

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000728

SITE DETAILS

Site: **Ecolab Carson City Plant**
Address: 2111 E Dominguez St., 90810, Carson City, California, UNITED STATES
Contact Person: Laura Kowalski
AWS Reference Number: AWS-000125
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2024-Jan-25
Validity of certificate: 2027-Jan-25

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Re-Certification Audit
Audit Start Date: 2023-Oct-25
Lead Auditor: Kimberly Worsham
Audit team participants:
Kimberly Worsham, Lead Auditor
Site Participants:
Charles Plunkett, Corporate Sustainability
Margaret Delany, Corporate Sustainability
Chris Puza, Factory Director
Anika Wahid, Corporate Sustainability

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ADDITIONAL INFO

Summary of Audit Findings: A total of 24 findings were raised during the certification audit, 16 minor non-conformities and 8 observations.

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 30 days of receipt of the audit report by 10 February 2024.

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

The audit team recommends re-certification of Ecolab Carson City Plant at Core level pending approval of the corrective action plans.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully submitted the corrective action plans addressing all findings. Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of Ecolab Carson City Plant against the AWS International Water Stewardship Standard Version 2.

The Ecolab/Nalco Water Carson plant is a manufacturing facility producing water treatment chemical blends, polymers, oil blends, antimony, and paper additives. The geographic scope of the site is limited to the property boundary of the facility. The facility is in an urban industrial setting. Water for the facility comes from the municipal water districts, which is sourced from Northern California, Colorado River, and local groundwater.

The Carson plant is situated on 10 acres. The facility is within the California Water Service, where all potable water supply is imported from the Metropolitan Water District of Southern California (MWDSC), which water is sourced from the Colorado & the State Water Project. Water is sourced from the Colorado River, Sacramento-San Joaquin Delta. Additional water sources include local ground water and recycled water. It is in the San Gabriel Subbasin (HUC-8, 18070106). The Carson plant receives approximately 46 m³ per day of potable water from the West Basin Water District.

Water scarcity, water infrastructure and risk of earthquakes and flooding damages have been identified as the primary water shared water challenges in the catchment. Water scarcity is attributed to the previous multi-year California drought and remains a primary catchment concern. The site has been addressing the challenges through multiple actions including internal efficiency initiatives (washout studies) and catchment actions through California Water Action Collaborative (CWAC).

The audit was conducted onsite on 25-27 October, 2023. The onsite site visit included the assessment of its incoming and outgoing water, chemical stores and production area, wastewater treatment, boilers, cooling tower, and WASH facilities in each building. The site had no identified IWRAs onsite.

The following external stakeholders were interviewed during the audit: GSI Environmental, The Pacific Institute, and WSP Environmental.

FINDINGS

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NUMBER OF FINDINGS PER LEVEL

Observation	8
Minor	16

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FINDING DETAILS

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Audit Number: AO-000728

Finding No: TNR-006690
Checklist Item No: 1.2.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-23
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: -It was unclear whether the water-related challenges changed the previous year.

-The stakeholder interviews indicated that the stakeholders identified were not relevant to the site or catchment. Stakeholders representatives of the site's ultimate water source and ultimate receiving water body or bodies have not been identified.

-The description of some water challenges is very general, for example: water quality, but what is the challenge with water quality? Is it about pH, Total Dissolved Solids, coliforms, etc? A more detailed description of each water challenge could inform the site of more opportunities to collaborate.

-Evidence of stakeholder consultation on water-related interests and challenges was unclear. The site should provide supporting evidence of activities shown in the outreach log, for example email, meetings, minutes.

-Since the last audit, Carson identified two new vulnerable stakeholder groups in October 2023: Boys and Girls Club and the Special Service for Groups. Even though the site had identified them, the site had not communicated or reached them out. The site could make an effort to communicate with these stakeholders to strengthen compliance, this could inform the site of more opportunities for collective action in the catchment.

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- Corrective action:
1. Add column to 2023 stakeholder log denoting water related challenges and change from previous year
 2. Site to review stakeholder log and make changes to level of influence and interests.
 3. Add more specific details to shared water challenges in the 1.6/1.7 Risk Assessment
 4. See Root Cause Analysis section
 5. The site will communicate with the Boys and Girls Club and the Special Service for Groups for opportunities to collaborate.

Finding No: TNR-006689
Checklist Item No: 1.2.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-23
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 stakeholder interviews indicated that stakeholders may not have been identified for the appropriate level of influence, especially considering the site's ultimate water source and ultimate receiving water body for wastewater.
Corrective action: Site to review stakeholder log and make changes to level of influence and interests.

Finding No: TNR-007173
Checklist Item No: 1.3.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-23
Checklist item: Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings: The site did not include losses from condensate/evaporation in the site water balance.
Corrective action: Consult with GSI Environmental Engineering group the feasibility of quantifying the losses from condensate/evaporation. The site shall also add these losses to their water balance map

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Audit Number: AO-000728

Finding No:	TNR-008502
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-23
Checklist item:	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.
Findings:	The site had not included in its water balance quantification of its losses from condensate/evaporation. The site should provide at least an estimate of these.
Corrective action:	Consult with GSI Environmental Engineering group the feasibility of quantifying the losses from condensate/evaporation. If possible, the site will then provide at least an estimate of these losses.

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Finding No: TNR-006695
Checklist Item No: 1.3.4
Status: In Progress - CA plan approved
Finding level: Observation
Due date: 2024-Oct-23
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: While there is a water-related challenge that would threaten good water quality status for people or the environment, the site did not provide quantifications of annual and, where applicable, seasonal variances.
Corrective action: Documentation of water samples tracked for proof of testing and to show water quality. Water testing reports to be provided to WSAS as needed.

The blue and green coloration is just a way to visually recognize separation of sampling events. The data represents the most recent testing data available, stormwater was not tested for Zinc prior to 2022.

TR Comment 24/January/2024: The site provided a file showing zinc levels for different months from December 2022 to May 2023. It is recommended that the information will be plotted to understand the variation of levels between months. This finding will be downgraded to an observation but it will be evaluated again during the next surveillance audit this year.

Evidence of implementation: TR Comment 24/January/2024: The site provided a file showing zinc levels for different months from December 2022 to May 2023. It is recommended that the information will be plotted to understand the variation of levels between months. This finding will be downgraded to an observation but it will be evaluated again during the next surveillance audit this year.

Finding No: TNR-007202
Checklist Item No: 1.3.6
Status: Open
Finding level: Observation
Due date: 2024-Oct-23
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 could consider the tree-lined area on site as an on-site IWRA.

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Audit Number: AO-000728

Finding No: TNR-006900
Checklist Item No: 1.5.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-23
Checklist item: The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings: The annual/seasonal variance wasn't identified - partly due to how the collected data was provided. Additionally, it was difficult to understand the catchment's water balance in its provided format. Lastly, the site did not include information about California's 2022-2023 4-month rain event that could have affected the water balance - particularly the water flow.
Corrective action: Data provided and used for annual averages was most detailed information available. Contact the local water district and if available, gather more detailed water balance data. If annual water balance data is available, provide WSAS with annual and, where appropriate, seasonal variances. Additionally communicate with water district to determine extreme rain effects on catchment

Finding No: TNR-006908
Checklist Item No: 1.5.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-23
Checklist item: 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.
Findings: Annual and seasonal variances in the catchment have not been identified.
Corrective action: Contact the local water district and if available, gather more detailed water quality data. If annual water quality data is available, provide WSAS with annual and, where appropriate, seasonal variances.

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Finding No: TNR-007204
Checklist Item No: 1.5.6
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-23
Checklist item: Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings: It was unclear from the evidence provided whether the site had identified existing water-related infrastructure in the catchment, including condition and potential exposure to extreme events. Additionally, the site identified in 1.6.2 the LA Flood Control District West Coast Basin Barrier (Manhattan Beach Wells) Construction Project (2022), which was not included in the planned water-related infrastructure.
Corrective action: Contact the West Basin Municipal Water District and attempt to obtain information on existing water-related infrastructure throughout the catchment. Given the scope of the catchment, a best effort will be given to the explicit list. Additionally, add the LA Flood Control District West Coast Basin Barrier (Manhattan Beach Wells) Construction Project to the water infrastructure list.

Finding No: TNR-006909
Checklist Item No: 1.6.2
Status: Open
Finding level: Observation
Due date: 2024-Oct-23
Checklist item: Initiatives to address shared water challenges shall be identified.
Findings: The site could consolidate the identified initiatives into one place to ensure ease of use and management.

Finding No: TNR-007207
Checklist Item No: 1.8.2
Status: Open
Finding level: Observation
Due date: 2024-Oct-23
Checklist item: Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings: The site identified a list of best practices to improve water balance on site. Water balance best practices for the catchment are not clearly identified.

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Finding No: TNR-007206
Checklist Item No: 1.8.3
Status: Open
Finding level: Observation
Due date: 2024-Oct-23
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings: The site identified a list of Water quality best practices on site. Clear best practices for the catchment were not identified.

Finding No: TNR-006910
Checklist Item No: 1.8.4
Status: Closed
Finding level: Minor
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings: Dikes were included but are technically required by the government. The site indicated it would review if this was still a best practice based on going above and beyond somewhere else.
Corrective action: <https://www.osha.gov/enforcement/directives/std-01-05-002>

Removing the API Standard as a functional link could not be located. The OSHA document and <https://www.pactecinc.com/guide-to-spill-containment/> both list that a site does not necessarily have to use dikes for spill containments.

TR comment, 24/January/2024: the site mentioned: This finding is closed.

Finding No: TNR-007208
Checklist Item No: 2.3.2
Status: Open
Finding level: Observation
Due date: 2024-Oct-23
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 timeframes and budget allocations were not clear for some sub-targets.

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Finding No:	TNR-006720
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-23
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 provided a risk assessment with some mitigation information but it was unclear whether the public agencies were coordinated to develop these plans.
Corrective action:	Site will contact relevant public sector and infrastructure agencies to develop and collaborate on a plan to mitigate water risks. Site to provide evidence of these interactions
Finding No:	TNR-007209
Checklist Item No:	3.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-23
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	The site is also supporting some corporate actions - relevance for the site was not always clear.
Corrective action:	Site will specify what they are doing specifically to help with corporate initiatives such as corporate projects regarding good catchment governance. Site will also specify how the corporate initiatives directly impact/influence their catchment.
Finding No:	TNR-008503
Checklist Item No:	3.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-23
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	The site should make an effort to engage with the service providers (in its catchment) to define whether an indirect water use target can be established.
Corrective action:	Request and communicate with service providers to determine if they have an indirect water usage target. If they do not have an indirect water usage target, site can encourage them to create one as applicable.

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Finding No: TNR-008504
Checklist Item No: 3.7.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-23
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: Evidence of engagement with service providers in the catchment identified in 1.4.2. beyond requesting data related to indirect water use, was not provided.
Corrective action: Refer to finding for indicator 3.7.1. Site can ask service providers about having a water use target. If they do not, site can encourage them to create one as applicable.

Finding No: TNR-007211
Checklist Item No: 3.9.2
Status: Open
Finding level: Observation
Due date: 2024-Oct-23
Checklist item: Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings: The first and third implementations identified look like the same best practice.

Finding No: TNR-006738
Checklist Item No: 3.9.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-23
Checklist item: Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings: Evidence of implementation for actions completed under the SWPPP has not been provided.
Corrective action: Site can provide pictures of socks and receipts for sweeper. The site can also take pictures of tarp on trash container going forward.

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Finding No: TNR-006736
Checklist Item No: 3.9.5
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-23
Checklist item: Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings: Evidence of implementation of the following best practice has not been provided:
-It is identified that drinking water is available at increased levels during the summer months
Corrective action: Site can provide evidence through receipts that water and Gatorade are purchased for team.

Finding No: TNR-007214
Checklist Item No: 4.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-23
Checklist item: Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings: It was not identified that the site consulted with stakeholders on its water stewardship performance other than the stormwater efforts.
Corrective action: Site will maintain more frequent communication with stakeholders regarding water stewardship performance and ask for feedback on how to improve efforts.

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Finding No: TNR-007212
Checklist Item No: 5.2.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-23
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 site indicated that its Water Stewardship Strategy had additional details about the WSP and its contributions to the AWS outcomes. The strategy had been shared with BEF and internal governance structures in the previous year, though that appeared to be around the COI performance given the evidence provided. The site shared that it had not shared with other stakeholders because of a struggle to receive response communications with the stakeholders identified. Additionally, the stakeholder interviewed revealed that stakeholders were not familiar with the site's water stewardship strategy or plan before the audit.
Corrective action: Site will maintain more frequent communication with relevant stakeholders to communicate WSP via email and calls and possible collaborative projects within the catchment. Additionally, site will meet with local water authorities and share water stewardship performance.

Finding No: TNR-008509
Checklist Item No: 5.3.1
Status: Open
Finding level: Observation
Due date: 2024-Oct-23
Checklist item: A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings: The site could communicate a summary of annual performance for all five targets.

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Report Details

Report	Value
Report prepared by	Kimberly Worsham
Report approved by	Monserath Zamora
Report approved on (Date)	10 January 2024

Surveillance

Proposed date for next audit
2024-Oct-23

Stakeholder Announcements

Date of publication	Location
08/04/2023	https://ecolab.widen.net/s/pfvgbvbwbr/stakeholder-announcement-ecolab-carson-city-plant-ca-usa-aws-000125?_gl=1*165uk2e*_ga*MTUyMjk4MjMzMC4xNjk2NjMyNjI2*_ga_E4F9EJHFVV*MTY5NzQ3Nzk0My4yLjAuMTY5NzQ3Nzk0My42MC4wLjA
24/07/2023	https://a4ws.org/wp-content/uploads/2023/07/AWS-000125-Stakeholder-Announcement-Ecolab-Carson-City-Plant-CA-USA.pdf https://watersas.org/wp-content/uploads/2023/07/Stakeholder-Announcement-Ecolab-Carson-City-Plant-CA-USA-AWS-000125.pdf
Comment	The stakeholder announcement was published on the WSAS and AWS websites. The site published the announcements for public comment on https://www.ecolab.com/corporate-responsibility/environment/water-stewardship .
Comment	During the audit, the auditor had 3 remote stakeholder interviews over Zoom and on the phone.

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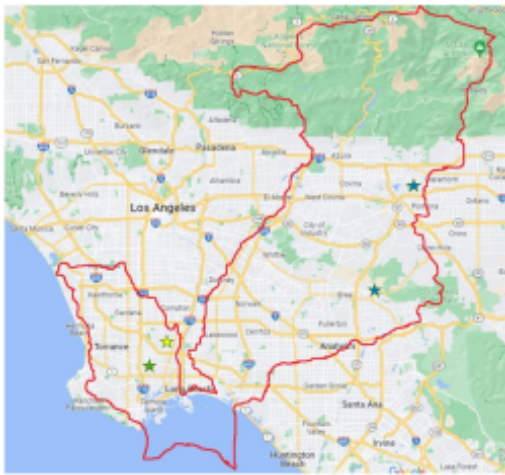
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Catchment Information

Catchment Information

The Ecolab Carson site is on 10 acres within the California Water Service, where all potable water supply is imported from the Metropolitan Water District of Southern California (MWDSC), where water is sourced from the Colorado & the State Water Project. Water is sourced from the Colorado River, Sacramento-San Joaquin Delta. Additional water sources include local groundwater and recycled water. It is in the San Gabriel Subbasin (HUC-8, 18070106). The Carson plant receives approximately 46 m3 daily potable water from the West Basin Water District.



EOI Carson Catchment.jpg

Client Description and Site Details

Client/Site Background

The Ecolab Carson City Plant is a manufacturing facility producing water treatment chemical blends, polymers, oil blends, antimony, and paper additives. The geographic scope of the site is limited to the property boundary of the facility. The facility is in an urban industrial setting. Water for the facility comes from the municipal water districts, which are sourced from Northern California, Colorado River, and local groundwater.



Site Map.png

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Summary of Shared Water Challenges

Summary of Shared Water Challenges

Water scarcity, water infrastructure, and risk of earthquakes and flooding damages have been identified as the primary shared water challenges in the catchment. Water scarcity is attributed to the previous multi-year California drought and remains a primary catchment concern, despite unseasonable rain in the previous 12 months.

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 the San Gabriel Sub-basin (HUC-8, 18070106).

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 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 scope of the proposed certification respects the required homogeneity.

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1 STEP 1: GATHER AND UNDERSTAND	
1.1	<i>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.</i>
1.1.1	<p><i>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</i></p> <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.
Comment	<p>The site said, "The catchment map was updated in 2023. Carson revisited and updated the catchment map as the water sources were not encompassed to include sub-basins and treatment plants."</p> <p>The physical scope of the site was mapped, considering the regulatory landscape and zone of stakeholder interests, including:</p> <ul style="list-style-type: none"> -Site boundaries. -Water-related infrastructure, including piping network. -Water sources providing water to the site and incoming water. -Water service provider and its ultimate water source. -Discharge points (the site treats its own wastewater) and ultimate receiving water bodies. -Catchment that the site affects and is reliant upon for water.
1.2	<i>Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.</i>
1.2.1	<p><i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i></p> <ul style="list-style-type: none"> - 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.

Yes

in progress

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Comment The site provided a description of the stakeholder identification process, "The process for determining stakeholders is to consider all parties that are impacted by our water use or that can impact us. This includes policymakers, as well as organizations upstream of our value chain and downstream of us. Ecolab is heavily engaged with stakeholders in the catchment through 2 primary organizations: The California Water Action Collaborative (CWAC) and the Water Resilience Coalition (WRC). Identifying stakeholders through those two organizations along with the Water Action Hub is our primary method of stakeholder ID. The stakeholders are updated regularly."

The site provided the Stakeholder and Outreach spreadsheet, which noted the types of stakeholders, organizations, stakeholder consultation on water-related interests and challenges, and degree of engagement. The site indicated that several stakeholders identified had shown low willingness to participate. The spreadsheet also indicated any changes to the stakeholders since the previous year.

In the Stakeholders and Outreach spreadsheet, the site indicated that since the previous audit, it added the following stakeholders: West Basin Municipal Water District, LA County Department of Public Works, GSI Environmental Inc., Merced Avenue Greenway, Council for Watershed Health, Emerald Necklace, DOW Chemical Company, Environmental Protection Agency, Sheriff's Department, Fire Department.

Since the last audit, Carson identified two new vulnerable stakeholder groups in October 2023: Boys and Girls Club and the Special Service for Groups. Even though the site had identified them, the site had not communicated or reached them out. The site could make an effort to communicate with these stakeholders to strengthen compliance, this could inform the site of more opportunities for collective action in the catchment.

It was unclear whether the water-related challenges changed the previous year. Additionally, the stakeholder interviews indicated that the stakeholders identified were not relevant to the site or catchment.

The description of some water challenges is very general, for example: water quality, but what is the challenge with water quality? Is it about pH, Total Dissolved Solids, coliforms, etc? A more detailed description of each water challenge could inform the site of more opportunities to collaborate.

Evidence of stakeholder consultation on water-related interests and challenges was not clear. The site should provide supporting evidence of this.

Finding No: TNR-006690

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

Comment The site said, "Low to high influence is denoted on the Stakeholder & Outreach log, and this was assigned by identifying economic & physical size. The site, corporate and the government relations team has met to evaluate the level of influence of the stakeholders. Their water use in the catchment determines the level, their level of interaction with the community and the level of regulatory influence on the operation. This is a critical element, as this region is open to private organizations taking a proactive role in policy development, water governance and actions outside its own boundaries. Using this influence rating, stakeholders were assigned to specific quadrants in the below Guidance matrix."

The site had identified the site's level of influence based on a scale with "raise awareness", "monitor", "collective engagement", and "key player for driving change". The site indicated that there was a workshop process for identifying stakeholder influence process and that the stakeholders did not change quadrants on the scale in the last 12 months - the only changes were the additions of new stakeholders.

However, the stakeholder interviews indicated that stakeholders may not have been identified for the appropriate level of influence.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000728

Finding No: TNR-006689

- 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 The site shared the following documents for this indicator: Contingency Business Plan (24Jul23); Emergency Procedure Manual (30Aug21); Stormwater Pollution Prevention Plan (20Sep23); and Spill Prevention, Control and Countermeasure Plan / SPCC (March 2019)

The stormwater pollution prevention plan was updated to include the best practices in 2023 and the SPCC was being updated at the time of the audit; the contingency business plan was updated with the new contact and staff information.

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

Comment The site wrote, "The water balance represents the annual city water input and output for the year 2022. The installed meters monitor the water usage, and the data is logged monthly. The water balance map is updated annually with the water balance in August 2023."

The site showed the following mapped: inflows, storage (via DI tank, newly added), and outflows. There were minimal changes from 2022 to 2023. However, the site did not include losses from condensate/evaporation on the balance.

Finding No: TNR-007173

- 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.* ➤
in progress

Comment The site provided seasonal water usage report in Excel. It includes information to understand monthly variances. The variances and reasons for them were discussed during the audit.

The site also provided a spreadsheet with seasonal and monthly effluent water, production water use, and the production-to-water ratio from 2015 to 2023. These were also analysed and discussed.

Finding No: TNR-008502

- 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.* ➤
in progress

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Comment The site wrote, "Carson does not test its incoming municipal water. The water is tested when it is used in a mixing process to ensure that there are no contaminants. The wastewater is tested for pH and sulfides prior to release. The site conducts random inspections for similar parameters along with weekly testing every Wednesday and Thursday. Quarterly testing is also conducted through ATL."

The site provided West Basic Municipal Water Quality reports from 2022 and 2023, saying that, "Carson recognizes that there were variances between the two years. Reference the quality reports for further information." The site also shared its wastewater treatment log from August 2023, which shows chemical dosing for meeting its wastewater quality requirements.

The site also provided stormwater testing from January and March 2023. The site also noted that, as of July 2022, it had entered Level 1 exceedance for high zinc level at the stormwater outfall.

While there is a water-related challenge that would threaten good water quality status for people or the environment, the site did not provide quantifications of annual and, where applicable, seasonal variances.

Finding No: TNR-006695

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

Comment The site wrote, "Potential sources of pollution would be the raw materials or products used on site. There are primary containment areas and sumps." The site provided a comprehensive list of raw materials on site, a map of the site, and a register of locations for the chemicals in the Hazardous Materials Inventory Statement. The site has not changed chemical storage locations in the past 12 months.

On the site tour, the site shared that everything within the site's boundaries was seen as a large chemical containment, and the site had a sloped feature that contained all potential pollution before outputting into receiving water bodies. The site also showed that stormwater drains were closed in its dispensing and production area until the site had tested them for release.

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

Comment The site wrote, "The picnic table area outside the breakroom was assessed but not considered an IWRA. The team uses this area primarily as a smoking area and has communicated they would prefer it to be covered and the tree removed. The landscaping in this area is not watered. There are no on-site IWRAs. This was confirmed through research conducted with Indicator 1.5.5."

While the site indicated no IWRAs, during the tour, the auditor noted a tree-lined that the site manager indicated was a nice place for pollinators and birds, and that a few colleagues enjoyed walking in the area. While the site indicated it was not watered, it was an area that would require water from the environment and could be considered an IWRA.

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.* ✔
Yes

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Comment The site provided 2022 costs and revenue for its water-related systems, including: total cost of water withdrawal, water-related environmental violations, AWS certification, and CRIT. It also quantified other costs, such as water-related equipment operational expenses and payroll.

The site provided quantified details of water-related costs. It also indicated that the revenue for the site had decreased annually since the previous audit due to a particular declining industry.

The site updated the WSP to identify the description and quantification of the social, cultural, environmental (though somewhat indicated by the violation costs), or economic water-related value generated by the site.

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



Yes

Comment The site wrote: "The site has 2 women's restrooms, 5 men's restrooms, and 2 Porta Johns. Additionally, there are 3 water fountains. Water bottles and electrolyte drinks are carried on site depending on the heat index and time of year. According to OSHA we are 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. All our toilets have soap, running water at both temperatures and drying units or hand towels. We also have hand sanitizer dispensers throughout the facility. For drinking water, we have kitchenettes including running potable water for employees to prepare food and wash utensils. The restrooms are cleaned by Pegasus Janitorial Services daily".

"For drinking water, all potable water is from the Municipal Water supply and is accessible to our employees. We have potable water flowing, as well as water jugs where they are not near a water fountain. Based on the above and our employee to bathroom ratio, we are well within compliance with the national regulations. Since the last audit, the Carson team has received Ecolab Science Certification; no changes have been made to WASH infrastructure."

The site also shared a completed WBCSD WASH survey score from July 2023. The site indicated no changes to the WASH systems since the previous audit.

The site indicated it had no showers for female staff because it had none, but that there was an area that could be retrofitted to accommodate that need should they ever hire a female.

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 site said, "Carson does utilize bottled water for visitors and in the self-serve cafeteria but this usage is very small in comparison to overall plant water usage as most people use the reusable water stations. Since the last audit, our raw material suppliers noted above have not changed. Evidence of our raw material purchases by supplier over this time period has been attached as evidence."

The site provided quantities of raw materials accounting for over 5% of raw material by weight purchased by the Carson plant. None of these were within the 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.*



Yes

Comment The site identified three outsourced services within the catchment. The site contacted each vendor on their estimated annual water usage related to Ecolab services. The site indicated that the services had not changed since the previous audit.

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- 1.5** *Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*
- 1.5.1** *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.* ✔
Yes

Comment The site wrote:

-LA IRWM (Integrated Regional Water Management) helps facilitate regional cooperation of water issues: lawaterplan.org (Updated 2017).
 -Metropolitan Water District of Southern California is a regional wholesaler of water for LA County: Integrated Water Resources Plan released in 2020 (<https://www.mwdh2o.com/how-we-plan/integrated-resource-plan/>).
 -LA County Public Works is responsible for the infrastructure in LA County: LADPW The Integrated Regional Water Management Plan (IRWMP) was released in April 2019 (<https://dpw.lacounty.gov/wmd/scr/About.aspx>) - from April 2019.
 -California Department of Water Resources manages all of CA's water resources, systems, and infrastructure, including the State Water Project
 West Basin Municipal Water District is the plant's water utility company. West Basin's 2020 Urban Water Management Plan (UWMP) provides a detailed summary of present and future water supplies and demands within the district's service area and assesses its ongoing water resource needs. This plan can be found here: <https://www.westbasin.org/2020-urban-water-management-plan/>.
 -Most of the stakeholder input to the IRWMP is conducted at the Subregional level which is then reported to the LC through the Subregional representatives during a standing LC meeting agenda item called "Subregional Reports." Since Subregional SC meetings are held locally, they increase the ability and time allowed for individual stakeholder participation. All GLAC stakeholders and the public are also invited to attend the monthly LC meetings and can speak during the public comment period.
 -Ecolab is a founding member of the California Water Action collaborative (CWAC). We attend monthly meetings, bi-annual in-person meetings, and participate in the South Coast regional working group. The group aims to drive collective action around water issues in California, and right now we are in the process of developing a portfolio approach to driving water stewardship in Southern California. With our NGO partners, corporate partners fund water projects that make a difference on the ground and help drive change in the landscape of California's water".
- 1.5.2** *Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.* ✔
Yes

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Comment The site has identified the following water-related legal and regulatory requirements:

- Statutory Water Rights Laws - effective January 1, 2023.
- California Water Code (particularly Division 2) and other California Code sections relevant to water rights.
- Porter-Cologne Water Quality Control Act - effective January 1, 2023.
- Excerpts of California Water Code, Division 7 (Water Quality).
- California Safe Drinking Water Laws - effective July 22, 2021.
- Carson compliance with EPA standards: Detailed Facility Report | ECHO | US EPA: https://echo.epa.gov/detailed-facility-report?fid=110000476137&ej_type=sup&ej_compare=US.
- Wastewater permits: "Industrial Waste Water Permit Aug2021-Aug2026.pdf.
- Carson also adheres to ISO 14001 standards.
- In response to the 2014 drought: http://www.waterboards.ca.gov/press_room/press_releases/2014/pr071514.pdf.
- Information on "paper water" or California's legal water rights practices: <https://www.c-win.org/paper-water>.
- West Basin Municipal Water District is committed to environmental and regulatory compliance for all its water operations. Details around the water permits and policies for this water district can be found at the following link: <https://www.westbasin.org/water-supplies/recycled-water/environmental-compliance-and-stewardship/>.
- 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.

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

Comment The site said: "The catchment was redrawn in 2023 to encompass a larger area to include sub-basins and wastewater treatment plants. We do not have a comparison from previous years as the catchment was updated. Ecolab received summarized and annual data; all data was pulled from 2020-2022, averaged, and summarized to be consistent as average data was provided for some sources."

The site provided separate quantified information about the catchment's water balance - including surface water, groundwater, imported water - the flows, incoming water from RWD, incoming water from West Basin District, imported water, groundwater pumping, precipitation, water consumed, and outgoing water.

The site shared annual variances for the Santa Fe Dam, Whittier Narrows Dam, and the catchment's annual water production and consumption. The site also provided seasonal variances for precipitation in LA County, which showed the average precipitation was highest from December through February. The details of the site's quantification of the catchment's water balance were detailed in the Appendix of its response document.

The site provided quantified information for 2020-2022 inflow rates for San Gabriel River (upstream), imported/purchased water, rainfall, and water consumed. The site also provided outflow rates for the San Gabriel River (downstream), and effluent discharge to the wastewater treatment plants (including the average amount each plant in the catchment recycled water annually). The annual/seasonal variance wasn't identified, however - partly due to how the collected data was provided. Additionally, it was difficult to understand the catchment's water balance in its provided format. Lastly, the site did not include information about California's 2022-2023 4-month rain event that could have affected the water balance - particularly the water flow.

Finding No: TNR-006900

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Audit Number: AO-000728

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.* 🚩 in progress

Comment The site provided water quality information and documentation about the Upper LA Basin Deep Aquifer Study; Groundwater Quality San Gabriel Groundwater Basins; and 2022 on San Gabriel River the USGS Fact Sheet 2011-3139: Groundwater Quality in the San Fernando–San Gabriel Groundwater Basins, California (<https://pubs.usgs.gov/fs/2011/3139/>). The site also identified the water utility water quality data from 2022 and 2023 (<https://www.watermaster.org/reports>). The site said, "Since the catchment was redrawn in 2023, Carson could not identify seasonal variances."

Finding No: TNR-006908

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 Due to redrawing the catchment in 2023, the following IWRA's have been recently identified and their status and susceptibility to extreme events discussed:

1. Chino Hills State Park
2. Angeles National Park and Fores
3. San Gabriel Reservoir and River
4. Morris Reservoir
5. Cogswell Reservoir
6. Santa Fe Reservoir
7. Puddingstone Reservoir
8. Whittier Narrows Natural Area
9. San Dimas Experimental Forest
10. Los Angeles River
11. Long Beach Coast
12. Colorado River

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

Comment The site wrote:

In September 2023, the EPA awarded an \$8 million grant to Los Angeles County for research into boosting water supplies and improving water security. The Los Angeles County Department of Public Works plans to research the use and risks of enhanced aquifer recharge (EAR) to improve groundwater availability and quality (<https://www.epa.gov/newsreleases/epa-awards-grant-los-angeles-county-research-boosting-water-supplies-and-improving>).

The existing water infrastructure is aging due to poor water stewardship by government agencies, as identified in water scarcity/loss. Due to this, there is vulnerability to earthquakes and floods and can potentially risk water treatment plants going offline.

It was unclear from the evidence provided whether the site had identified existing water-related infrastructure in the catchment, including condition and potential exposure to extreme events. Additionally, the site identified in 1.6.2 the LA Flood Control District West Coast Basin Barrier (Manhattan Beach Wells) Construction Project (2022), which was not included in the planned water-related infrastructure.

Finding No: TNR-007204

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

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Audit Number: AO-000728

Comment The site provided information and discussed issues on access to WASH in poor communities. According to the International Journal for Equity in Health, “reduced access to overnight sanitation resulted in 19% of the sample population using buckets inside their tents and 28% openly defecating in public spaces. Bottled water and public taps are the primary drinking water source, but 6% of the sample reported obtaining water from fire hydrants, and 50% of the population stores water for night use. Unhoused people also had limited access to water and soap for hand hygiene throughout the day, with 17% of the sample relying on hand sanitizer to clean their hands. Shower and laundry access were among the most limited services available, and reduced people’s ability to maintain body hygiene practices and limited employment opportunities.” (Evidence: International Journal for Equity in Health).

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.* ✔
Yes

Comment The site shared that the risk assessment provided was updated in 2023 as the catchment was revised to include a more accurate depiction.

The site also shared the process for assessing risk, using a table showing a scale of 1-5, with 5 being the most "game changing impact"/probable: The risk assessment uses probability and impact to prioritize the shared risks. The assessment used the following criteria. The impact and probability are multiplied together to result in prioritization ranking. Risks are evaluated based on the catchment and also the local site.

The site indicated the shared water challenges included Water Scarcity/Loss, Water Quality, and Loss of Wetlands and Species. These were prioritized.

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

Comment The site shared initiatives in the risk mapping spreadsheet. Initiatives were mapped to the shared water challenges and included title, timeline, leading organization(s), comments about the project, priority, and rationale for prioritization. The initiatives since the previous audit included the State of California mandatory water reduction mandate and the South Bay Subregional Plan.

The site also shared other initiatives, including the LA Detection Infrastructure Program (2021), California Water Resistance Portfolio (2020 - to address climate change and water scarcity), West Basin Water Shortage Contingency Plan (2021), Urban Water Management Plan (2020), LA Flood Control District West Coast Basin Barrier (Manhattan Beach Wells) Construction Project (2022), Colorado River Indian Tribes (CRIT) System Conservation Project (2021-2021).

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.*






1.7.1 *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.* ✔
Yes

Comment The site shared that its water risks and challenges were the same as the catchment risks and were available in the Risk Mapping Assessment. The site also provided the impact to the site within a given timeframe, and potential costs (and business impacts) in the risk mapping assessment spreadsheet.




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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>	 Yes
Comment	<p>The site wrote: Carson is addressing and solving site level risk through the following projects: (Business opportunities and savings are stated in the WSP in the results and evidence referenced in Indicator 2.3.2. See column M in WSP to see changes since the last audit.</p> <p>The site provided prioritization in column W in the WSP, and incorporated the potential savings in column P of the WSP.</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	The site provided a list of best practices for External and Internal Water Governance.	
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>	 Obs.
Comment	The site identified a list of best practices to improve water balance on site. Water balance best practices for the catchment are not clearly identified.	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Obs.
Comment	The site identified a list of Water quality best practices on site. Clear best practices for the catchment were not identified.	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Yes
Comment	The site identified a list of best practices for offsite IWRA's.	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes
Comment	The site identified a list of best WASH practices.	

Audit Number: AO-000728

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>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.</i>	
2.1.1	<p><i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i></p> <ul style="list-style-type: none"> - <i>That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</i> - <i>That the site implementation will be aligned to and in support of existing catchment sustainability plans</i> - <i>That the site's stakeholders will be engaged in an open and transparent way</i> - <i>That the site will allocate resources to implement the Standard.</i> 	 Yes
Comment	The site provided a signed document by the plant manager (signed September 2023) posted in the site's main lobby, which is open to the public. This was verified by the site auditor while on-site.	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<p><i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i></p> <ul style="list-style-type: none"> - <i>Identification of responsible persons/positions within facility organizational structure</i> - <i>Process for submissions to regulatory agencies.</i> 	 Yes
Comment	<p>The site provided a RACI matrix and submission processes. The site also provided processes from its SOP, which includes submissions to the regulatory agencies. The site indicated no changes to reporting or responsible parties since the last audit.</p> <p>The site indicated the stormwater Consent Decree compliance obligations under the SWPPP Form, under the Storm Water SMART Reporting. The site also shared, "Ecolab utilizes Velocity to report any safety and process issues including compliance nonconformances and observations. A report is filed in this system with a root cause analysis and corrective actions documented. Examples of Velocity reports can be found in 4.2.1."</p> <p>The site went above its "numerical allowed limits" in the permit, but the permit had a grace period of a year (with the possibility of extension) for corrective action. However, citizens complained about testing done in 2022/23 because certain levels were above the limits on public records while the site was working on corrective actions. As a result, the site had to follow a Consent Decree that included implementing best management practices for improving water quality.</p>	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>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.</i>	 Yes
Comment	The site provided a Water Stewardship Strategy from 2022 (updated August 2023) that included goals for good water stewardship, site mission (Slide 2), and vision (slide 3). The site indicated that the strategy had mostly remained unchanged in recent years.	

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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.

🔍
Obs.

Comment The site provided a Water Stewardship Plan (WSP). That included high-level targets with the following:

- How it will be measured and monitored.
- Actions to achieve and maintain (or exceed) it.
- Planned timeframes to achieve it (though many indicated annual and quarterly/ongoing timeframes instead of end-dates for many).
- Financial budgets allocated for actions (though several had "confidential" or vaguely indicated it being part of departmental budgets).
- Positions of persons responsible for actions and achieving targets.
- The link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes (where available).

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.*

🚧
in progress

Comment The site provided a risk assessment with some mitigation information but it was unclear whether the public agencies were coordinated to develop these plans. It had provided evidence of reaching out to public agencies in October 2023, though the agencies had not yet responded.

Finding No: TNR-006720

Audit Number: AO-000728

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>	 in progress
Comment	<p>The site's WSP target for water governance was "Good water governance: Maintain a good, open relationship with the local water authorities and catchment stakeholders" with the following sub-targets and actions:</p> <ul style="list-style-type: none"> -Site has an emergency response plan that outlines spill response/emergency shutdown procedures to maintain relationships with the community stakeholders: the site indicated that the plant manager communicated with the LA County Sheriff's Department on the emergency response plan in August 2023 (showed the letter to the sheriff's department about the plan as evidence). -Develop a comprehensive water stewardship plan for the site (the plan is the evidence for implementation). -CWAC members (site and corporate) - funded and participate: the site indicated that it participated in monthly meetings (the site shared meeting notes from July 2023 with evidence of Ecolab participating and https://www.ecolab.com/stories/carson-california-plant-certified). -Maintaining CWAC engagement and participating in initiatives/projects in local catchment: the site indicated that it supported CWAC's and Pacific Institute's leak detection project (the site provided evidence of implementation with a link to the project report page from the Pacific Institute, from June 2022, https://pacinst.org/announcement/pacific-institute-led-water-efficiency-project-featuring-remot-e-toilet-leak-detection-in-low-income-housing-wins-los-angeles-better-buildings-challenge-award/). -Signed water stewardship commitment/pledge: the site shared that it signed the stewardship commitment in September 2023 (evidenced on site tour). -Provide chemicals to enable help customers save water by solutions: The site provided evidence of the 2022 corporate sustainability report. -Local municipalities should have an understanding of water scarcity risks and maintain a water management plan: the site indicated it reviewed the 2020 West Basin Report and reached out to the West Basin District, but had no response (the site provided the email to the West Basin District from August 2023 and the WBD 2020 Report https://www.westbasin.org/2020-urban-water-management-plan/). -RC 14001 Certification for Carson: the site indicated that it had received certification in August 2023 (the site provided the audit report from 2023 as evidence). -Local strategy and communication for site for Ecolab's goal of 40% water reduction by 2030: the site indicated that it supported the Ecolab corporate goals and used the OGSM Scorecard (the site shared the site's scorecard as evidence, updated by August 2023). -Ecolab has corporate legal representation in the state of California that stays in touch with California water legislation which site engages in when needed: the site shared that it provided information to the state about shut-offs to abide by drought legislation. 	

Finding No: TNR-007209

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Audit Number: AO-000728

- 3.1.2** *Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.* ✔
Yes

Comment: The Tongva Tribe still lives in a territory that spans the San Gabriel Mountains to the Santa Ana River and over the entire Los Angeles basin including the four southern Channel Islands (Santa Catalina, San Clemente, San Nicolas, and Santa Barbara). The Kuruvunga Springs are an important cultural waterway for them, but that exists much further North of the basin (source: Mapping Indigenous LA| SoCalGIS.org).

The catchment was recently updated since the last audit therefore, and the assessment of water rights was updated.
- 3.2** *Implement system to comply with water-related legal and regulatory requirements and respect water rights.*

 - 3.2.1** *A process to verify full legal and regulatory compliance shall be implemented.* ✔
Yes

Comment: The safety, health and environment (SHE) team handles the permits for compliance. The SHE manager would help with any new permits, if applicable; is also responsible for water testing and compliance on the wastewater permit.
 - 3.2.2** *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.* ✔
Yes
- 3.3** *Implement plan to achieve site water balance targets.*

 - 3.3.1** *Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.* ✔
Yes

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Comment The site's target for water balance is "Sustainable water balance: Achieve a 40% water reduction per ton of product by 2030 (2018 baseline)", with sub-targets:

- Site maintains a weir on plant effluent: the site indicated that the weir was calibrated annually (the site shared a certificate of calibration report from September 2023 as evidence).
- Reduce landscaping water use, sprinklers to 1 day/week, to completely off: the site shared that the system would shut off and turn on as needed, based on Ecolab's guidance from September 2022 (the site showed the communications email from September 2022 as evidence of implementation).
- Utilize 3DT on water-related infrastructure (Cooling towers, boilers): the site shared that it continued to use 3DTRASAR units on cooling towers, reducing the blowdown system (the site showed the 3DTRASAR system next to the cooling towers during the site tour as evidence of implementation - <https://www.ecolab.com/offerings/3d-trasar-technology-for-cooling-water>).
- Production scheduling planning and scheduling optimization to reduce washouts: the site said the planning time continued to communicate to the production team through the daily production schedule (the site showed the Daily Production Schedule from October 2023 as evidence of implementation, highlighting that highlighted operator initials indicated that those operators did not wash out because of similar product production as a way to optimize scheduling of chemical production).
- Reduce washdown during filling, dry floor concept: the site indicated no longer washing trenches while capturing WOW/PRW.
- A maintenance plan is available to proactively identify steam or water leaks from equipment or pipes: the site shared that the production and maintenance teams worked together to identify and repair leaks throughout the facility (the site shared an email from September 2023 about leaks that the site had addressed through 2023, with information such as action numbers, due dates for leak fixes, title of leak, persons responsible, and status of work).
- Optimize RO System efficiency - RO System in place to analyze water reject loss: the site said the plant manager reached out for a quote to replace the RO system (the site shared an email requesting the RO system in September 2023).
- Eliminate majority of landscaping water use reduction: the site shared that there was a scope of work shared from Turf Bros for eliminating grass and installing turf instead across the entire site (the site shared a scope of work with images of locations for removing grass, and a quote from October 2023).

3.3.2 *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.* ✔
Yes

Comment Water scarcity is a shared water challenge in the site's catchment.

The site wrote, "Please see slide 6 of our Water Stewardship Strategy (Indicator 2.3.1) for annual water targets. The progress made by the site is reported in monthly OGSM meetings reviewed by the plant leadership team as seen in 2.3.2 WSP "Carson OGSM Scorecard.""

The site shared that all sites under the corporate Ecolab governance share the same goal of 40% per ton of product by 2030 goal. The site also shared the annual targets that are under the national water strategy.

3.3.3 *Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.* ✔
Yes


Comment Ecolab does not participate in the re-allocation of water.

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3.4 *Implement plan to achieve site water quality targets*

3.4.1 *Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.* 
Yes

Comment The site's water quality target was "Good water quality status: Meet or exceed all WW permit requirements (quarterly), Follow GSC Environmental Best Practices" with the following sub-targets:

-Execute Best Management Practices - Controlling urban water runoff on-site level. Filter socks and proactive sweeping. Required BMP's --The site shared it was implementing best practices as part of its Consent Decree, such as filter sock changes and preventative sweeping in the parking lot, and that there was a purchase of filter socks in September 2023, as well as a revised SWPPP from September 2023 (the site provided the sock order request from September 2023 and Storm Water Pollution Prevention Plan from September 2023 as evidence of implementation).

-Maintain permit compliance and execute quarterly wastewater testing to ensure water quality. The site shared that the wastewater permit was issued for 2021 to 2026. The site has followed SOP for waste treatment (the site shared recent industrial wastewater testing from 1.3.4 as evidence).

3.4.2 *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.* 
Yes

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Comment The site indirectly identified water quality as a shared water challenge through urban water runoff.

The site wrote: The water quality goals stated in the Water Stewardship Plan (reference Indicator 2.3.2) are to 1) meet or exceed wastewater permits and 2) follow GSC (Global Supply Chain) environmental best practices. Unfortunately, as of July 1st of 2022, the Carson plant entered Level 1 exceedance for high zinc level at the stormwater outfall. The site hired consultants (GSI Environmental) as of August 2022 to help mitigate the issue by implementing Best Management Practices (BMP) to reduce the levels with minimal success as shown in the Analytical Parameters below.

After Dec 11th testing the site entered Level 2 exceedance and was sued by LA Water Keepers in late Dec/early Jan. The site has finalized the Consent Decree with our lawyer and LA Waterkeepers as of June 28th, 2023. The Consent Decree was agreed upon in July 2023 to resolve the allegations and ensure that the industrial storm water discharges do not cause or contribute to an exceedance of applicable water quality standards.

-Storm Water Pollution Control Best Management Practices (BMP): Install an electronic rain gauge or sensor at the Facility. During the Term (5 years), Carson shall collect rainfall data using the gauge/sensor for all precipitation events to the nearest 0.1 inch, including start/stop times. Data from the rain gauge/sensor shall be conclusive of precipitation quantities and timing for purposes of the Consent Decree.

-Hydrologic Evaluation: Full assessment of facility drainage and storm water flow (including surface/sheet flow) and establishing the volume- and flow-based criteria for the Design Storm as defined in General Permit Section X.H.6: Design Storm Standards for Treatment Control BMPs

-During the Wet Season, implement a sweeping program using a PM-10 compliant street sweeper on all paved areas at least once per month, and employ hand sweeping in areas a mechanical sweeper cannot access (Dec 2022 – Annually) (Evidence provided: Klean SWEEP Invoice, Price Increase Letter).

-Annually by September 15th, employ and secure new filter socks around all drain inlets (Evidence provided: Filter Sock Order 22Dec22, Filter Sock Order 1Sep23, Tempest Weather System Order).

-During the Wet Season, as necessary, replace the filtration socks at the drain inlets when degraded or ineffective (Jan 2022 – Annually) (Evidence provided: Filter Sock Order 1Sep23, Tempest Weather System Order).

-Institute a formal pre-rain protocol throughout the Wet Season to be implemented prior to forecasted rain events with a greater than 50% probability of precipitation above 0.1 inches as forecasted by the National Oceanic and Atmospheric Administration at <https://www.weather.gov> for “Eftman”. The pre-rain protocol will include inspection of any filter socks deployed at the site and as practicable removal of exposed waste material and relocation of uncontained debris bins and trash cans under cover (Sep 2023 – Annually) (Evidence provided: National Weather Service Forecast Office).

-Updates to Storm Water Pollution Prevention Plan (SWPPP), identifying a stormwater pollution prevention team, and training completed by a Qualified Industrial Storm Water Practitioner (QISP) for SWPPP implementation (Annually) (Evidence provided: Stormwater Pollution Prevention Plan (20Sep23), Refer to Velocity Report in Indicator 4.2.1).

-Monitoring Implementation Plan (MIP) - This MIP was developed to address the following objectives (See SWPPP for further information): (Annually) (1) Identify team members assisting with implementation of the MIP; (2) Describe discharge locations; (3) Describe visual observation procedures; (4) Describe sample collection and handling procedures; (5) Procedures for field instrument calibration; (6) Provide justification for alternative discharge locations, Representative Sample Reduction (RSR), and Qualified Combined Samples (QCS), as applicable; (7) Provide an example Chain of Custody Record to be used when handling and shipping water quality samples to the laboratory.

The site provided all evidence of implementation indicated above in 3.4.1.

3.5 *Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.*

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3.5.1 *Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.* ✔
Yes

Comment The site's WSP target for IWRA's was "Healthy status of Important Water-Related Areas: Help maintain the same or better status through discharge water quality and public volunteerism" with the following sub-targets:

-Implementing Best Management Practices identified by GSI Environmental improving stormwater discharged to ultimate water source Long Beach Coast: the site shared that the Long Beach Coast was the ultimate receiving water body for its stormwater and wastewater.
 -Carson implemented best practices such as filter sock changes and preventative sweeping in the parking lot as identified in the SWPPP. Carson has identified the need for advanced stormwater treatment and working with the city to determine a path forward - see meeting notes in evidence for September 2023 meeting. See Indicator Response Document: Indicator 1.3.1 for SWPPP (The site shared an email from LA County in September 2023 about potential project ideas for advanced water treatment, including an example of advanced water quality treatment in Magic Johnson Park. That email followed up to the site manager's conversation with LA County about addressing the best management practice for improving water quality through advanced water treatment based on the Consent Decree for the previous stormwater exceedances).

3.6 *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.*

3.6.1 *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.* ✔
Yes

Comment The site wrote: The site has 2 women's restrooms, 5 men's restrooms, and 2 Porta Johns. Additionally, there are 3 water fountains. Water bottles and Gatorade are carried on-site for free, depending on the heat index and time of year.

According to OSHA we are 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. Below is the toilet per employee requirement:

<https://www.osha.gov/restrooms-sanitation>,
<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.141>

All our toilets have soap, running water at both temperatures and drying units or hand towels. We also have hand sanitizer dispensers throughout the facility. For drinking water, we have kitchenettes including running potable water for employees to prepare food and wash utensils.

For drinking water, all potable water is from the Municipal Water supply and is accessible to our employees. We have potable water flowing, as well as water jugs where they are not near a water fountain.

Based on the above and our employee-to-bathroom ratio, we are well within compliance with the national regulations.

The site indicated that there were no infrastructural changes to the WASH services on-site. Since the last audit, the Carson team has received Ecolab Science Certification (November 2022). The site provided implementation evidence of the Ecolab Science communications and cleaning logs (on the audit site tour).

3.6.2 *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.* ✔
Yes

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Comment Carson has an active Consent Decree to address the citizen lawsuit brought upon Ecolab. The site is actioning this appropriately therefore, the site is not impinging on the communities' right to safe water. Carson does not have groundwater and does not own any land adjacent or near to indigenous lands.

The site indicated during the site tour that it provided porta potties for truckers, as viewed on the site tour, and the site said that truckers could receive water from the site if requested.

3.7 *Implement plan to maintain or improve indirect water use within the catchment:*

3.7.1 *Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.* 🚩 in progress

Comment The site wrote, "We do not have any indirect water use targets in our water stewardship plan. The site indicated that there were no changes since the previous audit."

The site should make an effort to engage with the service providers (in its catchment) to define whether an indirect water use target can be established.

Finding No: TNR-008503

3.7.2 *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.* 🚩 in progress

Comment Evidence of engagement with service providers in the catchment identified in 1.4.2. beyond requesting data related to indirect water use, was not provided. Refer to finding for indicator 3.7.1.

Finding No: TNR-008504

3.8 *Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*

3.8.1 *Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.* ✅ Yes

Comment The site shared that it had emailed owners of shared water-related infrastructure in October 2023 regarding ways to address risk mitigation plans that pertained to aging water infrastructure (a cause of a shared water challenge identified in Step 1).

The site shared evidence of email communications with LADPW and attempts to reach out to the West Basin District on shared water-related infrastructure.

3.9 *Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*

3.9.1 *Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.* ✅ Yes

Audit Number: AO-000728

Comment The site stated in 1.8.1 the following best practices:

- To maintain a positive relationship with West Basin Water District. New actions have been pursued in the last three years (Evidence provided: West Basin MWD Email – Aug 29, 2023, though a response was not shared to show a positive relationship).
- Carson is continuously seeking opportunities to work with nearby organizations (in the watershed) around issues of water stewardship (Evidence provided: A draft agenda for the WEC Executive Roundtable in October 2023).
- The plant has maintained CWAC membership & engagement (Evidence provided: CWAC meeting notes and participant lists).
- Carson recently conducted our RC 14001 audit as well (Evidence provided: RC14001 audit report).

Best Practices for Internal Water Governance:

- Maintain a water stewardship plan, updated annually at a minimum (Existing best practice – see 2.3.2 for reference).
- Water targets are discussed regularly in plant meetings (existing best practice – see 2.3.2 evidence for OGSM slides).
- The AWS standard and its overall goals are communicated regularly to plant staff and leadership (existing best practice – see 2.3.2 evidence for OGSM slides).
- Establish a culture among all plant employees that encourages them to identify and execute projects promoting good water stewardship around the plant (new best practice identified in the last 3 years – evidence: See WSP 2.3.2 for work order list).

3.9.2 *Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.* 🔍
Obs.

Comment The site wrote: From Indicator 1.8.2, Best Practices to Improve Water Balance on Site Are:

- Recycle and reuse water within the plant or use West Basin Water District’s recycled water (Evidence provided: Annual HMIS Report from March 2023 & Planning Communication to Production Email from October 2023).
- Best practice for Carson’s utility systems would be to have all Nalco Water applicable technologies in place, including 3DTRASAR for boilers, cooling towers, and membranes if applicable. It also includes using Ecolab 3D (formerly known as envision) and Nalco 360 to remote monitor these systems. This allows for optimal performance and overall health of the equipment over time. Carson’s on-site condensate return best practice is 70-80% (evidence of 3DTRASAR seen on site tour).
- Best practice for manufacturing is to continue to use the PRW (process recovery water) program, saving the first rinse of a batch and reusing it again. This is to be utilized until inventory space does not allow for the space to do so (Evidence provided: Annual HMIS Report from March 2023 & Planning Communication to Production Email from October 2023).

The first and third implementations identified look like the same best practice.

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

Audit Number: AO-000728

Comment	<p>The site indicated the following relevant water quality best practices:</p> <ul style="list-style-type: none"> -The Carson team campaigns products to minimize water usage (continuing best practice - For evidence reference the washout sequence in the WSP in 2.3.2.) -Quarterly testing is also conducted through a third party (ATL). We have RC 14001 certification (Evidence provided: RC14001 audit report). -We work with our Nalco Water commercial resources to ensure this is robust. Annual clean outs, and overall maintenance of the cooling system are required (continuing best practice, Velocity Cooling Tower Snapshot 26Oct23). -There are best practices regarding stormwater. These are Best Management Practices (BMPs): -During the Wet Season, implement a sweeping program using a PM-10 compliant street sweeper on all paved areas at least once per month, and employ hand sweeping in areas a mechanical sweeper cannot access (Dec 2022 – Annually) (Evidence provided: Klean SWEEP Invoice, Price Increase Letter). -Annually by September 15th, employ and secure new filter socks around all drain inlets (Evidence provided: Filter Sock Order 22Dec22, Filter Sock Order 1Sep23, Tempest Weather System Order). -During the Wet Season, as necessary, replace the filtration socks at the drain inlets when degraded or ineffective (Jan 2022 – Annually) (Evidence provided: Filter Sock Order 1Sep23, Tempest Weather System Order). -Institute a formal pre-rain protocol throughout the Wet Season to be implemented prior to forecasted rain events with a greater than 50% probability of precipitation above 0.1 inches as forecasted by the National Oceanic and Atmospheric Administration at https://www.weather.gov for “Elftman”. The pre-rain protocol will include inspection of any filter socks deployed at the site and as practicable removal of exposed waste material and relocation of uncontained debris bins and trash cans under cover (Sep 2023 – Annually) (Evidence provided: National Weather Service Forecast Office). -Updates to Storm Water Pollution Prevention Plan (SWPPP), identifying a storm water pollution prevention team, and training completed by a Qualified Industrial Storm Water Practitioner (QISP) for SWPPP implementation (Annually) (Evidence provided: Stormwater Pollution Prevention Plan (20Sep23), Velocity Report). -Monitoring Implementation Plan (MIP) - This MIP was developed to address the following objectives (See SWPPP for further information): (Annually). -Identify team members assisting with implementation of the MIP (it was unclear what the evidence provided was here). -Describe discharge locations. -Describe visual observation procedures. -Describe sample collection and handling procedures. -Procedures for field instrument calibration. -Provide justification for alternative discharge locations, Representative Sample Reduction (RSR), and Qualified Combined Samples (QCS), as applicable. -Provide an example Chain of Custody Record to be used when handling and shipping water quality samples to the laboratory.
3.9.4	<p><i>Actions towards achieving best practice, related to targets in terms of the site’s maintenance of Important Water-Related Areas shall be implemented.</i></p> <p style="text-align: right;">Finding No: TNR-006738</p> <p style="text-align: right;">in progress </p>

Audit Number: AO-000728

Comment The site wrote:

-Partnering with NGOs to fund projects that protect and replenish the waterways in the watershed (existing best practice, see WSP 2.3.2 Pacific Institute Leak Detection Study from June 2022 - <https://pacinst.org/announcement/pacific-institute-led-water-efficiency-project-featuring-remot-e-toilet-leak-detection-in-low-income-housing-wins-los-angeles-better-buildings-challenge-award/>).


-Participation in the California Water Action Collaborative (CWAC) that aims to increase communication and awareness around California's water issues, and connects NGO partners with corporate organizations (funders) for watershed restoration projects (continuing overall best practice, such as CRIT project for the ultimate water source from the Colorado River referenced in 1.6.2 to stabilize lake levels in Lake Mead and reduce the impact and severity of water shortage declarations and WSP in 2.3.2) (Evidence provided: meeting notes and participant lists from CWAC).

-Knowing our water discharge goes back into a water source that is an IWRA (Long Beach Coast) and where water quality is an issue, it is imperative Carson ensures there is a proactive water safety plan and controls to eliminate or mitigate any potential pollutants. (See indicator 1.3.1 for SWPPP for further information) (Evidence provided: unclear).

-Dikes are used on all tank farms to ensure no chemicals contaminate the water quality. Spill prevention kits are also utilized across the plant in the event of any chemical spills on site to quickly eliminate the risk of contamination. We have a storm water prevention plan to address preventing any damage to IWRA, ultimate discharge Long Beach Coast, from onsite chemicals; reference to SWPPP in Indicator 1.3.1 for further detail (Evidence provided: unclear).

Evidence of implementation for actions completed under the SWPPP has not been provided.

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

 in progress

Comment The site provided the following best practices for WASH:

-More eye wash stations in the process area than required (existing best practice as seen by auditor on the tour).

-It is identified that drinking water is available at increased levels during the summer months (existing best practice) (Evidence provided: unclear).

-Hand washing stations available in the process area, laboratory areas, food preparation areas, and bathrooms (existing best practice as seen by auditor on the tour).

-Sufficient hand care products (i.e. sanitizer) available throughout the plant to ensure all employees and visitors can remain safe and healthy (existing best practice as seen by auditor on the tour).






-Ecolab Science Certification (new best practice identified and implemented in the last 3 years – see WSP 2.3.2 WASH section for evidence).

Finding No: TNR-006736

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Audit Number: AO-000728

4 STEP 4: EVALUATE - Evaluate the site's performance.		
4.1	<i>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.</i>	
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>	 Yes
Comment	The site evaluated each sub-target in the WSP for 2023 in column P, indicating what had happened most recently since the previous audit.	
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>	 Yes
Comment	In the WSP, the site evaluated identified social, economic and environmental benefits for actions (refer to tab named "Value Creation 4.1.2" for detailed information).	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>	 Yes
Comment	The site identified and quantified shared value benefits in the catchment in the WSP (refer to tab named "Value Creation 4.1.2" for detailed information).	
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>	
4.2.1	<i>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.</i>	 Yes
Comment	<p>The site wrote, "We track our emergency incidents and relevant root cause analysis, corrective and preventative actions through Velocity EHS which is a software tool for safety and process related incidents. Due to the level of confidentiality of the incidents, Carson is not able to share each incident reports but was able to provide an example of a significant incident since the last audit."</p> <p>The site provided a spreadsheet of incidents from March 2020 to June 2023 that indicated the incident ID number, date of incident, type, status, category, description. The site indicated that there had only been one emergency incident from the past 12 months (in June 2023), which was the example provided. The links in the spreadsheet go to reports with a root cause analysis, and corrective actions. For the particular example shared, the site indicated the corrective action was a training for preventative measures, and that preventative initiatives were linked into the corrective action section.</p>	
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>	 in progress

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Comment The site wrote:

As highlighted in Indicator 3.9.3, Carson is partnering with stakeholder GSI Environmental Inc. to implement stormwater best management practices (BMP.) This work is critical to the shared value benefits in the catchment as stormwater is not treated before making its way to different discharge streams.

Additionally, to continue to improve, Carson is working with the LA County Department of Public Works to assess the viability of a city-sponsored installation of an advanced water treatment system as mentioned in Indicator 3.4.1 and 3.4.2. This partnership is important as there is still room for opportunity after the implementation of the best management practices. A meeting was recently held on September 21st, 2023, as documented in Indicator 2.3.2 and 4.1.1 in Carson's water stewardship plan.

Carson and City of Industry not only benchmark against each other but work with the entire Ecolab network to leverage best practices through Ecolab's Horizontal Process Network (continuing in 2023 with next meeting being in November 2023), Global Supply Chain Sustainability Network. This horizontal process network is comprised of global supply chain leaders, engineers, and frontline operations teams to share best practices and highlight initiatives at the local, regional, and corporate level.

The site shared that these details were all new since the previous audit. The site also shared the evidence for these consultation meetings with GSI and LA County indicating a meeting that happened in June 2023 on a stormwater project, which was a consultation effort regarding its SWPPP from the Consent Decree - documented in its WSP. The site also shared the email communications with LA County in the WSP cell O27.

However it was not identified that the site consulted with stakeholders on its water stewardship performance other than the stormwater efforts.

Finding No: TNR-007214

4.4 *Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.*

4.4.1 *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.*




Yes

Comment The site shared the 2022 and 2023 WSP to show the modifications made - the formatting had changed significantly and several targets and goals had been adjusted in wording and scope. The site had also identified lessons learned from the previous WSP.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000728

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>	 Yes
Comment	<p>The site wrote: See our case study posted to https://www.ecolab.com/stories/carson-california-plant-certified (published October 2023), see Water Governance section.</p> <p>In the Water Governance section said, "At the plant level, the plant manager is responsible for overall wastewater compliance and compliance with wastewater permits, and accountable for wastewater discharge and PH monitoring. Maintenance Supervisor is responsible for wastewater testing, wastewater discharge and pH monitoring. Plant manager is ultimately accountable for overall wastewater compliance, wastewater testing, regulation updates, wastewater discharge and pH monitoring."</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

Audit Number: AO-000728

Comment The site wrote, "See our case study posted to [https://www.ecolab.com/stories/carson-california-plant-certified\(6Oct23\)](https://www.ecolab.com/stories/carson-california-plant-certified(6Oct23)) see Water Stewardship Journey and Solutions section. Additionally, Carson has attempted to connect with West Basin Water District to discuss COI's Water Stewardship Plan and shared water challenges, but the water authorities have been unresponsive to this point (October 2023.) See evidence for BEF communication of water stewardship strategy in stakeholder outreach folder (October 2023.) Please reference 1.2.1 West Basin outreach folder for evidence of communications. Refer to water strategy in 2.3.1 for further information on how Carson supports the 5 AWS outcomes."

The Water Stewardship Journey section said, "In addition to internal operational improvements, Ecolab's Carson plant's water stewardship activities are ongoing. Shared challenges between the plant and relevant, local stakeholders include water scarcity due to reduced snowpack from existing water sources, aging water infrastructure, urban water runoff, saline intrusion into groundwater and loss of wetlands and species. To address these shared issues, Ecolab collaborates with other water users in the basin, one of which is an Ecolab AWS-certified plant in City of Industry (COI), California.

Local water stewardship activities outside of the plant include continued engagement with the water utility company, Calwater, to maintain alignment on catchment water goals. Ecolab is involved in the California Water Action Collaborative (CWAC) and is also part of the South Coast working group (within CWAC). The Ecolab team participates in monthly meetings to keep pace on shared water challenges and efforts in California. Ecolab is actively seeking collective action projects in the region that align with corporate replenishment goals.

Ecolab is a member of a public policy water resources group in Washington D.C. that advocates for water resource policy with a heavy focus in California. In 2022, Ecolab continued to engage with and support the Alliance for Water Stewardship's global work by sharing the company's water stewardship strategy through multiple speaking engagements, AWS webinars and encouraging other large multinational corporations to join AWS."

The Solutions section included some details of completed projects and ongoing projects on-site that are included in the WSP. The Situation section mentions the water stewardship plan and the five outcomes for the AWS standard.

The site indicated that its Water Stewardship Strategy had additional details about the WSP and its contributions to the AWS outcomes. The strategy had been shared with BEF and internal governance structures in the previous year, though that appeared to be around the COI performance given the evidence provided. The site shared that it had not shared with other stakeholders because of a struggle to receive response communications with the stakeholders identified. Additionally, the stakeholder interviewed revealed that stakeholders were not familiar with the site's water stewardship strategy or plan before the audit.

Finding No: TNR-007212

5.3 *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.*

5.3.1 *A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.*

 Obs.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000728

Comment The site wrote: See our case study posted to <https://www.ecolab.com/stories/carson-california-plant-certified> (published October 2023) - Performance section and our Corporate Responsibility Report. In our CRR you can find specific highlights of projects and progress toward overall water goals and our enterprise water stewardship journey (p38-48).

The Performance section has a quantification of the site's progress on the reduction of water use per ton from 2022 (based on the water balance target). The Water Stewardship Journey section indicates some details on the site's performance on its governance target.

The site did not communicate summary performance to three of the five targets - about water quality, IWRAs, and WASH. The site also indicated that the site had not been updated annually since the previous audits.

5.4 *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.*

5.4.1 *The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.*



Yes

Comment The site wrote: See our case study posted to <https://www.ecolab.com/stories/carson-california-plant-certified> (published in October 2023) in the Situation section. We continue to evaluate and participate in initiatives that align with the shared water-related challenges present in 1.6 & 1.7.

The website indicated, "In addition to internal operational improvements, Ecolab's Carson plant's water stewardship activities are ongoing. Shared challenges between the plant and relevant, local stakeholders include water scarcity due to reduced snowpack from existing water sources, aging water infrastructure, urban water runoff, saline intrusion into groundwater and loss of wetlands and species. To address these shared issues, Ecolab collaborates with other water users in the basin, one of which is an Ecolab AWS-certified plant in City of Industry (COI) California."

The site also shared the stakeholder log that included engagement with stakeholders in the last 12 months around shared water challenges.

5.4.2 *Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*



Yes

Comment The site wrote: See our case study posted to <https://www.ecolab.com/stories/carson-california-plant-certified> (published in October 2023) as well as our Stakeholder Engagement log for our attempts at stakeholder communication. We disclose in our Corporate Responsibility Report to our investors.

The Stakeholder Engagement log includes meetings since May 2023 that include engagement to stakeholders including the public sector agencies, neighboring organization, and catchment partners. The site shared notes that indicate the details of the engagements.

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

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In June 2022, Carson uploaded their self-monitoring testing results to SMARTS (refer to 1.3.4 testing results). An initial NAL exceedance notice was communicated to the Carson plant manager, in July 2022 via email from the Water Board (see evidence in 1.2.1); this information is public record as of July 2022. A civil lawsuit against Ecolab was filed in January 2023. A consent decree was finalized on June 28, 2023 (see further detail in 1.3.4) disclosing the lawsuit.

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

Comment The site wrote: See our case study posted to <https://www.ecolab.com/stories/carson-california-plant-certified> (published in October 2023), where you can see that our corrective action is available upon request. The site is in the process of remedying a recent stormwater discharge zinc exceedance. The site is in the process of remedying a recent stormwater discharge zinc exceedance, which the resulting Consent Decree from July 2023 was public record.

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 wrote: See our case study posted to <https://www.ecolab.com/stories/carson-california-plant-certified> (published in October 2023), where you can see that our communication is available upon request. The site is in the process of remedying a recent stormwater discharge zinc exceedance. The site is in the process of remedying a recent stormwater discharge zinc exceedance, which the resulting Consent Decree from July 2023 was public record.

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Photographic Evidence from Audit


Yes

Comment The site disposed of bottles through getting them recycled in bulk, and had an obsolete water purifier in the lab near the eyewash shower.

In the lab, the site had a spill kit full of socks, and another underneath with a visor and cleanup items. The labs didn't have drains to prevent hazardous waste from entering the sewer system.

The site had water filtering for the lab in the janitorial closet.

The site used steam for its HVAC system, with a boiler, for its lab building. The chiller outside for the HVAC system did not use water.

The picnic area outside of the production area and kitchen was not identified as a potential IWRA.

The site had roof runoff drains in the parking lot. The site explained that it treated the entire facility as an active containment of chemicals and had it designed without drains and sloping the site towards its center to prevent spills off-site, and most stormwater drains are closed to contain potential hazards. For flooding it used filter socks near storm drains, as well. Inside, there were inclines by the storage doors to keep in chemicals.

The site had men's locker rooms only because it had no hired women historically but had an area that was identified for future conversion.

Clean Harbor took away aggregated hazardous waste the site stored outside.

The site provided porta-potties for truckers.

There was an eyewash near the chemical dispensing area, and a chemical sump nearby. Next to that, there was also the DI water storage tank outside.

The boiler room was getting shutdown maintenance for check valve leaking over the next weekend. It shared the same room as the RO unit, used on demand for water storage systems.

There were condensate puddles in the warehouse, and the storage for packaging of chemicals had bundings. The oil production area had little movable bundings around it, and it was all over a drain system.

Previous Findings

All non-conformities raised in the previous audit have been satisfactorily closed.


Yes

Comment There were no non-conformities from previous audits indicated for this site, as it was from the previous auditing system before WSAS.