

Environmental Quality Manual

Endorsement Page

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Overview/Introduction

Harvey Vogel Manufacturing Company (HVMC) developed and implemented the Environmental Management System (EMS) to improve its environmental management and, ultimately, to reduce the impact of its operations, activities, products, and services on the environment. The EMS complies with ISO 14001 and other legal and regulatory requirements.

The environmental manual is divided according to the main sections and subsections of ISO 14001. The purpose of this manual is to document the environmental policy, to define and describe the EMS and its scope, and to define authorities and responsibilities of the management personnel involved in the EMS.

Another purpose of this manual is to present the EMS to our customers and other interested parties, and to inform them what specific controls are implemented to assure responsible environmental management.

1.0 Scope

This EMS applies to all HVMC departments and personnel whose activities, products and services could impact the environment.

2.0 Normative References

- 2.1 ISO 14001 Environmental Management System Requirements
- 2.2 ISO 14004 Environmental Management Systems – General Guidelines on Principles, Systems, and Support Techniques

3.0 Terms and Definitions

- 3.1 Auditor – a person with the competence to conduct an audit.
- 3.2 Continual Improvement – recurring process, consistent with HVMC's Environmental Policy, of enhancing our EMS in order to achieve improvements in overall environmental performance.
- 3.3 Corrective Action – action to eliminate the cause of a detected nonconformity.
- 3.4 Document – information and its supporting medium.
- 3.5 Environment – surroundings in which HVMC operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.
- 3.6 Environmental Aspect – element of HVMC's activities or products or services that can interact with the environment.
- 3.7 Environmental Impact – any change to the environment, whether adverse or beneficial, wholly or partially resulting from HVMC's environmental aspects.
- 3.8 Environmental Management System (EMS) – the part of the management system used by HVMC used to develop and implement our environmental policy and manage our environmental aspects.
- 3.9 Environmental Objective – environmental goal, consistent with the environmental policy, that we as a company want to achieve.
- 3.10 Environmental Performance – measurable results of HVMC's management of its environmental aspects.

- 3.11 Environmental Policy – intentions and direction of HVMC relative to our environmental performance as formally expressed by executive management.
- 3.12 Environmental Target – detailed performance requirement that needs to be set and met in order to achieve our environmental objectives.
- 3.13 Interested Party – internal or external persons or groups concerned with or affected by the environmental performance of HVMC.
- 3.14 Internal Audit – systematic, independent, and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the EMS system audit criteria set by HVMC are fulfilled.
- 3.15 Nonconformity – non-fulfillment of a requirement.
- 3.16 Organization – HVMC, the entity to which this standard applies.
- 3.17 Preventive Action – action to eliminate the cause of a potential nonconformity.
- 3.18 Prevention of Pollution – use of processes, practices, techniques, materials, products, services, or energy to avoid, reduce or control the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse environmental impacts.
- 3.19 Procedure – specified way to carry out an activity or a process.
- 3.20 Record – evidence of activities performed and/or results achieved.

4.0 Environmental Management System Requirements

4.1 General Requirements

- 4.1.1 HVMC has established, documented, implemented, maintains and continually improves the Environmental Management System in accordance with ISO 14001.
- 4.1.2 The scope of HVMC's Environmental Management System is defined as follows:

The Environmental Management System applies to all HVMC departments and personnel whose activities, products, and services could impact the environment.

4.2 Environmental Policy

- 4.2.1 Top Management of HVMC in association with its employees has defined the Environmental Policy.
- 4.2.2 Top Management of HVMC ensures that, within the scope of our EMS, the Environmental Policy:
 - a. is appropriate to the nature, scale, and environmental impacts of our activities, products, and services
 - b. includes a commitment to continual improvement and prevention of pollution
 - c. includes a commitment to comply with applicable legal requirements and with other requirements to which our organization subscribes which relate to our environmental aspects
 - d. provides the framework for setting environmental objectives and targets
 - e. is documented, implemented, and maintained
 - f. is communicated to all people working for or on behalf of HVMC
 - g. is available to the public

4.2.3 HVMC Environmental Policy is as follows:

Within the framework of our Environmental Management System we commit to:

... Continual Improvement – Strive to;

- Continually enhance and improve our EMS environmental performance consistent with our goals and principles stated in our policy.

... Accomplished by;

- Proper establishment, implementation and maintenance of our EMS.
- Continually monitor our EMS through internal, external audits along with periodic reviews by Top Management.

...Prevention of Pollution – Strive to;

- Identify materials, processes, products and wastes that cause or may cause pollution.
- Applying processes for safe purchasing, handling, storage and disposal of chemicals used.
- Reducing waste generated by the company through the recycling program.

... Accomplished by;

- Controlling environmental aspects such as noise pollution, indoor air quality and emissions that affect our environment and employees
- Implementing measures to avoid reduce or control pollution where technically and economically viable.

...and Compliance with Environmental Requirements – Strive to;

- Comply with legal requirements and other requirements to which the company subscribes that relate to our environmental aspect.

... Accomplished by;

- Developing and maintaining management systems that identify relevant requirements and then monitoring performance of related activities.

HVMC's Condensed EMS Policy is:

“HVMC is committed within the framework of our EMS to continually strive for improvement in prevention of pollution and compliance to environmental requirements while maintaining a safe and healthy workplace.”

4.3 Planning

4.3.1 Environmental Aspects

HVMC has established, implemented and maintains procedures to:

- a. identify the environmental aspects of our activities, products, and services within the scope of the EMS that HVMC can control and those that it can influence taking into account planned or new developments, or new or modified activities, products and services.
- b. determine those aspects that have or can have significant impact(s) on the environment (i.e. significant environmental aspects).

HVMC has documented this information and keeps it up to date.

HVMC significant environmental aspects were taken into account in establishing and implementing the Environmental Management System, and they are taken in account in the maintenance of the Environmental Management System.

4.3.2 Legal and Other Requirements

HVMC has established, implemented, and maintains a procedure to:

- a. identify and have access to the applicable legal requirements and other requirements to which HVMC subscribes related to its environmental aspects,
- b. determine how these requirements apply to our organization's environmental aspects.

4.3.3 Objectives, Targets, and Programs

HVMC has established, implemented, and maintains documented environmental objectives and targets at relevant functions and levels within the organization.

These objectives and targets are measurable, where practicable, and are consistent with HVMC's Environmental Policy – including the commitments to prevention of pollution, to compliance with environmental requirements, and to continual improvement.

When establishing and reviewing the objectives and targets, our organization considers its significant aspects and the legal requirements and other requirements to which HVMC's subscribes. Our organization also considers its technical options, its financial, operational and business requirements, and the views of interested parties.

HVMC has established, implemented and maintains programs for achieving our objectives and targets. Programs include:

- a. designation of responsibility for achieving objectives and targets at relevant functions and levels of our organization,
- b. the means and time-frame by which they are to be achieved.

4.4 Implementation and Operation

4.4.1 Resources, Roles, Responsibility, and Authority

Top Management of HVMC ensures the availability of resources essential to the establishment, implementation, maintenance, and improvement of the Environmental Management System. Resources include human resources and specialized, organizational infrastructure, technology and financial resources.

Roles, responsibilities and authorities are defined, documented, and communicated in order to facilitate effective environmental management.

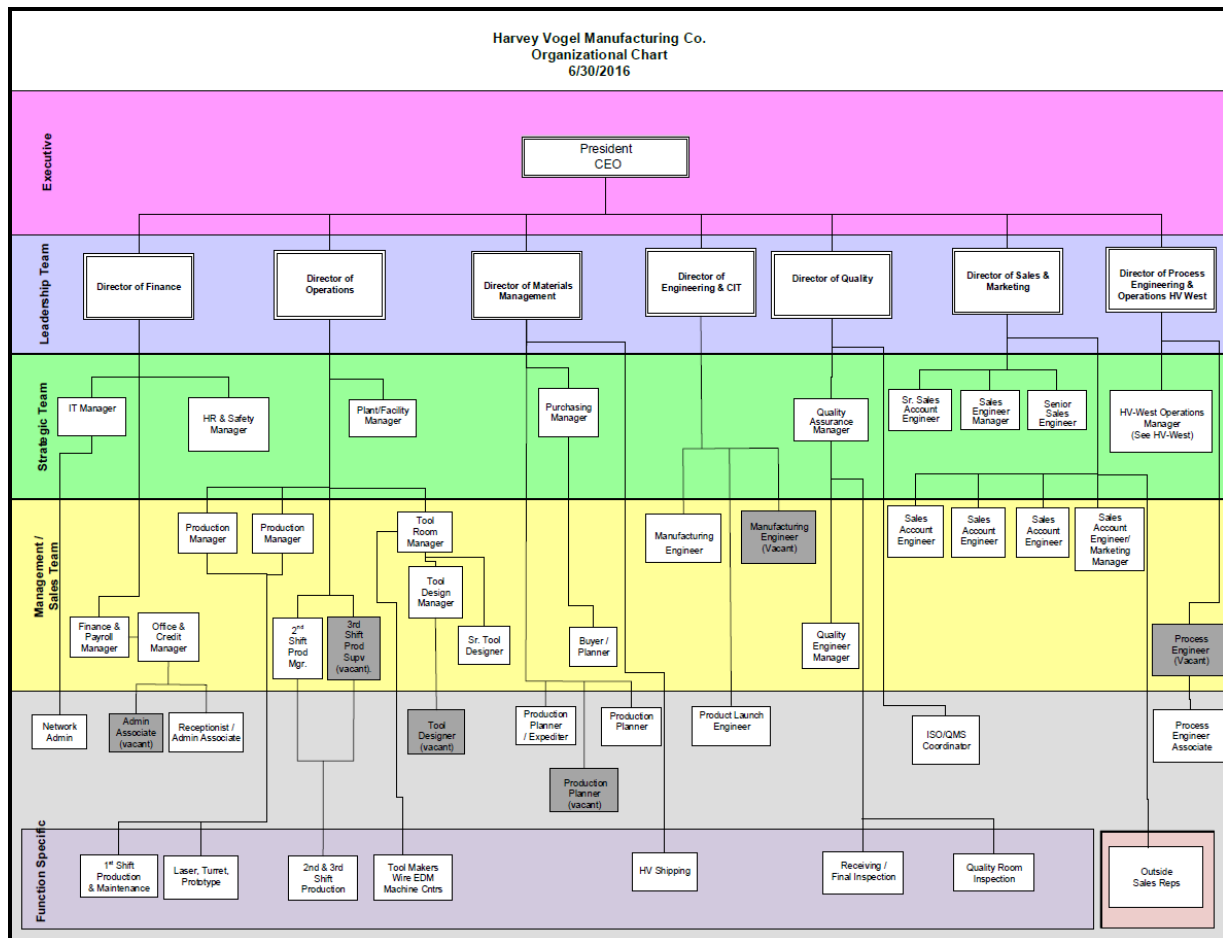
The functions and their interrelations within HVMC are defined and communicated in order to facilitate effective environmental management. The following describes this interrelationship:

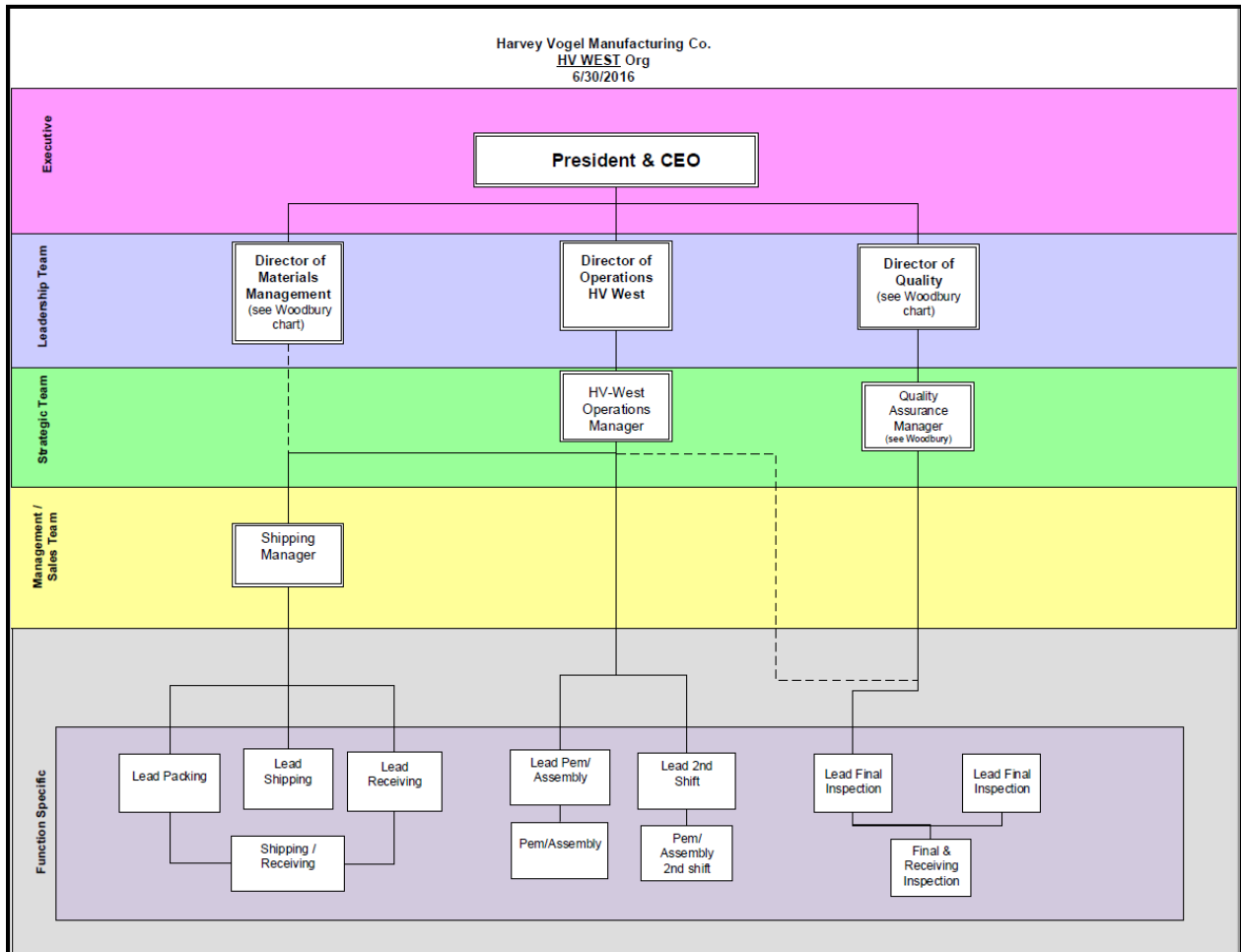
The appointed Management Representative (henceforth referred to as the Environmental Representative) is the Director of Quality.

Irrespective of other responsibilities, the Environmental Representative has defined roles, responsibility, and authority for:

- a. ensuring that the Environmental Management System is established, implemented, and maintained in accordance with the requirements of ISO 14001.
- b. reporting to Top Management on the performance of the Environmental Management System for review, including recommendations for improvement.

Further definition of roles and responsibilities are depicted in HV and HWV Organization Charts





4.4.2 Competence, Training, and Awareness

HVMC ensures that any person(s) performing tasks for it or on its behalf – that have the potential to cause a significant environmental impact(s) identified by the organization – is (are) competent on the basis of appropriate education, training or experience, and retains applicable records.

HVMC identifies training needs associated with its environmental aspects and its environmental management system. It provides training or takes other action to meet these needs, and retains associated records.

HVMC has established, implemented, and maintains a procedure to make persons working for it or on its behalf are aware of:

- a. the importance of conformity with the Environmental Policy and procedures and with the requirements of the Environmental Management System,
- b. the significant environmental aspects and related actual or potential impacts associated with their work, and the environmental benefits of improved personal performance,
- c. their roles and responsibilities in achieving conformity with the requirements of the Environmental Management System, and the potential consequences of departure from specified procedures.

4.4.3 Communication

With regard to its environmental aspects and Environmental Management System has established, implemented, and maintains procedures for:

- a. internal communication among the various levels and functions of the organization
- b. receiving, documenting, and responding to relevant communication from external interested parties

HVMC does not to communicate externally about its significant environmental aspects.

4.4.4 Documentation

The Environmental Management System documentation includes:

- a. the environmental policy, objectives and targets,
- b. description of the scope of the Environmental Management System
- c. description of the main elements of the Environmental Management System and their interaction and reference to related documents
- d. documents, including records, required by ISO 14001
- e. documents, including records, determined by HVMC to be necessary to ensure the effective planning, operation, and control of processes that relate to its significant environmental aspects.

4.4.5 Control of Documents

Documents required by the Environmental Management System and by ISO 14001 are controlled.

HVMC has established, implemented, and maintains a procedure to:

- a. approve documents for adequacy prior to issue,
- b. review and update as necessary and re-approve documents,
- c. ensure that changes and the current revision status of documents are identified,
- d. ensure that relevant versions of applicable documents are available at points of use,
- e. ensure that documents remain legible and readily identifiable,
- f. ensure that documents of external origin determined by the organization to be necessary for the planning and operation of the Environmental Management System are identified and their distribution controlled, and
- g. prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose.

4.4.6 Operational Control

HVMC has identified and planned those operations that are associated with the identified significant environmental aspects consistent with its environmental policy, objectives and targets, in order to ensure that they are carried out under specified conditions, by:

- a. establishing, implementing and maintaining documented procedures where their absence could lead to deviation from the environmental policy, objectives and targets, and
- b. stipulating the operating criteria in the procedures, and
- c. establishing, implementing and maintaining procedures related to the identified significant environmental aspects of goods and services used by the organization and communication applicable procedures and requirements to suppliers, including contractors.

4.4.7 Emergency Preparedness and Response

HVMC has established, implemented, and maintains a procedure to identify potential emergency situations and potential accidents that can have an impact on the environment and how it will respond to them.

HVMC responds to actual emergency situations and accidents and prevents or mitigates adverse environmental impacts.

HVMC periodically reviews and, where necessary, revises its emergency preparedness and response procedures, in particular, after the occurrence of accidents or emergency situations. HVMC periodically tests such procedures where practicable.

4.5 Checking

4.5.1 Monitoring and Measurement

HVMC has established, implemented, and maintains procedures to monitor and measure, on a regular basis, the key characteristics of its operations that can have a significant environmental impact. The procedures include the documenting of information to monitor performance, applicable operational controls and conformity with the organization's environmental objectives and targets.

HVMC ensures that calibrated or verified monitoring and measurement equipment is used and maintained and retains associated records.

4.5.2 Evaluation of compliance

Consistent with its commitment to compliance, HVMC has established, implemented and maintains a procedure for periodically evaluating compliance with applicable legal requirements and other requirements to which it subscribes.

HVMC keeps records of these periodic evaluations.

4.5.3 Nonconformity, Corrective Action, and Preventive Action

HVMC has established, implemented, and maintains a procedure for:

- a. dealing with actual and potential nonconformities and taking actions to mitigate their environmental impacts,
- b. investigating nonconformities, determining their cause, and taking actions in order to avoid their recurrence,
- c. evaluating the need for actions to prevent nonconformities and implementing appropriate actions designed to avoid their occurrence,
- d. recording the results of corrective actions and preventive actions taken, and
- e. reviewing the effectiveness of corrective actions and preventive actions taken

Actions taken shall be appropriate to the magnitude of the problems and the environmental impacts encountered.

HVMC shall ensure that any necessary changes are made to Environmental Management System documentation.

4.5.4 Control of Records

HVMC has established and maintains records as necessary to demonstrate conformity to the requirements of its Environmental Management System, ISO 14001, and the results achieved. HVMC has established, implemented, and maintains a procedure for the identification, storage, protection, retrieval, retention, and disposal of records. Records are legible, identifiable and traceable.

4.5.5 Internal Audits

HVMC ensures that internal audits of the Environmental Management System are conducted at planned intervals to determine whether the Environmental Management System conforms to planned arrangements for environmental management, including the requirements of ISO 14001; has been properly implemented and is maintained, and provides information of the results of audits to Top Management.

Internal audit planning is established, implemented, and maintained by, and takes into consideration the environmental importance of the operations concerned and the results of previous audits.

Audit procedures address responsibilities and requirements for planning and conducting audits, reporting results, retaining associated records, and determination of audit criteria, scope, frequency, and methods.

Auditors are selected and the audit is conducted to ensure objectivity and impartiality in the audit process.

4.6 Management Review

HVMC Top Management and others, as applicable, review the EMS at planned intervals to ensure its continuing suitability, adequacy, and effectiveness. This review includes assessing opportunities for improvement and the need for changes to the EMS, including the environmental policy and environmental objectives and targets. Records of the reviews are maintained.

Inputs to the EMS Management Reviews include the following:

- a. results of internal audits and evaluations of compliance with legal requirements and with other requirements to which the organization subscribes
- b. communications from external interested parties, including complaints,
- c. the environmental performance of the organization,
- d. the extent to which objectives and targets have been met,
- e. status of corrective and preventive actions,
- f. follow-up actions from previous management reviews,
- g. changing circumstances, including applicable developments in legal and other requirements related to environmental aspects
- h. recommendations for improvement.

Outputs from management reviews include decisions and actions related to:

- a. changes to physical, human and financial resources,
- b. improving the system's suitability, adequacy, and effectiveness,
- c. possible changes to the environmental policy, objectives, targets and other elements of the EMS, consistent with the commitment to continual improvement.