

# **Legrand, North America Water Policy**

## Legrand, North America Water Policy

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## 1.0 PURPOSE

The purpose of this policy is to define the guidelines for the consumption of water throughout all Legrand, North America sites with the goal of improving water intensity. This policy will include recommendations on how to monitor and conserve water. The policy is in support of Legrand's ISO 14001 objectives.

### 1.1 Definitions

- 1.1.1 **Grey water** – is wastewater generated from sinks, showers, or processes which can be recycled on-site for uses such as in landscaping.
- 1.1.2 **Low-flow faucets and adapters** – are devices that restrict water flow. Some are “screw on” aerators while others are laminar flow heads that are integral to the faucet or at the water supply line under the faucet.
  - 1.1.2.1 Aeration injects air into the stream of water, thus displacing much of the water content.
  - 1.1.2.2 Laminar flow heads use multiple small diameter parallel streams of water that are not aerated.
  - 1.1.2.3 A tamper resistant solution is to install permanent flow-control valves. These are installed underneath the sink/faucet and restrict the amount of water entering the faucet. A small hole in the valve controls the amount of water passing through the line, regardless of aeration or how much water is present at the faucet.
- 1.1.3 **Water intensity** – is a calculation of actual water consumed divided by output measure. The output measure depends on the facility use and is determined by the site environmental manager who identifies the most appropriate option for the site. Generally, offices use square footage as an output measure, while manufacturing may use sales dollars or hours of operation. (**See Appendix C**)
- 1.1.4 **Water scarcity** – means the lack of sufficient available water resources to meet the demands of water usage within a region. Water scarcity involves water stress, water shortage or deficits, and water crisis. While the concept of water stress is relatively new, it is the difficulty of obtaining sources of fresh water for use during a period of time and may result in further depletion and deterioration of available water resources.
- 1.1.5 **Weather based irrigation controllers** – act like a thermostat for your sprinkler system— telling it when to turn on and off by using local weather conditions to tailor watering schedules to meet actual conditions of the site. Instead of irrigating using a controller with a clock and a preset schedule, weather based controllers allow watering schedules to better match plants' water needs while minimizing waste.

## 2.0 **SCOPE**

This policy applies to all Legrand, North America facilities. Legrand, North America associates should use this policy to guide behavior in regards to water consumption and procurement and installation of equipment that uses water. This policy focuses on broad areas that are applicable to all sites.

## 3.0 **POLICY**

Water is a critical natural resource that is essential to life on earth. Less than 1% is available for human use. Maintaining a clean and sustainable supply of water is imperative both to the future of Legrand and to the future of our communities. We recognize the impact of our business on the communities in which we live and operate, and strive to comply with all applicable legislative and regulatory requirements with respect to water quality and consumption.

Legrand, North America has a commitment to environmental stewardship. The water policy is in alignment with our Environmental Policy [EMS-001, Section 4.1LNA EMS Manual](#). We are committed to reducing both the short and long-term negative impacts of our business on the environments of our communities in the following ways:

- Commit to preserve the quality of water resources in the communities where we operate.
- Continually improve the utilization of water in our operations through improved efficiency, conservation, and employee awareness.
- Maintain regulatory compliance in our use and discharge of water from our operations.

**Leased Facilities:** It is understood that in leased facilities some aspects of this policy may not be feasibly attained.

**3.1 Policy Communication:** The policy shall be communicated to all newly hired employees as part of their new-hire orientation. The policy will be made known to all employees on an annual basis through standard electronic and non-electronic employee communication processes. Suggestions for methods to communicate the policy effectively throughout the workforce can be found in **Appendix A**.

**3.2 Policy Input:** Legrand, North America associates may give input or suggestions to the policy by directing all comments to the Sustainability Operations Team Leader or Sustainability Analyst.

**3.3 Policy Review Period:** The policy shall be reviewed annually by the site energy and/or ISO 14001 representatives and/or Sustainability Operations Team members. The Sustainability Operations Team Leader shall initiate this annual review no later than March 31<sup>st</sup> and conclude no later than June 30<sup>th</sup> of each year.

#### **4.0 RESPONSIBILITY**

- 4.1 The Sustainability Operations Team Leader has ultimate responsibility for implementation, upkeep and ensuring adherence to this policy.
- 4.2 The Vice President of Energy Efficiency, Sustainability and Public Policy is the executive sponsor of this policy.
- 4.3 The Plant Manager or the Senior Leader for each Legrand, North America facility has responsibility for implementation of this policy.
- 4.4 Site Human Resources representatives have responsibility for communicating this policy at their location.
- 4.5 All local managers and supervisors have the responsibility for training associates and adopting this policy.
- 4.6 Associates are responsible for adhering to the policy requirements. In the event of any possible conflict of interests preventing associates from conformance, the associate should raise the issue to their supervisor. If there is a local environmental management system representative (EMSR) at the site, he or she should be notified by either the associate or the associate's supervisor.

## 5.0 PROCEDURES

### 5.1 **Facilities Water Usage Measurements**

- 5.1.1 Specific water measurements will be defined by the Sustainability Operations Team Leader.
- 5.1.2 Water measurements will be assimilated on the Operations Team Goals Sharepoint site. Sites should enter data monthly or at the frequency they receive billing information. An example of water measurement can be found in **Appendix C**.
  - 5.1.2.1 The Operations Team Goals Sharepoint site can be found at the following web address:  
<http://internal.legrand.us/Ininitiatives/Sustainability/Environment/Operations/Operations%20Team%20Goals/Forms/AllItems.aspx>
- 5.1.3 For assistance accessing the Sharepoint site, please contact the Sustainability Analyst.

### 5.2 **Water Use Standards**

- 5.2.1 Water flow shall be shut off when not in active use at facilities.
- 5.2.2 **Low-flow faucets and adapters** – All faucets used primarily for hand washing shall use 1.0 gallons per minute (GPM) of flow or less. Hand washing faucets with flow rates above 1.0 GPM shall incorporate a low-flow faucet adapter or be replaced with a low-flow faucet.
- 5.2.3 **Hand Washing Faucets** – During any bathroom remodel or anytime a hand washing faucet is replaced it shall be replaced with an automatic water control system such as self-closing or electronic sensor operated faucet. This prevents water waste attributed to manual faucets being left on inadvertently.
- 5.2.4 **Toilets** – Today's standard 1.6 gallons per flush (gpf) are called Ultra-Low flow toilets. High efficiency toilets are the next generation and use less than 1.3 gpf.
  - 5.2.4.1 **Dual flush mechanisms**– users can choose between 0.8-1.0 gpf for liquids or 1.6 gpf for solids. In actual operation, dual-flush models average about 1.2-1.4gpf.
  - 5.2.4.2 During any bathroom remodel or anytime a toilet is replaced it shall be replaced with a high-efficiency model that uses 1.3 gpf or less.
  - 5.2.4.3 Choose toilets that rate high in testing programs for waste removal thresholds. This will ensure that toilets will properly remove all waste on the first flush, thus eliminating the need for a second flush.
- 5.2.5 **Urinals** – Today's standard mandates a maximum flush volume of 1.0 gpf yet many manufacturers make high efficiency urinals (HEU) that use less than 0.5 gpf or no water at all.
  - 5.2.5.1 **Waterless Urinals** - Waterless urinals are a sound and cost effective solution for most sites. All models eliminate water consumption attributed to flushing, but may have different implementation and running costs.

Waterless urinals yield dry surfaces which harbor much less bacteria over time than wet surfaces, thus improving sanitation.

5.2.5.2 During any bathroom remodel or anytime a urinal is replaced waterless urinals should be considered. If a waterless urinal is not feasible, it shall be replaced with a high-efficiency model that uses 0.5 gpf or less.

**5.2.6 Grey water**

5.2.6.1 Where feasible the use of grey water should be considered, if not prohibited by local laws and regulations.

**5.2.7 Irrigation**

5.2.7.1 All landscape irrigation systems shall be equipped with weather-based Irrigation Controllers and/or water indicators to prevent irrigation during rainfall.

5.2.7.1 When installing or changing landscaping, sites should consider using plants native to the area. These require much less watering.

**5.2.8 Process Equipment**

5.2.8.1 Open loop tap water cooling processes should not be used at Legrand, North America facilities. Whenever possible closed loop cooling systems should be used.

5.2.8.2 Processes should not use a continuous overflow of water to a drain (i.e. rinse tanks on paint lines) whenever possible.

5.2.8.2.1 Processes that do, shall have annual reduction goals and should contain a maximum flow restriction device.

5.2.8.3 Automatic water shutoff controls should be utilized on water consuming equipment (i.e. paint lines).

5.2.8.4 Operations that are prone to leaks or where abnormal water use cannot be easily detected shall have real time monitoring or alarms.

**5.3 Water Use Scarcity**

5.3.1 Legrand, North America sites shall identify and abide by any local water use restrictions and/or required actions in locations where we operate.

5.3.1.1 When restrictions or required actions are identified they shall be reported at the regular Sustainability Operations Team meetings.

**5.4 Water Policy Assessments**

5.4.1 **Initial Assessment:** An internal audit shall be performed to review the facility to ensure conformance to this policy within 12 months of this policy's release date.

5.4.1.1 A facility inventory of all locations where water is used shall be established including restrooms, kitchens, process equipment, drinking fountains, irrigation, etc.

5.4.1.1.1 Actual water usage or estimates should be included where feasible for each location water is used.

5.4.1.1.2 The facility inventory will indicate if a water conservation device is being utilized or not for each location water is used.

- 5.4.1.1.3 Any leaks found during the audit shall be clearly identified and Maintenance notified so they can be repaired.
- 5.4.1.2 Audits shall document conformance to this policy by referencing the specific policy section.
- 5.4.1.3 Any areas of policy non-conformance shall be noted.
- 5.4.1.4 The audit shall include a section on conservation recommendations and estimates on potential water savings based on those recommendations.
- 5.4.2 **Annual Assessments** – shall be completed by June 30<sup>th</sup> beginning the following calendar year after the initial assessment.
  - 5.4.2.1 The annual audit shall be initiated by the Sustainability Operations Team Leader and monitored by the Sustainability Analyst.
  - 5.4.2.2 Audits shall document conformance to this policy by referencing the specific policy section.
  - 5.4.2.3 The following will be reviewed and updated on the annual assessment report.
    - 5.4.2.3.1 The facility water usage inventory.
    - 5.4.2.3.2 Status of the previous year's recommendations/projects.
    - 5.4.2.3.3 Any new conservation recommendations/projects.
    - 5.4.2.3.4 All areas of policy compliance and non-compliance.
  - 5.4.2.4 Completed assessments shall be sent to the Sustainability Operations Team Leader or Sustainability Analyst.

## 6.0 PURCHASING

### **Scope of Purchasing**

All Legrand, North America associates who purchase items or equipment for facilities that consume or use water are responsible to obtain equipment that has the WaterSense Label when possible.

### **Products bearing the WaterSense Label**

- Perform as well or better than their less efficient counterparts
- Are 20% more water efficient than average products in that category
- May possess rebates or incentives reducing cost
- Realize water savings on a national level
- Provide measurable water savings results
- Achieve water efficiency through several technology options
- Are effectively differentiated by the WaterSense label
- Obtain independent, third-party certification



### **The WaterSense label can be found on products such as:**

- Bathroom sink faucets and accessories
- Showerheads
- Toilets
- Urinals
- Weather-based Irrigation Controllers

## 7.0 REFERENCES

- 7.1 Legrand, North America Water Policy SharePoint page:  
<http://internal.legrand.us/Initiatives/Sustainability/Environment/Operations/WaterPolicy/default.aspx>
- 7.2 [WaterSense Label Link](#)

## Appendix A:

### FOR REFERENCE ONLY

#### Water Policy Communications Suggestions

Suggestions to communicate new policies and guidelines:

- Provide manager talking points for department / staff / all hands meetings & Quarterly Webcast
  - Ask managers to provide feedback from these discussion
- Publish on legrand.us, sustainability site, dialog, Service Center Sustainability site, intranet with HR policies
- Display on TV monitors
- Include in new hire orientation package / meetings

To reinforce behaviors:

- Provide “point of use” reminders
  - Sticker near faucets – “Turn off faucet while washing hands”
  - Plaque on wall in bathrooms – “Report any drips/leaks for repair”
- Insert Check box on purchase orders – “Does this purchase comply with WaterSense guidelines?”
- Quarterly or Semi-annual TV or email reminders about different sections of the policy and where to find it



## Appendix B:

### FOR REFERENCE ONLY

#### PROTECTIVE LAWS & REGULATIONS –

**CLEAN WATER ACT:** The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was significantly reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972.

- **NATIONAL POLLUTION DISCHARGE ELIMINATION SYSTEM:** Water pollution degrades surface waters making them unsafe for drinking, fishing, swimming, and other activities. As authorized by the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES) permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. In most cases, the NPDES permit program is administered by authorized states. Since its introduction in 1972, the NPDES permit program is responsible for significant improvements to our Nation's water quality
- **PRETREATMENT OF WASTEWATER (INDUSTRIAL USERS):** EPA and states conduct periodic inspections and audits of the Publically Owned Treatment Works (POTW) pretreatment implementation programs to ensure that the programs are being properly implemented.
- **INDUSTRIAL STORM WATER:** EPA conducts inspections of three types of facility operations subject to the storm water regulations: construction sites, industrial sites, and municipal separate storm sewer systems (MS4).
- **OIL SPILL PREVENTION:** EPA conducts inspections of facilities that store oil to ensure that the facility satisfies requirements designed to prevent oil spills.
- **WETLANDS (SECTION 404):** EPA conducts inspections of sites to determine whether dredged or fill material is being illegally dumped into wetlands in violation of the regulations and statute; to verify whether and if facilities/sites have a wetlands permit and are complying with it; and whether steps are being taken to minimize or avoid wetland impacts where practicable.

**THE SAFE DRINKING WATER ACT (SDWA):** Is the main federal law that ensures the quality of Americans' drinking water. Under SDWA, EPA sets standards for drinking water quality and oversees the states, localities, and water suppliers who implement those standards.

SDWA was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply. The law was amended in 1986 and 1996 and requires many actions to protect drinking water and its sources: rivers, lakes, reservoirs, springs, and ground water wells.

### Appendix C:

### Example of Water Usage Monitoring

Operations Team Goals Worksheet												
Goal		Target										
Reduce Water Intensity		5.0% vs 2012 baseline										
Site	Brand(s)	Data Type					Site Contact	January		February		
			2010	2011	2012	2013		H2OGallons	Costs /\$\$	H2OGallons	Costs /\$\$	
Mascoutah	Cablofil	Gallon	158,600	123,500	310,700	186,900	Jim Kramer	13,900	\$ 188.01	17,700	\$ 232.70	
Pico Rivera	Cablofil	Gallon	535,636	580,448	416,636	204,204	n/a					
New London	Commercial Data Comm	Office	-	-	-	-	n/a					
El Paso	Commercial Data Comm	Distribution Center	-	-	-	-	n/a					
Juarez	Commercial Data Comm	Manufacturing	-	-	-	-	n/a					
Anaheim	Electrorack	Gallon	777,224	777,224	558,319	539,185	George Izeppi	56,104	\$ 165.24	30,670	\$ 90.33	
BTCino SFO	Home Systems	Office	-	-	-	-	n/a					
Harrisburg	Home Systems	Office	-	-	-	-	n/a					
Orem	Home Systems	Gallon	1,295,500	1,189,000	1,440,000	1,103,000	Mark Fisher	10,000	\$ 166.43	7,000	\$ 164.69	
Syracuse	Pass & Seymour	Gallon	630,000	460,000	470,000	460,000	Donna Love	20,000	\$ 86.47	20,000	\$ 83.34	
Concord	EWS	Gallon	2,223,750	1,620,750	1,812,000	668,250	Doug Sheppard	45,000	\$ 511.00	54,750	\$ 603.00	
Santa Clara	Wattstopper	Gallon	3,780	4,576	4,478	71,060	Staci Barajas	4,488	\$ 180.35	5,984	\$ 180.35	
Livermore	Wattstopper	Gallon	2,160	2,160	2,160	87,433	Staci Barajas	1,493	\$ 271.29	1,908	\$ 287.20	
Birmingham	Wattstopper	Gallon	352	490	244,010	121,938	Staci Barajas	7,481	\$ 56.62	5,984	\$ 127.89	
Carlsbad	Wattstopper	Gallon	990	1,335	1,320	-	n/a					
Plano	Wattstopper	Gallon	410	370	315	-	Staci Barajas	2,000	\$ 130.35			
West Hartford	Wiremold	Gallon	4,514,180	3,111,680	3,114,672	3,390,684	Bill Luchon	267784	\$2,142.00			
Tijuana, Mexico	EWS	Gallon	2,037,295	2,037,295	3,267,807	3,614,402	Jamie Barboza	252,813	\$ 4,592.42			
Fairfield	Mid-Atlantic	Gallon	4,259,000	2,064,000	1,836,210	1,810,285	Bob Oehrlein	141,600	\$ 2,500.00	135,740		
Rancho Cucamonga	Legrand	Distribution Center	-	-	-	-	n/a					
Fort Mill	Legrand	Distribution Center	-	-	-	-	Steve Hargett					
Vaughn, Ontario, Canada	Legrand	Distribution Center	-	-	-	-	n/a					
			16,438,877	11,972,828	13,480,639	12,259,354		822,663	\$ 10,990	279,736	\$ 1,770	
<b>Notes:</b>												
								Total Less Tijuana	569,850	6,398	279,736	1,770

**Appendix D:**

# LEGRAND, NORTH AMERICA ANNUAL WATER POLICY AUDIT FORM



**Appendix E: Future Considerations**

**1) Foam handsoap as a strategy to reduce water consumption:**

“Water Consumption Reduced with One Simple Change” - *Environmental Leader*

<http://www.environmentalleader.com/2014/06/26/water-consumption-reduced-with-one-simple-change/>

Summary: Conversion to foam hand soap in restrooms leads to 45% less time spent running faucet than lotion soap, translating to a 16% reduction in water consumed during handwashing.

REV.	ECO NO.	DESCRIPTION OF CHANGE	DATE EFFECTIVE
A		INITIAL RELEASE	11/20/14