

Program Name:	Environmental Program Page: 1 of		
Plant Name:	Kagome, Inc.	Issue Date:	12/05/2023
Address:	333 Johnson Road, Los Banos, CA 93635	Supersede Date:	12/01/2022

ENVIRONMENTAL PROGRAM



Program Name:	Environmental Program	Page:	2 of 8
Plant Name:	Kagome, Inc.	Issue Date:	12/05/2023
Address:	333 Johnson Road, Los Banos, CA 93635	Supersede Date:	12/01/2022

Table of Contents

Table of Contents	2
Management Review and Approval	2
Purpose	3
Policy	3
Program Elements	3
a. Water	3
b. Sanitary	2
Sewer	3
c. Storm Water	4
d. Emissions	4
e. Hazardous Waste	4-5
f. Refuse Disposal	5
g. Recycling	5-6
h. Energy	6
i. Crisis Management/Emergency Response	6
Emergency Contact List	7
Local Emergency Numbers	7
Facility Map	8

Management	Poviow	and	Annrova	ı
wanauement	Review	anu i	Abbiova	

Mellon C Moseley III Digitally signed by Mellon C Moseley III Date: 2023.12.05 09:29:17 -08'00'

Author

 $\frac{3}{28/24}$ SQF Practitioner

Any changes and/or updates are communicated to the team electronically.



Program Name:	Environmental Program	Page:	3 of 8
Plant Name:	Kagome, Inc.	Issue Date:	12/05/2023
Address:	333 Johnson Road, Los Banos, CA 93635	Supersede Date:	12/01/2022

PURPOSE

Kagome Inc. is focused on the preservation of people's health and improving sustainability of the Earth's environment. Our goal is to reduce the impact on the environment by ensuring all environmental procedures, training, work practices and controls are effectively developed, communicated and implemented within all local, state and federal guidelines.

POLICY

To conduct our business in an environmentally responsible manner that protects the public, our employees and the earth that we all share. Kagome Inc. commits to:

- Make environmental concerns an integral part of planning and decision making to implement effective environmental and sustainability programs,
- Train and educate employees to be accountable for environmental stewardship and encourage them to seek innovative ways to improve our operations,
- Avoid, minimize and mitigate any adverse environmental impacts caused by our operations,
- Promote the efficient use of energy and natural resources through cost effective conservation methods and energy efficient initiatives,
- Ensure the proper handling and disposal of all waste streams.
- Pursue and create opportunities to prevent pollution, reduce solid waste and capture all recyclables.

PROGRAM ELEMENTS

A. WATER

- 1. Usage
 - a. All water used on premise for processing or for human consumption is provided by the City of Los Banos,
 - b. Water quality is tested and monitored by City of Los Banos and Kagome Inc. Water Quality Program,

2. Conservation

a. Environmental Compliance Manager is responsible for surveying the facility and implementing any water conservation measures.

B. SANITARY SEWER

- 1. Discharge
 - All sanitary sewer is permitted to be discharged to the infrastructure provided by the City of Los Banos. Flows are recorded and tested daily.

2. Reporting

a. Environmental Compliance Manager is responsible for documenting invoices and reporting all charges monthly.

C. STORM WATER

- Discharge
 - All storm water is collected into underground piping and stored in a
 wet well at the northeast corner of the property. Once a high level is
 achieved, water is pumped into a holding pond at rear of property

Program Name:	Environmental Program	Page:	4 of 8
Plant Name:	Kagome, Inc.	Issue Date:	12/05/2023
Address:	333 Johnson Road, Los Banos, CA 93635	Supersede Date:	12/01/2022

along Overland Ave, west of the facility.

2. Regulatory

a. All storm water is regulated by the California Regional Water Quality Control Board. Access to discharge was granted by the City of Los Banos when the facility was built. No permit to discharge is needed at this time.

3. Record Keeping

 Environmental Compliance Manager is responsible for monitoring and complying with all regulatory quality standards for surface water defined in the Clean Water Act set forth by the Environmental Protection Agency.

D. EMMISIONS

1. Regulatory

- a. All emissions are regulated per Rule 4320 adopted by the San Joaquin Valley Air Pollution Control District.
- b. Environmental Compliance Manager is responsible for scheduling monthly testing, source test and annual inspection.

2. Monitoring

- a. (1) 300Hp steam boiler is tested and reported monthly for emission compliance and inspected annually.
- b. (2) Clayton 100Hp steam generators are inspected annually. Exempt from emission testing.

E. HAZARDOUS WASTE

1. Regulatory

- a. Kagome Inc. is regulated by county, state and federal guidelines.
 - i. Merced County permit numbers:
 - 1. Small quantity generator -- PT0005005
 - 2. HAZ-MAT Storage PT0008957
 - 3. Cal-ARP Annual Permit PT0004810
 - ii. State of California, Department of Toxic Substances Control
 - California Generator ID # 000037241

iii. Federal ID

EPA ID # CAL00003714

2. Disposal

- a. All departments report items to be disposed to ECM. A list of the items is generated and pick up is scheduled.
- b. Disposal of hazardous waste is contracted through Advanced Chemical Transport.

3. Record Keeping

 Environmental Compliance Manager is in charge of all permit applications, scheduling, verifying manifest and recordkeeping for all KIUS Hazardous waste.

Program Name:	Environmental Program	Page:	5 of 8
Plant Name:	Kagome, Inc.	Issue Date:	12/05/2023
Address:	333 Johnson Road, Los Banos, CA 93635	Supersede Date:	12/01/2022

F. REFUSE DISPOSAL

- 1. Disposal
 - a. All refuse for disposal is contracted through the Mid-Valley Disposal Two (2)- 6 yard bins are emptied Tuesday through Saturday.
 - b. All product destruction is contracted through American Recycling.
- 2. Record Keeping
 - Environmental Compliance Manager is in charge of all scheduling, verifying destruction, tracking and recordkeeping for all KIUS Refuse Disposal.

G. RECYCLING

- 1. Contracted provider
 - a. American Recycling is contracted for all recycled items for KIUS. Scheduling is handled by ECM and Operations Supervisors.
- 2. Recyclables
 - a. Plastic
 - All plastics by products from production are placed into 1-yard bins located in the production hallway, end of PDS line, Bin dump #1 and Bin dump #2. Once bins are full, operators place contents into large 25-yard compactor.
 - b. Paper
 - Recycled paper containers are located in each office and various areas within the facility. Housekeeping empties containers daily into a 6-yard bin located behind the production offices.
 - c. Cardboard
 - All cardboard is compacted in 2 large balers located in PDS and on north side of the facility. Bales are stored in pallet area until loaded.
 - d. Metal
 - i. All recycled metals are disposed into a 40-yard bin located on the north side of the facility.
 - e. Barrels
 - i. All metal and plastic barrels are placed into a 53' trailer located on the north side of the facility.
 - f. Wet waste
 - All product deemed inedible is collected into 1-yard bins located in batch room #1 and batch room #2. Operators regularly dispose into a 25-yard water-tight bin located on the north side of the facility.

Program Name:	Environmental Program	Page:	6 of 8
Plant Name:	Kagome, Inc.	Issue Date:	12/05/2023
Address:	333 Johnson Road, Los Banos, CA 93635	Supersede Date:	12/01/2022

H. ENERGY

- 1. Contracted providers
 - a. Electricity
 - Electricity for the facility is provided via transmission lines provided by Pacific Gas and Electric. Electricity for the facility is purchased from Constellation Energy.
 - b. Natural Gas
 - All Natural Gas for the facility is provided via transmission lines provided by Pacific Gas and Electric. All Natural Gas for the facility is purchased from Constellation Energy.
 - c. Solar
 - i. Renewable energy is generated on-site by solar panels mounted on the facility roof.
- 2. Contracting
 - a. KIUS elected into the California Direct Access program which allows purchasing energy from a 3rd party. Contracts are negotiated with Constellation Energy periodically dependent upon length of contract.
- 3. Record keeping
 - a. Environmental Compliance Manager is responsible for documenting invoices and reporting all charges monthly.

I. CRISIS MANAGEMENT/EMERGENCY RESPONSE

1. Please refer to the Emergency Action Plan for specific emergency response procedures. During plant evacuation operations, it is the responsibility of employees listed on the Emergency contact list to check the assigned areas to ensure that all employees working in their area are accounted for. Refer to Section VIII, Emergency Contact List

Program Name:	Environmental Program	Page:	7 of 8
Plant Name:	Kagome, Inc.	Issue Date:	12/05/2023
Address:	333 Johnson Road, Los Banos, CA 93635	Supersede Date:	12/01/2022

J. EMERGENCY CONTACT LIST

Facility Main Number (209) 826-8850

CONTACT	TITLE	EXT	CELL
Molly Miller	C.A.O	104	(209) 675-0661
	Sr. Director of Quality &		
Lily Chiem	Regulatory	108	(209) 675-6454
Cruz Rodriguez	EHS Administrator	126	(209) 270-1340
Luis DeOliveira	C.E.O.	140	(209) 704-8850
Mark Davis	Sr. Maintenance Manager	109	(209) 552-1547
	Sr. Director of Supply Chain		
Patty Gomes	Management	101	(209) 485-3033
	Sr. Environmental Compliance		
Mell Moseley III	Manager	116	(209) 704-2529
Jeremy Ruiz	Sr. Operations Manager	119	(209) 675-1785
Jaime Sandoval	Director of Operations	138	(209) 675-0212

CONTRACT PROVIDER CONTACT LIST

Contract provider	Contact	Number
City of Los Banos	Eric Espindola	(209) 827-7052
Advance Chemical Transport	Bruce Wescott	(209) 722-4228
American Recycling	Linden Coffee	(209) 537-4410
Constellation Energy	Tisha Agha	(310) 941-8474

K. LOCAL EMERGENCY NUMBERS

EMERGENCY PHONE NUMBERS

Any emergency	911
Local Hospital	209-826-0591
Los Banos Police Department	209-827-7070x0
Los Banos Fire Department	209-827-7025
Merced County Hazmat	209-381-1100
California Hazardous Spill/Release	1-800-852-7550
Advanced Chemical Transport	209-722-4228
Poison Control	1-800-346-5922

Program Name:	Environmental Program	Page:	8 of 8
Plant Name:	Kagome, Inc.	Issue Date:	12/05/2023
Address:	333 Johnson Road, Los Banos, CA 93635	Supersede Date:	12/01/2022

Facility Map

