the parish. The site established communication with the local newspaper. Site provided evidence of communications with key stakeholders.	
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>	
4.4.1	<i>The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i>	 Yes
Comment	The Site WSP is a living document that they continue to amend as they complete projects, engage in new projects and set new goals and evaluate feasibility of existing projects as well as engage with their stakeholders and learn about their best practices and initiatives.	

5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts		
5.1	<i>Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.</i>	
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i>	 No
Comment	The site discloses a document entitled Water Governance (Case Study); however, does not include the position of those responsible for enforcing laws and regulations related to water. Furthermore, the document is not publicly available. <p style="text-align: right;">Finding No: TNR-002493</p>	
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>	
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i>	 in progress
Comment	The Site has not present exhibits of the communication with relevant stakeholders of their WSP, including how the water stewardship plan contributes to AWS Standard outcomes. The site has a public document available at the website page called Case Study The stakeholders interviewed did not have information about the WSP contribution to AWS Standard outcomes. Communication should be of a level of detail, language and format most relevant to each relevant stakeholder group. <p style="text-align: right;">Finding No: TNR-001757</p>	
5.3	<i>Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.</i>	
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i>	 Yes
Comment	The Site disclosed annually reports at his website (2018, 2019, 2020, 2021): https://www.responsibilityreports.com/Company/ecolab-inc - ECOLAB 2021 corporate Report - Water is in the page 33 up to page 40	
5.4	<i>Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.</i>	
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Yes
Comment	The Site has disclosed it shared water-related challenges and efforts made to address these challenges (case study) and efforts made to address these challenges.	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes

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Comment To engage with stakeholders, Ecolab was an active participant company in the Louisiana Water Synergy Project (LWSP), participates bimonthly in the Community Action Panel (CAP), is part of the Local Mutual Aid and St. John Parish Emergency Operations Center (EOC) and cooperates with the Household Hazardous Materials Collection Day. See indicator 1.2.1 Moreover, the Ecolab Foundation supports the Loch Leven project in partnership with The Nature Conservancy (TNC) to restore and enhance 10,000 wetland acres and provide 12.1 billion gallons of flood storage capacity to local communities. In addition to local water stewardship efforts, Ecolab's global giving program, Solutions for Life, enhances the company's mission to conserve and protect fresh water through partnership with two global non-governmental organizations (NGOs): TNC and Project WET Foundation.

5.5 *Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*

5.5.1 *Any site water-related compliance violations and associated corrections shall be disclosed.*



Yes

Comment The site indicates that it discloses violations related to the compliance of the site's water regulations and the corresponding corrections. To its main stakeholders. The site's complete incident history can be requested and is also freely available on the EPA website. The site violated the water regulations 4 times between 2019 and June 2022, however no formal action has been taken against them. When asked about this, the auditee replied that the discharges were contained within their limits with the gates installed to control the discharges. This effluent is treated at the WWTP before being discharged into the Mississippi River. The water discharge permit obliges the Site to report any discharge even if it remains within the limits.

<https://echo.epa.gov/detailed-facility-report?fid=110007015871&sys=ICP>

5.5.2 *Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*



Yes

Comment The site presented evidence of corrective actions presented in indicator 4.2.1. No necessary corrective actions need to be disclosed taken by the site to prevent future occurrences.

5.5.3 *Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*



Yes

Comment The site will promptly notify the relevant government agencies and disclose any water-related violations that may pose a significant risk and threat to human health or ecosystems. To date, no water-related violation has been recorded that could pose a significant risk and threat to human or ecosystem health.

Photographic Evidence from Audit



Yes