

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000727

SITE DETAILS

Site: **Ecolab City of Industry**

Address: 183483 Railroad St, 91748, City of Industry, California, UNITED STATES

Contact Person: Charles Plunkett

AWS Reference Number: AWS-000126

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2024-Jan-16

Validity of certificate: 2027-Jan-16

AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2023-Oct-23

Lead Auditor: Kimberly Worsham

Audit team participants:

Kimberly Worsham, Lead Auditor

Site Participants:

Jennifer Zehnder, Factory EHS Manager

Margaret Delany, Corporate Sustainability

Amy Hanson, Quality manager

Charles Plunkett, Other

John Cheng, TPM Coordinator

Jeff Silverstone, Engineering Manager

Ray Otero, Other

Billy Pepet, Other

Juan Ancona, Process Safety Engineer

Hugo Ciceros, Production manager

Dennis Hummel, Maintenance Lead

Steve Olson, Factory Director

Beatriz Chavira, Quality Engineer

Amanada Robles, Other

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ADDITIONAL INFO

Summary of Audit Findings: A total of 31 findings were raised during the certification audit, 0 major non-conformity, 20 minor non-conformities, 11 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 6 January 2024.

The major non-conformity must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report by 5 March 2024.

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

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

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully submitted the corrective action plan addressing all findings. Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. 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 the conformity of Ecolab City of Industry against the AWS International Water Stewardship Standard Version 2.

The Ecolab - City of Industry plant is a manufacturing facility producing industrial cleaning and sanitizing chemical liquids for institutional, food, beverage, and textile industries. The geographic scope of the site is limited to the facility's property boundary. The facility is in an urban industrial setting. Water for the facility comes from the municipal water district, sourced from Northern California and Colorado Rivers.

The City of Industry plant is situated on about 7.8 acres. The site is within the Rowland Water District (RWD). It is in the San Gabriel Subbasin (HUC-8, 18070106). The plant receives approximately 262 m3 of potable water from the RWD daily. Water scarcity, water infrastructure, and risk of earthquakes and flooding damages have been identified as the catchment's primary water shared water challenges. Water scarcity is attributed to the previous multi-year California drought and remains a primary catchment concern.

The audit was conducted onsite on 23-25 October, 2023. The onsite site visit included the assessment of potable and process water connections on site, production area, storage areas (for water and chemicals), intake water and wastewater treatment plant(s), waste and disposal facility, effluent leaving the site and WASH facilities.

The following external stakeholders were interviewed during the audit: Los Angeles County Sanitation Districts, Rowland Water District and Bonneville Environmental Fund.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	11
Minor	20

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FINDING DETAILS

Finding No:	TNR-006868
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-22
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: <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.
Findings:	<ul style="list-style-type: none">-The site shall review its identification of stakeholders and ensure those on the list pertain to the site and its catchment.-The site should identify vulnerable, women, minority, and Indigenous people in the catchment to strengthen conformance.-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.-The water challenges for: LA County Department of Public Works and US Army Corp of Engineers have not been identified.-The level of interest and influence of US Army Corp of Engineers has not been identified.
Corrective action:	<ul style="list-style-type: none">1). Solution: Revisit catchment and identify vulnerable groups2). Reanalyze shared water challenges to be more descriptive to identify opportunities to collaborate.3). Identify water challenges for both of the groups .4). Revisit and include level of interest and influence for the group. <ul style="list-style-type: none">1). RCA: Through the initial scope the vulnerable groups were not included in our catchment.2). Not enough detail pertaining to water challenges shared.3). Did not include water challenges for LA CDPW and US Army Corp of Engineers.4). Did not include level of interest and influence for the US Army Corp of Engineers.

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Audit Number: AO-000727

Finding No: TNR-007010
Checklist Item No: 1.2.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
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. The site shall identify the current and potential degree of influence between it and its stakeholders specific to the catchment, ultimate water source, and ultimate receiving water body for wastewater.
Corrective action: Review and amend stakeholder level of influence and interest

Finding No: TNR-006876
Checklist Item No: 1.3.1
Status: Open
Finding level: Observation
Due date: 2024-Oct-22
Checklist item: Existing water-related incident response plans shall be identified.
Findings: The site could provide an update on what was updated on the plans and whether they were water related to better conform.

Finding No: TNR-008027
Checklist Item No: 1.3.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings: Not all water flows are mapped, for example: evaporative/condensate/blowdown losses from boilers.
Corrective action: Update and include the losses in our water flow. Numbers will be quantifiable with water meter to be installed

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Audit Number: AO-000727

Finding No: TNR-006879
Checklist Item No: 1.3.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
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 its condensate loss, evaporation/drift loss from cooling towers, neither the evaporative/blowdown losses from boilers. The site should provide at least an estimate of these.
To further strengthen conformity, the site could also quantify variance in losses.
Corrective action: Update and include the losses in our water balance as well as variances for the losses. Numbers will be quantifiable with water meter to be installed in 2024

Finding No: TNR-006556
Checklist Item No: 1.5.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings: The site shall provide annual and seasonal variances rather than annual averages. Also, the site shall provide information about how the catchment was affected by 2023's extreme rain in California.
Corrective action: Solution: Contact the Rowland Water District and attempt to obtain the most updated water balance information as well as to determine extreme rain effects on catchment

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Audit Number: AO-000727

Finding No: TNR-006559
Checklist Item No: 1.5.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
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: The site shall identify annual and seasonal variances in the catchment.

The site could make an effort to get updated water quality information, these documents are out of date:

- Groundwater Quality San Gabriel Groundwater Basins.pdf: 2012.
- USGS Fact Sheet 2011-3139: Groundwater Quality in the San Fernando–San Gabriel Groundwater Basins, California: 2011.

Corrective action: Contact the Rowland Water District and attempt to obtain the most updated water quality information. This water quality data could then be used to provide variances year over year.

Finding No: TNR-007014
Checklist Item No: 1.5.6
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22

Checklist item: Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.

Findings: The site shall identify existing water-related infrastructure in the catchment, including conditions and potential exposure to extreme events. The site shall also indicate any changed conditions or potential exposure to extreme events, including the Q1 2023 rain events in California.

Corrective action: Contact the Rowland Water District and attempt to obtain information on existing water-related infrastructures within the catchment as well as potential exposure to extreme events such as the great rain event during Q1 of 2023

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Finding No: TNR-006563
Checklist Item No: 1.6.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Initiatives to address shared water challenges shall be identified.
Findings: The site shall provide information on how the following initiatives match to the existing shared water challenges:

-LA Detection Infrastructure Program (through CWAC), Colorado River Indian Tribes (CRIT) System Conservation Project, various policies and programs in Rowland Water District (e.g., The California Water Resistance Portfolio, The Water Conservation and Water Shortage Contingency Plan, and The Urban Water Management Plan.).
Corrective action: Match the shared water challenges with the corresponding initiatives included in the risk assessment file

Finding No: TNR-008009
Checklist Item No: 1.8.1
Status: Open
Finding level: Observation
Due date: 2024-Oct-22
Checklist item: Relevant catchment best practice for water governance shall be identified.
Findings: The site shall reassess whether wastewater quality testing would be related to best practices for good water governance.

Finding No: TNR-006841
Checklist Item No: 1.8.2
Status: Open
Finding level: Observation
Due date: 2024-Oct-22
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: Having an explicit water balance best practice list for the catchment would improve conformance.

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Finding No: TNR-006869
Checklist Item No: 1.8.3
Status: Open
Finding level: Observation
Due date: 2024-Oct-22
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings: Having explicit water quality best practices for the catchment would improve conformance.

Finding No: TNR-007016
Checklist Item No: 2.3.2
Status: Open
Finding level: Observation
Due date: 2024-Oct-22
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 site shall improve the timeframes to ensure that it was clear for each sub-target

Finding No: TNR-006572
Checklist Item No: 2.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
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 shall coordinate with relevant public-sector agencies on identifying a plan to mitigate or adapt to identified water risks.
Corrective action: Coordinate with relevant public-sector agencies and provide evidence of collaboration and outreach.

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Finding No: TNR-006577
Checklist Item No: 3.1.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Evidence that the site has supported good catchment governance shall be identified.
Findings: -For corporate actions: the site shall review and ensure that its good catchment governance identified relate to the site.

-Some actions are also related to water balance, this should be indicated in the Water Stewardship Plan.
Corrective action: Ensure that all corporate actions are related to catchment level water governance. Actions has been confirmed and related to the site's catchment. Additionally, include all governance projects in the WSP to the water balance within the same document.

Finding No: TNR-007023
Checklist Item No: 3.2.2
Status: Open
Finding level: Observation
Due date: 2024-Oct-22
Checklist item: 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.
Findings: The site shall continue implementing best practices from the Consent Decree to maintain the water rights of others.

Finding No: TNR-006655
Checklist Item No: 3.4.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: 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.
Findings: The site shall provide evidence of recent stormwater test results to show improvements in its stormwater quality and address the Consent Decree.
Corrective action: Submit 2023 testing reports

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Finding No: TNR-006654
Checklist Item No: 3.5.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings: -The site had not identified Ballona Creek Wetlands as one of its 11 catchment IWRAs.

-The dashboard of proposed projects did not include Ballona Creek Wetland.

-Evidence of donations should be better supported: for example an email from the organization which receives the donation.
Corrective action: Include the Ballona Creek Wetlands (1.3.5 IWRA list) and include transactional evidence of donations. However, the link to the cleanup had already been included in the WSP during the audit.

Finding No: TNR-006656
Checklist Item No: 3.6.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: 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.
Findings: The site shall provide evidence of implementation at the site level for the Ecolab disaster relief outreach activities (Ecolab foundation - Project WET).
Corrective action: Include evidence of Ecolab involvement in the Los Angeles area

Finding No: TNR-006657
Checklist Item No: 3.7.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings: Even when the site has made an effort to engage with a primary input supplier, the site should engage with the service provider (Quala Wash) to define whether an indirect water use target can be established.
Corrective action: Request and communicate with Qualawash to determine if they have an indirect water usage target. If they do not, attempt to establish an indirect water use target with the service provider and quantify it.

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Finding No: TNR-006658
Checklist Item No: 3.7.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.
Findings: The site shall provide evidence of engagement with service providers in the catchment identified in 1.4.2. beyond requesting data related to indirect water use.
Corrective action: Refer to finding for indicator 3.7.1. Increase communication on 3rd party water usage, request information on sustainability efforts by third party service providers.

Finding No: TNR-006660
Checklist Item No: 3.9.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings: The site shall provide evidence of implementation on meter installation.
Corrective action: Solution: site will provide evidence once installation is complete.

Finding No: TNR-006663
Checklist Item No: 3.9.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings: The site shall provide evidence of implementing of:
-The water safety plan for the cooling towers.
-Educate plant employees and visitors on current city water quality issues.
Corrective action: Include PMs (preventative maintenance plans) for the cooling towers. Additionally, train new hires of water quality issues whether it be through plant meetings or new hire training.

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Finding No: TNR-006664
Checklist Item No: 3.9.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
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: The site shall share evidence of implementation for all identified best practice actions that have happened. For example:

-Participate in local watershed events such as Friends of the LA River each year bring together thousands of volunteers to clean the LA River such as Habitat Restoration Day: the site provided a link of the event, however evidence of the site participating in this event was not provided.
-Having plant wide volunteer days that help protect and restore waterways in the watershed. The site provided evidence of existing community volunteer days, such as from LAWaterKeeper (<https://www.lawaterkeeper.org/events/coastal-cleanup-day-2023>) and FOLAR's Habitat Restoration Day (<https://folar.org/get-involved/>), but not specific site-led volunteer days.
Corrective action: Begin documenting waterway restoration volunteer days

Finding No: TNR-006661
Checklist Item No: 3.9.5
Status: Closed
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings: The site shall provide evidence of implementation of supporting local community groups with WASH services.
Corrective action: The site hosted a household chemical giveaway to the community, and evidence was provided in both the Indicator Responses document and through evidence submission.

Finding No: TNR-006680
Checklist Item No: 4.3.1
Status: Open
Finding level: Observation
Checklist item: Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings: The site has shared water stewardship performance with two key stakeholders. The effectiveness of the consultation process will be further assessed at the next audit.

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Finding No:	TNR-006682
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-22
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	<p>The site has shared information about AWS outcomes and some general performance details. Additionally, the site only provided this information to RWD and Bonneville Environmental Fund. In addition, the stakeholder interviews revealed that stakeholder did not receive disclosure of the site's WSP before the audit.</p> <p>The site shall communicate the water stewardship plan and its performance to relevant stakeholders.</p>
Corrective action:	Communicate water stewardship performance details to additional stakeholders beyond Rowland Water District and Bonneville Environmental Fund.
Finding No:	TNR-006805
Checklist Item No:	5.4.2
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-22
Checklist item:	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings:	The site shall provide explicit details for supporting public-sector agencies necessarily, which could have further strengthened conformance.
Finding No:	TNR-006687
Checklist Item No:	5.5.1
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-22
Checklist item:	Any site water-related compliance violations and associated corrections shall be disclosed.

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Finding No: TNR-006880
Checklist Item No: 5.5.2
Status: Open
Finding level: Observation
Due date: 2024-Oct-22
Checklist item: Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.

Finding No: TNR-006881
Checklist Item No: 5.5.3
Status: Open
Finding level: Observation
Checklist item: 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.

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Report Details

Report	Value
Report prepared by	Kimberly Worsham
Report approved by	Monserrath Zamora
Report approved on (Date)	6 December 2023

Surveillance

Proposed date for next audit
2024-Oct-22

Stakeholder Announcements

Date of publication	Location
08/04/2023	https://ecolab.widen.net/s/pnrwg2swpw/stakeholder-announcement-ecolab-city-of-industry-ca-usa-aws-0000126?_gl=1*165uk2e*_ga*MTUyMjk4MjMzMC4xNjk2NjMyNjI2*_ga_E4F9EJHFVV*MTY5NzQ3Nzk0My4yLjAuMTY5NzQ3Nzk0My42MC4wLjA
25/07/2023	https://watersas.org/wp-content/uploads/2023/07/Stakeholder-Announcement-Ecolab-City-of-Industry-CA-USA-AWS-0000126.pdf
24/07/2023	https://a4ws.org/wp-content/uploads/2023/07/AWS-000126-Stakeholder-Announcement-Ecolab-City-of-Industry-CA-USA.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	The auditor interviewed 4 stakeholders over 3 interviews. All occurred remotely.

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Catchment Information

Catchment Information

The Ecolab City of Industry (COI) site is on about 7.8 acres within the Rowland Water District (RWD), in the San Gabriel Sub-basin (HUC-8, 18070106). The potable water supply is imported from the Metropolitan Water District of Southern California (MWDSC), 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.

Ecolab COI treats all wastewater and discharges it to the nearby municipal water treatment plant (San Jose Creek Water Reclamation Plant). Ecolab COI discharges approximately 97.67 m³ of water per day. The water is then treated at this municipal site. Recycled water is discharged from the San Jose Creek Water Reclamation Plant to the concrete-lined portion of the San Gabriel River and the Joint Water Pollution Control Plant (JWPCP). The San Gabriel River then flows south and empties into the Pacific Ocean near Long Beach.

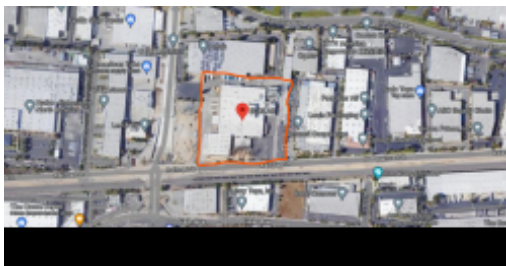


Ecolab Col Catchment.png

Client Description and Site Details

Client/Site Background

The ECOLAB - City of Industry site is a manufacturing facility producing industrial cleaning and sanitizing chemical liquids for institutional, food, beverage, and textile industries. The geographic scope of the site is limited to the facility's property boundary. The facility is in an urban industrial setting. Water for the facility comes from the municipal water districts, which are sourced from Northern California and the Colorado River.



Ecolab COI Site.png

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Summary of Shared Water Challenges

Summary of Shared Water Challenges


Water scarcity/loss, water quality and loss of wetlands and species have been identified as the primary shared water challenge in the catchment. Water scarcity is attributed to the previous multi-year California drought and remains a primary catchment concern.

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 is in 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 certification 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 certification respects the homogeneity required.

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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 mapped the site boundaries relative to neighbors, water-related infrastructure, catchment location, discharge paths and points at the site and catchment levels, water service providers, ultimate water source, and placement in the catchment.</p> <p>While the site's boundaries hadn't changed since the previous audit, the site expanded the catchment boundaries in 2023. COI revisited and updated the catchment map as the water sources were not encompassed to include sub-basins and treatment plants.</p>
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 details identifying several stakeholders, including the California Water Action Collaborative (CWAC), the Water Action Hub Water Resilience Coalition (WRC), and public agencies. There is a description of the stakeholder identification process, "Process for determining stakeholders is to consider all parties that are impacted by our water use or that can impact us. This includes policy makers, 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 site indicated that in the last year, it identified a local HOA (Action Property Management) to engage with residents in its catchment.

The site identified stakeholders in the spreadsheet "Stakeholders and Outreach" with more stakeholders, specific organizational names, and shared water-related challenges. The spreadsheet also indicated what stakeholders were new or had changed in role in the last 12 months.

The site should have identified vulnerable, women, minority, and indigenous people in the catchment to strengthen conformance.

The stakeholder interviews, however, indicated that the stakeholders identified were not relevant for 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.

The water challenges for: LA County Department of Public Works and US Army Corp of Engineers have not been identified.

The level of interest and influence of US Army Corp of Engineers has not been identified.

Finding No: TNR-006868

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 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 stakeholder level of influence changes in the previous year were included in the Stakeholders spreadsheet.

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

Finding No: TNR-007010

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.* 🔍 Obs.







Comment The site shared the following documents for this indicator: Global Operations Disaster Recovery Plan for COI (last revised September 2022), Emergency Response and Contingency Plan (last revised November 2022), and Quick Reference Guide for Hazardous Waste Contingency Plan (last reviewed November 2022)

The site indicated water-related incidents in the Emergency Response and Contingency Plan, including flooding and earthquakes (pertaining to water infrastructure). There could have been clearer indications of what the changes to the plans had been since the previous audit.

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1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 in progress
Comment	<p>The site provided a detailed map of the site's water balance from July 2023. The site's water balance includes inflows from the city water, storage, losses, and outflows to the city sewer. The site shared that the only changes were volumetric in the last year or two.</p> <p>However, not all water flows are mapped, for example: evaporative/condensate/blowdown losses from boilers.</p> <p style="text-align: right;">Finding No: TNR-008027</p>	
1.3.3	<i>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.</i>	 in progress
Comment	<p>The site had not included in its water balance quantification its condensate loss, evaporation/drift loss from cooling towers, neither the evaporative/blowdown losses from boilers. To further strengthen conformity, the site could also quantify variance in losses.</p> <p style="text-align: right;">Finding No: TNR-006879</p>	
1.3.4	<i>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.</i>	 Yes
Comment	<p>The site shared the RWD 2021 & 2022 Quality Report, which includes the site's water source water quality quantified details. The site also provided quantified levels for TDS, COD, and BOD since 2019, indicating variances showing a gradual increase in COD and TDS, and a recent trend in decreasing BOD. The site also provided external wastewater testing results.</p> <p>For receiving water bodies water quality, the site said, "Ultimate discharge: As of October 2023, this 2018 report was the only study Ecolab could locate on San Gabriel River quality. See more here: http://sgrmp.org/"</p>	
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 Yes
Comment	<p>The site provided a comprehensive list of raw materials onsite and a map of the site, and analyzed the location of hazardous materials, as well as the new chemicals comparing 2022 to 2021. The site said that the potential sources of pollution also included every source that could impact stormwater.</p>	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes
Comment	<p>There are no IWRA's on site.</p>	
1.3.7	<i>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.</i>	 Yes
Comment	<p>The site provided 2022-2023 costs and revenue for its water-related systems, including: water withdrawal, wastewater surcharges, water-related projects and initiatives. It also quantified other costs, such as water-related equipment operational expenses, water governance costs, and payroll.</p> <p>The site indicated the WSP contained the description of water-related values in columns S-U, indicating the identified value generated by the site for different water stewardship activities.</p>	

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- 1.3.8** *Levels of access and adequacy of WASH at the site shall be identified.* ✔
Yes
- Comment The site said, "According to OSHA, we are required to provide workers with sanitary restrooms with cold and hot running water, hand towels or air dryers, and soap. Potable water also is required by law for washing, drinking and food preparation. - <https://www.osha.gov/restrooms-sanitation/> <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.141>
- All of our toilets have soap, running water at both temperature and drying units or hand towels. We also have hand sanitizer dispensers throughout the facility. The restrooms are cleaned by janitorial staff daily. For drinking water, we also have kitchenettes including running potable water for employees to prepare food and wash utensils. For drinking water, all potable water is from the parish and is accessible to our employees. When there are boil water advisories issued, we communicate that to the employees and provide alternative drinking water stations. 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 of the national regulations".
- The site also completed the Self-Assessment Tool for Evaluating Access to Water, Sanitation and Hygiene (WASH) in June 2023. The site indicated that there had been no changes for employees around WASH services on-site.
- 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 also provided information that it has bottled water in the kitchen, but it was an insignificant amount of water compared to its catchment.
- Regarding changes since the previous audit, the site wrote, "since our last audit, our supply chain was stressed due to the COVID-19 pandemic and the above materials were sourced by multiple suppliers from 2020-2022. Since our supply chain has stabilized, the reported list and the associated suppliers accurately reflect our embedded water use in 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 indicated that none of the identified embedded water services changed in recent years.
- 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

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Comment The site has identified the following water governance initiatives:

- LA IRWM 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: mwdh20.com <https://www.mwdh20.com/how-we-plan/integrated-resource-plan/>
- LA County Public Works is responsible for the infrastructure in LA County. The Integrated Regional Water Management Plan (IRWMP) was released in April 2019 <https://dpw.lacounty.gov/wmd/scr/About.aspx>
- California Department of Water Resources manages all of CA's water resources, systems, and infrastructure, including the State Water Project.
- Rowland Water District (RWD) is the plant's water utility company. Additionally, the most recent RWD Urban Water Management Plan (2020) can be found at <https://www.rwd.org/urban-water-management-plan/>.
- LA IWRMP: Upper San Gabriel River and Rio Hondo River - Last plan created was in 2013, updated project lists can be found at lawaterplan.org
- The majority of 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 items called "Subregional Reports."
- Ecolab is a founding member of the California Water Action collaborative (CWAC). The site attends 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 the site is in the process of developing a portfolio approach to driving water stewardship in Southern California. With its 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. Cawateraction.org.

Based on the water initiatives identified by the site, there were no changes since the previous audit.

1.5.2 *Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.* ✔ Yes

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. All data below was pulled from 2020-2022. The variance in the total inflow versus outflow is due to the wastewater treatment plant that services the entire region of LA in our catchment. Therefore, the effluent of that plant contains wastewater from in and out of our catchment."

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. 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-006556

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

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Comment The site said, "Since the catchment was redrawn in 2023, COI could not identify seasonal variances from previous years."

The site also provided documents about the Upper LA Basin Deep Aquifer Study, Groundwater Quality San Gabriel Groundwater Basins, and the USGS Fact Sheet 2011-3139: Groundwater Quality in the San Fernando–San Gabriel Groundwater Basins, California; RWD Water Quality Reports from 2021 and 2022; San Gabriel River water quality report from 2018. However, annual and seasonal variances have not been identified.

The site could make an effort to get updated water quality information, these documents are out of date:


- Groundwater Quality San Gabriel Groundwater Basins.pdf: 2012.
- USGS Fact Sheet 2011-3139: Groundwater Quality in the San Fernando–San Gabriel Groundwater Basins, California: 2011.

Finding No: TNR-006559

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 Notable IWRA's include 11 in the catchment- Due to redrawing the catchment in 2023, the following IWRA's have been recently identified":

1. Chino Hills State Park.
2. Angeles National Park and Forest: the park spans 700 000 acres,
3. San Gabriel Reservoir and River.
4. Morris Reservoir: a manmade reservoir, is now used as part of conservation efforts. Water is drawn from the reservoir to aid in clean up initiatives as part of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).
5. Cogswell Reservoir.
6. Santa Fe Reservoir: was originally a means of flood prevention, not unlike Cogswell. Now, it is used more as a recreational site.
7. Puddingstone Reservoir: was originally a means of flood prevention, like Cogswell. Now, it is used more so as a recreational site.
8. Whittier Narrows Natural Area.
9. San Dimas Experimental Forest.
10. Los Angeles River.
11. Long Beach Coast.

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

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Comment The site wrote: "Rowland Water District has completed multiple upgrade projects such as Reservoir 8 SCADA and RMS Building (Completed in November 2021) and Phase 4 Valve replacements (Completed in October 2021) since the last audit to address aging infrastructure. See their website for examples: Current Construction Projects | Rowland Water District (rwd.org).

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.

Finding No: TNR-007014

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

Comment Water access in these communities is continually monitored. 20 000-60 000 people are served by failing water systems in LA County.

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 a spreadsheet with shared water challenges, including water scarcity/loss, poor water quality, and loss of wetlands and species. The site also indicated the process for identifying prioritization - on a scale of 1 to 5 (where 5 is the most severe/probable). The higher the number, the higher the priority.

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

Comment The site shared initiatives such as the LA Detection Infrastructure Program (through CWAC), Colorado River Indian Tribes (CRIT) System Conservation Project, various policies and programs in Rowland Water District (e.g., The California Water Resistance Portfolio, The Water Conservation and Water Shortage Contingency Plan, and The Urban Water Management Plan.).

However, it was not clear how these different initiatives matched to the existing identified shared water challenges.

Finding No: TNR-006563

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 said, "Since the last audit, the site risks have changed with stormwater challenges. COI continues to implement best practices for stormwater management and will complete all BMP in October 2024 as outlined in the water stewardship plan.

The unique climate of Southern California creates distinct risks that we face as a site.

The site shared the COI WRM Report, full water usage plan, and the site risk assessment. The site prioritized the risks in the risk assessment. The assessment also indicates how these risks affect the site. The Risk Analysis spreadsheet included the site's impact, potential costs, and business impact within a given timeframe. The site also shared a spreadsheet with many tabs including the amount of water saved on-site, where, by whom, and how.

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1.7.2 *Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.* ✔
Yes

Comment The site shared the full water usage plan, These opportunities for reduction of water usage are compiled within our Water Stewardship Plan which contains project timeline, budget, savings, and link to site/catchment water risks."

The site also shared a spreadsheet with many tabs including of the amount of water saved on-site, where, by whom, and how.

1.8 *Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*

1.8.1 *Relevant catchment best practice for water governance shall be identified.* 🔍
Obs.

Comment Best practices for external water governance are:

- To maintain a positive relationship with Rowland Water District (existing best practice).
- Continue to constantly seek opportunities to work with nearby organizations (in the watershed) around issues of water stewardship (existing best practice but new projects and opportunities identified in last 3 years).
- Maintain CWAC membership & engagement (best practice).
- Partner or fund organizations that restore and increase the number of natural areas within Los Angeles to encourage more biodiversity, absorb excess water to prevent flooding, and reduce the heat island effect found in cities (new action identified in the last 3 years).
- COI conducts bimonthly wastewater quality checks and conduct third party wastewater treatment as well which is beyond permit requirements (existing best practice).
- Partner with local and state officials to coordinate efforts surrounding shared water challenges (existing best practice).
- Ecolab partners with the Project WET Foundation (Water Education Today) to educate children and their families about water conservation and hygiene through The Clean and Conserve Education Program. Ecolab also launched a study marking the state water stewardship, Ecolab Watermark Study (<https://watermark.ecolab.com/>) highlighting the concern about water throughout different countries. In the US alone, 81% of consumers list clean and safe water as a significant environmental concern and 25% of water conservation efforts should be the responsibility of manufacturers/businesses.

Internal Water Governance:

- Maintain a water stewardship plan, updated annually at a minimum (existing best practice).
- Water targets are discussed regularly in plant wide meetings (existing best practice).
- The AWS standard and its overall goals are communicated regularly to plant staff and leadership (existing best practice).
- 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).

It is unclear, how wastewater quality checks would be related to water governance.

1.8.2 *Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.* 🔍
Obs.

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Comment Best practice to improve water balance on site are:

- Include metering installed throughout the plant that would allow us to track water use in all areas of the plant (new best practice identified in the last 3 years).
- Recycle and reuse water within the plant or use Rowland Water District's recycled water (new best practice identified in the last 3 years).
- Waterless urinals are currently used onsite.
- Desert landscape is currently used onsite.
- Best practice for our 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. The on-site condensate return best practice is 70-80%.
- Other best practice could include water recycling or using RWD's (Rowland Water District) recycled water. At this time, the site does not believe this option to be feasible, but the site will continue to pursue options in the future.

The site wrote, "Catchment best practices can be seen in our context based water targets case study referenced in Indicator 1.8.1."

Having an explicit water balance best practice list for the catchment would improve conformance.

1.8.3 *Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.* 🔍 Obs.

Comment Water quality best practices are:

- Continue testing our wastewater regularly to maintain minimal environmental impact (existing best practice).
- Use the correct water quality for all of the processes internally (new best practice identified in the last 12 months).
- Water safety plan updated regularly on the site's cooling water system (existing best practice).
- Some of the site's processes require RO or softened water. In all cases, the site aims to use the least processed quality water required for the process to have the lowest embedded water impact on the site's water quantity metrics. For example, if the site can use soft water instead of RO water, the site will prevent additional water lost for RO reject for instance.
- Educate plant employees and visitors on current city water quality issues (new best practice identified in the last 12 months).
- Another best practice is to have a water safety plan in place on the site's cooling water system. The site works with its Nalco Water commercial resources to ensure this is robust. Annual clean outs, and overall maintenance of the cooling system are required (existing best practice.)
- Catchment best practices can be seen in the site's context based water targets case study referenced in Indicator 1.8.1 (existing best practice.)

Having explicit water quality best practices for the catchment would improve conformance.

1.8.4 *Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.* ✅ Yes


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Comment Best practice for offsite IWRAs include:




- Partnering with NGOs to fund projects that protect and replenish the waterways in the watershed and ultimate water source for COI such as the CRIT project (existing best practice).
- Having plant wide volunteer days that help protect and restore waterways in the watershed (existing best practice).
- Partner with the Angeles National Forest, FRV Fisheries Resource Volunteer Corps, East Fork's Golden Preservation, the Pasadena casting club, and San Gabriel Mountains Trail builders hosted 2 volunteer efforts along the San Gabriel River. They removed 15 dams to restore critical habit, collected 2300 lbs of trash, and removed graffiti from dumpsters and restrooms. Angeles National Forest | Arcadia CA | Facebook (new best practice since last audit).
- Participate in local watershed events such as Friends of the LA River each year bring together thousands of volunteers to clean the LA River such as Habitat Restoration Day foliar.org | Get Involved or LA Waterkeeper performed a statewide volunteer cleanup effort in Junipero Beach in Long Beach CA Coastal Cleanup Day 2023-LA Waterkeeper (new best practice since last audit).

1.8.5 *Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.* 
Yes

Comment Best practice for WASH include:

- More eye wash stations in the process area than required (existing best practice).
- Showers available for line workers that are ADA compliant (existing best practice).
- Drinking water available at increased levels during the summer months (existing best practice).
- Hand washing stations available in the process area, laboratory areas, food preparation areas, and bathrooms (existing best practice).
- 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).
- Menstrual products are offered and free in restrooms (new best practice since last audit).
- Provide water or supplies for emergency support (new best practice identified since last audit).
- Free hygiene products such as soap offered to associates in form of giveaway pallet (existing best practice).
- Support local community groups to ensure low-income households have access to WASH and that WASH services are easily searchable and identifiable (new best practice since last audit).
- Host a household chemical giveaway for the community (new best practice identified since last audit).
- Ecolab Science Certification (new best practice identified in the last 3 years).

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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	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. 	 Yes
Comment	The site has a publicly-disclosed statement by the plant manager in the public lobby (viewed during site tour) stating: <ul style="list-style-type: none"> -That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes. -That the site implementation will be aligned to and in support of existing catchment sustainability plans. -That the site's stakeholders will be engaged in an open and transparent way. -That the site will allocate resources to implement the Standard. 	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	 Yes
Comment	The site wrote, "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." The site provided a RACI matrix but did not include the submission process to regulatory agencies, specific compliance obligations, and timelines for obligations. The site also provided a compliance calendar that identified processes and timeline for maintaining water compliance. The spreadsheet included details of permits, inspections, reports, compliance plan review, and action items. Each tab had title, owner of permit, frequency of action, expiration date, and notes on process.	
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

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Comment The site provided a Water Stewardship Strategy presentation that includes goals to good water stewardship. The site indicated that its Water Stewardship Approach (slide 2) was its mission, and the Water Stewardship Journey (slide 3) was its vision. The site indicated that the strategy had mostly remained unchanged, but the water goals were dynamic based on sites annually.

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 some were unclear or mislabeled.
- Financial budgets allocated for actions.
- 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).

To address the stormwater Consent Degree based on the closed citizen lawsuit, the site included "BMP Implementation Drainage Area 1 and 2 (for stormwater discharge)" and "Follow Global Supply Chain (GSC) environmental best practices: Maintain stormwater permit limits and support LA IWRMP's has a goal to improve stormwater capture by October 2024" in the WSP.

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 the risk assessment and tab 2.4.1, but it was unclear whether the public agencies were coordinated to develop these plans. The site indicated that it had reached out to but not yet coordinated with relevant public sector agencies related to risks.

Finding No: TNR-006572

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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 target in the WSP for good governance was "Good water governance: Maintain a good, open relationship with the local water authorities and catchment stakeholders", with the following sub-targets:</p> <p>-Produce chemicals to enable help customers save water through Ecolab solutions: "COI site produces chemicals to be used by our customers. A sales team sits on site at COI. We continue to be ahead of pace, achieving 109% of our annual target by helping customers save 219 billion gallons (~829 million cubic meters) of water, equivalent to the drinking water needs of almost 757 million people (Evidence provided: Ecolab 2022 Corporate Responsibility Report)".</p> <p>-Achieve AWS certification and participate in AWS activities: "Pledge was signed by the plant manager in 2023, re-affirming commitment to water stewardship. Ecolab participated in a webinar with AWS on communication in implementing the AWS standard on 8/30/2023. Ecolab spoke with Toyota regarding AWS and water stewardship on 6/29/2020. Ecolab participated in a conversation with Johnson & Johnson regarding AWS and water stewardship in early 2020." (Evidence Provided: The re-certification audit visit).</p> <p>-Water stewardship strategy/policy, corporate level: the site wrote, "We've approached these goals through key partnerships with other companies in the Water Resilience Coalition and with public organizations like the California Water Action Collaborative (CWAC), a network for diverse stakeholders pursuing collective action projects that will improve California's water security for people, business, agriculture and nature." (Evidence provided: Ecolab 2022 Corporate Responsibility Report & CEO Water Mandate 2022 Impact Report).</p> <p style="text-align: right;">Finding No: TNR-006577</p>	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	 Yes
Comment	<p>The impact this site has on the overall watershed is minimal. However, it should be recognized that the watershed in which the COI plant operates has indigenous populations and land. The Tongva Tribe still lives in a territory that spans the San Gabriel Mountains to the Santa Ana River. The Kuruvunga Springs are an important waterway for them, but they exist much further North of the basin. (http://www.arcgis.com/apps/MapJournal/index.html?appid=a9e370db955a45ba99c52fb31f31f1fc).</p> <p>Refer to indicator 3.2.2 where more measures are explained.</p>	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 Yes

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Comment The site wrote, "The SHE Team handles the permits for compliance. We meet with our Plant manager monthly to review our EHS compliance tracker that helps us organize when we are up for renewal or annual renewal. Our EHS manager would help on any new permits, if applicable. Our EHS manager is also responsible for water testing getting scheduled and compliance on our wastewater permit. We maintain a site compliance calendar that outlines when things are due and who is responsible and what and when things should be reviewed internally for all legal, regulatory, internal and external certifications as well."

The site indicated it didn't manage the stormwater NAL/Consent Decree incident as a compliance but as an incident because most of the actions were one-time events and managed in its VelocityEHS as an incident management system report. The site also provided evidence of external wastewater testing from August-October 2023, spill kit inspections, and an EPA compliance report from 2023.

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.*


Obs.

Comment Between the years of 2016 to 2021, we were out of our NAL (Numeric Action Levels) pertaining to our stormwater pollution prevention program. To remedy this, a Consent Decree was agreed upon in January of 2023 to bring down the elevated levels of zinc and nitrate+nitrite. Additional measures have also been in place to maintain 100% compliance such as PMs of the pH probes to test our wastewater as well as regular monitoring of the effluent pH".

The site provided evidence of its permits for wastewater and stormwater, as well as the Consent Decree from 2022.

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 water balance target was "Sustainable water balance: Achieve a 40% water reduction per ton of product by 2030 (2018 baseline)" with the following sub-targets:
- RO Reclaim Tank: the project has been completely designed and is ready for the CAR phase. Currently waiting on capital funding (Evidence provided: RO Reuse Presentation from August 2023).
 - Water reduction annual goals: the water reduction goals are set by Ecolab senior leadership and continue to be aggressive targets to support 40% reduction of water consumption. COI continues to support this goal. Water usage is tracked monthly and reviewed by the plant leadership team. Additional information is located in the water stewardship strategy and water usage document. (Evidence provided: Water Stewardship Strategy & Weekly Water Reduction Reports up to October 2023).
 - Site will complete detailed water balance to understand where all water goes, where opportunities exist: water balance is formally refreshed annually, but is evaluated throughout the year by plant personnel (Evidence provided: Site water balance).
 - BMP Implementation Drainage Area 1 and 2 (Best management practices for stormwater discharge): evidence provided: Technical Report from GSI in July 2022 on the exceedance response to the Consent Decree & a table of zinc and nitrate levels.
 - WFI (Water Flow Intelligence): evidence provided: Project details for the site on WFI project from February 2023 & a WFI update from October 2023 that was not available.
 - 530 Bottle Washer Upgrade: bottle washer was upgraded in 2023. The washer is maintained through preventative maintenance at the site (Evidence provided: A MOC Form from June 2023).
 - Smart Water Valve: The site wrote, " A smart water valve was installed in January 2022." (Evidence provided: The site provided a link to a MOC that was not available).
 - Dedicated Hold Tanks - Chemistries: the project was kicked off in September 2020 and completed 3 months later (Evidence provided: A dashboard from 2021 on HT Dedicated Water Savings).
 - Fund water replenishment project directly impacting catchment water balance: "In May 2021, a report was published by Ecolab summarizing the Colorado River Indian Tribes (CRIT) System Conservation Project. The primary objective of the CRIT-DCP project was to stabilize lake levels in Lake Mead and reduce the impact and severity of water shortage declarations. These declarations would curtail water deliveries to cities, businesses and farms in Nevada, Arizona, and Southern California."(Evidence provided: Ecolab 2022 Corporate Responsibility Report & CRIT Case Study from 2021).
 - Waste Water Peak Flow Reduction: completed in 2021 (Evidence provided: A dashboard from April 2021 on Waste Water Peak Flow Reduction).
 - Drive Indirect Water Use Reduction: "Significant (greater than 5% total product weight) suppliers identified within catchment. Suppliers requested to provide feedback on their water stewardship practices " (Evidence provided: An email from September 2023 indicated that its supplier, Olin, wouldn't share the information on a water estimate because it was proprietary).




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

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Comment	<p>Water scarcity is a shared water challenge in the site's catchment.</p> <p>Ecolab has stated a goal to reduce water use intensity by 40% per ton of product by 2030 from a 2018 baseline. Through 2022, the City of Industry plant is -9% from their 2018 baseline, which is ~4% from the goal of -13% by 2022.</p> <p>The site provided the water stewardship strategy as evidence, which had a table showing progress on water reduction.</p>	
3.3.3	<p><i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i></p>	 Yes
Comment	Ecolab does not participate in the re-allocation of water.	
3.4	<p><i>Implement plan to achieve site water quality targets</i></p>	
3.4.1	<p><i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i></p>	 Yes
Comment	<p>The site's target for water quality is "Good water quality status: Meet or exceed all WW permit requirements, Follow GSC Environmental Best Practices", with the following sub-targets:</p> <p>-Maintain wastewater permit limits:" (Evidence provided: internal DI and soft water tests since July 2023 that indicate testing for visual, conductivity, pH, "Certificate of Analysis", odor, and/or water hardness).</p> <p>-Follow GSC environmental best practices: Maintain stormwater permit limits and support LA IWRMP's has a goal to improve stormwater capture by October 2024 : (Evidence provided: Ecolab ERA Level Technical Report from GSI in July 2022 & Contaminant Level Chart 2018-2021).</p> <p>The site indicated that, in addition to its WSP target, it had best management practices (from January 2023) it had to maintain compliance with the Consent Decree on its closed stormwater discharge quality lawsuit from August 2022. The site showed that several of the best management practices being implemented included details under the second sub-target that were outstanding.</p>	
3.4.2	<p><i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i></p>	 in progress
Comment	<p>The site indirectly identified water quality as a shared water challenge.</p> <p>A summary of the best practices implemented to address the improper compliance of storm water discharge that resulted in high levels of zinc and nitrate+nitrite are as follows:</p> <p>-Rerouting roof run-off to eliminate run-on contribution from adjacent neighboring business, Actek Manufacturing and Engineering. Completed by October 2022.</p> <p>-Reconfiguring berms at Outfall 2 to route truck traffic around filter socks. Completed by October 2022.</p> <p>-Setup filter socks with appropriate media. Completed by October 2022.</p> <p>-Downspout systems were put in place to capture and divert stormwater flows to the sanitary sewer. Completed in 2023.</p> <p>-Additional sweeping and power wash cleaning services were implemented at Outfalls 1 and 2. Completed in 2023.</p> <p>The site provided evidence of implementation of these best practices through the WSP. That said, the site did not provide recent stormwater test results to show improvements on its stormwater quality and addressing the Consent Decree.</p>	

Finding No: TNR-006655

Audit Number: AO-000727

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

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.*

 in progress

Comment The site's target is "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:


-Ecolab COI donation to LA Waterkeeper: the COI team donated to the LA Waterkeeper in 2022. LA Waterkeeper completed a project at the Ballona Creek Wetlands (IWRAs) (<https://www.lawaterkeeper.org/events/plastic-free-july-cleanup-challenge-2021>)." However, the site had not identified Ballona Creek Wetlands as one of its 11 catchment IWRAs. (Evidence provided: An email from February 24, 2022, stating a \$2 500 donation & a dashboard of proposed projects that did not include Ballona Creek Wetland).

-Plant donations to local environmental organizations - WHALES, Orange County Coastkeeper: Over the past 3 years, COI has made donations to local environmental organizations who conduct work in the basin (Evidence provided: a dashboard of proposed projects including WHALES that did not show donation evidence).

Finding No: TNR-006654

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.*

 in progress

Comment The site has quantified the number of restrooms per gender.

All the toilets have soap, running water at both temperature and drying units or hand towels. The site also has hand sanitizer dispensers throughout the facility. For drinking water, all potable water is from the parish and is accessible to the employees.

The site also completed the WBCSD WASH Survey in June 2023 and received a score.

The site indicated that, while there were no infrastructural changes in the previous period, the site received certification for Ecolab Science that ensured hygiene and janitorial services achieved a certain level of safety and cleanliness (details here: <https://sciencecertified.ecolab.com>).

In addition, the site's relevant WASH target in the WSP was, "WASH: Ensure safe water & sanitation hygiene access to all within the COI site & understand how to further this goal within the basin", with the following sub-targets:

-Ecolab disaster relief outreach activities - Ecolab foundation - Project WET: the site wrote, "Since launching the partnership in 2014, the program has reached more than eight million individuals in 98 countries with its fun, hands-on lessons about water conservation and healthy hygiene practices. The Clean and Conserve curriculum resources, along with training videos, can be downloaded in multiple languages free of charge. See page 75 of the Corporate Sustainability Report for further information." (Evidence provided: Ecolab 2022 Corporate Sustainability Report, which focused on corporate efforts instead of site).


-Ecolab Science Certified certification: the site took great strides this year in following specific procedures associated with product uses, daily, weekly and monthly cleanings with those products and preventative maintenance of public areas such as restrooms and break rooms (the site provided evidence of the Ecolab Science certification).

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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

Comment The site provided evidence of the Consent Decree from August 2023 to show efforts on best practices for improving water quality in the waterways which may affect access to water and sanitation for community members downstream.

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
Finding No: TNR-006657

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 The site did not include evidence of engagement with service providers in the catchment identified in 1.4.2. beyond requesting data related to indirect water use.

Finding No: TNR-006658

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 wrote, "COI has identified many shared water challenges as identified in Indicator 2.4.1: Water scarcity/loss, Water quality, Loss of wetlands and species. There is evidence that the risk message as shown in the Risk Assessment on 2.4.1 tab as referenced in Indicator 2.4.1. Efforts to identify other actions or areas of engagement with the unaddressed risks will continue."

This indicator was about evidence of engagement on shared water-related infrastructure, and the site provided evidence of engagement with owners of shared water-related challenges from October 2023, with one response from RWD.

The site shares infrastructure with the water (RWD) and wastewater utility (LAPWD).

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

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Comment The site stated in 1.8.1 the following best practices:

- To maintain a positive relationship with Rowland Water District (existing best practice – email evidence with Rowland Water -District and COI).
- Continue to constantly seek opportunities to work with nearby organizations (in the watershed) around issues of water stewardship (existing best practice but new projects and opportunities identified in last 3 years. Executive Roundtable evidence).
- Maintain CWAC membership & engagement (existing best practice – evidence: meeting notes related to membership and projects).
- Partner or fund organizations that restore and increase the number of natural areas within Los Angeles to encourage more biodiversity, absorb excess water to prevent flooding, and reduce the heat island effect found in cities (new best practice identified in the last 3 years - WHALES/LA Water Keeper evidence).
- COI conducts bimonthly wastewater quality checks and conduct third party wastewater treatment as well which is beyond permit requirements.

"In terms of seeking new opportunities to work with other organizations in the watershed and maintaining its CWAC engagement, there are two particular projects/activities to highlight. The first is a World Environment Center Executive Roundtable event in October 2023 focusing on "Accelerating Action on California Water." This event brings together business leaders and water-related organizations and demonstrates Ecolab's ongoing efforts to seek new opportunities to work with California stakeholders to address California's water crisis".

"The second project to highlight shows maintained CWAC membership and engagement: Leak Detection in Low-Income Multi-Family Housing in Southern California. Launched in 2021, CWAC developed this project in collaboration with the Pacific Institute, Bonneville Environmental Foundation, Sensor Industries, water utility companies, nonprofit housing groups, and corporations. The goal of this project is to improve urban water efficiency by addressing the leading source of water waste inside households – leaky toilets. The initial pilot project has focused on a few low-income multi-family buildings in Los Angeles and has reduced water use and water bills by 15%. More pilots are under development in California, Arizona, Texas, and New York."

The site provided the WSP, email evidence from RWD, draft agenda for the October 2023 WEC Executive Roundtable information, meeting notes from CWAC in July 2023, and bimonthly wastewater quality tests as evidence. It is unclear, however, how wastewater quality checks would be related to governance.

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

Comment Best practices that are implemented to improve water balance on site are (refer to 1.8.2 for entire list of best practices):

- Include metering installed throughout the plant that would allow the site to track water use in all areas of the plant (new best practice identified in the last 3 years), though it was unclear what the evidence would have been for this.
- Waterless urinals are currently used onsite as verified by auditor during tour.
- Desert landscape is currently used onsite as verified by auditor during tour.
- Best practice for the site utility systems would be to have all Nalco Water applicable technologies, including 3DTRASAR for boilers, cooling towers, and membranes if applicable. It also includes using Ecolab 3D (formerly known as Envision) and Nalco 360 to remotely monitor these systems. This allows for optimal performance and overall health of the equipment over time. The on-site condensate return best practice is 70-80%. 3DT implementation was verified by auditor during tour.
- The site provided the following evidence for best practices: its context-based water targets case study, though it was unclear from the document when it was created.

Finding No: TNR-006660

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

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Comment The site indicated the following relevant water quality best practices:

- "Continue testing our wastewater regularly to maintain minimal environmental impact (existing best practice – see Indicator 1.3.4 for external testing results) Weck Labs Inc, a 3rd party vendor, also performs bi-monthly effluent testing to ensure we maintain the pH of our effluent for discharge.
- Some of our processes require RO or softened water. In all cases, we aim to use the least processed quality water required for the process to have the lowest embedded water impact on our water quantity metrics. The COI team uses the appropriate water for all our processes internally and utilizes campaigning of products to minimize water usage (new best practice identified in the last 12 months). For evidence reference the washout sequence in the WSP in 2.3.2.
- Another best practice is to have a water safety plan in place on our cooling water system. 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. Water safety plan updated regularly on our cooling water system (existing best practice.) There are also PMs that are performed annually to drain out and cleanout the cooling towers for the maintenance team on site. The last time that they were performed was on 8/12/2023. It was unclear what the evidence was for implementing this activity.
- Catchment best practices can be seen in our context based water targets case study (See Indicator 1.8.1 for evidence)".

Evidence provided included: wastewater testing from 2023 and washout sequence for the site.


Finding No: TNR-006663

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

Comment The site provided the following IWRA best practices:

- Partnering with NGOs to fund projects that protect and replenish the waterways in the watershed (existing best practice). The site provided evidence of project funding from February 2023.
- Having plant wide volunteer days that help protect and restore waterways in the watershed (existing best practice). The site provided evidence of existing community volunteer days, such as from LAWaterKeeper (<https://www.lawaterkeeper.org/events/coastal-cleanup-day-2023>) and FOLAR's Habitat Restoration Day (<https://folar.org/get-involved/>), but not specific site-led volunteer days.
- 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 to stabilize lake levels in Lake Mead and reduce the impact and severity of water shortage declarations and WSP in 2.3.2). The site provided evidence of the CRIT project.

Finding No: TNR-006664

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

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Comment The site provided the following best practices for WASH

- More eye wash stations in the process area than required (existing best practice, verified during tour by auditor).
- Showers available for line workers that are ADA compliant (existing best practice, verified during tour by auditor).
- Drinking water available at increased levels during the summer months (existing best practice, evidence of implementation provided through Heat Safety Program).
- Hand washing stations available in the process area, laboratory areas, food preparation areas, and bathrooms (existing best practice, verified during 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, verified during the tour).
- Menstrual products are offered and free in restrooms (identified in 2023, verified during tour by auditor).
- Provide water or supplies for emergency support (evidence of giveaway program provided).
- Free hygiene products such as soap offered to associates (identified in 2023, see evidence of giveaway area).
- Support local community groups to ensure low-income households have access to WASH and that WASH services are easily searchable and identifiable (new best practice identified in the last 12 months). It was unclear what evidence showed implementation of this.
- Host a household chemical giveaway to the community (identified in 2020, giveaway to local employees).
- COI also received Ecolab Science Certified certification which is a best practice for industry (Evidence provided of Ecolab Science certification).
- COI refreshed the WBCSD self-assessment tool in June 2023 for evaluating access and best practices for WASH (Evidence of WASH survey provided).

Finding No: TNR-006661

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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 provided evidence of evaluating the WSP performance in column P of the WSP.	
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 in columns S-U for all actions also a tab named "Value Creation 4.1.2" provides 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 through columns S-U.	
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, "Here is a review of all the emergency incidents that occurred since 2018. 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. See example for Steam Pipe Leak Near miss in August 2023 for incident report, corrective actions and preventative actions."</p> <p>The site provided information on a spreadsheet with emergency incidents from the previous year providing the incident number, date, type, status, category, description, and hazard type. The site also provided a link of an example incident report from August 2023 with the description, location of incident, root cause analysis, and corrective actions (which also included preventative initiatives).</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>	 No

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Comment The site wrote: "the COI facility remains engaged with the water utility, Rowland Water District, to maintain alignment on catchment water goals. Ecolab's COI plant used Context-Based Water Targeting (CBWT) to evaluate water stewardship outcomes. There has been significant turnover within the leadership of the RWD. COI is in the process of re-establishing relationships with the RWD leadership and is pursuing a similar progress meeting in late 2023/early 2024. Since the last audit, COI met with Rowland Water District as outlined in 2.3.2 to discuss the water stewardship plan (October 2023). Additionally, the site met with BEF in October 2023 and shared the water stewardship plan (2.3.2) & strategy (2.3.1) (evidence of meeting in Step 5)".

The site provided evidence of communications with the RWD, however it was not identified that the site consulted with stakeholders on the site's water stewardship performance.

Finding No: TNR-006680

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 provided the lessons learned and shared the 2022 WSP to show differences from 2023 WSP because the latter was updated and augmented. The site shared that the need for the social, environmental, and economic value benefits at the catchment and site levels helped the site create a more in-depth WSP for moving forward.

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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/city-of-industry-california-plant-certified (published October 2023).</p> <p>The website stated, "At the plant, the Safety, Health and Environmental (SHE) department is responsible for wastewater compliance, with the SHE manager ultimately responsible and plant manager accountable. The corporate environmental lead is available to consult on regulatory updates and wastewater compliance. Additionally, the SHE manager is ultimately responsible for pH monitoring. The site's production supervisors are responsible for 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
Comment	<p>The site wrote: "See our case study posted to https://www.ecolab.com/stories/city-of-industry-california-plant-certified (published October 2023), see Water Stewardship Journey and Solutions section". The Solutions section on the website provided water balance performance and ongoing projects onsite - these were all in the WSP, but were not explicitly indicated as such on the website.</p> <p>"Additionally, COI has invited Rowland Water District and Bonneville Environmental Fund (BEF Meeting invite) in October 2023 to discuss COI's Water Stewardship Plan."</p> <p>The site has shared information about AWS outcomes and some general performance details. Additionally, the site only provided this information to RWD and Bonneville Environmental Fund. In addition, the stakeholder interviews revealed that stakeholder did not receive disclosure of the site's WSP before the audit.</p> <p style="text-align: right;">Finding No: TNR-006682</p>
5.3	<i>Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.</i>
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i> ✔ Yes
Comment	<p>The site wrote: "See our case study posted to https://www.ecolab.com/stories/city-of-industry-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)".</p> <p>The webpage provided water stewardship performance with quantifications for public information.</p>

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5.4	<i>Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.</i>	
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Yes
Comment	<p>The site wrote: See our case study posted to https://www.ecolab.com/stories/city-of-industry-california-plant-certified (published 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.</p> <p>The webpage indicated, "In addition to internal operational improvements, Ecolab's COI plant's water stewardship activities are ongoing. Shared challenges between the plant and relevant stakeholders include water scarcity due to reduced snowpack from existing water sources, aging water infrastructure, urban water runoff, vulnerability to earthquakes and flood events 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 Carson, California."</p>	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Obs.
Comment	<p>The site wrote: See our case study posted to https://www.ecolab.com/stories/city-of-industry-california-plant-certified (published 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.</p> <p>The site's stakeholder log included 18 stakeholder engagements since March 2023 with notes on the details of stakeholder engagement and coordination with public-sector agencies. The site did not provide explicit details for supporting public-sector agencies necessarily, which could have further strengthened conformance.</p>	
5.5	<i>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.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Obs.
Comment	<p>The site wrote: See our case study posted to https://www.ecolab.com/stories/city-of-industry-california-plant-certified (published October 2023), where you can see that our compliance is available upon request.</p> <p>The site is in the process of remediating a recent stormwater discharge zinc exceedance.</p>	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Obs.
Comment	<p>The site wrote: See our case study posted to https://www.ecolab.com/stories/city-of-industry-california-plant-certified (published October 2023) where you can see that our compliance is available upon request.</p> <p>The site is in the process of remediating a recent stormwater discharge zinc exceedance. Corrective actions are detailed in Indicator 3.4.</p>	
5.5.3	<i>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.</i>	 Obs.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000727

Comment The site wrote: See our case study posted to <https://www.ecolab.com/stories/city-of-industry-california-plant-certified> (published October 2023) where you can see that our compliance is available upon request.

The site is in the process of remedying a recent stormwater discharge zinc exceedance.

Photographic Evidence from Audit



Yes

Comment The site tour included indoor and outdoor areas related to water, including incoming water, outgoing water (underground), chemical stores, WASH facilities, and water treatment systems.

The site shared that RWD uses gravity-fed systems to get its water, since it was at the lowest altitude for the area. It had 4 main locations for fire water, and water came in through blue pipes, running north through the site. It had porta potties available for truck drivers that were cleaned weekly.

The site had 2 water softeners outside and a salt make-up tank in black near the trucking area. The site had spill kits with kitty litter and spill socks for trucks and outside spills. There were no drains on site.

The site's chemical tanks had large surrounding bundings, and many eyewash stations around the chemical stores. The effluent pit on-site were just for industrial wastewater. The RO system had a wet area on the ground, though the site wasn't clear whether it was a water leak, condensate, or another chemical - this occurred throughout the site. The RO system used black charcoal, the tank next to the system.

The site's cooling towers manage FDA-regulated chemical products and mixing. The site's boiler had drains under it. The site had waterless urinals in the men's rooms. There were also ADA-compliant showers in the women's locker room.

The site's lab had a UPW mini treatment that was installed in March 2023. There were wastewater tanks in a sump in the basement, which also had a washing machine to clean overalls from the sump's work. The chemical storage warehouse had some plumbed eyewash stations, and some that used a keg system.

Previous Findings

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



Yes

Comment There were no previous findings to close out.