



Operation Clean Sweep[®] | blue



GUIDE TO OCS BLUE VERIFICATION

VERSION 1 (SEPTEMBER 2023)





TABLE OF CONTENTS

| | |
|---|----|
| Introduction | 3 |
| Verification – The Next Step | 4 |
| Alignment with Key Programs | 5 |
| Program Administration & Guidance | 5 |
| Verification Cycle Timing | 7 |
| Facility Level Verification | 8 |
| Key Definitions | 8 |
| Required Facilities for Each Verification Cycle | 8 |
| Selecting Facilities for Each Verification Cycle | 9 |
| OCS Blue Verification Process & Inspection | 10 |
| Corrective Action Process | 10 |
| Notification to OCS Program | 10 |
| Scheduling an OCS Blue Verification Inspection | 11 |
| Integration of OCS Blue Into Management Systems | 11 |
| Approved Verifiers & OCS Blue Verifier Qualifications | 12 |
| Appendix A – OCS Blue Verification Process (Visual) | 13 |
| Appendix B – OCS Blue Verification Summary Report | 14 |



INTRODUCTION

Operation Clean Sweep® (OCS) is an industry-led program that supports companies in their goal towards achieving zero plastic resin loss in operations. OCS was founded by Plastics Industry Association (PLASTICS) in 1991 is managed in partnership with the American Chemistry Council (ACC) Plastics Division.

OCS members demonstrate significant leadership in industry-led voluntary stewardship to protect the environment, preserve water quality and wildlife, and strengthen worker safety. Any company that physically handles preproduction plastic resin in the United States is eligible to join OCS as a member and the requirements are summarized below. Participation in the base tier of OCS membership is on a per facility basis.

OCS REQUIREMENTS

1. Commit to making zero plastic resin loss a priority and sign the OCS Pledge.
2. Assess your company's situation and needs.
3. Make necessary upgrades in facilities and equipment as appropriate.
4. Raise employee awareness and create accountability.
5. Follow up and enforce procedures, including routine inspections and continuous improvement.

Building upon the foundational OCS program, OCS Blue was launched in the United States in 2017 to offer an opportunity for industry leaders to elevate their commitment to ending plastic resin loss. OCS Blue requires that 100% of a company's plastic-handling facilities in the US are onboarded to the program and requires the enhanced management practices, summarized below. In addition to the existing management practices, OCS Blue Verification, as described in this guide, will be a new requirement for all OCS Blue members following the launch of OCS Blue Verification in September 2023.

OCS BLUE REQUIREMENTS

1. Conduct regular training and new employee onboarding on resin handling, loss prevention, containment, and clean up.
2. Display the OCS Blue certificate, plaque, and posters in public areas to reinforce commitment.
3. Periodically conduct internal audits to confirm whether management systems meet the requirements and objectives of OCS Blue.
4. Enable employees to provide feedback on the company's plastic resin containment program.



5. Establish written procedures and checklists to locate potential risks, prevent resin loss, and manage clean up.
6. Periodically conduct site inspections based on risks.
7. Educate transportation partners to help them understand the importance of OCS and their participation.
8. Share an experience or successful strategy at least once per year from your company's implementation of OCS Blue with the OCS program for potential use in OCS resources.
9. Participate in an OCS event at least once per year.
10. Report OCS Blue Metrics at required frequency.
11. Complete OCS Blue Verification for required facilities during each verification cycle.

Please reach out to ocs@plasticsindustry.com with any questions related to OCS or OCS Blue membership, as well as any inquiries about international OCS programs, which currently operate in more than 60 countries worldwide.



OCS BLUE VERIFICATION – THE NEXT STEP

The development of OCS Blue Verification represents the next step in the evolution of the OCS Blue program, catalyzed by the commitment of OCS Blue members to end plastic resin loss in operations. The OCS Blue Verification program was developed between 2021 and 2023 and included multiple pilots at OCS Blue member facilities.

The OCS Blue Verification program verifies implementation of required OCS Blue management practices at the facility-level for OCS Blue member companies in the United States. OCS Blue Verification will be a requirement for all OCS Blue members beginning after OCS Blue Verification launches in September 2023, providing a new level of strength and transparency in the program. The verification program as described in this guide is exclusive to the OCS Blue program in the US.

This Guide to OCS Blue Verification summarizes how the program works, the requirements for OCS Blue members, and the process for a facility to achieve OCS Blue Verification. The OCS Blue Verification program and related documents will be updated periodically and all versions will be accessible on the OCS website (opcleansweep.org). In addition to this guide, please consult the [OCS Blue Verification Framework](#), which details the required management practices that comprise the OCS Blue Verification inspection itself.

ALIGNMENT WITH KEY PROGRAMS

OCS Blue Verification is designed to be aligned with several key programs that companies throughout the plastics value chain frequently participate in. These programs include Responsible Care® and ISO 14001 Certification. Additionally, the OCS Blue Verification program is aligned with the OCS inspection programs that operate in certain jurisdictions, including Europe, Mexico, Brazil, and New Zealand. Please reach out to ocs@plasticsindustry.org for more information on the OCS verification and certification programs administered outside of the US.

PROGRAM ADMINISTRATION & GUIDANCE

Operation Clean Sweep, including OCS Blue Verification, is operated in partnership by the ACC Plastics Division and PLASTICS. Two key groups support program staff in the administration of the program: the OCS Advisory Committee and the OCS Blue Operations Committee.

The OCS Advisory Committee provides strategic guidance to the program and is comprised of eight appointed OCS Blue members that have demonstrated strong leadership in working to end plastic resin loss in operations. Each OCS Blue member appointed to the OCS Advisory Committee designates a senior executive leader to serve on the committee for a two-year term.



The OCS Blue Operations Committee is comprised of technical experts with at least one representative from each OCS Blue member company serving on the group. This committee also supports the OCS Blue Verification Working Group, which developed the technical program requirements for OCS Blue Verification and provides tactical advice on an ongoing basis on the operation of the OCS Blue Verification Program.



Decisions on program administration are made through consensus whenever possible within the OCS Advisory Committee and OCS Blue Operations Committee and in collaboration with PLASTICS and ACC Plastics Division program staff.



VERIFICATION CYCLE TIMING

OCS Blue Verification will be administered in verification cycles that are three years in duration. Each verification cycle will start on January 1st of the first year and end on December 31st of the third year. The first three verification cycles are as follows:

- **2023-2025**
- **2026-2028**
- **2029-2031**

Due to the launch of OCS Blue Verification in September 2023, OCS Blue members will be able to verify facilities for the first cycle over the course of late 2023, through 2024 and 2025. A facility that achieves OCS Blue Verification will be verified for a period of three years. For example, if a facility achieves OCS Blue Verification on March 1st of 2023, its verification certificate will state that it is valid through March 1st, 2026.

For a company joining OCS Blue for the first time, when mandatory participation in OCS Blue Verification begins will depend on what point in the verification cycle the company joins. If a company joins with more than half of the current verification cycle remaining, participation in OCS Blue Verification is required during the current verification cycle. But, if a company joins OCS Blue with less than half of the current verification cycle remains, participation can begin in the following verification cycle. For example, if a new company joins OCS Blue in March of 2024, they will be required to achieve OCS Blue Verification for their required facilities in the current 2023-2025 verification cycle, because there is more than half of the verification cycle remaining. However, if a new company joins OCS Blue in March of 2025 with less than half of the verification cycle remaining, they may participate in the 2026-2028 verification cycle. Please reach out to ocs@plasticsindustry.org with any questions about verification cycle timing.

The three-year cycle duration and the timing of cycles is designed to align with the cycles for both [Responsible Care®](#) and the [OCS Europe Certification Scheme](#) to streamline implementation for OCS Blue members who participate in each program.



FACILITY-LEVEL VERIFICATION

OCS Blue Verification occurs at the facility-level and is achieved through a successful on-site inspection by an approved OCS Blue Verifier that assesses the implementation of facility management practices with required OCS Blue management practices detailed in the [“OCS Blue Verification Framework”](#). Each OCS Blue member is required to achieve OCS Blue Verification for a portion of their US plastic-handling facilities during each verification cycle and 100% of facilities across multiple verification cycles.

All OCS Blue members commit to maintaining up-to-date records of all US-based plastic handling facilities with the OCS program. Please reach out to ocs@plasticsindustry.org if you need to confirm your company’s facility records or make any changes to them.

KEY DEFINITIONS

The following definitions are important to ensure consistency in the OCS Blue Verification program. They are also useful to help OCS Blue members understand the total number of facilities in their portfolio when determining the subset required to achieve OCS Blue Verification in each cycle.

- **Facility:** One or more plastic resin handling operations within the same physical boundary that are operated or controlled by the same legal organization.
- **Plastic resin handling operation:** An operation that handles at least one ton of preproduction plastic resin per year and manufactures, transports, warehouses, distributes, repackages, processes, and/or converts plastic resin.
- **Plastic resin:** A solid material which contains as an essential ingredient one or more high-molecular mass polymers and which is formed (shaped) during either manufacture of the polymer or the fabrication into a finished product by heat and/or pressure.
- **Physical boundary:** The limit point of where land owned or controlled by the organization is legally recognized, including plant outfalls, the point at which surface water drains, and/or and sewers discharge into the public sewer or controlled waters.

In certain instances, it may be difficult to distinguish if a cluster of plastic resin handling operations are one facility or multiple facilities. It is recommended that a cluster of resin handling operations are considered one facility when in close geographic proximity and have the same management. It is recommended that multiple resin handling operations are considered separate facilities if they are not in close geographic proximity and/or have different management. For any questions or unique cases, please reach out to ocs@plasticsindustry.org.

REQUIRED FACILITIES FOR EACH VERIFICATION CYCLE

While OCS Blue members must implement OCS at 100% of all US-based plastic-handling facilities, only a subset are required to achieve OCS Blue Verification for each cycle. Over multiple verification cycles, all facilities will achieve verification. The percentage of facilities required to achieve OCS Blue Verification for each verification cycle is based on the OCS Blue member’s total number of facilities and divided into three tiers.



| Total Number of Facilities | Facilities Required for Verification Cycle |
|----------------------------|--|
| 1-20 Facilities | 33% |
| 21-50 Facilities | 25% |
| 51+ Facilities | 20% |

If an OCS Blue member has a number of facilities that is not exactly divisible by the percentage required, the number of facilities will be rounded up. For example, if an OCS Blue member has 5 facilities, 2 facilities will be required to achieve OCS Blue verification during each verification cycle to meet the 33% requirement. If an OCS Blue member has one facility, that same facility will participate in each verification cycle. These guidelines are designed to be consistent with the protocols of inspection and certification programs.

An OCS Blue member may voluntarily elect to have a greater number of facilities secure OCS Blue Verification than the required percentage in a verification cycle, if they so choose. However, this will not impact the minimum number of facilities required to achieve OCS Blue Verification in future cycles.

SELECTING FACILITIES FOR EACH VERIFICATION CYCLE

For each verification cycle, the OCS Blue member will establish the number of facilities required to receive OCS Blue Verification and identify the specific facilities from their portfolio. It is at the OCS Blue member's sole discretion to identify the individual facilities to achieve OCS Blue Verification for each verification cycle. The OCS program recommends that OCS Blue members select a mix of facilities based on geography, size, function, and if a triggering event has taken place, which may include a facility acquisition or a significant resin release incident. In each proceeding verification cycle, a new group of facilities must be selected until all facilities have attained OCS Blue Verification, as described below.

- For OCS Blue members with 1-20 facilities where 33% are required to achieve OCS Blue Verification in each cycle, all facilities must secure verification at the conclusion of three cycles.
- For OCS Blue members with 21-50 facilities where 25% are required to achieve OCS Blue Verification in each cycle, all facilities must secure verification at the conclusion of four cycles.
- For OCS Blue members with 51 or more facilities where 20% are required to achieve OCS Blue Verification in each cycle, all facilities must secure verification at the conclusion of five cycles.



OCS BLUE VERIFICATION PROCESS

For a complete visual of the OCS Blue Verification process, please consult Appendix A.

OCS BLUE VERIFICATION INSPECTION

The OCS Blue Verification process entails an on-site inspection of an OCS Blue member facility performed by an approved OCS Blue Verifier. During the inspection, the OCS Blue Verifier will assess implementation of management practices at the facility with the [“OCS Blue Verification Framework”](#), which details all required OCS Blue management practices and documentation that the OCS Blue Verifier can request. In order to assess implementation, the OCS Blue Verifier will review documentation provided by the OCS Blue company, as well as make on-site observations and conduct on-site interviews to determine implementation of management practices.

Documentation should be provided by the OCS Blue member to the OCS Blue Verifier in advance to support an efficient on-site inspection. After an OCS Blue Verification inspection is conducted, the OCS Blue Verifier will provide a detailed report to the OCS Blue company with full findings, including the identification of any gaps present.

CORRECTIVE ACTION PROCESS

For any gaps identified by the OCS Blue Verifier during the OCS Blue Verification inspection, the OCS Blue member will proceed with the corrective action process. The corrective action process will occur exclusively between the OCS Blue Verifier and OCS Blue member. The corrective action process will entail a “Corrective Action Response” that the OCS Blue member will submit to the OCS Blue Verifier within 60 days from the receipt of the detailed report identifying the gap.

The Corrective Action Response that the OCS Blue member submits to the OCS Blue Verifier will include the gap identified, a root cause investigation of the gap, the corrective action taken, and future actions planned. Evaluation of the effectiveness of the corrective action is encouraged. Evidence included in the Corrective Action Response can be virtually submitted with photographs, video, receipts, and other digital evidence for evaluation by the OCS Blue Verifier. After determination by the OCS Blue Verifier that the Corrective Action Response successfully demonstrates implementation of the required management practice, the OCS Blue Verifier will proceed to notify the OCS program of a successful OCS Blue Verification inspection as described below.

NOTIFICATION TO THE OCS PROGRAM

For OCS Blue Verification inspections that establish successful implementation of the facility’s management practices with required OCS Blue management practices, a high-level summary will be sent to the OCS program. The format for the high-level Summary Report is outlined in Appendix B. Once the Summary Report is received by the OCS Blue program, an OCS Blue Certificate of Verification for the facility will be provided to the OCS Blue member and the facility will be added to the OCS Blue Verified Facility Registry, which will be publicly available online.



SCHEDULING AN OCS BLUE VERIFICATION INSPECTION

OCS Blue members may schedule a standalone OCS Blue Verification inspection with an approved OCS Blue Verifier. Scheduling and pricing for an OCS Blue Verification inspection is arranged exclusively between the OCS Blue member and the approved OCS Blue Verifier.

For OCS Blue members that participate in other programs that require on-site inspection, such as Responsible Care® and ISO 14001 Certification, it may be beneficial to schedule the OCS Blue Verification inspection adjacent to previously scheduled inspections for other programs.

The OCS Blue program has no preference as to whether the OCS Blue Verification inspection occurs in a standalone fashion, adjacent to another management system inspection, or integrated into another management system inspection. It is anticipated that OCS Blue Verification inspections will take approximately one day in length if scheduled in a standalone capacity or adjacent to a separate inspection.

INTEGRATION OF OCS BLUE INTO MANAGEMENT SYSTEMS

Optionally, OCS Blue members may wish to integrate OCS Blue management practices into environmental management systems in which they already participate. In these instances, it may be convenient to arrange for the OCS Blue Verification inspection to be embedded within the inspection for a broader management system program.

Examples of other management systems that OCS Blue could potentially be fully or partially integrated into include RCMS:2019, RC14001, RCMS:2023, RC14001:2023, or ISO14001:2015. To explore an OCS Blue Verification inspection that's integrated into the inspection for a broader management system, OCS Blue members should contact their audit service provider (ASP) to discuss possibilities.

In addition to the environmental management systems above, it may be possible to partially integrate OCS Blue management practices into quality management systems adhering to ISO9001:2015. If an OCS Blue member is interested in exploring an OCS Blue Verification inspection being integrated into the inspection for a quality management system, additional consultation may be necessary with an ASP.



APPROVED VERIFIERS

OCS Blue Verification inspections can be conducted by approved OCS Blue Verifiers with ASPs and independent consultancies that meet the specific criteria below and receive OCS Blue Verifier Training, as described in the next section. The OCS Blue program maintains a list of all organizations with approved OCS Blue Verifiers on the OCS Blue Verifier List online and regularly provides OCS Blue Verifier Training. ASPs and consultancies with approved OCS Blue Verifiers are expected to maintain records for verification inspections completed.

OCS BLUE VERIFIER QUALIFICATIONS

Individuals who are fully qualified by an ASP to audit ISO14001, ISO45001, ISO9001, or RCMS®/RC14001® are automatically qualified to serve as verifiers for OCS Blue upon completion of OCS Blue Verification training. Alternatively, individuals may be eligible to receive OCS Blue Verifier Training by fulfilling at least one option in all of the qualification sections below.

Please reach out to ocs@plasticsindustry.org with any questions about OCS Blue Verifier eligibility criteria or qualifications.

PROFESSIONAL EXPERIENCE

Option 1: Successful attainment of the rank “Provisional Auditor” or “Lead Auditor” in ISO14001, ISO45001, ISO9001, and/or RCMS®/RC14001®, as well as a minimum of one year of employment or as a contractor with an ASP.

Option 2: A proven track record as an independent consultant in environmental, health, and safety management systems within the manufacturing, chemical, or plastics industries with at least four years of experience.

KNOWLEDGE OF MANAGEMENT SYSTEMS

Option 1: Successful completion of a training course on conformance auditing of management systems for ISO14001, ISO45001, ISO9001, and/or RCMS®/RC14001®.

Option 2: Certification by Exemplar Global for ISO14001, ISO9001, ISO45001, and/or Responsible Care®.

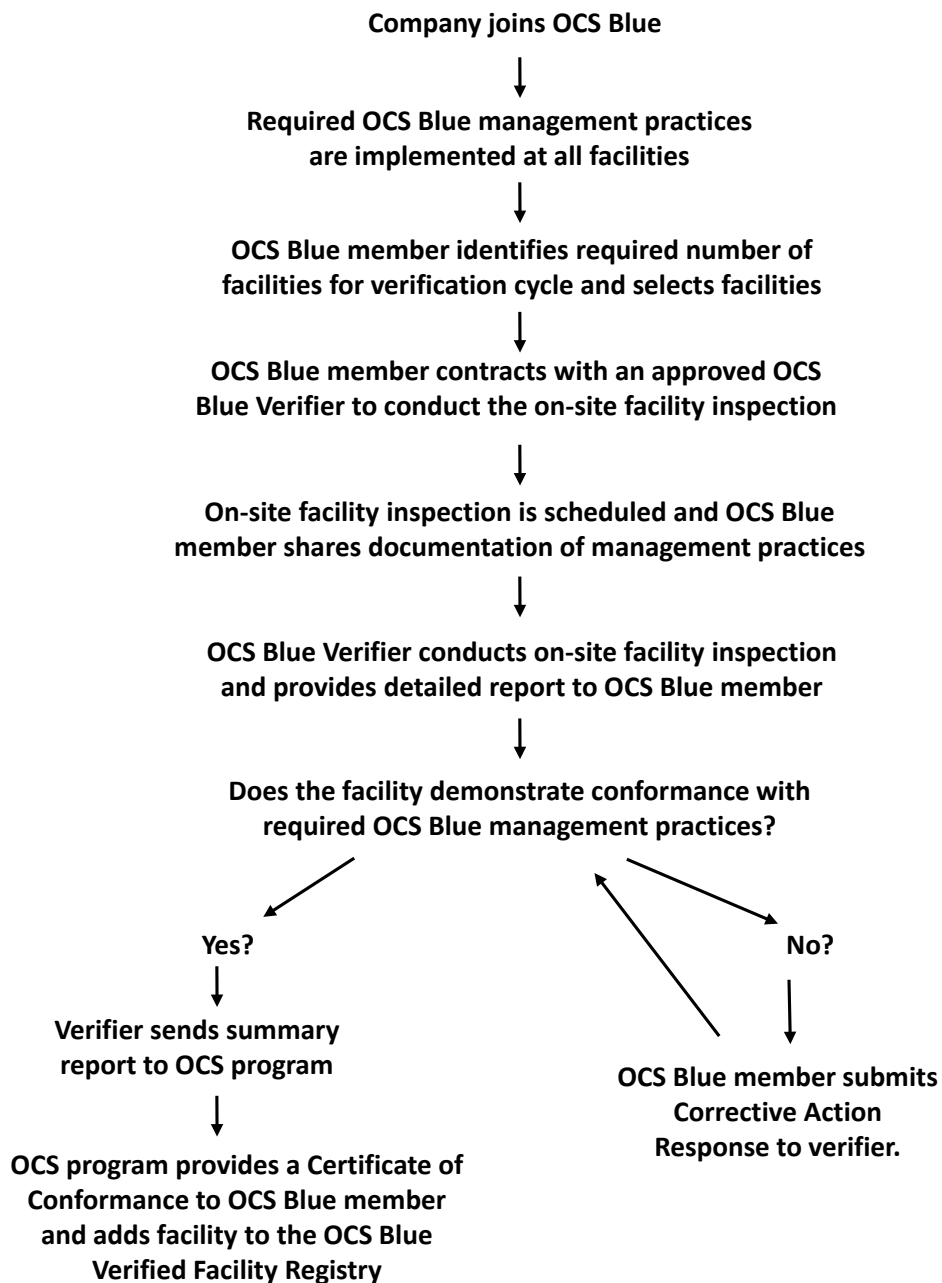
KNOWLEDGE OF OCS BLUE VERIFICATION

Option 1: Review of the [OCS Manual](#), the OCS Blue Verification Guide, and the [OCS Blue Verification Framework](#).



APPENDIX A: OCS BLUE VERIFICATION PROCESS

OCS Blue Verification Process





APPENDIX B: OCS BLUE SUMMARY REPORT

The Summary Report below is to be completed by the OCS Blue Verifier and sent to the OCS Program after verifying successful implementation of required OCS Blue management practices at an OCS Blue member company's facility.

Upon receipt by the OCS Program, the Certificate of Verification for the facility will be sent to the OCS Blue member and the facility will be added to the OCS Blue Verification Facility Registry.

| OCS Blue Company Information | | |
|---|----------------------|--|
| OCS Blue Company: | | |
| Full facility address: | | |
| Facility name (if applicable): | | |
| Number of employees and contractors at facility: | | |
| Facility Contact | Name: | |
| | Title: | |
| | Email: | |
| | Phone Number: | |



| OCS Blue Verifier Information | | |
|--|------------------|--|
| OCS Blue Verifier | Name: | |
| | Title: | |
| | Email: | |
| | Phone Number: | |
| | Verifier Number: | |
| OCS Blue Verifier Company/ Organization: | | |

| Outcome of OCS Blue Verification Inspection | | |
|---|---|----------------------|
| Date of OCS Blue Verification Inspection: | | |
| Verification Outcome: | Check one of the following options. | |
| | Successful implementation observed during inspection: | |
| | Minor gaps observed during inspection: | |
| Corrective Action Process: | If minor gaps are observed, complete information below. | |
| | Date of Submission for Corrective Action Response: | |
| | Successful implementation demonstrated in Corrective Action Response: | Yes: _____ No: _____ |



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